PACIFIC GAS AND ELECTRIC COMPANY
Risk Spending Accountability Report Discovery 2025
Data Response

PG&E Data Request No.:	ED_002-Q002
PG&E File Name:	RSARDiscovery2025_DR_ED_002-Q002
Request Date:	September 24, 2026
Requester DR No.:	002
Requesting Party:	Energy Division
Requester:	Abigail "Bender" Bender
Date Sent:	October 8, 2026
PG&E Witness(es):	N/A

QUESTION 002

CAPITAL - GAS DISTRIBUTION – MWC 27 GAS METER PROTECTION MAT 27A GAS METER PROTECTION (RAMP RISK NAME: LOSS OF CONTAINMENT ON GAS DISTRIBUTION MAIN OR SERVICE)

Type	Functional Area	MWC	MWC Name	MAT	MAT Name	Difference for 2025 ($000)	Spending Percent Variance for 2025 (%)	Unit Percent Variance for 2025 (%)
Capital	Gas Distribution	27	Gas Meter Protection	27A	Meter Protection	$27,399.3	489.1%	17238.1%

PG&E Explanation:

This program is below the SRM Total line and meets the threshold to require an explanation. The variance for 2025 is greater than $20 million. Additionally, the percentage variance is also greater than 20%. However, PG&E does not provide a cost variance explanation for this sub-SRM Total program. The cost and percentage variance for this sub-program differ from the SRM Total program. Largely, sub-programs follow the costs and percentages of the SRM total programs, yet this one differs.

MWC and MAT is same as Q1.

DR question to PG&E:

1. The SRM total program for MAT 27A is the subject of Q1 in this data request, while Q2 addresses a sub-program of MWC 27 MAT 27A SRM Total. Please also provide a cost variance explanation for this sub-program.
2. Please explain how costs were shifted from any programs to provide additional funding for this sub-program.

3. How did PG&E determine more work allocated to the program associated with this RAMP risk, versus RAMP risk of *Loss of Containment on Gas Customer Connected Equipment*?
4. In 2023 and 2024, sub-SRM total programs under MAT 27A had varied imputed amounts ($219, $221.7 and $5,256.7, $$5,319.9 respectively for 2023, 2024 between the two sub-SRM programs). Why is the 2025 imputed amount across both sub-SRM total lines identical and not distributed among the programs?

ANSWER 002

1. PG&E would like to clarify that there are no sub-programs within this Meter Protection Program, it is all one program. The Risk Mitigation and Control rows do not represent different sub-programs within MAT code 27A; they show the risk that is being mitigated by MAT code 27A. The two lines below the "SRM Total" in Table 2-4, line 7, represent the two different risks that the Meter Protection Program is a control for: Loss of Containment on Gas Customer Connected Equipment (line 8) and RAMP risk Loss of Containment on Gas Distribution Main or Service (line 9). The split between the Loss of Containment on Gas Customer Connected Equipment and Loss of Containment on Gas Distribution Main or Service is based on a percent allocation. This percent allocation to each risk was based on looking at historical data and determining roughly how much of the completed meter protection work was related to each asset type, i.e. customer connect equipment such as bollard installations and gas distribution mains and services such as replacement of service line. This resulted in 4% allocated to Loss of Containment on Gas Customer Connected Equipment (line 8) and 96% allocated to RAMP risk Loss of Containment on Gas Distribution Main or Service (line 9). Note, this percentage split was presented in the 2020 RAMP as well as the 2023 GRC prior to the reclassification of meter post protection from expense MAT EXB to capital MAT 27A.
2. When planning and executing the work in MAT 27A, there is no differentiation between the work that controls either of the two risks shown in Table 2-4, it is planned for the program as a whole.

   The adopted and recorded amounts shown for each risk in Table 2-4, lines 8 and 9, reflect a percent allocation. Please see response to Question 1 above. There are no sub-programs within the Meter Protection Program. The Meter Protection Program is part of the general gas portfolio prioritization process and Gas does not have available specific dollar amounts from other programs or MAT codes that transferred funds to MAT 27A.
3. Work under this MAT code is not planned at the specific RAMP risk level. The allocation of the impact to different risks occurs as a subsequent analytical exercise. See response to Question 1 above for an explanation of the allocation.
4. During the preparation of this response, PG&E identified an error in Table 2-4, lines 8 and 9, column "2025 Imputed Adopted Costs" and "2025 Imputed Adopted Units." The adopted dollars and units should have been allocated to the two risks using the percent split as all other years were. The adopted dollars and units should show 4% to Loss of Containment on Gas Customer Connected Equipment and 96% to Loss of Containment on Gas Distribution Main or Service as all other values show. PG&E has corrected these items in attachment, *"RSARDiscovery2025_DR_ ED_ 002-*

Q002Atch01.xlsx" for Table 2-4 and has also corrected the SRM Capital Combined Excel attachment *"RSARDiscovery2025_DR_ED_ 002-Q002Atch02.xlsx".*