BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of Pacific Gas and Electric Company for Adoption of Electric Revenue Requirements and Rates Associated with its 2027 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation (U 39 E)	Application No. 26-05-007 (Filed May 15, 2026)

CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S REQUEST FOR EVIDENTIARY HEARINGS

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September 24, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Adoption of Electric Revenue Requirements and Rates Associated with its 2027 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation (U 39 E)	Application No. 26-05-007 (Filed May 15, 2026)

CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S REQUEST FOR EVIDENTIARY HEARINGS

The Assigned Commissioner's August 3 Scoping Memo and Ruling[1] directs parties to request evidentiary hearings in the above-captioned proceeding by September 24, 2026. Accordingly, CalCCA submits this request for evidentiary hearings in A.26-05-007, *Application of Pacific Gas and Electric Company for Adoption of Electric Revenue Requirements and Rates Associated with its 2027 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation.*

As CalCCA explains below, certain disputed facts in this proceeding related to Pacific Gas and Electric Company's (PG&E) proposed Power Charge Indifference Adjustment (PCIA) rates for 2027 would benefit from further record development following the submission of PG&E's rebuttal testimony. Specifically, further record development is necessary to address and resolve material issues of disputed fact related to PG&E's methodology for calculating the Retained

[1] Application (A.) 26-05-007, *Assigned Commissioner's Scoping Memo and Ruling* at 5 (Aug. 3, 2026) (Scoping Memo).

Resource Adequacy (RA) value associated with non-energy storage PCIA-eligible resources. This issue impacts CalCCA's interests because PG&E's Retained RA calculation directly impacts the PCIA rates CCA customers pay. As CalCCA witness Matley notes in direct testimony, the difference between PG&E's and CalCCA's proposed approaches to the Retained RA calculation translates to a significant PCIA revenue requirement impact.[2]

CalCCA has issued two rounds of discovery requests following the submission of PG&E's rebuttal testimony in an effort to resolve or narrow disputed facts related to PG&E's Retained RA calculation.[3] PG&E responded to certain discovery requests from CalCCA's tenth set of discovery on September 23, 2026; the remainder of the requests from CalCCA's tenth and eleventh set of discovery requests remain pending at the time this request was filed. It is possible PG&E's responses to CalCCA's discovery requests may help narrow the need for live witness cross examination at an evidentiary hearing. However, at this time, CalCCA believes that evidentiary hearings will be necessary and would assist the Commission in arriving at a decision in this proceeding. If the Commission were to deny CalCCA's request, CalCCA would lack any means of testing the veracity, basis and completeness of disputed, material factual assertions PG&E's witnesses make in their rebuttal testimony and in responses to discovery issued following the submission of rebuttal testimony. CalCCA identifies those material issues of disputed fact below.

[2] The precise impact is confidential and provided in witness Matley's confidential direct testimony.

[3] *See* Attachments A and B to this Request, which are the public redacted versions of CalCCA's tenth and eleventh discovery requests to PG&E, issued following the submission of PG&E's rebuttal testimony.

I. REQUEST FOR HEARING

As directed in the Scoping Memo, CalCCA provides below: 1) the material issues of disputed fact; 2) the evidence the party proposes to introduce at the requested hearing, and 3) the schedule for conducting the hearing.

A. Parties Dispute Several Facts Material to the Case's Resolution, Each Related to PG&E's Retained RA Value Calculation.

Scoping Issue 1 in this proceeding asks if the Commission should adopt PG&E's request to approve 2027 ERRA Forecast revenue requirements for 2027 ratesetting purposes, including PG&E's 2027 PCIA revenue requirement.[4] Scoping Issue 1 remains disputed. Specifically, CalCCA disputes the reasonableness of PG&E's approach to calculating the Retained RA value associated with its non-storage PCIA-eligible resources. This calculation directly impacts the calculation of PG&E's 2027 PCIA revenue requirement. All else equal, higher Retained RA value lowers the PCIA revenue requirement, whereas a lower Retained RA value increases the PCIA revenue requirement.

The dispute between CalCCA and PG&E with respect to PG&E's Retained RA value calculation involves policy and legal issues, but it also involves material issues of disputed fact. CalCCA has identified at minimum the following disputed factual issues that would benefit from further record development in an evidentiary hearing:

- Whether PG&E's Retained RA value calculation for intermittent resources is based on its peak hour RA contribution or its NQC. *See* PG&E Rebuttal Testimony at 3-3, line 13-15.

[4] Scoping Memo at 2-3.

- Whether the peak hour is in fact the "basis for how RA market transactions are measured[.]" *See* PG&E Rebuttal Testimony at 3-3, lines 29-30.
- Whether the 2026 or 2027 RA market price benchmarks predominantly reflect baseload resources, and the resources those prices reflect. *See* PG&E Rebuttal Testimony at 3-5, lines 1-5.
- The basis for PG&E's assertion that CalCCA's proposal implies approximately 1.62 MW of retained solar quantity for each MW of peak-hour NQC. *See* PG&E Rebuttal Testimony at 3-6, lines 30-34.
- Whether CalCCA's proposal overstates the RA market value of solar resources. *See* PG&E Rebuttal Testimony at 3-7, lines 8-16.
- The calculation and meaning of the prices in Attachment A to Chapter 3 of PG&E's Rebuttal Testimony, including how those prices are reflected in PG&E's RA transactions, and the quantity to which those prices are applied.

As explained above, CalCCA has issued two sets of discovery following the submission of PG&E's rebuttal testimony in an effort to narrow or resolve disputed factual issues related to PG&E's Retained RA calculation.[5] PG&E responded to certain discovery requests from CalCCA's tenth set of discovery on September 23, 2026; the remainder of the requests from CalCCA's tenth and eleventh set of discovery requests remain pending at the time this request was filed. It is possible PG&E's responses to CalCCA's discovery requests may help narrow the need for live witness cross examination at an evidentiary hearing. However, at this time, CalCCA believes that evidentiary hearings will be necessary to develop a complete and robust record for the

[5] *See* Attachments A and B to this Request, which are the public versions of CalCCA's tenth and eleventh discovery requests to PG&E, issued following the submission of PG&E's rebuttal testimony.

Commission's consideration and will assist the Commission in arriving at a decision in this proceeding. If the Commission were to deny CalCCA's request, CalCCA would lack any means of testing the veracity, basis and completeness of disputed, material factual assertions PG&E's witnesses make in their rebuttal testimony and in responses to discovery issued following the submission of rebuttal testimony.

B. The Evidence CalCCA Proposes to Introduce at the Evidentiary Hearing

CalCCA anticipates it may introduce certain PG&E responses to discovery requests CalCCA issued following the submission of PG&E's rebuttal testimony. At this time, several of those discovery requests remain pending, and therefore it is impossible for CalCCA to identify the evidence it may introduce at the evidentiary hearing with specificity. Assuming the ALJ grants this request, CalCCA would provide the ALJ and parties a list of evidence it proposes to introduce at the evidentiary hearing ahead of the hearing.

C. Hearing Schedule

Until CalCCA receives complete responses to the discovery requests it issued following the submission of PG&E's rebuttal testimony, CalCCA cannot determine its need for live witness cross examination with specificity. At this time, however, CalCCA anticipates requiring one hour for cross examination of PG&E witness Keller, who addresses PG&E's Retained RA value calculation in his rebuttal testimony.[6] CalCCA does not anticipate cross examining any other witness at the evidentiary hearing, but reserves its right to ask questions of any witness that takes the stand.

[6] *See* PG&E Rebuttal Testimony, Chapter 3.

II. CONCLUSION

For the reasons described herein, CalCCA respectfully requests the Commission set this matter for evidentiary hearing.

Respectfully submitted,

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Counsel to CalCCA

ATTACHMENT A

KEYES&FOX LLP

September 18, 2026

RE: A.26-05-007: CalCCA's PUBLIC Tenth Data Request to PG&E

Pursuant to Article 10 of the California Public Utilities Commission's Rules of Practice and Procedure, California Community Choice Association ("CalCCA") hereby serves their Public Tenth Data Request upon Pacific Gas and Electric Company ("PG&E") in the above-referenced proceeding, A.26-05-007, *Application of Pacific Gas and Electric Company for Adoption of Electric Revenue Requirements and Rates Associated with its 2027 Energy Resource Recovery Account (ERRA) and Generation Non-By passable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation (U 39 E).* CalCCA requests responses by **Tuesday, September 22, 2026.**

Please send the responses containing confidential, non-public data only to Brian Dickman, Jack Buckley, Ryan Matley, Nikhil Vijaykar, Tim Lindl, Poojan Thakrar, Corey Cochran, and Alicia Zaloga as indicated in the instructions.

Please contact me with any questions or concerns regarding this matter.

Sincerely,

/s/ Nikhil Vijaykar

Nikhil Vijaykar
Poojan Thakrar
Tim Lindl
KEYES & FOX LLP
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INSTRUCTIONS

The following general instructions apply to all data requests set forth herein.

A. Consider all the Definitions and General Instructions herein to be applicable to each item of discovery submitted by the above-referenced parties.

B. These requests for documents and responses are continuing in character so as to require you to file supplemental answers as soon as possible if you obtain further or different information before or after the hearing. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.

C. Unless otherwise indicated, the documents for which production is sought shall include all documents dated, prepared, sent, or received during the designated period.

D. For each separate discovery item, identify the individual(s) responsible (whether primarily or indirectly) for providing the response. Further, please designate the proper witness, if any, to cross-examine at the hearing concerning the response. If witnesses have not yet been selected at the time a data response is provided, please supplement the response once witnesses have been selected to provide the requested information.

E. In producing documents and written responses pursuant to these discovery requests, designate and restate the request(s) and subpart(s) thereof in response to which each document or response is produced.

F. Where a document or narrative response is relevant to more than one request, a duplicate need not be provided. Where a discovery request can be answered in whole or in part by reference to a response to a preceding or subsequent discovery request (or subpart thereof), it is sufficient to indicate by specifying in the response, by number and date, which other discovery response answers it, and by specifying whether it is claimed that the response to the preceding or subsequent discovery request is a full or partial response to the current request being answered. If the latter, the response to the balance of the current discovery request shall be completed.

G. Whenever these discovery requests specifically request an answer, rather than the identification of documents, an answer is required and the production of documents in lieu thereof will not substitute for an answer.

H. If information requested is not available in the exact form requested, provide such data or documents as are available and responsive to the particular

discovery request.

I. As to any discovery request consisting of a number of separate subdivisions, or related parts, sub-parts, or portions a complete response is required to each part or portion with the same effect as if it were propounded as a separate discovery request.

J. Any objection to a discovery request should clearly indicate to which part or portion of the discovery request the objection is directed.

K. For each computer generated document identified or produced in a response, state separately (a) what types of data files are included in the input and the source thereof; (b) the computer program; (c) a description of the recordation system employed (including program description, flow charts, etc.); and (d) the identification of the person or persons, during the designated period, who were in charge of the collection of input materials, the processing of input materials, the databases utilized, and/or the programming to obtain such output.

L. If any document described in any request for documents is no longer in your possession or control, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred voluntarily or involuntarily to others; or (d) has been otherwise disposed of.

M. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it and a statement of facts constituting the justification and basis therefore.

N. If, in answering any of these discovery requests, there is deemed to be any ambiguity in interpreting either the discovery request or a definition or instruction applicable thereto, promptly call counsel to CalCCA to obtain a clarification.

O. Each document and individual response of more than one page shall be stapled or otherwise bound, and each page thereof consecutively numbered.

P. Please provide a set of responses via e-mail where appropriate, and via hard copy where appropriate, to:

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225 Union Boulevard, Suite 450, Lakewood, CO 80228
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Q. If PG&E objects to any request on the ground that the information sought is irrelevant or immaterial to any issue in the above-captioned matter, please state the specific basis for such objection, including the basis for any contention that such information is or not does not appear "reasonably calculated to lead to the discovery of admissible evidence."

R. If any response requires the use of, references or otherwise includes confidential, non-public data, **please submit the confidential, non-public portion of the response only to Brian Dickman, Jack Buckley, Ryan Matley, Nikhil Vijaykar, Tim Lindl, Poojan Thakrar, Corey Cochran, and Alicia Zaloga.**

DEFINITIONS

A. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these discovery requests any information or documents which might otherwise be considered to be beyond their scope.

B. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these discovery requests any information or documents which might otherwise be considered to be beyond their scope.

C. The term "communications" includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.

D. The term "document" shall include, without limitation, all writings and records of every type in your possession, control, or custody, including but not limited to the following items, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable from discovery: computer data files, information stored in electronic media, including on computer tapes, disks, diskettes, tapes, inputs, outputs, and printouts; notes; letters; correspondence; communications; telegrams; memoranda; summaries and records of telephonic and telegraphic communications; summaries and records of personal conversations; diaries; appointment books; reports; surveys; studies; comparisons; tabulations; budgets; work papers; charts; plans; maps; drawings; engineering and other diagrams; photographs; film; microfilm; microfiche; tape and other mechanical and electrical audio and video recordings; data compilations; log sheets; ledgers; vouchers; accounting statements; books; pamphlets; bulletins; minutes and records of meetings; transcripts; stenographic records; testimony and exhibits, including work papers; copies, reports, and summaries of interviews and speeches; reports and summaries of investigations; opinions and reports of consultants; reports and summaries of negotiations; press releases; newspaper clippings; drafts and revisions of draft of documents; and any and all other records, written, electrical, mechanical, and otherwise. "Documents" shall also refer to copies of documents, every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the originals or any other copy, and all attachments or

appendices to any documents.

E. "Energy Contract" means any contract under which the IOU makes payments and seeks to recover (or has recovered) all or any part of those payments from any Community Choice Aggregator or other Load Serving Entity under an NBC.

F. "Identification" of a document includes stating: (a) the identity of each person who wrote, dictated, or otherwise participated in its preparation, (b) the location of the document; and (c) the identity of each person having custody of or control over the document. "Identification" of a document includes identifying all documents known or believed to exist, whether or not in your custody or the custody of counsel or other representatives.

G. "Identification" of a person includes stating his or her full name, most recent known business address and telephone number, present position, and prior connection to or association with any party to this proceeding, including position at the time of connection to the information requested.

H. "CalCCA" means California Community Choice Association.

I. "NBC" means any generation-related "non-bypassable" charge, including the Diablo Canyon Non-Bypassable Charge ("DCNBC"), Power Charge Indifference Adjustment ("PCIA"), the Cost Responsibility Surcharge, the Cost Allocation Mechanism, or any other existing non-bypassable charge. For purposes of these requests, "NBC" does not include any non-generation-related charges, such as charges assessed through transmission or distribution charges, or charges for public purpose programs.

J. The term "PG&E" means Pacific Gas and Electric Company, and any and all of its subsidiaries, parent companies, affiliates, present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf. "Utility" or "Company" refers to PG&E. "IOU" refers to any of the three California investor-owned utilities.

K. "Relate to," "concern," and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, or be connected with, in any way, the subject of these data requests.

L. "Related Attributes" means economically-valuable resources or elements related to any UOG Resource or any resource delivering under an Energy Contract, including, but not limited to, renewable energy credit value, capacity value, resource adequacy value, residual unit commitment payments, and so

on.

M. "Study," "studies," "analyses" or "report(s)" denotes any document, as defined above, which reflects or was utilized in the collection, evaluation, analysis, summarization, or characterization of data in connection with these requests.

N. "UOG Resource" means any electrical generation or storage facility owned by PG&E as to which the PG&E seeks to recover any part of the PG&E's costs relating to the facility from any CCA or other LSE under an NBC.

O. "Vintage" refers to a group of departing customers based on the date they leave utility bundled service so that they are responsible for generation costs incurred on their behalf before their departure to a CCA.

P. Unless otherwise provided for in these Definitions, undefined acronyms shall have the same definition as that provided within PG&E's Application 26-05-007 and PG&E's prepared testimony accompanying that application.

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TENTH DATA REQUEST OF CALCCA

CalCCA to PG&E 10.1. Refer to page 2-3 at 13-19 of PG&E's Rebuttal Testimony where it states "For example, in the 2026 ERRA Forecast Fall Update, PG&E used 2 CCAs' forecasts even though those CCAs had different data center forecasts than PG&E."

a. Identify the two CCAs for which PG&E used their data center load forecast as opposed to PG&Es.
b. Provide the rationale for using the CCA's load forecast instead of PG&E's.
c. Provide all other instances when PG&E has elected to use the CCAs load forecast when it does not agree with PG&E's forecast.

CalCCA to PG&E 10.2. Refer to page 2-4 at 4-12 of PG&E's Rebuttal Testimony where it states "Q 10 Does the current meet and confer process require PG&E to use CCAs' load forecasts? A 10 No;" Confirm or deny that PG&E has the final authority on whether or not to adopt CCAs load forecast into its load forecast that is used to set rates in the ERRA proceeding. If the answer is anything other than an unqualified admission, please explain.

CalCCA to PG&E 10.3. Refer to page 2-4 at 24 to page 2-5 at 4 of PG&E's Rebuttal Testimony where it states "Q 12 Were any CCA forecasts not used because of differences in data center forecasts? A 12 Yes. Of the 5 forecasts PG&E did not use, data center forecasts were identified as being a driver of difference for 3 of the CCA forecasts. In each of the 3 cases, data center load was either explicitly excluded from the CCA's forecast (when data center load was acknowledged) or the data center forecast relied on outdated assumptions/historical application data. In all instances where PG&E did not use a CCA's forecast, PG&E communicated to the respective CCA why the forecasts were not used and each of the CCAs did not communicate an objection to the decision."

a. Which 3 CCAs did not have their load forecast adopted due to differences in data center forecasts?

b. Who determined that the assumptions/historical application data was outdated?
c. What was the basis for the determination that the assumptions/historical application data was outdated?
d. Did PG&E and the CCAs agree that the assumptions/historical application data was outdated?
e. When data center load was omitted, was that a conscious choice by the CCA or an omission?
f. If the CCA were to object when PG&E communicated it was not using its forecast, would PG&E have engaged in any additional process to resolve the disagreement or dispute?

CalCCA to PG&E 10.4. Refer to page 3-5 at 1-5 of PG&E's Rebuttal Testimony where it states "Based on available data, the 2026 Forecast RA MPB of $138.36 per kW NQC-year is predominantly comprised of baseload SoD RA transactions. Based on similarly available data, PG&E anticipates the 2027 RA MPB will also be primarily comprised of baseload SoD RA transactions.?

a. On what basis does PG&E make the assertion that the 2026 RA MPB was based primarily on baseload resources and it expects the 2027 RA MPB to be the same? Please provide a detailed explanation of how PG&E has data on all RA market transactions used by the CPUC to determine the MPB.

CalCCA to PG&E 10.5. Refer to Chapter 3, Attachment A of PG&E's Rebuttal Testimony. Why did PG&E [redacted] Please provide all solicitation materials that gave guidance to bidders on available capacity and type of resource RA.

CalCCA to PG&E 10.6. Refer to page 4-2 at 16-26 of PG&E's Rebuttal Testimony where it states "On August 3, 2026, PG&E filed its RPS Compliance Report for 2025, which included 1,643,425 megawatt-hours of RECs retired to PG&E's 2025 Western Renewable Energy Generation Information System (WREGIS) account. In addition to these RECs, PG&E now plans on retiring the remaining Unsold RECs to either its 2026 or 2027 WREGIS accounts." Refer also to PG&E's response to DR CalCCA 007-004 where it lists the total quantity of 3,821,058 of unsold RPS by last month to retire in WREGIS. Please provide:

a. The total quantity of unsold RPS already retired or planned to be retired to each of the 2025, 2026, and 2027 WREGIS accounts.
b. Explain how PG&E will value the Unsold RECs retired to the 2025, 2026 and 2027 WREGIS accounts when used towards minimum retained RPS. In particular, specify the "applicable year's Market Price Benchmark" that PG&E will use to value the REC, the PABA vintage to which that value will be credited, if any, and the PABA vintage to which that value will be charged, if any.

c. Please indicate which vintage of RECs and the quantity in each vintage that were displaced (and are no longer planned to be used for compliance) by the retirement of unsold RPS and the plan to use those in the 2025-27 Compliance period.
d. On what date or dates were the 1,653,525 MWh of RECs retired to the 2025 WREGIS account? Were those RECs considered as 2025 retained RA and valued at the RPS MPB in the 2025 ERRA Compliance case?

CalCCA to PG&E 10.7. Refer to page 4-3, Q 10 in PG&E's Rebuttal Testimony which discusses the ERRA Forecast implications of PG&E's plan to retire Unsold RPS volumes to its 2025, 2026 and 2027 WREGIS accounts. In its answer to Q 10, PG&E explains the amount of Unsold RPS it will retain will depend on whether its physical short position is less or greater than its Unsold RPS volumes.

a. Are PG&E's Unsold RPS volumes currently greater or less than its physical short position for 2025, 2026 and 2027?
b. Provide a comparison of PG&E's Unsold RPS volumes to its physical short position for 2025, 2026 and 2027.
c. Please provide workpapers showing PG&E's updated minimum retained RPS entries associated with 2025, 2026 and 2027 and the PCIA impacts of those updated entries.
d. In the event that PG&E's physical short position is smaller than its quantity of unsold RPS in 2025, 2026, and 2027, would that result in PG&E forfeiting any unsold RPS that is greater than its physical short position? In other words, being unable to either retire the REC for compliance purposes or to bank the REC for future use.

CalCCA to PG&E 10.8. Refer to page 4-2 at 27 to 4-3 at 6 of PG&E's Rebuttal Testimony where it states "Banking is not possible under the RPS compliance rules adopted by the Commission. PG&E is not able to bank the Unsold RECs as a retail seller can only bank excess procurement when, among other conditions, its quantitative procurement requirement for a compliance period is met." Please provide the relevant provisions of the RPS compliance rules that specify PG&E is permitted to bank excess RECs.

CalCCA to PG&E 10.9. Refer to page 3-8, Q 22 in PG&E's Rebuttal Testimony. Please identify with specificity the aspects of D.26-07-008 that "depend on modifications to the RA Market Reference Data and related implementation steps that are outside of PG&E's control" and explain why those aspects are outside of PG&E's control. Please explain when PG&E expects to implement those aspects of D.26-07-008.

CalCCA to PG&E 10.10. Does PG&E agree that CalCCA's proposed methodology for valuing retained RA under the SoD framework, as presented in witness Matley's direct testimony and discussed in Chapter 3 of PG&E's Rebuttal Testimony, is the same as

Southern California Edison Company's (SCE) interim SoD methodology. If PG&E does not agree, explain why not.

For the purposes of this question, SCE's interim SoD methodology refers to the methodology SCE uses to value its retained RA from all RA resources for PCIA ratemaking purposes, and is the same methodology witness Keller references at page 3-2 of PG&E's rebuttal testimony.

CalCCA to PG&E 10.11. Does PG&E have an hourly RA price curve that applies to all RA resources? If the answer is anything other than an unequivocal no, please provide PG&E's hourly RA price curve(s).

CalCCA to PG&E 10.12. Does PG&E take the position that technology adjusted RA MPBs should be applied to different RA resource technologies?

CalCCA to PG&E 10.13. Refer to page 2-7 at 4-15 of PG&E's Rebuttal Testimony where witness Barry discusses a calculation error when the hypothetical data center load was to be served by a CCA. Please provide all workpapers and analysis used to identify the error and quantify its impact.

CalCCA to PG&E 10.14. The table below lists a sample of PG&E's PCIA-eligible solar resources included in the 2027 forecast.

Project Name	LogNum
Agua Caliente Solar Project	33R084
AV Solar Ranch One	33R073
California Flats Solar Project	33R344
Copper Mountain Solar 2	33R166
Desert Center Solar Farm	33R138
High Plains Ranch II	33R052
Mesquite Solar 1	33R144
Northern Orchard Solar	33R551-H01
RE Astoria	33R330
Topaz Solar Farm	33R056

For each resource listed, please provide the following information by month for 2027:

a. Nameplate capacity (MW)

b. 2027 final NQC (MW) published by the CAISO

c. Peak hour RA (MW) as included in PG&E's Tables 4-6 through 4-17 (2027 BUNDLED PORTFOLIO SYSTEM RA)

CalCCA to PG&E 10.15. Referring to PG&E's Rebuttal Testimony Chapter 3 Attachment A: Please confirm that PG&E's initial bid prices for solar in November and December [redacted]

CalCCA to PG&E 10.16. Referring to PG&E workpaper 05. ERRA_2027_Forecast_WP_PGE_20260515-Ch05_4-6_4-17_5-4_5-15_5-16_5-17_RA Open Position-CONF: Please confirm that PG&E includes [redacted] of RA from PCIA-eligible solar resources during the peak load hour in January, February, March, May, November, and December. If not confirmed, please explain.

ATTACHMENT B

KEYES&FOX LLP

September 22, 2026

RE: A.26-05-007: CalCCA's PUBLIC Eleventh Data Request to PG&E

Pursuant to Article 10 of the California Public Utilities Commission's Rules of Practice and Procedure, California Community Choice Association ("CalCCA") hereby serves their Eleventh Data Request upon Pacific Gas and Electric Company ("PG&E") in the above-referenced proceeding, A.26-05-007, *Application of Pacific Gas and Electric Company for Adoption of Electric Revenue Requirements and Rates Associated with its 2027 Energy Resource Recovery Account (ERRA) and Generation Non-By passable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation (U 39 E).* CalCCA requests responses by **Thursday, September 24, 2026.**

Please send the responses containing confidential, non-public data only to Brian Dickman, Jack Buckley, Ryan Matley, Nikhil Vijaykar, Tim Lindl, Poojan Thakrar, Corey Cochran, and Alicia Zaloga as indicated in the instructions.

Please contact me with any questions or concerns regarding this matter.

Sincerely,

/s/ Nikhil Vijaykar

Nikhil Vijaykar
Poojan Thakrar
Tim Lindl
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INSTRUCTIONS

The following general instructions apply to all data requests set forth herein.

A. Consider all the Definitions and General Instructions herein to be applicable to each item of discovery submitted by the above-referenced parties.

B. These requests for documents and responses are continuing in character so as to require you to file supplemental answers as soon as possible if you obtain further or different information before or after the hearing. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.

C. Unless otherwise indicated, the documents for which production is sought shall include all documents dated, prepared, sent, or received during the designated period.

D. For each separate discovery item, identify the individual(s) responsible (whether primarily or indirectly) for providing the response. Further, please designate the proper witness, if any, to cross-examine at the hearing concerning the response. If witnesses have not yet been selected at the time a data response is provided, please supplement the response once witnesses have been selected to provide the requested information.

E. In producing documents and written responses pursuant to these discovery requests, designate and restate the request(s) and subpart(s) thereof in response to which each document or response is produced.

F. Where a document or narrative response is relevant to more than one request, a duplicate need not be provided. Where a discovery request can be answered in whole or in part by reference to a response to a preceding or subsequent discovery request (or subpart thereof), it is sufficient to indicate by specifying in the response, by number and date, which other discovery response answers it, and by specifying whether it is claimed that the response to the preceding or subsequent discovery request is a full or partial response to the current request being answered. If the latter, the response to the balance of the current discovery request shall be completed.

G. Whenever these discovery requests specifically request an answer, rather than the identification of documents, an answer is required and the production of documents in lieu thereof will not substitute for an answer.

H. If information requested is not available in the exact form requested, provide such data or documents as are available and responsive to the particular

discovery request.

I. As to any discovery request consisting of a number of separate subdivisions, or related parts, sub-parts, or portions a complete response is required to each part or portion with the same effect as if it were propounded as a separate discovery request.

J. Any objection to a discovery request should clearly indicate to which part or portion of the discovery request the objection is directed.

K. For each computer generated document identified or produced in a response, state separately (a) what types of data files are included in the input and the source thereof; (b) the computer program; (c) a description of the recordation system employed (including program description, flow charts, etc.); and (d) the identification of the person or persons, during the designated period, who were in charge of the collection of input materials, the processing of input materials, the databases utilized, and/or the programming to obtain such output.

L. If any document described in any request for documents is no longer in your possession or control, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred voluntarily or involuntarily to others; or (d) has been otherwise disposed of.

M. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it and a statement of facts constituting the justification and basis therefore.

N. If, in answering any of these discovery requests, there is deemed to be any ambiguity in interpreting either the discovery request or a definition or instruction applicable thereto, promptly call counsel to CalCCA to obtain a clarification.

O. Each document and individual response of more than one page shall be stapled or otherwise bound, and each page thereof consecutively numbered.

P. Please provide a set of responses via e-mail where appropriate, and via hard copy where appropriate, to:

Brian Dickman
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Q. If PG&E objects to any request on the ground that the information sought is irrelevant or immaterial to any issue in the above-captioned matter, please state the specific basis for such objection, including the basis for any contention that such information is or not does not appear "reasonably calculated to lead to the discovery of admissible evidence."

R. If any response requires the use of, references or otherwise includes confidential, non-public data, **please submit the confidential, non-public portion of the response only to Brian Dickman, Jack Buckley, Ryan Matley, Nikhil Vijaykar, Tim Lindl, Poojan Thakrar, Corey Cochran, and Alicia Zaloga.**

DEFINITIONS

A. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these discovery requests any information or documents which might otherwise be considered to be beyond their scope.

B. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these discovery requests any information or documents which might otherwise be considered to be beyond their scope.

C. The term "communications" includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.

D. The term "document" shall include, without limitation, all writings and records of every type in your possession, control, or custody, including but not limited to the following items, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable from discovery: computer data files, information stored in electronic media, including on computer tapes, disks, diskettes, tapes, inputs, outputs, and printouts; notes; letters; correspondence; communications; telegrams; memoranda; summaries and records of telephonic and telegraphic communications; summaries and records of personal conversations; diaries; appointment books; reports; surveys; studies; comparisons; tabulations; budgets; work papers; charts; plans; maps; drawings; engineering and other diagrams; photographs; film; microfilm; microfiche; tape and other mechanical and electrical audio and video recordings; data compilations; log sheets; ledgers; vouchers; accounting statements; books; pamphlets; bulletins; minutes and records of meetings; transcripts; stenographic records; testimony and exhibits, including work papers; copies, reports, and summaries of interviews and speeches; reports and summaries of investigations; opinions and reports of consultants; reports and summaries of negotiations; press releases; newspaper clippings; drafts and revisions of draft of documents; and any and all other records, written, electrical, mechanical, and otherwise. "Documents" shall also refer to copies of documents, every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the originals or any other copy, and all attachments or

appendices to any documents.

E. "Energy Contract" means any contract under which the IOU makes payments and seeks to recover (or has recovered) all or any part of those payments from any Community Choice Aggregator or other Load Serving Entity under an NBC.

F. "Identification" of a document includes stating: (a) the identity of each person who wrote, dictated, or otherwise participated in its preparation, (b) the location of the document; and (c) the identity of each person having custody of or control over the document. "Identification" of a document includes identifying all documents known or believed to exist, whether or not in your custody or the custody of counsel or other representatives.

G. "Identification" of a person includes stating his or her full name, most recent known business address and telephone number, present position, and prior connection to or association with any party to this proceeding, including position at the time of connection to the information requested.

H. "CalCCA" means California Community Choice Association.

I. "NBC" means any generation-related "non-bypassable" charge, including the Diablo Canyon Non-Bypassable Charge ("DCNBC"), Power Charge Indifference Adjustment ("PCIA"), the Cost Responsibility Surcharge, the Cost Allocation Mechanism, or any other existing non-bypassable charge. For purposes of these requests, "NBC" does not include any non-generation-related charges, such as charges assessed through transmission or distribution charges, or charges for public purpose programs.

J. The term "PG&E" means Pacific Gas and Electric Company, and any and all of its subsidiaries, parent companies, affiliates, present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf. "Utility" or "Company" refers to PG&E. "IOU" refers to any of the three California investor-owned utilities.

K. "Relate to," "concern," and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, or be connected with, in any way, the subject of these data requests.

L. "Related Attributes" means economically-valuable resources or elements related to any UOG Resource or any resource delivering under an Energy Contract, including, but not limited to, renewable energy credit value, capacity value, resource adequacy value, residual unit commitment payments, and so

on.

M. "Study," "studies," "analyses" or "report(s)" denotes any document, as defined above, which reflects or was utilized in the collection, evaluation, analysis, summarization, or characterization of data in connection with these requests.

N. "UOG Resource" means any electrical generation or storage facility owned by PG&E as to which the PG&E seeks to recover any part of the PG&E's costs relating to the facility from any CCA or other LSE under an NBC.

O. "Vintage" refers to a group of departing customers based on the date they leave utility bundled service so that they are responsible for generation costs incurred on their behalf before their departure to a CCA.

P. Unless otherwise provided for in these Definitions, undefined acronyms shall have the same definition as that provided within PG&E's Application 26-05-007 and PG&E's prepared testimony accompanying that application.

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Adoption of Electric Revenue Requirements and Rates Associated with its 2027 Energy Resource Recovery Account (ERRA) and Generation Non-By passable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation (U 39 E)	A.26-05-007

PUBLIC ELEVENTH DATA REQUEST OF CALCCA

CalCCA to PG&E 11.1. Refer to page 3-6 at 27:30 of PG&E's Rebuttal Testimony where it states "Under PG&E's approved interim methodology, one megawatt of peak-hour NQC generally corresponds to one megawatt of retained RA quantity, resulting in a ratio of 1.0." Under what condition or for what specific resources would one megawatt of peak hour NQC *not* correspond to one megawatt of retained RA?

CalCCA to PG&E 11.2. Refer to Table 3-1 on page 3-6 of PG&E's Rebuttal Testimony, Line No. 1. Please provide all calculations, inputs and assumptions underlying PG&E's assertion that CalCCA's proposal results in 1.62 Retained MW per MW of peak hour NQC.

CalCCA to PG&E 11.3. Refer to Chapter 3, Attachment A of PG&E's Rebuttal Testimony. Are the RA prices shown in that table presented as dollars per MW of NQC capacity? If not, please indicate the unit of capacity that is reflected in the prices in that table.

CalCCA to PG&E 11.4. Refer to Chapter 3, Attachment A of PG&E's Rebuttal Testimony which shows Initial Bid Prices for PG&E's Year-Ahead 2027 RA Solicitation. In the hypothetical situation that a PG&E would sell 100 MW of solar RA at the offered price of [redacted] would that buyer be purchasing 100 MW of RA capacity that could be used to meet its RA compliance requirements, or would that buyer be buying 100 MWs of nameplate capacity, of which some fraction could be used for RA compliance? If the latter, please indicate how the buyer would calculate the RA available for compliance from this purchase. If the response is contingent

on other factors, please describe those factors and the role they play.

CalCCA to PG&E 11.5. Refer to Chapter 3, Attachment A of PG&E's Rebuttal Testimony which shows Initial Bid Prices for PG&E's Year-Ahead 2027 RA Solicitation. In the hypothetical situation that a PG&E would sell 100 MW of Flat NQC (24x7) RA at the offered price of [redacted] would that buyer be purchasing 100 MW of RA capacity that could be used to meet its RA compliance requirements, or would that buyer be buying 100 MWs of nameplate capacity, of which some fraction could be used for RA compliance? If the latter, please indicate how the buyer would calculate the RA available for compliance from this purchase. If the response is contingent on other factors, please describe those factors and the role they play.

CalCCA to PG&E 11.6. Refer to PG&E rebuttal testimony page 3-6 lines 17-24, and Chapter 3 Attachment A: If the peak hour NQC for a stand-alone solar resource is 0 in November and December (or the 0.1 non-zero QC floor described in the CPUC RA SOD Filing Guide), does that mean a buyer of solar RA in the market for November and December would pay a total of $0 regardless of the market price (i.e. market price * 0 MW)? If no, please explain what volume denomination would be used to determine the amount paid for solar RA in November and December.

CalCCA to PG&E 11.7. Refer to PG&E's response to CalCCA DR 6-6. For each transaction selling RA from standalone solar resources, please provide the following:

a. The executed contract or other agreement detailing the commercial terms of the sale agreement.
b. Documentation demonstrating that the delivery volume is equal to the peak hour NQC of the underlying resources.
c. Documentation demonstrating the total monthly payments received by PG&E, including details of the monthly price and quantity used to determine monthly payments.