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

PG&E Data Request No.:	ED_003-Q006
PG&E File Name:	RSARDiscovery2025_DR_ED_003-Q006
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 006

O&M – GAS TRANSMISSION & STORAGE – MWC JO: GAS TRANSMISSION PIPELINE MAINTENANCE; MAT JOP: CORRECTIVE MAINTENANCE – GAS MAIN LEAK

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	JO	GT Pipeline Maintenance	JOP	CM G Main Lk	(10,919.3)	-93.3%	85.7 - %

PG&E Explanation:

"Program expenses were below imputed regulatory values due to a continued trend of lower-than-planned leak find rates, resulting in fewer leak finds and repairs. An additional factor contributing to reduced costs is the implementation of process improvement initiatives, such as value stream mapping resulting in unit cost improvements."

The following MATs within MWC JO also experienced significant underspending and/or undercompletion in 2025:

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	JO	GT Pipeline Maintenance	JOE	Ground Leak Survey	(597.6)	-57.6%	-98.6%
Expense	GT&S	JO	GT Pipeline Maintenance	JOR	Leak Rechecks	(244.0)	-88.0%	-86.4%
Expense	GT&S	JO	GT Pipeline Maintenance	JOW	Aerial Leak Survey	(818.1)	-31.3%	-2.7%

DR Questions:

1. PG&E states that lower-than-planned leak find rates resulted in fewer leak finds and repairs. Please explain how PG&E determined that the lower number of leak finds was attributable to a lower underlying incidence of leaks rather than a reduction in the amount or frequency of leak detection, surveying, or rechecking activity. Please reconcile this explanation with the significant under completion of MATs JOE, JOR, and JOW.

2. For MATs JOE, JOP, and JOR, please explain the significant undercompletion of work in 2025 and whether the lower level of completed work affected the number of leaks identified or repaired.
    a. For MAT JOE – Ground Leak Survey, actual units were 98.6% below imputed units. Please explain the reason for the substantial under completion.

    b. For MAT JOP – CM G Main Lk, actual units were 85.7% below imputed units. Please explain whether the substantial undercompletion was related to fewer leaks being identified or to less leak detection activity being performed.

    c. For MAT JOR – Leak Rechecks, actual units were 86.4% below imputed units. Please explain the reason for the substantial under completion.

3. Please explain whether PG&E performed a safety or risk analysis before completing fewer leak survey, aerial survey, or leak recheck activities than planned in 2025.

ANSWER 006

1. PG&E updated its internal procedure to allow more assets to be flown with aerial leak detection equipment in MAT JOW. PG&E also changed aerial vendors that expanded the LiDAR footprint to approximately 200 feet on either side of the pipeline therefore allowing a greater number of assets to be included in the aerial surveys such as farm taps and high pressure regulator stations. Thus, there has not been a reduction in the amount of leak detection, surveying, or rechecking activity. Rather, use of aerial leak detection and improved technology resulted in assets being checked more efficiently. This revised approach allows PG&E to still complete all required leak surveys (i.e., every six months not to exceed seven and a half months) in accordance with GO 112F.
2. See below for reasoning why MATs JOE, JOP and JOR completed less units than adopted and whether the lower level of completed work affected the number of leaks identified or repaired.
    a. MAT JOE – During the preparation of this response, PG&E identified an error in Table 2-9, lines 102 and 103. The actual end of year units for MAT JOE are 297 miles rather than 6 miles. PG&E has corrected this in attachment, "*RSARDiscovery2025_DR_ED_003-Q006Atch01.xlsx*" for Table 2-9 and has also corrected the SRM Expense Combined Excel attachment "*RSARDiscovery2025_DR_ED_003-Q006Atch02.xlsx*". This unit correction reduces the amount below adopted units from 98.6% to 36.6%. Actual units were lower than adopted due to an updated procedure that allowed work to be shifted from ground miles surveyed (MAT JOE) to aerial miles surveyed (MAT JOW) which is more cost effective. Between the units completed in MAT JOE and JOW, all state and federal code required units were completed in 2025.
    b. MAT JOP (leak repair) actual units were lower than adopted due to a combination of lower leak find rates, and implementation of process improvements to classify leak repairs based on leak type and the survey method used for identification. As a result, fewer units were recorded in MAT JOP than were adopted; however all MAT JOP leak repairs were completed on time and in compliance with GO-112F.
    c. MAT JOR (leak recheck) actual units were lower than adopted due to there being less MAT JOP leak repairs for the reasons explained in subpart 2.b above.
3. All ground (MAT JOE) and aerial (MAT JOW) leak survey work was completed on time and in compliance with state and federal codes. In addition, all MAT JOR leak rechecks were completed on time and in compliance with state and federal codes. A safety or risk analysis was not required, as PG&E was able to use more efficient aerial leak detection equipment to perform work in 2025.