Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612

October 16, 2026 **VIA ELECTRONIC MAIL**

Leuwam Tesfai
Deputy Executive Director, Energy & Climate Policy
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: PG&E's Response to Cal Advocates' Comments on PG&E's 2025 Risk Spending Accountability Report

Dear Ms. Tesfai:

Pacific Gas and Electric Company (PG&E) respectfully submits this response to the July 21, 2026, comments filed by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) on PG&E's 2025 Risk Spending Accountability Report (RSAR). While there is no formal step in the annual RSAR process for an Investor-Owned Utility (IOU) to respond to intervenor comments, PG&E respectfully submits this response for Energy Division's consideration in its review of PG&E's 2025 RSAR.

Response to Cal Advocates' Recommendations

Cal Advocates makes two recommendations:

(1) the Commission should require PG&E to file and serve to the 2027 General Rate Case (GRC) proceeding (A.25-05-009), the Risk Assessment and Mitigation Phase application (A.24-05-008), and 2023 GRC proceeding (A.21-06-021) specific information on the overhead conductor replacement program (Maintenance Activity Type 08J) as previously recommended by Energy Division; and

(2) require PG&E to complete the prior Commission adopted Overhead Conductor Replacement work by filing and serving Tier 2 Advice Letters that contain work plans, schedules, and annual program updates, consistent with Cal Advocates' recommendations in the 2027 GRC testimony.[1]

These recommendations are not appropriate because (1) PG&E fulfilled the Commission's 2025 RSAR requirements, (2) the recommendations duplicate, conflict with, or unnecessarily add to other regulatory review, compliance, and enforcement processes already in place through the 2027 General Rate Case, and (3) the recommendations incorrectly assume that PG&E has no discretion to reprioritize work

[1] Comments of the Public Advocates Office on Pacific Gas and Electric Company's 2025 Risk Spending Accountability Report (Cal Advocates Comments), p. 3. Filed July 21, 2026.

and must perform work based on the adopted expenditures forecast in the GRC. PG&E addresses these issues further below.

1. PG&E Has Fulfilled Commission Requirements for the 2025 RSAR

PG&E's 2025 RSAR meets the provisions of D.14-12-025, D.19-04-020, D.21-11-009, and D.22-10-002, which contain specific and detailed requirements of what is to be included in an annual RSAR. As discussed in D.19-04-020, the RSAR is a spending accountability report submitted for Energy Division's review that provides the following information at an activity/program level (Major Work Category and/or MAT Code for PG&E): (1) the differences between a utility's recorded costs and completed units versus the applicable general rate case (GRC) decision's imputed adopted values, and (2) variance explanations where the spending variances meet specific threshold triggers.[2] PG&E fully complied with the RSAR requirements. Cal Advocates does not contest this. Cal Advocates' recommendations exceed the scope of the RSAR process and thus should not impede disposition of PG&E's 2025 RSAR.

In addition, PG&E disagrees with Cal Advocates' characterization that "PG&E refuses to provide information requested by Energy Division staff regarding a timeline for completion of this work and the impacts of PG&E's deferral on long-term reliability and safety metrics."[3] PG&E has responded in discovery that overhead conductor replacement projects are developed approximately one year before execution based on current system conditions, risk assessments and competing work priorities. Rescheduled mileage may be incorporated into future projects, but there is not a specific completion schedule PG&E can provide.[4] The Commission also has existing regulatory mechanisms in place to monitor and enforce compliance of safety work. For example, PG&E files annually its Safety Performance Metrics Report (SPMR), which reports PG&E's performance related to key safety metrics and responds to discovery in that venue.

2. Cal Advocates' Recommendations Are Already Provided in the 2027 GRC (A. 25-05-009)

PG&E's 2027 GRC application (A.25-05-009) includes PG&E's deferred work analysis and explanation for the period 2023-2026, as required by the 2023 GRC decision,[5] as well as PG&E's proposal for the Overhead Conductor Replacement Program for 2027-2030.[6] This venue for raising recommendations regarding deferred work as identified in RSARs or pursuant to the deferred work showing affords parties full due process rights. Notably, this RSAR process does not provide PG&E with a formal opportunity to respond.

As acknowledged by its comments, Cal Advocates made its recommendations with respect to the Overhead Conductor Replacement program in PG&E's 2027 GRC.[7] PG&E

[2] D.19-04-020, p.43.
[3] Cal Advocates Comments, p. 2.
[4] See PG&E's response to RSARDiscovery2025_DR_CalAdvocates_002-Q001.
[5] D.23-11-069, OP 4, p.900.
[6] See A.25-05-009, Exhibit (PG&E-4), pp. 17-6 to 17-11.
[7] Cal Advocates Comments, p. 9.

has responded in testimony and briefs and does not repeat them here.[8] As such, these recommendations are currently under review by the Commission in the 2027 GRC. Accordingly, Cal Advocates' recommendations should not be addressed through this RSAR reporting as it is duplicative of, and could potentially conflict with, the process that is underway in the 2027 GRC.

Lastly, Cal Advocates' concerns regarding PG&E's spending on the Overhead Conductor Replacement program from prior GRC cycles[9] has already been considered by the Commission in prior GRCs. The 2025 RSAR addresses PG&E's performance compared to adopted amounts from the 2023 GRC decision. Safety program work performance in the 2020 GRC period (2020-2022) was the subject of prior year RSARs. The Commission already considered the results of the prior RSAR information (2020 and 2021) in making its 2023 GRC decision. It is not appropriate to bring in prior GRC periods for RSAR reviews, as RSARS are limited to the GRC decision governing the RSAR period.

3. PG&E's Prioritization of Work is Appropriate

The Commission has determined that a utility has both the discretion and the obligation to reprioritize work to manage its operations in a safe and reliable manner in light of current conditions and evolving needs since the forecast was originally developed.[10] While Cal Advocates' raises concerns that falling behind in completing Overhead Conductor replacements may lead to safety and reliability risks,[11] this fails to consider that PG&E is reprioritizing funding to safety investments that have greater overall risk reduction benefits. In other words, prioritization is necessary to maximize overall system safety and reliability. In addition to assessing risk annually as part of the business plan deployment process, PG&E monitors the condition of primary overhead conductors through patrols, inspections, and targeted infrared inspections to identify system needs and mitigate overall system issues. Ultimately, PG&E aims to provide safe, reliable, and affordable service to our customers, which means making challenging prioritization decisions. Even so, as shown in the 2025 RSAR Tables 1-1 and 1-2, PG&E has invested above imputed adopted amounts during the 2023 GRC cycle to address system priorities and notably, has invested $16.583 billion in electric distribution capital work in 2023-2025, which is $4.887 billion above the imputed adopted amounts for the same period. PG&E is doing a substantial amount of work to keep our customers safe and deliver on our commitments to customers, however the amount of work PG&E can and should execute at once is not limitless as we balance customer affordability.

For the above reasons, PG&E's 2025 RSAR meets all the Commission's requirements. PG&E agrees with Cal Advocates' point that it is "imperative that the Commission scrutinize PG&E's performance in ensuring safety, reliability, and

[8] A. 25-05-009, Exhibit (PG&E-16), pp. 17-4 to 17-8; Opening Brief of Pacific Gas and Electric Company, pp. 4-226 to 4-230 (Filed July 2, 2026); Reply Brief of Pacific Gas and Electric Company, pp. 4-142 to 4-145 (Filed July 23, 2026).
[9] Cal Advocates Comments, p. 5.
[10] D.11-05-018, p. 27 (reprioritization is "expected and is necessary").
[11] Cal Advocates Comments, p. 1-2.

maintenance.” However, this scrutiny, including any additional reporting requirements, work plans, schedules, and annual program updates, is part of the 2027 GRC, and not appropriate as part of the 2025 RSAR review.

PG&E appreciates your consideration of this matter. Should you have any questions, please contact GRC@pge.com.

Sincerely,

Shilpa Ramaiya
Vice President, Regulatory Proceedings and Rates

cc: Service List for A.21-06-021, A.24-05-008 and A.25-05-009