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

PG&E Data Request No.:	ED_003-Q007
PG&E File Name:	RSARDiscovery2025_DR_ED_003-Q007
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 007

O&M – GAS TRANSMISSION & STORAGE – MWC HP: CGT BALANCING ACCOUNTS; MAT HPM: REPAIRS / REPLACE <50 FT

Type	Functional Area	MWC	MWC Name	MAT	MAT Name	Difference for 2025 ($000)	Spending Percent Variance for 2025 (%)	Unit Percent Variance for 2025 (%)
Expense	HP	CGT Balancing Accounts	HPM	Repairs / Replace < '50ft	(4,510.9)	-99.0%	HP	N/A

PG&E Explanation:

"Below variance threshold." No cost or unit variance explanation is provided.

DR Questions:

1. PG&E's 2025 actual spending for MAT HPM was approximately 99 percent below the imputed adopted amount. Please explain the reason for the significant underspending in 2025, including whether the variance was primarily due to fewer pipe segments requiring replacement, work being deferred or not completed, or another factor.
2. Please explain whether PG&E performed a safety or integrity risk assessment before deferring or not completing any planned HPM work in 2025, and whether any such work remains outstanding.

ANSWER 007

1. MAT HPM records expense pipe replacements under 50 feet that are performed in lieu of strength testing to assess pipelines subject to 49 CFR Part 192, Subpart O. A replacement is used when it is the practical way to address an integrity threat, such

as a manufacturing or time-dependent threat, on a short segment. The amount of MAT HPM work each year depends on the number of short segments due for assessment pursuant to Subpart O for which replacement is more cost effective than other methods. In 2025, there were no segments that would fall under these MAT HPM replacement criteria. 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 adopted units which are the same each year in the rate case cycle.

2. PG&E did not defer or cancel any required MAT HPM work in 2025. MAT HPM replacements are one method of completing required Subpart O assessments and the MAT HPM replacement frequency varies year over year. PG&E tracks each pipeline segment's assessment due date and selects the method, whether strength testing, In-Line Inspection (ILI), direct assessment, or replacement, based on the threats present and the pipeline segment's conditions and requirements. The assessment is required to be performed by the compliance date and PG&E determines which assessment method is the preferred assessment method.