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

PG&E Data Request No.:	ED_002-Q003
PG&E File Name:	RSARDiscovery2025_DR_ED_002-Q003
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 003

CAPITAL – GAS DISTRIBUTION – MWC 52 G DIST LEAK REPL/EMERGENCY MAT 52C EMERG RESP-G-DIG-INS-MAIN (RAMP RISK NAME: SRM TOTAL)

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	52	G Dist Leak Repl/Emergency	52C	Emerg Resp-G-Dig-Ins-Main	$2,442.47	805%	28.4%

PG&E Explanation:

This program does not trigger the cost variance threshold; therefore, no explanation is necessary. PG&E states that this program had higher units due to an emergent project, which required replacement of ~1,225 feet of main pipe exposed due to natural forces. PG&E states this project, along with other reduced-scope emergencies, drove overall unit completions in 2025.

MWC 52 includes work and materials required to replace damaged or failed facilities including replacement of mains and services due to gas dig-ins and external forces such as landslides and earthquakes. This MWC relates to safety and/or reliability and/or maintenance as it includes work and materials required to replace damaged or failed facilities.

MAT 52C replaces greater than or equal to 100 feet gas distribution main due to dig-in or damage by outside forces or third party. Deactivate greater than or equal to 1-foot gas distribution main due to dig-in or damage by outside forces. This program relates to safety and/or reliability and/or maintenance as it involves replacing greater than or equal to 100 feet gas distribution main due to dig-ins, damage by outside forces, or third

parties. It also includes deactivations of greater than or equal to 1-foot gas distribution main due to dig-ins or damage by outside forces.

DR question to PG&E:

1. As the imputed costs are significantly lower than actual costs for this program, please explain how costs were shifted from any programs to provide additional funding for this sub-program.
2. Please explain the reasoning behind PG&E decision to spend more than the imputed amount for this program.
3. Please explain the statement "This project, along with other reduced-scope emergencies, drove overall unit completions in 2025."
    a. What are reduced-scope emergencies?
    b. Is this emergent project categorized as a "reduced-scope" emergency?
    c. What is the implication of "overall unit completion"? – did other projects fulfill imputed work units for MAT 52C?

ANSWER 003

1. PG&E cannot predict the exact amount of work that is going to be required as this program includes emergent safety-related work, meaning it must be performed based on situations outside of PG&E's control. Accordingly, the forecast is based on a historical average and funding is allocated to this program through the annual gas portfolio prioritization process, as needed.
2. PG&E's actual spend for MAT 52C exceeded the amount adopted because this MAT code addresses the replacement of gas mains damaged by third-party dig-ins and other outside force events (i.e., earthquakes, landslides, storms, etc.) for which an emergency declaration is not issued. The level of work performed is driven by the occurrence of these unplanned safety-related events, which exceeded the amount in the imputed forecast.
3. The statement "this project, along with other reduced-scope emergencies, drove overall unit completions in 2025" refers to the total volume of work completed in 2025 under MAT 52C. The volume of work is made up of the major emergency project that required replacement of approximately 1,225 feet of exposed main, as well as multiple smaller-scale emergency response main replacement jobs associated with third-party dig-ins and other small outside force events.
    a. "Reduced-scope" emergencies refer to third-party dig-ins and smaller scale events involving a limited scope of replacement work.
    b. The emergent project referred to in the "2025 unit variance explanation" column is not categorized as a "reduced-scope" emergency. That project was related to a major inclement weather event resulting in approximately 1,225 feet of main pipe exposed needing replacement.
    c. No, MAT 52C is demand-driven, therefore, only units that must be completed are completed as they arise. No other projects fulfilled adopted work units for MAT 52C. "Overall unit completion" in the variance explanation refers to the actual

volume of MAT 52C work performed as a result of third-party dig-ins and other outside force events.