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

PG&E Data Request No.:	ED_003-Q002
PG&E File Name:	RSARDiscovery2025_DR_ED_003-Q002
Request Date:	October 7, 2026
Requester DR No.:	003
Requesting Party:	Energy Division
Requester:	Abigail Bender
Date Sent:	October 21, 2026
PG&E Witness(es):	N/A

QUESTION 002

O&M – GAS TRANSMISSION & STORAGE – MWC HP: CGT BALANCING ACCOUNTS; MAT HPC: ECDA INDIRECT INSPECTIONS

Type	Functional Area	MWC	MWC Name	MAT	MAT Name	Difference for 2025 ($000)	Spending Percent Variance for 2025 (%)	Unit Percent Variance for 2025 (%)
Expense	GT&S	HP	CGT Balancing Accounts	HPC	ECDA Indirect Inspections	$7,661.5	101.2%	61.2%

PG&E Explanation:

"Actual costs were higher than imputed regulatory values due to more miles of pipeline needing to be assessed with ECDA."

DR Questions:

1. PG&E states that actual costs were higher than imputed values because more miles of pipeline needed to be assessed using ECDA. Please explain what caused the additional pipeline mileage requiring ECDA assessment in 2025 and why this additional work was not reflected in the imputed adopted costs.
2. PG&E further states that the additional scope resulted from the decision to use ECDA rather than other assessment technologies. Please explain the basis for selecting ECDA over the other assessment technologies and whether the decision resulted in additional costs or work that would not otherwise have been incurred.
3. Please explain whether the additional ECDA work was identified as a higher-priority safety or reliability need and, if so, whether work was deferred from other GT&S programs to accommodate the additional ECDA work.

ANSWER 002

1. ECDA is a compliance-driven assessment method under 49 CFR Part 192, Subpart O. In 2025, PG&E used ECDA for High Consequence Area (HCA) pipeline segments that were due for re-assessment,[1] had not been upgraded for in-line inspection (ILI), and where ECDA was more cost effective than Transmission Integrity Management Program (TIMP) strength testing. PG&E does not perform ECDA work at a fixed annual rate, but rather based on which pipeline segments are coming due to stay in compliance with Subpart O. Given the year to year variability of when compliance work needs to be completed, actual work in a given year may be substantially different than the imputed adopted units which are evenly spread across each year in the rate case cycle. In 2025 specifically, this meant more ECDA units were performed than were adopted.
2. PG&E selects an assessment method based on the known threats on each pipeline segment and the assessment options available to assess those threats. Where Traditional ILI is not the planned assessment method, PG&E considers active threats and assessment lengths when determining the preferred assessment and project scope. PG&E makes pipelines assessable by ILI where feasible (i.e., piggable). For segments that cannot be or have yet to be made piggable, and where ECDA is the more cost effective method, ECDA remains an important option for assessing external corrosion. Because these HCA pipeline segments required assessment or re-assessment to stay in compliance regardless of method, ECDA did not create discretionary or incremental work that would not have otherwise been performed.
3. PG&E treats ECDA as compliance-required integrity work. ECDA Indirect Inspections (MAT HPC) costs are recorded in the Transmission Integrity Management Program Balancing Account (TIMPBA) in compliance with D. 23-11-069 because the work is required by 49 CFR Part 192, Subpart O. Each year PG&E assesses which threats are due for inspection as required by Subpart O and allocates funding between the TIMP assessment methods within the TIMPBA and withing MWC HP accordingly. Funding was not reallocated from other non-TIMPA (MWC HP) programs to accommodate the additional ECDA work. The TIMPBA is a one-way balancing account and any unspent funds at the end of the 2023 GRC rate case period (2023-2026) are returned to customers.

[1] Subpart O requires re-assessments at a maximum of seven calendar years after the last assessment or sooner based on threats and risks.