

Bronkall, Bob

From: Loidor, Elizabeth <E4LH@pge.com>
Sent: Monday, March 10, 2025 6:19 PM
To: Bronkall, Bob
Subject: PG&E Filing of Advice Letter 7533-E to CPUC re: Rule 20A Reallocation

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Dear Robert,

Below for your records, please find a copy of PG&E's Proposal of Reallocations of Electric Rule 20A Work Credits which was filed with the CPUC on March 10, 2025. This filing includes the list of proposed recipients and amounts to be reallocated for Rule 20A projects. If you would like to submit any comments on this filing, please find details under the Protests section below.

Sincerely,

Elizabeth Loidor | Rule 20A Program Liaison, Municipal Projects & Programs
Pacific Gas and Electric Company
(925) 206-9226 cell | Elizabeth.Loidor@pge.com



March 10, 2025

Advice 7533-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Proposal of Reallocations of Electric Rule 20A Work Credits

Purpose

Pursuant to Ordering Paragraph (OP) 5 of Decision (D.) 23-06-008 (the Decision), Pacific Gas and Electric Company (PG&E) hereby submits to the California Public Utilities Commission (Commission or CPUC) this Tier 2 Advice Letter (AL). The purpose of this AL is to propose reallocations of Electric Rule 20A work credits.

Background

As required by D.23-06-008, each utility is to file a Tier 2 advice letter within 18 months of the effective date of the Decision to propose work credit reallocations to Active Rule 20A Projects in accordance with the reallocation prioritization requirements of the Decision. On November 19, 2024, PG&E requested a 90-day extension to give certain communities an opportunity to propose new Rule 20A Projects to avoid having their Rule 20A work credits reallocated. On November 27, 2024, the CPUC informed PG&E that the 90-day extension request was granted.

Discussion

PG&E proposes the reallocation of 44.7M in work credits from 73 inactive communities within PG&E's service territory to 22 projects in active communities meeting the prioritization criteria described in the Decision, as shown in the summary table below. For additional details, please see Attachments A and B to this AL. Attachment A contains the required information listed in Attachment A of the Decision, and Attachment B provides an accounting of all inactive communities and final work credit balances to be reallocated with totals, as required by OP 5(b) of the Decision.

Community	Project	Project ID	Expected Project Cost *	Proposed Reallocation Amount
TEHAMA	5TH STREET, TEHAMA	19-52013-01	\$ 2,765,000	2,222,333.59
SAN JOAQUIN	COLORADO AVE, SAN JOAQUIN	20-10047-01	\$ 3,553,000	2,222,333.59
HURON	LASSEN AVE PH 3, HURON	19-10030-01	\$ 5,962,000	2,222,333.59
SIERRA COUNTY	MAIN STREET, SIERRA CITY	19-46000-01	\$ 10,040,000	2,222,333.59
RIO DELL	WILDWOOD AVE PH 2, RIO DELL	95-12040-01	\$ 2,612,000	2,107,928.00
DOS PALOS	BLOSSOM ST, DOS PALOS	19-24006-01	\$ 2,907,000	2,089,292.00
ORANGE COVE	EP ANCHOR AVE ORANGE COVE R20A	16-10039-01	\$ 4,054,000	2,222,333.59
WILLITS	SNIDER PARK, WILLITS	19-23028-01	\$ 3,067,000	2,181,573.95
LAKEPORT	11 ST, LAKEPORT **	19-17010-01	\$ 12,251,000	2,222,333.59
RIO VISTA	MAIN ST PH 1, RIO VISTA	19-48010-02	\$ 4,041,000	2,222,333.59
KINGSBURG	10TH AVE ROOSEVELT SCHOOL KINGSBURG R20A	04-10000-01	\$ 3,428,000	2,062,594.00
ARVIN	VARSITY RD, ARVIN	19-15001-01	\$ 6,599,000	2,222,333.59
COALINGA	ELM AVE PH 1 COALINGA R20A	11-10013-01	\$ 2,581,000	646,408.00
FORT BRAGG	CHESTNUT ST PH1, FORT BRAGG	21-23011-01	\$ 2,190,000	834,077.00
SHAFTER	SOUTH SHAFTER AVE PH 1, SHAFTER	20-15048-01	\$ 4,876,000	2,222,333.59
MARYSVILLE	HWY 70, MARYSVILLE	20-58010-01	\$ 5,690,000	2,222,333.59
DINUBA	TRANSIT CENTER BETWEEN L & M ST R20A	11-54007-01	\$ 3,341,000	1,953,345.00
GRASS VALLEY	LA BARR MEADOWS, GRASS VALLEY R20A **	24-29004-01	\$ 9,789,000	2,222,333.59
SELMA	NEBRASKA AVE, SELMA	20-10049-04	\$ 6,405,000	2,222,333.59
MARINA	RESERVATION RD MARINA R20A **	08-27019-01	\$ 5,583,000	2,222,333.59
OROVILLE	MYERS ST OROVILLE R20A	11-04015-01	\$ 3,188,000	1,727,403.84
MANTECA	AIRPORT WAY, MANTECA R20A **	24-39013-01	\$ 9,946,000	2,222,333.59
Total			\$114,868,000	44,715,292.05

* All project costs have been escalated to expected project start year.

** Project delineating ESJ and non-ESJ communities has been included for reallocation.

In making this reallocation, PG&E recognizes that there are more proposed projects needing additional work credits than work credits available for reallocation. More specifically, municipalities within PG&E's service territory have passed resolutions for 154 projects that will not move forward unless the work credit gap is addressed.

Accordingly, to determine which projects should receive reallocation pursuant to the Decision, PG&E followed the prioritization methodology described in detail below.

A. Updating Project Costs

To identify potential Rule 20A projects to receive work credit reallocation, PG&E first needed to update project cost estimates for the full queue of proposed projects in the service territory. Prior to this reallocation effort, proposed Rule 20A projects in the queue were at different phases of the design and scoping process. Also, some of the proposed Rule 20A projects in PG&E's queue were proposed by municipalities many years ago, and costs for labor and materials have changed. Accordingly, not all PG&E's cost estimates for these proposed Rule 20A projects were still accurate.

To update the proposed project cost estimates, PG&E developed a project cost calculator tool. The tool performed linear regression analyses on quantitative characteristics (e.g. trench length) and qualitative variables (e.g. geographic settings) from 37 Rule 20A projects completed from 2019 to 2023 to identify which combinations yielded the least uncertainty in predicted cost estimates for each project. The tool then used this data to obtain more accurate cost estimates by seeking out combinations that minimized the magnitude of potential variances. Recalculating project costs using this tool was more efficient than individually designing all projects for estimating purposes.

After identifying the updated project costs, PG&E developed a multiyear, Rule 20A workplan for proposed future work. The workplan was informed by the expected Rule 20A program budget in future years, project queue, project financial forecast by month, and forecasted project durations. Creating the workplan also allowed PG&E to forecast what year(s) project costs would be incurred so that the appropriate cost escalation factors could be applied.

B. Reviewing the Priority Criteria

After recalculating the Rule 20A project costs in the queue, PG&E reviewed which projects require additional work credits to see if the projects meet one or both priority criteria outlined in OP 4 of the Decision. The priority criteria were defined in the Decision as (1) active Rule 20A Projects located in a city, unincorporated county, or tribal jurisdiction that has not completed a Rule 20A project since 2004 or (2) Active Rule 20A Project where at least 50 percent of the main line trench distance will be located within Environmental and Social Justice Community census tract(s).

PG&E sorted the projects into three groups based on the number of priority criteria met by the project scope—i.e., no priority criteria, one priority criteria, or both priority criteria. Upon sorting the proposed projects, PG&E discovered that the total reallocation need for projects meeting both priority criteria was greater than the total work credits available for reallocation.

Ultimately, PG&E chose to propose reallocation only to the group of projects meeting both priority criteria outlined in the Decision and not to projects meeting one or no priority criteria.

C. Reallocation Cap

Among the Rule 20A projects meeting both priority criteria, there was a wide range in the number of work credits needed to complete the project scope of work. For example, the

smallest need for reallocation to cover additional costs was 646K in work credits while the largest need was 11.2M in work credits.

Given this disparity, PG&E set a reallocation cap so that all proposed projects within the group of projects meeting both criteria would receive some reallocation. PG&E determined that this cap should be up to 2,222,333.59 in work credits. This reallocation cap will allow 8 projects to be fully funded. 14 additional projects will either require a scope reduction and/or additional financial contribution to close the gap between the projects' expected costs and available work credits.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than March 31, 2025, which is 21¹ days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name and e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, and OP 5 of D.23-06-008, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, April 9, 2025, which is 30 calendar days after the date of submittal.

¹ Pursuant to Rule 1.5 of General Order 96-B, PG&E requests to extend the protest period by one additional day because twenty days following submission of this advice letter is Sunday, March 30, 2025.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service list for R.17-05-010. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Sidney Bob Dietz II
Director, Regulatory Relations
CPUC Communications

Attachments:

Attachment A: Required Information Regarding Proposed Projects for Reallocation of Rule 20A Work Credits

Attachment B: Inactive Communities and Final Work Credit Balances to be Reallocated

cc: Service List R.17-05-010

Attachment A

Required Information Regarding Proposed Projects
for Reallocation of Rule 20A Work Credits

	Other Project Sponsors	County	City	Utility Underground District	Project Name/Identifier	Project Address (Street, City, ZIP Code)	Applicant Type	Project Status (Active/Hold)	Priority (Pl, Es, Co, Ctr)
	None	TEHAMA	TEHAMA	5TH STREET	5TH STREET, TEHAMA 19-52013-01 NO ORDER	5TH ST, TEHAMA, 96021	Government Agency	Hold	Pl
IN	None	FRESNO	SAN JOAQUIN	COLORADO AVE	COLORADO AVE, SAN JOAQUIN 20-10047-01 NO ORDER	COLORADO AVE, SAN JOAQUIN, 93660	Government Agency	Hold	Pl
	None	FRESNO	HURON	LASSEN AVE PH 3	LASSEN AVE PH 3, HURON 19-10030-01 NO ORDER	LASSEN AVE, HURON, 93234	Government Agency	Hold	Pl
UNITY	None	SIEERRA	UNINCORPORATED	THE SIERRA CITY MAIN STREET PROJECT AND UUD	MAIN STREET, SIERRA CITY 19-46000-01 NO ORDER	MAIN ST, SIERRA CITY, 96125	Government Agency	Hold	Pl
	None	HUMBOLDT	RIO DELL	UUD NO. 2	WILDWOOD AVE PH 2, RIO DELL 95-12040-01 NO ORDER	WILDWOOD AVE, RIO DELL, 95562	Government Agency	Hold	Pl
	None	MERCED	DOS PALOS	BLOSSOM ST, DOS PALOS	BLOSSOM ST, DOS PALOS 19-24006-01 NO ORDER	BLOSSOM ST, DOS PALOS, 93620	Government Agency	Hold	Pl
OVE	None	FRESNO	ORANGE COVE	ANCHOR AVE	EP ANCHOR AVE ORANGE COVE R20A 16-10039-01 31221681	ANCHOR AVE, ORANGE COVE, 93646	Government Agency	Hold	Pl
	None	MENDOCINO	WILLITS	SNIDER PARK	SNIDER PARK, WILLITS 19-23028-01 NO ORDER	SNIDER PARK ALONG STATE ST, MARIN ST, HUMBOLDT ST, E. COMMERCIAL ST, WILLITS, 95490	Government Agency	Hold	Pl
	None	LAKE	LAKEPORT	11TH ST	11 ST, LAKEPORT 19-17010-01 NO ORDER	11TH ST, LAKEPORT, 95453	Government Agency	Hold	Pl
	None	SOLANO	RIO VISTA	MAIN ST PH 1	MAIN ST PH 1, RIO VISTA 19-48010-02 NO ORDER	MAIN ST, RIO VISTA, 94571	Government Agency	Hold	Pl
G	None	FRESNO	KINGSBURG	10TH ST (ROOSEVELT SCHOOL)	10TH AVE ROOSEVELT SCHOOL KINGSBURG R20A 04-10000-01 30768527	10TH ST, KINGSBURG, 93631	Government Agency	Hold	Pl
	None	KERN	ARVIN	UUD #1	VARSITY RD, ARVIN 19-15001-01 NO ORDER	VARSITY RD, ARVIN, 93203	Government Agency	Hold	Pl
	None	FRESNO	COALINGA	ELM AVE	ELM AVE PH 1 COALINGA R20A 11-10013-01 74013924	ELM AVE, COALINGA, 93210	Government Agency	Hold	Pl
G	None	MENDOCINO	FORT BRAGG	CHESTNUT ST	CHESTNUT ST PH1, FORT BRAGG 21-23011-01 NO ORDER	CHESTNUT ST, FORT BRAGG, 95437	Government Agency	Hold	Pl
	None	KERN	SHAFTER	SOUTH SHAFTER AVE	SOUTH SHAFTER AVE PH 1, SHAFTER 20-15048-01 NO ORDER	SOUTH SHAFTER AVE, SHAFTER, 93263	Government Agency	Hold	Pl
E	None	YUBA	MARYSVILLE	HWY 70 AND 12TH ST, MARYSVILLE	HWY 70, MARYSVILLE 20-58010-01 NO ORDER	HWY 70, MARYSVILLE, 95901	Government Agency	Hold	Pl
	None	TULARE	DINUBA	TRANSIT CENTER	TRANSIT CENTER BETWEEN L & M ST R20A 11-54007-01 35543384	L ST & M ST, DINUBA, 93618	Government Agency	Hold	Pl
LEY	None	NEVADA	UNINCORPORATED	LA BARR MEADOWS ROAD UNDERGROUND UTILITY DISTRICT	LA BARR MEADOWS, GRASS VALLEY R20A 24-29004-01 NO ORDER	LA BARR MEADOWS RD, GRASS VALLEY, 95949	Government Agency	Hold	Pl
	None	FRESNO	SELMA	NEBRASKA AVE	NEBRASKA AVE, SELMA 20-10049-04 NO ORDER	NEBRASKA AVE, SELMA, 93662	Government Agency	Hold	Pl
	None	MONTEREY	MARINA	RESERVATION RD, UUD # 2008-1	RESERVATION RD MARINA R20A 08-27019-01 30649669	RESERVATION RD, MARINA, 93933	Government Agency	Hold	Pl
	None	BUTTE	OROVILLE	MYERS ST	MYERS ST OROVILLE R20A 11-04015-01 30938105	MYERS ST, OROVILLE, 95966	Government Agency	Hold	Pl
	None	SAN JOAQUIN	MANTECA	UNDER GROUND UTILITY AIRPORT WAY	AIRPORT WAY, MANTECA R20A 24-39013-01 NO ORDER	AIRPORT WAY, MANTECA, 95337	Government Agency	Hold	Pl

costs have been escalated to expected project start year.

ect located in city or unincorporated county that has not completed a Rule 20A e 2004 and where at least 50 percent of the main line trench distance will be in Environmental and Social Justice Community (ESJ) census tract(s).

Attachment B

Inactive Communities and Final Work Credit Balances to be Reallocated

Ln	Inactive Community	Work Credit Balances	Work Credits to be Reallocated	Work Credit Balances After Reallocation	
1	ALPINE COUNTY	20,011.00	20,011.00	-	-
2	AMADOR CITY	37,458.00	37,458.00	-	-
3	AMADOR COUNTY	92,891.45	92,891.45	-	-
4	ANTIOCH	969,287.17	969,287.17	-	-
5	ATASCADERO	2,402,852.00	2,402,852.00	-	-
6	AUBURN	120,804.60	120,804.60	-	-
7	AVENAL	600,887.00	600,887.00	-	-
8	BENICIA	1,779,815.00	1,779,815.00	-	-
9	BIGGS	10,302.00	10,302.00	-	-
10	BLUE LAKE	261,203.00	261,203.00	-	-
11	CALISTOGA	571,030.00	571,030.00	-	-
12	CLEARLAKE	2,344,459.00	2,344,459.00	-	-
13	CLOVERDALE	622,310.00	622,310.00	-	-
14	COLFAX	158,643.17	158,643.17	-	-
15	CORCORAN	52,971.00	52,971.00	-	-
16	CORNING	499,239.89	499,239.89	-	-
17	DEL REY OAKS	272,008.00	272,008.00	-	-
18	GLENN COUNTY	2,543,706.00	2,543,706.00	-	-
19	GONZALES	367,516.00	367,516.00	-	-
20	GUADALUPE	457,152.00	457,152.00	-	-
21	GUSTINE	293,603.00	293,603.00	-	-
22	HEALDSBURG	34,070.87	34,070.87	-	-
23	HERCULES	824,252.00	824,252.00	-	-
24	HOLLISTER	601,188.00	601,188.00	-	-
25	IONE	388,553.00	388,553.00	-	-
26	ISLETON	319,244.00	319,244.00	-	-
27	JACKSON	130,285.00	130,285.00	-	-
28	KERMAN	441,895.00	441,895.00	-	-
29	KING CITY	93,596.00	93,596.00	-	-
30	LAFAYETTE	782,546.00	782,546.00	-	-
31	LASSEN COUNTY	303,380.00	303,380.00	-	-
32	LATHROP	327,693.53	327,693.53	-	-
33	LIVINGSTON	548,430.00	548,430.00	-	-
34	MADERA	419,235.62	419,235.62	-	-
35	MARICOPA	228,291.00	228,291.00	-	-
36	MARIPOSA COUNTY	165,414.00	165,414.00	-	-
37	MENDOTA	627,996.00	627,996.00	-	-
38	MONTE SERENO	366,701.00	366,701.00	-	-
39	NEWMAN	912,236.43	912,236.43	-	-
40	OAKDALE	33,530.59	33,530.59	-	-
41	OAKLEY	807,676.00	807,676.00	-	-
42	PASO ROBLES	99,771.82	99,771.82	-	-
43	PIEDMONT	575,342.00	575,342.00	-	-
44	PLACER COUNTY	73,879.98	73,879.98	-	-
45	PLEASANT HILL	1,895,963.36	1,895,963.36	-	-
46	PLYMOUTH	162,687.00	162,687.00	-	-
47	RED BLUFF	1,153,627.00	1,153,627.00	-	-
48	ROCKLIN	341,036.00	341,036.00	-	-
49	ROSEVILLE	13,343.00	13,343.00	-	-
50	SACRAMENTO COUNTY	756,783.00	756,783.00	-	-
51	SAN ANSELMO	661,747.00	661,747.00	-	-
52	SAN CARLOS	223,044.97	223,044.97	-	-
53	SAN JUAN BAUTISTA	268,760.00	268,760.00	-	-
54	SAN RAMON	1,536,447.11	1,536,447.11	-	-
55	SANGER	944,622.00	944,622.00	-	-
56	SARATOGA	129,044.00	129,044.00	-	-
57	SCOTTS VALLEY	876,827.00	876,827.00	-	-
58	SHASTA COUNTY	2,355,433.49	2,355,433.49	-	-
59	SHASTA LAKE	6,498.00	6,498.00	-	-
60	SISKIYOU COUNTY	27,275.00	27,275.00	-	-
61	SONORA	656,535.00	656,535.00	-	-
62	ST HELENA	54,788.00	54,788.00	-	-
63	STANISLAUS COUNTY	293,884.00	293,884.00	-	-

64	SUISUN CITY	835,227.00	835,227.00	-
65	SUTTER CREEK	442,859.00	442,859.00	-
66	TAFT	892,057.00	892,057.00	-
67	TRINIDAD	2,146.00	2,146.00	-
68	TRINITY COUNTY	13,122.00	13,122.00	-
69	TULARE COUNTY	4,954,134.00	4,954,134.00	-
70	WASCO	1,306,331.00	1,306,331.00	-
71	WHEATLAND	281,446.00	281,446.00	-
72	WILLIAMS	28,662.00	28,662.00	-
73	WILLOWS	17,606.00	17,606.00	-
74	ANDERSON *	-	-	-
75	ANGELS CAMP *	-	-	-
76	ATHERTON	-	-	-
77	ATWATER *	-	-	-
78	BELVEDERE *	-	-	-
79	BUTTE COUNTY	-	-	-
80	CAMPBELL *	-	-	-
81	COLMA	-	-	-
82	FIREBAUGH *	-	-	-
83	FOSTER CITY	-	-	-
84	FOWLER *	-	-	-
85	HILLSBOROUGH *	-	-	-
86	LEMOORE *	-	-	-
87	MILL VALLEY *	-	-	-
88	NAPA COUNTY *	-	-	-
89	PLACERVILLE *	-	-	-
90	RIVERBANK *	-	-	-
91	SAN LUIS OBISPO *	-	-	-
92	SAND CITY **	221,664.00	-	221,664.00
93	SAUSALITO **	1,381,141.88	-	1,381,141.88
94	SEASIDE	-	-	-
95	SEBASTOPOL	-	-	-
96	SOLANO COUNTY **	2,925,239.00	-	2,925,239.00
97	SONOMA *	-	-	-
98	WOODSIDE	-	-	-
99	YOLO COUNTY	-	-	-
Total		49,243,336.93	44,715,292.05	4,528,044.88

* Inactive communities with negative work credit balances are shown as zero for the purposes of this table.

** Rule 20A work credits were not used for reallocation due to community having pending action for those work credits.

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