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ALJ : \_\_\_\_\_  
Witness : Michael Tan



**PUBLIC ADVOCATES OFFICE  
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**MONITORING AND EVALUATION REPORT**

**Pacific Gas and Electric Company's  
Core Procurement Incentive Mechanism**

**CPIM Year 29  
November 1, 2021 through October 31, 2022**

**Application 96-08-043**

San Francisco, California  
July 21, 2025

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# CHAPTER 1

## SUMMARY AND RECOMMENDATIONS

### 1.1 Introduction and Summary

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) performed an audit and evaluation of the data and documents submitted by Pacific Gas and Electric Company (PG&E) for its Core Procurement Incentive Mechanism (CPIM) Annual Performance Reports for the period November 1, 2021, through October 31, 2022 (Year 29). Chapter 2 of this report presents the details and results of Cal Advocates' review. Cal Advocates' evaluation of PG&E's recorded natural gas costs confirms that PG&E's costs were below the benchmark for CPIM Year 29, which resulted in ratepayer savings.

PG&E submitted its CPIM Performance Report on April 19, 2024, which covered the period of November 1, 2021, through October 31, 2022. Cal Advocates' examination of PG&E's recorded costs for CPIM Year 29 shows that PG&E's actual gas costs were within the benchmark's lower tolerance band, which results in no reward to PG&E's shareholders and a ratepayer benefit of \$4,213,644.<sup>1</sup>

### 1.2 Background

The objective of the CPIM is to provide PG&E an incentive to reduce natural gas procurement costs. These costs include fixed transportation costs for Canadian and U.S. interstate, intrastate, and reservation charges. Other procurement costs include pipeline volumetric transportation costs, natural gas storage costs, and hedge costs. The incentive mechanism is used as a ratemaking tool and is designed to increase efficiency in administering regulatory controls.

The CPIM structure establishes procedures on performance evaluation and reporting for PG&E's gas procurement costs. It sets forth guidelines for standard operating conditions and for special circumstances. The allowed monthly benchmark

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<sup>1</sup> See calculation on Cal Advocates CPIM Year 29 Report, Table 1-1.

dollars are totaled over the annual CPIM period and compared to actual costs for the year to determine PG&E's performance. A tolerance band is constructed around the benchmark and defines a range of costs considered reasonable. If PG&E's actual gas costs as measured against the CPIM benchmark are between the upper and lower limit specifications for the tolerance band, there is no shareholder reward or penalty for the CPIM period. If actual costs fall outside the tolerance band, there will be sharing of the gains or losses that occur outside the tolerance band between ratepayers and PG&E shareholders. In Chapter 2 of this report, Cal Advocates presents detailed results of the tolerance band calculation.

The CPIM program was originally approved by the California Public Utilities Commission (Commission) in Decision (D.) 97-08-055 as set forth in the PG&E/ORA<sup>2</sup> Post-1997 CPIM Agreement and PG&E's Supplemental Report describing the Post-1997 CPIM. This decision established the framework to recover core gas procurement and transportation costs through rates. Since then, numerous changes and extensions have been made to modify and refined the CPIM program structure and incentives.

In D.07-06-013, the Commission approved a settlement agreement between PG&E, Cal Advocates, The Utility Reform Network (TURN), and Aglet Consumer Alliance (Aglet). The settlement modified the CPIM to increase benefits to ratepayers in situations where natural gas purchases are less than the lower range of the tolerance band. The specific CPIM changes that resulted from the settlement agreement included:

- A 20/80 shareholder/ratepayer sharing of savings below the tolerance band, in contrast to the previous 25/75 shareholder/ratepayer sharing;
- The 2.5 Billion cubic feet (Bcf) of un-sequenced storage withdrawal adjustment was eliminated and is included proportionately to the storage withdrawal sequence;
- A change in the sequencing steps for San Juan Basin and AECO for natural gas purchases;

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<sup>2</sup> The Office of Ratepayer Advocates (ORA) was renamed the Public Advocates Office of the California Public Utilities Commission pursuant to Senate Bill No. 854, which was signed by the Governor on June 27, 2018 (Chapter 51, Statutes of 2018).

- A savings of five percent from full tariff rates on pipeline or storage contracts to offset CPIM gas costs;
- A change in the index used to calculate the benchmark for daily swing from the NGI daily Topock index to the NGI daily PG&E Citygate index;
- For storage acquired via the Incremental Storage Capacity Request for Offers process, the daily benchmark will be adjusted to accommodate the incremental storage injection and withdrawal requirements to improve savings in gas costs.

In D.10-01-023, the Commission adopted a settlement agreement between PG&E, Cal Advocates, and TURN which addressed the treatment of hedging costs for PG&E. The key provisions of the adopted settlement call for the following treatment of hedging transactions:

- 80% of net realized gains or losses and associated transaction costs will be included in the CPIM benchmark;
- 100% of the net hedging realized gains or losses and associated transaction costs will be included in the cost side of the CPIM calculation. Any gains will be subtracted, and losses will be added to CPIM costs;
- A modification to the CPIM sharing mechanism such that total shareholders earnings will be capped solely at 1.5 percent of annual gas commodity costs and a removal of the dollar cap of \$25 million on shareholder gains effective November 1, 2009.

In D15-10-050, the Commission adopted a new interstate pipeline capacity range for PG&E's core customers and the Core Transport Agents (CTAs)<sup>3</sup>. PG&E established an April through October interstate pipeline capacity range between 80% and 105% of forecast average annual daily core demand, and between 100% and 115% for November through March. Later, in D.19-09-025, the GT&S Rate Case Final Decision, the Commission approved a new interstate pipeline capacity range: the

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<sup>3</sup> Core Transport Agents provide retail procurement service to core customers who choose to opt out of PG&E service.

winter range maximum increased from 115% to 162% of the average annual daily core demand, and the March range minimum was reduced from 100% to 80% of the average annual daily demand.

In D.19-09-025, the Commission adopted the modifications of CPIM in the pipeline sequence, storage profile, benchmark load and storage inventory requirements. A Memorandum of Understanding (MOU) for the CPIM modification was signed by Cal Advocates and PG&E's Core Gas Supply (CGS) unit, becoming effective on July 3, 2020.<sup>4</sup>

### **1.3 Procurement and Sales**

For the CPIM Year 29 period, PG&E's recorded actual commodity gas costs (excluding transportation, hedging, and storage costs) for core customers totaled \$1,572,203,314 which was associated with a purchase volume of 290,955,106 MMBtus.<sup>5</sup>

PG&E utilizes gas sales on a daily basis to help manage its assets and reduce gas costs. It purchases and sells gas supplies to comply with daily pipeline balancing requirements, responds to changes in core loads, and captures price arbitrage opportunities. For CPIM Year 29, PG&E reported total gas sales of (\$389,059,977) in revenue with an associated sales volume of (60,257,642) MMBtus.<sup>6</sup>

### **1.4 Financial Hedging Activities**

Per D.07-06-013, all derivative gains, losses, and related transaction costs associated with PG&E's winter hedging plan were excluded from CPIM costs. These costs flowed directly to PG&E's retail customers. D.07-06-013 authorized PG&E, under the terms of the settlement, to place financial hedges on a rolling three-year basis via an Annual Plan filing. PG&E was required to file five Annual Plans beginning

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<sup>4</sup> See Advice Letter for MOU Between PG&E CGS and the CPUC Public Advocates Office (PG&E Advice Letter 4271G, effective July 03, 2020).

<sup>5</sup> See Cal Advocates CPIM Year 29, Exhibits 2-5 and 2-16.

<sup>6</sup> Id., Exhibits 2-7 and 2-17.

with the 2007/2008 winter season, that authorized a hedging plan for the current winter season and the subsequent two winter seasons. In addition, the settlement created a Core Hedging Advisory Group where Cal Advocates, Aglet, TURN and PG&E met quarterly to discuss PG&E's Annual Plan, and related hedging operations. By April 1 of each year, PG&E is required to report the financial results of its Annual Plan including total funds spent on hedging instruments, total losses and gains for each category of hedging instrument, amount of monthly natural gas supplies hedged, and the impact of hedging results on customer rates.<sup>7</sup>

Pursuant to D.10-01-023, PG&E remains responsible for managing hedges proactively to ensure stability in customer rates. This includes implementing controls and selecting appropriate hedging instruments to mitigate derivative risks. PG&E is also required to take proactive steps by adjusting its hedging positions in response to changing market conditions.

On January 25, 2010, the Commission approved D.10-01-023 and the associated Settlement Agreement, which requires eighty percent (80%) of winter hedging gains and losses and related transaction costs to be included in the CPIM benchmark. The Settlement Agreement also requires one hundred percent (100%) of winter hedging gains and losses and related transaction costs be included in the CPIM actual commodity costs. These changes were incorporated starting in CPIM Year 18.

For the current CPIM Year 29, the total costs of winter hedges included in the CPIM were \$3,457,713 which was comprised of \$19,609,296 in option premiums, (\$16,179,296) in option and swap settlements, and \$27,713 in commissions and fees.<sup>8</sup>

## **1.5 Natural Gas Storage**

Pursuant to D.06-07-010 and D.07-06-013, PG&E is authorized to acquire incremental storage to meet a 1-day-in-10-year peak-planning standard for its core customers. The incremental storage costs are included in the benchmark and

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<sup>7</sup> Settlement Agreement – Regarding PG&E Long-Term Core Hedge Program (A.06-05-007), the Core Procurement Incentive Mechanism (CPIM), and Transportation Capacity held on Behalf of Core Customers, December 15, 2006.

<sup>8</sup> See Cal Advocates CPIM Year 29, Exhibits 2-10.

inventory schedules and are adjusted by the number of injections and withdrawals daily. This enables PG&E to track costs for the benchmark and adjust the amount of daily actual incremental natural gas injection and withdrawals.

Under the CPIM, PG&E would use a daily injection and withdrawal schedule for managing core customer demands and balancing purposes. For CPIM Year 29, beginning inventory including incremental storage was reported at 15,666,393 MMBtus, and ending inventory was 15,137,432 MMBtus.<sup>9</sup>

## **1.6 Core Intrastate and Interstate Capacity**

Pursuant to D.04-12-050, the Commission allowed PG&E's Core Procurement Department (since renamed Core Gas Supply) to recover costs for firm reservation of intrastate backbone pipeline capacity. In the current CPIM, PG&E holds core intrastate capacity on Redwood Path and Baja Path. Redwood path capacity provides approximately 605 MDth/d annually, two seasonal contracts provide approximately 250 and 100 MDth/d during varies months; Baja path capacity is a Seasonal contract providing approximately 300 MDth/d.<sup>10</sup>

PG&E holds interstate capacity for the core on NOVA Gas Transmission Ltd. (NGTL/NOVA), Foothills Pipelines, Ltd. (Foothills), Gas Transmission Northwest (GTN), El Paso Natural Gas Company LLC(El Paso), and Ruby Pipeline, LLC. (Ruby).

For CPIM Year 29, core interstate capacity was reported as approximately NGTL contracts for total 370 MDth/d; Foothills contracts for total of 366 M Dth/d; GTN contracts for total of 360 MDth/d effective Nov 1, 2020, through Oct 31, 2027. Ruby contracts for total of 250 MDth/d; Addition winter season contract for 162MDth/d with El Paso Pipeline effective Nov 1, 2020 through Mar 31, 2023.<sup>11</sup>

## **1.8 Review of CPIM Performance**

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<sup>9</sup> See calculation on Cal Advocates CPIM Year 29 Report, Table 2-5.

<sup>10</sup> See PG&E Annual Performance Report, Year 29, page 19.

<sup>11</sup> Id.

Table 1-1 below compares benchmark gas costs to actual costs of natural gas (including commodity, transportation, hedges, reservation, and storage costs) in total dollars.

<b>Table 1-1</b> <b>Pacific Gas and Electric Company</b> <b>CPIM Year 29</b> <b>Gas Costs Comparison</b> <b>November 1, 2021 - October 31, 2022</b>		
Benchmark Gas Costs	\$ 1,545,501,601	
Actual Gas Costs	\$ 1,541,287,953	
Cal Advocates Audited Total Savings		\$ 4,213,648
PG&E Reported Savings		4,213,644
Variance		4
Rounding		(4)
Total Variance		\$ -
Savings and Rewards		
<b>Ratepayer Savings</b>		\$ 4,213,644
<b>Shareholder Rewards</b>		\$ -
CPIM Savings		\$ 4,213,644

Source: See Cal Advocates CPIM Report, Exhibits 2-1.

For the CPIM Year 29, Cal Advocates found no material variance for PG&E reported savings and Cal Advocates audited total savings. For this period, the total saving for the period is \$ 4,213,644. The ratepayer benefit associated with the total savings amounts to \$4,213,644. Because the total saving is within the tolerance band, there is no PG&E shareholder reward.

### 1.9 Conclusion: CPIM Year 29

Based on the foregoing, Cal Advocates recommends that no shareholder reward for CPIM Year 29 be recovered through PG&E's Purchased Gas Account. Cal Advocates will continue to monitor and evaluate the CPIM and identify any modifications needed to enhance the CPIM's effectiveness.

**CHAPTER 2**  
**MONITORING AND EVALUATION AUDIT**  
**YEAR 29**

**2.1 Cal Advocates' CPIM Reward Evaluation**

On April 19, 2024, PG&E filed its CPIM Performance Report, Year 29, in compliance with the Gas Accord Decision (D.) 97-05-055(A.96-08-043). The Year 29 CPIM Performance Report covers natural gas procurement results for the period from November 1, 2021 through October 31, 2022. Cal Advocates conducted a review and evaluation of PG&E's accompanying performance report. The results from this evaluation include work papers from Cal Advocates' compilations, which are incorporated as exhibits in Appendix A.

On August 22, 2002, the Commission issued D.02-08-070, the Gas Accord II Decision, extending the initial Gas Accord market structure including the CPIM, through 2003. On December 18, 2003, the Commission issued D.03-12-061, extending the CPIM through Year 2005, or until a revised CPIM is adopted by the Commission. Pursuant to D.07-06-013, the Commission adopted a Settlement Agreement that address long-term hedging for PG&E's core customers, as well as CPIM related modifications.

The CPIM report summarizes gas costs, tolerance band limits, and performance results that compare actual costs to the benchmark. The CPIM benchmark consists of four components: a) variable costs which include commodity costs, Canadian and U.S. interstate, and California intrastate pipeline fuel and volumetric capacity costs; b) fixed transportation costs which include Canadian, U.S. interstate, and California intrastate reservation costs; c) storage costs for fixed reservation charges and variable costs; and d) Hedging costs which included 80% of net realized gains or losses and associated transaction costs of winter hedges. The total combined cost of these four components serves as the benchmark to compare to the actual costs.

The actual commodity costs of gas are measured on an annual basis against the benchmark and the calculated tolerance band. The benchmark commodity cost is

based on the prevailing published natural gas price indices for gas delivered from the gas production areas, borders, and PG&E's Citygate.

PG&E's CPIM Year 29 performance as set forth in Table 2-1 shows total benchmark costs of \$1,545,501,601 and PG&E's total actual costs of \$1,541,287,953. The difference between the total benchmark costs and PG&E's total actual costs results in a total of \$4,213,648 in natural gas procurement savings. The calculation of the shared savings between PG&E's customers and shareholders is shown in Table 2-1.

<p><b>TABLE 2-1</b>  <b>Pacific Gas &amp; Electric Company</b>  <b>Ratepayer Savings and Shareholder Award Calculation</b>  <b>CPIM 29</b>  <b>November 1, 2021 Through October 31, 2022</b></p>
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<b>CPIM Reward Calculation</b>	
Total Benchmark Costs	\$ 1,545,501,601
Total Actual Costs	<u>\$ 1,541,287,953</u>
Under/(Over)	\$ 4,213,648
Upper Tolerance Band (Benchmark + 2% of Commodity Cost)	\$ 1,570,555,980
Lower Tolerance Band (Benchmark - 1% of Commodity Cost)	\$ 1,532,974,412
Cap On Shareholder Reward=1.5% of commodity costs:	
Total Commodity Costs	<u>\$ 1,248,664,001</u>
CPIM Year 29 Shareholder Award After 1.5% Cap	<u>\$ 18,729,960</u>
Total Shareholders' share:	\$ 4,213,648
Total Ratepayers' share:	<u>\$ -</u>
<b>Total Savings:</b>	<b><u>\$ 4,213,648</u></b>
Rounding:	\$ 4
PG&E Reported Savings:	\$ 4,213,644
Variance:	\$ -

Source: See Cal Advocates CPIM Report, Exhibits 2-1.

## 2.2 Summary of Benchmark and Actual Costs

The overall annual results of the actual commodity costs compared to the benchmark commodity costs of gas operation are summarized in Table 2-2. Cal Advocates examined and reconciled all gas commodity costs, hedging costs, and transportation reservation charges that were reported in the current CPIM period. The natural gas sale and miscellaneous costs and revenues are included in the actual costs as costs or credits depending on the result of natural gas operation. The following sections in this chapter provide a detailed review and breakdown of these related costs.

<b>Table 2-2</b>			
<b>Pacific Gas &amp; Electric Company</b>			
<b>Summary of Benchmark and Actual Costs</b>			
<b>CPIM 29</b>			
<b>November 1, 2021 Through October 31, 2022</b>			
	<b>Actual Costs</b>	<b>Benchmark Costs</b>	<b>Under/(Over)</b>
Purchased Gas Costs	\$ 1,572,203,314	\$ 1,249,806,767	\$ (322,396,547)
Volumetric Transportation Costs	\$ 53,852,268	\$ -	\$ (53,852,268)
Gas Sales	\$ (389,059,977)	\$ -	\$ 389,059,977
Other Costs and Revenues	\$ 8,064,683	\$ -	\$ (8,064,683)
Hedge Costs	\$ 3,457,713	\$ 2,766,168	\$ (691,545)
Reservation Charges	\$ 239,062,067	\$ 239,062,067	\$ -
Custom and Border Protection Fee	\$ 146,000	\$ 146,000	\$ -
Discount	\$ (64,478)	\$ -	\$ 64,478
Capacity Release Revenues	\$ (94,236)	\$ -	\$ 94,236
Storage Costs	\$ 53,720,599	\$ 53,720,599	\$ -
<b>Total</b>	<b>\$ 1,541,287,953</b>	<b>\$ 1,545,501,601</b>	<b>\$ 4,213,648</b>

Source: See Cal Advocates CPIM Report, Exhibits 2-2.

### **2.3 Review of Benchmark Commodity and Reservation (Demand) Charges**

The total benchmark commodity costs consist of three main components, benchmark gas costs, other costs, and benchmark reservation costs. Table 2-3 shows a breakdown for total benchmark commodity costs of \$1,545,501,601. Cal Advocates confirmed the total benchmark gas costs of \$1,249,806,767, the other costs of \$2,912,168, and total benchmark reservation charges of \$292,782,666.

**TABLE 2-3**  
**Benchmark Commodity Costs and Reservation Charges**  
**CPIM Year 29**  
**November 1, 2021 Through October 31, 2022**

	Market	
	Benchmark	*Reference
<b>Benchmark Purchased Gas Costs - by Pipelines:</b>		
Ruby	\$ 393,534,705	2-14
Nova	\$ 493,096,480	2-14
El Paso	\$ 72,330,278	2-14
Malin	\$ 143,671,812	2-14
Topock	\$ 47,239,839	2-14
Citygate	\$ 99,933,653	2-14
<b>Total Benchmark Gas Costs:</b>	<b>\$ 1,249,806,767</b>	
<b>Other Costs</b>		
80% of Winter Hedging Cost	\$ 2,766,168	2-15
MPF	\$ 146,000	2-19
<b>Total Other Costs</b>	<b>\$ 2,912,168</b>	
<b>Benchmark Reservation Charges:</b>		
El Paso Natural Gas Company	\$ 6,234,323	2-8
Gas Transmission Northwest Corp	\$ 26,728,027	2-8
Pacific Gas and Electric Company	\$ 130,028,056	2-8
Ruby Pipeline	\$ 51,579,857	2-8
Transcanada Foothills Pipelines Ltd	\$ 7,443,398	2-8
Transcanada Nova Gas Transmission Ltd	\$ 17,048,406	2-8
Storage	\$ 53,720,599	2-13
<b>Total Benchmark Reservation Charges:</b>	<b>\$ 292,782,666</b>	
<b>Total Benchmark Commodity Costs:</b>	<b>\$ 1,545,501,601</b>	

\*Source: See Cal Advocates CPIM Report, Exhibits.

## 2.4 Actual Natural Gas Costs

A review of actual costs for commodity purchases and reservation charges reported by PG&E is summarized in Table 2-4. On a monthly basis, PG&E will sell some of its unused assets. The net sale is treated as a credit to the procurement costs. In addition to the calculation of actual commodity costs of CPIM, one hundred percent of winter hedging realized gains or losses and associated transaction costs are included in the actual costs. Reservation charges include intrastate and interstate charges which include PG&E's California Gas Transmission, El Paso Natural Gas

Company LLC, Foothills Pipe Line Ltd., Nova Gas Transmission, Ltd., Gas Transmission Northwest Corporation, and Ruby Pipeline LLC,<sup>12</sup>

PG&E's net total actual commodity costs are \$1,541,287,953, which include interstate and intrastate purchased gas costs of \$1,236,995,613, other costs of 11,668,396, and reservation charges of \$292,623,952.

**TABLE 2-4**  
**Summary of Actual Commodity Costs & Reservation Charges**  
**CPIM Year 29**  
**November 1, 2021 Through October 31, 2022**

<b>Actual Purchased Gas Costs - by Pipeline:</b>	<b>Actual Costs</b>	<b>*Reference</b>
CGT - Citygate	\$ 182,874,672	2-5
CGT	\$ 50,777,948	2-5
El Paso	\$ 114,732,137	2-5
GTN	\$ 274,060,942	2-5
Nova	\$ 477,712,451	2-5
Ruby	\$ 307,032,731	2-5
WFS	\$ 164,896,366	2-5
Kern	\$ 116,067	2-5
Volumetric Transportation Cost	\$ 53,852,268	2-6
Gas Sale	\$ (389,059,969)	2-7
<b>Total Purchased Gas Costs:</b>	<b>\$ 1,236,995,613</b>	
<b>Other Costs:</b>		
100% Winter Hedging Cost	\$ 3,457,713	2-10
MPF	\$ 146,000	2-19
Miscellaneous Costs & Revenues	\$ 8,064,683	2-9
<b>Total Other Costs:</b>	<b>\$ 11,668,396</b>	
<b>Actual Reservation Charges:</b>		
El Paso Natural Gas Company LLC	\$ 6,234,323	2-8
Foothills Pipelines Ltd	\$ 7,443,398	2-8
Nova Gas Transmission Ltd	\$ 17,048,406	2-8
Gas Transmission Northwest Corp	\$ 26,728,027	2-8
Ruby Pipeline	\$ 51,579,857	2-8
PG&E's California Gas Transmission	\$ 130,028,056	2-8
Storage Costs	\$ 53,720,599	2-13
Discount Demand Charges	\$ (64,478)	2-11
Capacity Release Revenue	\$ (94,236)	2-12
<b>Total Reservation Charges:</b>	<b>\$ 292,623,952</b>	
Rounding:	\$ (8)	
<b>Net Actual Commodity Costs:</b>	<b>\$ 1,541,287,953</b>	

\*Source: See Cal Advocates CPIM Report, Exhibits

<sup>12</sup> PG&E Annual Performance Report, CPIM Year 29, page 11.

## 2.5 Natural Gas Storage Costs

In accordance with D.06-07-010, PG&E uses a monthly distribution of winter storage withdrawals and summer storage injections in the calculation of the monthly benchmark purchase volumes. PG&E reports on its managed storage so that impacts to CPIM metrics can be attained while ensuring adequate capacity is available for reliability. PG&E also uses a schedule to establish daily benchmark allocations of injections and withdrawals and to ensure distributions are allocated evenly throughout the period. When it becomes necessary to balance portfolio supplies with core loads, PG&E will generally make exceptions from its planned schedules to meet interstate and intrastate pipeline tolerances, balancing rules, and most importantly, conservation of gas for storage and peak requirements.<sup>13</sup>

In Table 2-5, a summary of storage inventory shows the status of physical inventories (measured in MMBtus) for beginning and ending balances for core customers. PG&E reported beginning storage inventory levels as of November 1, 2021, at 15,666,393 MMBtus and ending inventory as of October 31, 2022 at 15,137,432 MMBtus.

<b>TABLE 2-5</b> <b>Pacific Gas and Electric Company</b> <b>Summary of Storage Inventory Injections and Withdrawals</b> <b>CPIM Year 29</b> <b>November 1, 2021 Through October 31, 2022</b>		
<b>Gas Storage Providers</b>	<b>Beginning Inventory 11/01/21 (MMBtus)</b>	<b>Ending Inventory 10/31/22 (MMBtus)</b>
Firm Storage CGT	15,666,393	15,137,432
Incremental Storage	0	0
<b>Total Storage Inventory</b>	<b>15,666,393</b>	<b>15,137,432</b>

Source: See Cal Advocates CPIM Report, Exhibits 2-20.

## 2.6 Review of Purchase Gas Account (PGA)

<sup>13</sup> See PG&E Annual Performance Report, Year 29, p.13-16.

PG&E submitted its reconciliation of its regulatory balancing account, the Purchase Gas Account (PGA). For the reporting period, PG&E's accounting entries represent amounts expected to be received from, or refunded to, PG&E's customers through authorized adjustments within a twelve-month period. The PGA shows the tracking of gas related costs and revenues for recovery. The under-or-over collected position of this account is dependent upon the seasonality and volatility in gas volumes. Table 2-6 below illustrates net commodity costs, which shows immaterial timing difference with supporting documentation presented in PG&E's Performance Report, for actual natural gas purchases.<sup>14</sup>

As part of the PGA audit, Cal Advocates selected three months in the CPIM period, December 2021, March 2022, and September 2022 to review PG&E's supporting records. PG&E provided copies of supporting documents and purchase invoices for the purpose of the verification. Cal Advocates traced the costs of these purchase invoices to the monthly statement and then to the annual report and determined that the selected purchase invoices reconciled with recorded amounts in the annual report.

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<sup>14</sup> See PG&E July 16, 2024 Response to Cal Advocates Date Request A.96-08-04\_CPIM Year 29\_01\_Q6 issued July 1, 2024.

**TABLE 2-6**  
**Pacific Gas and Electric Company**  
**Purchase Gas Account Review**  
**CPIM Year 29**

**November 1, 2021 through October 31, 2022**

<b>CPIM Purchase Costs</b>	<b>Commodity Purchases</b>	<b>Volumetric Transportation</b>	<b>Subtract True-up</b>	<b>Add True-up</b>	<b>Total CPIM</b>
CPIM Costs:					
Purchases and Sales:	\$ 1,183,143,342	\$ 53,757,044			\$ 1,236,900,386
Cochrane Extraction Rev	\$ (5,260,287)				\$ (5,260,287)
<b>SubTotal</b>	<b>\$ 1,177,883,055</b>	<b>\$ 53,757,044</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 1,231,640,099</b>
Misc. Revenues and Expenses	\$ 484,388				\$ 484,388
<b>Total</b>	<b>\$ 1,178,367,443</b>	<b>\$ 53,757,044</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 1,232,124,487</b>
SAP Journal Entries:					
SAP Total	\$ 1,261,387,443	\$ 53,923,416	\$ (208,771,896)	\$ 125,585,523	\$ 1,232,124,486
<b>Total PGA</b>	<b>\$ 1,261,387,443</b>	<b>\$ 53,923,416</b>	<b>\$ (208,771,896)</b>	<b>\$ 125,585,523</b>	<b>\$ 1,232,124,486</b>
<b>Timing Difference</b>	<b>\$ (83,020,000)</b>	<b>\$ (166,372)</b>	<b>\$ 208,771,896</b>	<b>\$ (125,585,523)</b>	<b>\$ 1</b>

## 2.7 Review of Core Pipeline Demand Charge Account (CPDCA)

As part of the CPIM Year 29 filing, PG&E submitted its reconciliation for regulatory balancing account Core Pipeline Demand Charge Account (CPDCA). This account is used to record costs associated with backbone transmission, interstate capacity, and Canadian capacity for core procurement. Cal Advocates reviewed PG&E's documentation, which shows total charges by pipeline for the period to be \$292,719,156.<sup>15</sup>

Cal Advocates' audit showed the CPIM demand costs were \$292,719,156 which included demand charges, discount demand charges, capacity release revenue and release revenue charges. When Cal Advocates compared the reported CPIM demand costs to the SAP journal entries, no material difference is found.

<sup>15</sup> See PG&E July 16, 2024 Response to Cal Advocates Date Request A.96-08-04\_CPIM Year 29\_01\_Q07 issued July 1, 2024.

<b>TABLE 2-7</b> <b>Pacific Gas and Electric Company</b> <b>CPDCA and CFSA Accounts Review</b> <b>CPIM Year 29</b> <b>November 1, 2021 through October 31, 2022</b>				
CPIM Demand Costs	Demand Charges	Subtract True-up	Add True-up	Total CPIM
Foothills Pipe Lines Ltd	\$ 7,443,395			\$ 7,443,395
California Gas Transmission	\$ 153,384,624			\$ 153,384,624
El Pas Natural Gas	\$ 6,075,605			\$ 6,075,605
Ruby Pipeline	\$ 51,580,752			\$ 51,580,752
Third Party Gas Storage	\$ 30,458,347			\$ 30,458,347
NOVA Gas Transmission	\$ 17,048,405			\$ 17,048,405
Gas Transmission	\$ 26,728,028			\$ 26,728,028
<b>Total Demand Charges:</b>	<b>\$ 292,719,156</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 292,719,156</b>
SAP Journal Entries				
Total SAP Entries	\$ 293,191,036	\$ (27,963,379)	\$ 27,491,500	\$ 292,719,157
<b>Total CPDCA:</b>	<b>\$ 293,191,036</b>	<b>\$ (27,963,379)</b>	<b>\$ 27,491,500</b>	<b>\$ 292,719,157</b>
<b>Timing Difference:</b>	<b>\$ (471,880)</b>	<b>\$ 27,963,379</b>	<b>\$ (27,491,500)</b>	<b>\$ (1)</b>

## 2.8 Review of Miscellaneous Costs and Revenues

Table 2-8 shows a summary of miscellaneous costs and revenues from PG&E's Annual Performance Report for the period. The revenues in this section also offset reported procurement costs and assist management in managing net costs that impact CPIM performance. Results show total annual miscellaneous costs and revenues at \$8,064,683. This amount consists of cochrane extraction revenue of (\$5,260,287), non-winter hedge cost and revenues of \$12,855,995, and miscellaneous costs and revenues of \$468,975.

**TABLE 2-8**  
**Pacific Gas and Electric Company**  
**Miscellaneous Costs and Revenues**  
**CPIM Year 29**  
**November 1, 2021 through October 31, 2022**

Month	Cochrane Extraction Revenue	Non-Winter Hedge Cost and Revenues	Miscellaneous Costs and Revenues	Total
Nov-21	\$ (355,728)	\$ 515,603	\$ 57,089	\$ 216,964
Dec-21	\$ (425,718)	\$ (75,916)	\$ 55,806	\$ (445,828)
Jan-22	\$ (563,964)	\$ (7,916,412)	\$ 55,960	\$ (8,424,416)
Feb-22	\$ (515,377)	\$ (403,963)	\$ 60,206	\$ (859,134)
Mar-22	\$ (586,146)	\$ (153,644)	\$ 50,185	\$ (689,605)
Apr-22	\$ (484,488)	\$ (192,375)	\$ 35,218	\$ (641,645)
May-22	\$ (433,193)	\$ (298,065)	\$ 57,279	\$ (673,979)
Jun-22	\$ (462,349)	\$ (2,413,425)	\$ 34,719	\$ (2,841,055)
Jul-22	\$ (366,626)	\$ 6,836,167	\$ 39,038	\$ 6,508,579
Aug-22	\$ (386,746)	\$ 10,508,512	\$ 34,871	\$ 10,156,637
Sep-22	\$ (359,666)	\$ 5,154,750	\$ (7,694)	\$ 4,787,390
Oct-22	\$ (320,286)	\$ 1,294,763	\$ (3,702)	\$ 970,775
<b>Total</b>	\$ (5,260,287)	\$ 12,855,995	\$ 468,975	\$ 8,064,683

Source: See Cal Advocates CPIM Report, Exhibits 2-9.

## 2.9 Examination of Financial Derivatives

Pursuant to D.07-06-013, the Commission authorized PG&E's Annual Core Hedge Implementation Plan for 2008 for long term hedging for purchases of call options and swaps for a three-year period. This decision provided guidelines for the long-term core hedging program as well as reporting requirements.

In D.10-01-023, the Commission approved a policy incorporating winter hedging transactions into the CPIM. The winter hedging transactions executed on or after November 1, 2009, would be included in PG&E's CPIM calculation beginning on or after November 1, 2010. CPIM Year 18 was the first year to include the winter hedging costs and this change was adopted for future CPIM calculations. The financial results for the winter 2021-2022 are summarized in Table 2-9.

PG&E reported \$3,457,713 in CPIM Year 29 for actual winter hedging costs. The total option premiums costs are \$19,609,296, Option and Swap Settlement are(\$16,179,296), and commission and fees are \$27,713.

<p><b>Table 2-9</b>  <b>Pacific Gas and Electric Company</b>  <b>Winter Hedge Costs</b>  <b>CPIM Year 29</b>  <b>November 1, 2021 - October 31, 2022</b></p>
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	Option Premiums	Option and Swap Settlements	Commissions and Fees	Winter Hedge Cost Total
<b>Nov-21</b>	\$ -	\$ -	\$ -	\$ -
<b>Dec-21</b>	\$ 4,956,203	\$ (3,328,625)	\$ 8,306	\$ 1,635,884
<b>Jan-22</b>	\$ 7,699,083	\$ (10,793,425)	\$ 10,590	\$ (3,083,752)
<b>Feb-22</b>	\$ 6,954,010	\$ (2,057,246)	\$ 8,817	\$ 4,905,581
<b>Mar-22</b>	\$ -	\$ -	\$ -	\$ -
<b>Apr-22</b>	\$ -	\$ -	\$ -	\$ -
<b>May-22</b>	\$ -	\$ -	\$ -	\$ -
<b>Jun-22</b>	\$ -	\$ -	\$ -	\$ -
<b>Jul-22</b>	\$ -	\$ -	\$ -	\$ -
<b>Aug-22</b>	\$ -	\$ -	\$ -	\$ -
<b>Sep-22</b>	\$ -	\$ -	\$ -	\$ -
<b>Oct-22</b>	\$ -	\$ -	\$ -	\$ -
<b>Total</b>	\$ 19,609,296	\$ (16,179,296)	\$ 27,713	\$ 3,457,713

Source: See Cal Advocates CPIM Report, Exhibits 2-10.

**2.10 Review of Sales and Volume Transactions**

Table 2-10 shows PG&E’s total sales of (\$389,059,985), and total reported volume of (60,257,642) MMBtus.

<p><b>Table 2-10</b>  <b>Pacific Gas and Electric Company</b>  <b>Gas Sales and Volumes</b>  <b>CPIM Year 29</b>  <b>November 1, 2021 through October 31, 2022</b></p>
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<b>Sale by Pipeline:</b>	<b>Volume (MMBtus)</b>	<b>Dollars</b>
CGT Citygate	(29,400,361)	\$ (226,082,862)
CGT - All	(2,679,563)	\$ (13,788,203)
El Paso	(8,761,291)	\$ (44,600,528)
GTN	(5,551,153)	\$ (33,401,496)
Kern	(1,812,455)	\$ (10,202,627)
Nova	(4,706,277)	\$ (17,246,189)
Ruby	(784,003)	\$ (4,355,805)
WFS	(6,562,539)	\$ (39,382,267)
<b>Total:</b>	(60,257,642)	\$ (389,059,977)
<b>Rounding:</b>		\$ (8)
		\$ (389,059,985)
*Reference	2-17	2-7

\*Source: See Cal Advocates CPIM Report, Exhibits.

**2.11 Review of Volumetric Transport Costs**

Table 2-11 provides a summary of PG&E's reported volumetric transportation costs by pipelines. It shows that trends in transport activity are consistent with purchase and sales transactions.

The total volumetric transport costs were \$53,852,268. In addition, costs were broken down by pipeline: PG&E CGT \$49,839,248, El Paso \$133,279, GTN \$1,137,566, Ruby Pipeline \$2,518,058, WFS \$133,750, and ISP \$90,367. These costs are included in the CPIM and are part of the reconciliation of the PGA balancing account.

**TABLE 2-11**  
**Pacific Gas and Electric Company**  
**Commodity Volumetric Transport Costs**  
**CPIM Year 29**  
**November 1, 2021 through October 31, 2022**

Pipeline	Costs	*Reference
PG&E CGT	\$ 49,839,248	
El Paso	\$ 133,279	
GTN	\$ 1,137,566	
Ruby Pipeline	\$ 2,518,058	
Transwestern	\$ -	
WFS	\$ 133,750	
ISP	\$ 90,367	
<b>Total Volumetric Transport Costs:</b>	<b>\$ 53,852,268</b>	2-6

\*Source: See Cal Advocates CPIM Report, Exhibits.

**2.12 Review of Reservation Charges**

To identify any variances, Cal Advocates performed a reconciliation of the benchmark reservation charges to the actual reservation charges reported in PG&E's Annual Performance Report for the subject period. Table 2-12 provides a summary of adjustments that were offset against the benchmark. The results show no discrepancies. The reconciliation account for actual reservation charges was \$175,623,952 which included total actual demand charges of \$122,062,067, adjustments of demand charges discount of (\$64,478), capacity release revenue of (\$94,236), and storage costs of \$53,720,599.

**TABLE 2-12**  
**Pacific Gas and Electric Company**  
**Reconciliation of Reservation Charges**  
**CPIM Year 29**  
**November 1, 2021 through October 31, 2022**

<b>Actual Demand Charges by Pipeline System:</b>	<b>Benchmark Demand Charges:</b>	Reference
<u>Canadian</u>	<b><u>\$ 239,062,067</u></b>	
Foothills Pipelines Ltd.	\$ 7,443,398	
Nova Gas Transmission Ltd.	\$ 17,048,406	
Canadian Subtotal	<u>\$ 24,491,804</u>	
<u>Interstate</u>		
Gas Transmission Northwest Corporation	\$ 26,728,027	
El Paso Natural Gas Company	\$ 6,234,323	
Ruby Pipeline	\$ 51,579,857	
Transwestern Pipeline Company	\$ -	
Interstate Subtotal	<u>\$ 84,542,207</u>	
<u>Intrastate</u>		
PG&E California Gas Transmission	\$ 13,028,056	
Intrastate Subtotal	<u>\$ 13,028,056</u>	
<b>Total Actual Demand Charges:</b>	<b><u>\$ 122,062,067</u></b>	<b>\$ 239,062,067</b> 2-8
 <b>Discount Demand Charges:</b>		
El Paso Natural Gas Company	\$ (64,478)	
Transwesten Pipeline Company	\$ -	
Gas Transmission Northwest LLC	\$ -	
<b>Demand Charge Discount Subtotal:</b>	<b><u>\$ (64,478)</u></b>	<b>\$ -</b> 2-11
 <b>Capacity Release Revenue:</b>		
Interstate Pipeline	\$ (94,236)	
<b>Total Capacity Release Revenue:</b>	<b><u>\$ (94,236)</u></b>	<b>\$ -</b> 2-12
 <b>Storage Cost:</b>		
California Gas Transmission Firm Storage	\$ 23,352,619	
Other Storage Costs	\$ 30,367,980	
<b>Storage Cost Subtotal:</b>	<b><u>\$ 53,720,599</u></b>	<b>\$ 53,720,599</b> 2-13
<b>Reconciliation of Reservation Charges:</b>	<b><u>\$ 175,623,952</u></b>	<b>\$ 292,782,666</b>

### 2.13 Review of Benchmark Commodity Indices

The benchmark gas price indices are published by various natural gas publications. Each index is then adjusted with fuel costs from supplying regions to PG&E's Citygate and the adjusted gas indices are used to calculate the monthly commodity costs benchmark.

The Canadian benchmark commodity indices are established using the exchange rates in effect when the indices are issued prior to the availability of closing currency exchange rates. However, the final indices, which determine the actual gas supply prices, reflect closing exchange rates.

For the reporting period, PG&E's gas operations applied a pipeline sequencing methodology for purposes of purchasing gas at the lowest cost. PG&E has the discretion to change the sequence to select a different pipeline at any time to meet reliability requirements.

Cal Advocates reviewed and verified gas price in each publication that PG&E used to compute the benchmark. Cal Advocates has not found any discrepancies.

#### **2.14 Examination of Benchmark Storage Charges and Transportation Costs**

Cal Advocates reviewed PG&E's reported benchmark reservation (demand) and fixed storage charges and identified any changes in activity in the report. The total transportation and storage costs are \$175,782,666 which consisted of Canadian pipeline demand charges of \$24,491,804, U.S. interstate pipeline reservation costs of \$84,542,207, California intrastate pipeline costs of \$13,028,056, and storage costs of \$53,720,599. Table 2-14 provides a summary of these costs.

**TABLE 2-14**  
**Pacific Gas and Electric Company**  
**Summary of Fixed Transport and Storage Costs**  
**CPIM Year 29**  
**November 1, 2021 through October 31, 2022**

<b>Benchmark Demand Charges</b>			
<u>Canadian</u>			Reference
Foothills Pipelines Ltd.	\$	7,443,398	
Nova Gas Transmission Ltd.	\$	17,048,406	
	Canadian Subtotal	<u>\$ 24,491,804</u>	
<u>Interstate</u>			
Gas Transmission Northwest Corporation	\$	26,728,027	
El Paso Natural Gas Company	\$	6,234,323	
Ruby Pipeline	\$	51,579,857	
	Interstate Subtotal	<u>\$ 84,542,207</u>	
<u>Intrastate</u>			
PG&E California Gas Transmission	\$	13,028,056	
	Intrastate Subtotal	<u>\$ 13,028,056</u>	
	Total Demand Charges	<u>\$ 122,062,067</u>	2-8
 <b>CA Intrastate Storage Costs:</b>			
California Gas Transmission Firm Storage	\$	23,352,619	
Other Storage Costs	\$	30,367,980	
	Total Storage Costs	<u>\$ 53,720,599</u>	2-13
 <b>Total Transportation &amp; Storage Costs:</b>	 <u>\$</u>	 <u>175,782,666</u>	

## 2.15 Utilization of Firm Interstate and Intrastate Pipeline Assets

PG&E has short and long-term contracts to meet core gas demand for purchases of natural gas resources transported from Canadian, U.S. interstate and California intrastate pipeline systems. During CPIM Year 29, PG&E transported natural gas resources using firm transportation contracts. PG&E estimates its utilization proportionally based on capacity available to transport supplies and/or releases to other parties. Pursuant to D.04-09-022, PG&E is authorized to recover the costs associated with its Canadian and U.S. interstate capacity, allocate firm intrastate capacity, and recover associated costs. The summary in Table 2-15 below shows PG&E's estimated utilization for the period and notes changes in contract activity from prior years.<sup>16</sup>

<sup>16</sup> PG&E Annual Performance Report, CPIM Year 29, page 18.

**Table 2-15**  
**Pacific Gas and Electric Company**  
**Core Gas Supply - Utilization of Interstate, Intrastate and Canadian Pipeline Assets**  
**CPIM Year 29**  
**November 1, 2021 through October 31, 2022**

<b>Pipeline Capacity:</b>	<b>Quantity (Dth/d)</b>	<b>Contract Expiration Date</b>	<b>Utilization Rate</b>
<b>TransCanada Pipelines:</b>			
NGTL	287,745	10/31/2027	
	82,223	10/31/2027	
<b>Total NOVA:</b>	369,968		97%
Foothills-BC System	284,810	10/31/2027	
	81,384	10/31/2027	
<b>Total Foothills-BC System:</b>	366,194		97%
<b>Interstate Pipelines:</b>			
Gas Transmission Northwest	279,968	10/31/2027	
Seasonal	80,000	10/31/2027	
<b>Total Gas Transmission Northwest:</b>	359,968		97%
El Paso Natural Gas (Nov-Mar)	162,000		
<b>Total El Paso Natural Gas:</b>	162,000	3/31/2023	66%
Ruby			
<b>Total Ruby:</b>	250,000	10/31/2026	85%
<b>PG&amp;E Core Gas Supply- Intrastate Pipelines:</b>			
Redwood Path			
Annual	605,088		
Seasonal (Nov-Jan)	250,000		
Seasonal (Feb-Mar)	100,000		
<b>Total Redwood:</b>	Varies		96%
Baja Path			
Seasonal	300,000		
<b>Total Baja:</b>	300,000		88%

## **Exhibits**

2-1  
Pacific Gas and Electric Company  
CPIM Year 29  
November 1, 2021 - October 31, 2022  
CPIM Calculation

	Interstate and Intrastate Gas Purchase		Pipeline Reservation Charge		CPIM Performance					
	Actual	Benchmark	Actual	Benchmark	Total	Total	Benchmark	Upper Limit	Lower Limit	(Over)/Under
	Commodity	Commodity	Reservation Charge	Reservation Charges	Actual Costs	Benchmark Costs	Less Actuals	(2%)	(1%)	Tolerance Band
Nov-21	\$ 124,898,006	\$ 124,091,795	\$ 27,283,931	\$ 27,296,900	\$ 152,181,937	\$ 151,388,695	\$ (793,242)	\$ 153,870,531	\$ 150,147,777	\$ (2,034,160)
Dec-21	\$ 187,172,634	\$ 189,265,043	\$ 32,991,482	\$ 33,004,451	\$ 220,164,116	\$ 222,269,494	\$ 2,105,378	\$ 226,054,795	\$ 220,376,844	\$ 212,728
Jan-22	\$ 189,537,691	\$ 177,831,556	\$ 34,096,200	\$ 34,109,169	\$ 223,633,891	\$ 211,940,725	\$ (11,693,166)	\$ 215,497,356	\$ 210,162,409	\$ (13,471,482)
Feb-22	\$ 122,282,063	\$ 120,782,148	\$ 29,906,115	\$ 29,919,084	\$ 152,188,178	\$ 150,701,232	\$ (1,486,946)	\$ 153,116,875	\$ 149,493,411	\$ (2,694,767)
Mar-22	\$ 93,736,852	\$ 77,730,083	\$ 23,557,123	\$ 23,663,961	\$ 117,293,975	\$ 101,394,044	\$ (15,899,931)	\$ 102,948,646	\$ 100,616,743	\$ (16,677,232)
Apr-22	\$ 95,513,978	\$ 91,189,658	\$ 20,834,033	\$ 20,834,033	\$ 116,348,011	\$ 112,023,691	\$ (4,324,320)	\$ 113,847,484	\$ 111,111,794	\$ (5,236,217)
May-22	\$ 101,598,130	\$ 101,255,075	\$ 20,910,886	\$ 20,910,886	\$ 122,509,016	\$ 122,165,961	\$ (343,055)	\$ 124,191,063	\$ 121,153,410	\$ (1,355,606)
Jun-22	\$ 93,279,359	\$ 92,572,432	\$ 20,707,563	\$ 20,707,563	\$ 113,986,922	\$ 113,279,995	\$ (706,927)	\$ 115,131,444	\$ 112,354,271	\$ (1,632,651)
Jul-22	\$ 68,805,023	\$ 78,062,329	\$ 20,708,252	\$ 20,708,252	\$ 89,513,275	\$ 98,770,581	\$ 9,257,306	\$ 100,331,828	\$ 97,989,958	\$ 8,476,683
Aug-22	\$ 59,601,372	\$ 71,468,395	\$ 20,590,287	\$ 20,590,287	\$ 80,191,659	\$ 92,058,682	\$ 11,867,023	\$ 93,488,050	\$ 91,343,998	\$ 11,152,339
Sep-22	\$ 47,317,040	\$ 64,713,073	\$ 20,426,683	\$ 20,426,683	\$ 67,743,723	\$ 85,139,756	\$ 17,396,033	\$ 86,434,017	\$ 84,492,625	\$ 16,748,902
Oct-22	\$ 64,921,853	\$ 63,757,348	\$ 20,611,397	\$ 20,611,397	\$ 85,533,250	\$ 84,368,745	\$ (1,164,505)	\$ 85,643,892	\$ 83,731,172	\$ (1,802,078)
<b>Total</b>	<b>\$ 1,248,664,001</b>	<b>\$ 1,252,718,935</b>	<b>\$ 292,623,952</b>	<b>\$ 292,782,666</b>	<b>\$ 1,541,287,953</b>	<b>\$ 1,545,501,601</b>	<b>\$ 4,213,648</b>	<b>\$ 1,570,555,980</b>	<b>\$ 1,532,974,412</b>	<b>\$ (8,313,541)</b>
Reference	A	B	C	D	E=A+C	F=B+D	G=F-E	H=A*1.02+C	I=A*0.99+C	J=E-I

	Benchmark Costs	\$ 1,545,501,601	F	
	Actual Costs	\$ 1,541,287,953	E	
	CPIM Saving	\$ 4,213,648	G=F-E	
	Lower Tolerance Band (1%)	\$ 1,532,974,412	I	
	Amount for Benchmark Costs less Lower Tolerance Band (Not Subject to Sharing: 0% - 1%)	\$ -	K=F-I	
	Lower Tolerance Band Less Actual Commodity Cost (Subject to Sharing)	\$ -	L=I-E	
	Amount for Subject to 80% - 20% Sharing (1% - 5%)	\$ -	L	
	Ratepayers' Share: 80%	\$ -	M=L*.8	
	Shareholders' Share: 20%	\$ -	N=L*.2	
	Total Shareholder Reward	\$ -	N	
	Total Ratepayer Saving	\$ 4,213,648	O=G-N	
	CPIM Saving	\$ 4,213,648		
	Total Shareholder Reward	\$ -		
	Shareholder Award Cap 1.5% of Total Commodity Costs	\$ 18,729,960	P=A*0.015	

## 2-1a

## Pacific Gas and Electric Company

## CPIM Year 29

November 1, 2021 - October 31, 2022

## CPIM Costs/Savings

Benchmark Costs	\$	1,545,501,601
Actual Costs	\$	1,541,287,953
CPIM Saving	\$	4,213,648
Lower Tolerance Band (1%)	\$	1,532,974,412
Amount for Lower Tolerance Band Not Subject to Sharing (0% - 1%)	\$	(8,313,541)
Amount for Subject to 80% - 20% Sharing (1% - 5%)	\$	(8,313,541)
Ratepayers' Share: 80%	\$	(6,650,833)
Shareholders' Share: 20%	\$	(1,662,708)
Total Shareholder Reward	\$	(1,662,708)
Total Ratepayer Saving	\$	5,876,356
CPIM Saving	\$	4,213,648
Total Shareholder Reward	\$	(1,662,708)
Rounding	\$	-
<b>Total Shareholder Reward</b>	<b>\$</b>	<b>(1,662,708)</b>

Pacific Gas and Electric Company  
 CPIM Year 29  
 November 1, 2021 - October 31, 2022  
 CPIM Performance

	Actual		Benchmark		Under/(Over)
Commodity Costs	\$ 1,572,203,314	\$	1,249,806,767	\$	(322,396,547)
Volumetric Transportation Costs	\$ 53,852,268	\$	-	\$	(53,852,268)
Commodity Sales	\$ (389,059,977)	\$	-	\$	389,059,977
Total Gas Purchase Costs	\$ 1,236,995,605	\$	1,249,806,767	\$	12,811,162
Other Costs and Revenues	\$ 8,064,683	\$	-	\$	(8,064,683)
Winter Hedging Costs	\$ 3,457,713	\$	2,766,168	\$	(691,545)
Customs & Border Protection					
Merchandise Processing Fee	\$ 146,000	\$	146,000	\$	-
Total Commodity Costs	\$ 1,248,664,001	\$	1,252,718,935	\$	4,054,934
Demand Charges	\$ 239,062,067	\$	239,062,067	\$	-
Discount Demand Charges	\$ (64,478)	\$	-	\$	64,478
Capacity Release Revenues	\$ (94,236)	\$	-	\$	94,236
Firm Storage Costs	\$ 53,720,599	\$	53,720,599	\$	-
Total Reservation Costs	\$ 292,623,952	\$	292,782,666	\$	158,714
Total	\$ 1,541,287,953	\$	1,545,501,601	\$	4,213,648

Pacific Gas and Electric Company  
CPIM Year 29  
November 1, 2021 - October 31, 2022  
Monthly Actual Costs

	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Total
Commodity Costs	\$ 177,259,612	\$ 207,447,191	\$ 215,496,457	\$ 139,393,311	\$ 115,483,240	\$ 96,373,352	\$ 120,711,372	\$ 119,930,973	\$ 100,374,752	\$ 99,879,595	\$ 93,279,334	\$ 86,574,125	\$ 1,572,203,314
Volumetric Transportation Costs	\$ 5,388,848	\$ 7,235,047	\$ 7,572,203	\$ 5,794,276	\$ 4,222,568	\$ 3,547,432	\$ 3,088,790	\$ 3,238,659	\$ 3,698,241	\$ 3,298,958	\$ 3,407,028	\$ 3,360,218	\$ 53,852,268
Commodity Sales	\$ (57,979,418)	\$ (28,712,060)	\$ (22,035,201)	\$ (26,963,171)	\$ (25,291,751)	\$ (3,777,161)	\$ (21,540,453)	\$ (27,061,218)	\$ (41,788,949)	\$ (53,746,218)	\$ (54,168,712)	\$ (25,995,665)	\$ (389,059,977)
Total Gas Purchase Costs	\$ 124,669,042	\$ 185,970,178	\$ 201,033,459	\$ 118,224,416	\$ 94,414,057	\$ 96,143,623	\$ 102,259,709	\$ 96,108,414	\$ 62,284,044	\$ 49,432,335	\$ 42,517,650	\$ 63,938,678	\$ 1,236,995,605
Other Costs and Revenues	\$ 216,964	\$ (445,828)	\$ (8,424,416)	\$ (859,134)	\$ (689,605)	\$ (641,645)	\$ (673,979)	\$ (2,841,055)	\$ 6,508,579	\$ 10,156,637	\$ 4,787,390	\$ 970,775	\$ 8,064,683
100% Winter Hedging Costs	\$ -	\$ 1,635,884	\$ (3,083,752)	\$ 4,905,581	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,457,713
Custom and Border Protection													
Marchandise Processing Fee	\$ 12,000	\$ 12,400	\$ 12,400	\$ 11,200	\$ 12,400	\$ 12,000	\$ 12,400	\$ 12,000	\$ 12,400	\$ 12,400	\$ 12,000	\$ 12,400	\$ 146,000
Total Commodity Costs	\$ 124,898,006	\$ 187,172,634	\$ 189,537,691	\$ 122,282,063	\$ 93,736,852	\$ 95,513,978	\$ 101,598,130	\$ 93,279,359	\$ 68,805,023	\$ 59,601,372	\$ 47,317,040	\$ 64,921,853	\$ 1,248,664,001
Demand Charges	\$ 22,860,193	\$ 28,567,744	\$ 29,639,797	\$ 25,449,712	\$ 19,194,589	\$ 16,343,762	\$ 16,420,615	\$ 16,217,292	\$ 16,217,981	\$ 16,100,016	\$ 15,932,826	\$ 16,117,540	\$ 239,062,067
Discount Demand Charges	\$ (12,969)	\$ (12,969)	\$ (12,969)	\$ (12,969)	\$ (12,602)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (64,478)
Capacity Release Revenues	\$ -	\$ -	\$ -	\$ -	\$ (94,236)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (94,236)
Firm Storage Costs	\$ 4,436,707	\$ 4,436,707	\$ 4,469,372	\$ 4,469,372	\$ 4,469,372	\$ 4,490,271	\$ 4,490,271	\$ 4,490,271	\$ 4,490,271	\$ 4,490,271	\$ 4,493,857	\$ 4,493,857	\$ 53,720,599
Total Reservation Costs	\$ 27,283,931	\$ 32,991,482	\$ 34,096,200	\$ 29,906,115	\$ 23,557,123	\$ 20,834,033	\$ 20,910,886	\$ 20,707,563	\$ 20,708,252	\$ 20,590,287	\$ 20,426,683	\$ 20,611,397	\$ 292,623,952
Actual Costs	\$ 152,181,937	\$ 220,164,116	\$ 223,633,891	\$ 152,188,178	\$ 117,293,975	\$ 116,348,011	\$ 122,509,016	\$ 113,986,922	\$ 89,513,275	\$ 80,191,659	\$ 67,743,723	\$ 85,533,250	\$ 1,541,287,953

Pacific Gas and Electric Company  
 CPIM Year 29  
 November 1, 2021 - October 31, 2022

Monthly Benchmark Costs

	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Total
Commodity Cost	\$ 124,079,795	\$ 187,943,937	\$ 180,286,158	\$ 116,846,484	\$ 77,717,683	\$ 91,177,658	\$ 101,242,675	\$ 92,560,432	\$ 78,049,929	\$ 71,455,995	\$ 64,701,073	\$ 63,744,948	\$ 1,249,806,767
Volumetric Transportation Costs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Commodity Sales	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Gas Purchase Cost	\$ 124,079,795	\$ 187,943,937	\$ 180,286,158	\$ 116,846,484	\$ 77,717,683	\$ 91,177,658	\$ 101,242,675	\$ 92,560,432	\$ 78,049,929	\$ 71,455,995	\$ 64,701,073	\$ 63,744,948	\$ 1,249,806,767
Other Costs and Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
100% Winter Hedging Cost	\$ -	\$ 1,308,706	\$ (2,467,002)	\$ 3,924,464	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,766,168
Custom and Border Protection													
Marchandise Processing Fee	\$ 12,000	\$ 12,400	\$ 12,400	\$ 11,200	\$ 12,400	\$ 12,000	\$ 12,400	\$ 12,000	\$ 12,400	\$ 12,400	\$ 12,000	\$ 12,400	\$ 146,000
Total Commodity Cost	\$ 124,091,795	\$ 189,265,043	\$ 177,831,556	\$ 120,782,148	\$ 77,730,083	\$ 91,189,658	\$ 101,255,075	\$ 92,572,432	\$ 78,062,329	\$ 71,468,395	\$ 64,713,073	\$ 63,757,348	\$ 1,252,718,935
Demand Charge	\$ 22,860,193	\$ 28,567,744	\$ 29,639,797	\$ 25,449,712	\$ 19,194,589	\$ 16,343,762	\$ 16,420,615	\$ 16,217,292	\$ 16,217,981	\$ 16,100,016	\$ 15,932,826	\$ 16,117,540	\$ 239,062,067
Discount Demand Charges	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Capacity Release Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Firm Storage Cost	\$ 4,436,707	\$ 4,436,707	\$ 4,469,372	\$ 4,469,372	\$ 4,469,372	\$ 4,490,271	\$ 4,490,271	\$ 4,490,271	\$ 4,490,271	\$ 4,490,271	\$ 4,493,857	\$ 4,493,857	\$ 53,720,599
Total Reservation Cost	\$ 27,296,900	\$ 33,004,451	\$ 34,109,169	\$ 29,919,084	\$ 23,663,961	\$ 20,834,033	\$ 20,910,886	\$ 20,707,563	\$ 20,708,252	\$ 20,590,287	\$ 20,426,683	\$ 20,611,397	\$ 292,782,666
Benchmark CPIM Commodity Cost	\$ 151,388,695	\$ 222,269,494	\$ 211,940,725	\$ 150,701,232	\$ 101,394,044	\$ 112,023,691	\$ 122,165,961	\$ 113,279,995	\$ 98,770,581	\$ 92,058,682	\$ 85,139,756	\$ 84,368,745	\$ 1,545,501,601

Pacific Gas and Electric Company  
 CPIM Year 29  
 November 1, 2021 - October 31, 2022  
 Actual Commodity Purchases Summary

	CGT-		CGT		El Paso		GTN		Kern		Nova		Ruby		WFS		Total	
	PGE Citygate																	
Nov-21	\$ 8,430,431	\$	543,476	\$	26,990,184	\$	56,833,460	\$	-	\$	42,351,236	\$	42,110,825	\$	-	\$	177,259,612	
Dec-21	\$ 36,405,206	\$	19,561,936	\$	22,373,103	\$	50,912,034	\$	-	\$	38,468,621	\$	31,924,145	\$	7,802,146	\$	207,447,191	
Jan-22	\$ 26,345,566	\$	14,740,985	\$	28,306,814	\$	63,094,338	\$	15,472	\$	33,279,223	\$	39,453,063	\$	10,260,996	\$	215,496,457	
Feb-22	\$ 18,889,368	\$	15,931,551	\$	20,799,492	\$	22,182,426	\$	-	\$	32,619,365	\$	22,979,109	\$	5,992,000	\$	139,393,311	
Mar-22	\$ 17,273,540	\$	-	\$	16,262,544	\$	18,260,513	\$	-	\$	37,158,509	\$	22,148,262	\$	4,379,872	\$	115,483,240	
Apr-22	\$ 27,112,865	\$	-	\$	-	\$	4,206,252	\$	-	\$	34,573,746	\$	13,920,801	\$	16,559,688	\$	96,373,352	
May-22	\$ 29,476,063	\$	-	\$	-	\$	9,912,634	\$	-	\$	45,430,020	\$	16,539,024	\$	19,353,631	\$	120,711,372	
Jun-22	\$ 1,861,650	\$	-	\$	-	\$	22,110,266	\$	-	\$	56,436,404	\$	15,684,166	\$	23,838,487	\$	119,930,973	
Jul-22	\$ 843,025	\$	-	\$	-	\$	7,221,142	\$	-	\$	53,457,374	\$	22,796,085	\$	16,057,126	\$	100,374,752	
Aug-22	\$ 1,502,730	\$	-	\$	-	\$	8,100,184	\$	51,646	\$	38,335,548	\$	28,072,985	\$	23,816,502	\$	99,879,595	
Sep-22	\$ 4,894,634	\$	-	\$	-	\$	2,253,226	\$	-	\$	32,390,829	\$	31,405,572	\$	22,335,073	\$	93,279,334	
Oct-22	\$ 9,839,594	\$	-	\$	-	\$	8,974,467	\$	48,949	\$	33,211,576	\$	19,998,694	\$	14,500,845	\$	86,574,125	
Total	\$ 182,874,672	\$	50,777,948	\$	114,732,137	\$	274,060,942	\$	116,067	\$	477,712,451	\$	307,032,731	\$	164,896,366	\$	1,572,203,314	

1,572,203,314

\$ -

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Pacific Gas and Electric Company  
CPIM Year 29  
November 1, 2021 - October 31, 2022  
Volumetric Transportation Costs

	El Paso Natural Gas Company, LLC	Gas Transmission Northwest LLC	Kern River Gas Transmission Company	Independent Storage Providers	PG&E California Gas Transmission	Ruby Pipeline, LLC	Transcanada	Transwestern Pipeline Company	Williams Field Services Complany, LLC	Total
Nov-21	\$ 18,413	\$ 92,834	\$ -	\$ 766	\$ 5,048,941	\$ 223,241	\$ -	\$ -	\$ 4,653	\$ 5,388,848
Dec-21	\$ 45,409	\$ 94,563	\$ -	\$ 13,663	\$ 6,802,082	\$ 272,823	\$ -	\$ -	\$ 6,507	\$ 7,235,047
Jan-22	\$ 40,750	\$ 98,914	\$ -	\$ 2,000	\$ 7,172,442	\$ 251,649	\$ -	\$ -	\$ 6,448	\$ 7,572,203
Feb-22	\$ 28,707	\$ 93,741	\$ -	\$ 21,572	\$ 5,448,627	\$ 195,805	\$ -	\$ -	\$ 5,824	\$ 5,794,276
Mar-22	\$ -	\$ 100,005	\$ -	\$ 9,544	\$ 3,877,278	\$ 230,916	\$ -	\$ -	\$ 4,825	\$ 4,222,568
Apr-22	\$ -	\$ 95,680	\$ -	\$ 8,400	\$ 3,157,662	\$ 267,773	\$ -	\$ -	\$ 17,917	\$ 3,547,432
May-22	\$ -	\$ 90,960	\$ -	\$ 8,910	\$ 2,774,534	\$ 198,241	\$ -	\$ -	\$ 16,145	\$ 3,088,790
Jun-22	\$ -	\$ 95,386	\$ -	\$ 9,570	\$ 3,009,922	\$ 109,001	\$ -	\$ -	\$ 14,780	\$ 3,238,659
Jul-22	\$ -	\$ 93,528	\$ -	\$ 2,586	\$ 3,377,465	\$ 210,359	\$ -	\$ -	\$ 14,303	\$ 3,698,241
Aug-22	\$ -	\$ 93,575	\$ -	\$ 471	\$ 2,996,450	\$ 193,931	\$ -	\$ -	\$ 14,531	\$ 3,298,958
Sep-22	\$ -	\$ 95,553	\$ -	\$ 3,854	\$ 3,091,705	\$ 201,846	\$ -	\$ -	\$ 14,070	\$ 3,407,028
Oct-22	\$ -	\$ 92,827	\$ -	\$ 9,031	\$ 3,082,140	\$ 162,473	\$ -	\$ -	\$ 13,747	\$ 3,360,218
Total	\$ 133,279	\$ 1,137,566	\$ -	\$ 90,367	\$ 49,839,248	\$ 2,518,058	\$ -	\$ -	\$ 133,750	\$ 53,852,268

53,852,268

\$ -

Pacific Gas and Electric Company  
 CPIM Year 29  
 November 1, 2021 - October 31, 2022  
 Commodity Sales Revenue

	CGT- PG&E Citygate	CGT -All	El Paso	GTN	Kern	Nova	Ruby	TW	WFS	Total
Nov-21	\$ (26,576,513)	\$ (8,998,553)	\$ (17,043,114)	\$ (1,645,596)	\$ -	\$ (2,735,592)	\$ (876,000)	\$ -	\$ (104,050)	\$ (57,979,418)
Dec-21	\$ (9,562,462)	\$ (1,511,219)	\$ (332,699)	\$ (11,618,206)	\$ (1,949,818)	\$ (361,790)	\$ (684,315)	\$ -	\$ (2,691,551)	\$ (28,712,060)
Jan-22	\$ (5,412,691)	\$ (2,668,210)	\$ (2,458,461)	\$ (5,663,444)	\$ (2,094,865)	\$ (72,189)	\$ -	\$ -	\$ (3,665,341)	\$ (22,035,201)
Feb-22	\$ (8,698,289)	\$ (610,221)	\$ (8,737,554)	\$ (1,176,162)	\$ (1,484,825)	\$ (16,842)	\$ (833,984)	\$ -	\$ (5,405,294)	\$ (26,963,171)
Mar-22	\$ (4,432,510)	\$ -	\$ (16,028,700)	\$ (86,300)	\$ (1,089,107)	\$ (1,554,483)	\$ (772,456)	\$ -	\$ (1,328,195)	\$ (25,291,751)
Apr-22	\$ (1,115,901)	\$ -	\$ -	\$ (32,063)	\$ (145,181)	\$ (913,375)	\$ -	\$ -	\$ (1,570,641)	\$ (3,777,161)
May-22	\$ (4,997,731)	\$ -	\$ -	\$ (4,783,460)	\$ -	\$ (3,190,102)	\$ -	\$ -	\$ (8,569,160)	\$ (21,540,453)
Jun-22	\$ (16,088,232)	\$ -	\$ -	\$ (950,097)	\$ (1,226,984)	\$ (1,716,580)	\$ -	\$ -	\$ (7,079,325)	\$ (27,061,218)
Jul-22	\$ (38,455,369)	\$ -	\$ -	\$ (105,844)	\$ (315,735)	\$ (2,819,469)	\$ -	\$ -	\$ (92,532)	\$ (41,788,949)
Aug-22	\$ (43,369,324)	\$ -	\$ -	\$ (4,801,629)	\$ (728,352)	\$ (1,644,331)	\$ (1,027,600)	\$ -	\$ (2,174,982)	\$ (53,746,218)
Sep-22	\$ (52,623,939)	\$ -	\$ -	\$ (661,634)	\$ -	\$ (403,878)	\$ -	\$ -	\$ (479,261)	\$ (54,168,712)
Oct-22	\$ (14,749,901)	\$ -	\$ -	\$ (1,877,061)	\$ (1,167,760)	\$ (1,817,558)	\$ (161,450)	\$ -	\$ (6,221,935)	\$ (25,995,665)
Total	\$ (226,082,862)	\$ (13,788,203)	\$ (44,600,528)	\$ (33,401,496)	\$ (10,202,627)	\$ (17,246,189)	\$ (4,355,805)	\$ -	\$ (39,382,267)	\$ (389,059,977)

\$ (389,059,969)

\$ (8)

Pacific Gas and Electric Company  
 CPIM Year 29  
 November 1, 2021 - October 31, 2022  
 Demand Charges Summary

	El Paso Natural Gas Company LLC	Gas Transmission Northwest LLC	PG&E California Transmission	Ruby Pipeline, LLC	Transcanada-Foothills Pipelines Ltd	Transcanda Nova Gas Transmission Ltd	Transwestern Pipeline Company	Total
Nov-21	\$ 1,257,197	\$ 2,264,608	\$ 13,088,391	\$ 4,396,919	\$ 481,199	\$ 1,371,879	\$ -	\$ 22,860,193
Dec-21	\$ 1,257,197	\$ 2,241,438	\$ 18,821,393	\$ 4,398,591	\$ 480,173	\$ 1,368,952	\$ -	\$ 28,567,744
Jan-22	\$ 1,257,197	\$ 2,371,594	\$ 19,447,005	\$ 4,397,580	\$ 679,028	\$ 1,487,393	\$ -	\$ 29,639,797
Feb-22	\$ 1,257,197	\$ 2,145,744	\$ 15,492,547	\$ 4,394,096	\$ 677,056	\$ 1,483,072	\$ -	\$ 25,449,712
Mar-22	\$ 1,205,535	\$ 2,288,722	\$ 9,287,072	\$ 4,273,741	\$ 670,613	\$ 1,468,906	\$ -	\$ 19,194,589
Apr-22	\$ -	\$ 2,233,940	\$ 7,750,104	\$ 4,272,426	\$ 654,225	\$ 1,433,067	\$ -	\$ 16,343,762
May-22	\$ -	\$ 2,300,098	\$ 7,750,104	\$ 4,274,160	\$ 657,034	\$ 1,439,219	\$ -	\$ 16,420,615
Jun-22	\$ -	\$ 2,097,429	\$ 7,750,104	\$ 4,272,155	\$ 650,395	\$ 1,447,209	\$ -	\$ 16,217,292
Jul-22	\$ -	\$ 2,249,998	\$ 7,660,334	\$ 4,225,944	\$ 645,467	\$ 1,436,238	\$ -	\$ 16,217,981
Aug-22	\$ -	\$ 2,164,584	\$ 7,660,334	\$ 4,226,743	\$ 635,127	\$ 1,413,228	\$ -	\$ 16,100,016
Sep-22	\$ -	\$ 2,103,923	\$ 7,660,334	\$ 4,221,331	\$ 603,773	\$ 1,343,465	\$ -	\$ 15,932,826
Oct-22	\$ -	\$ 2,265,949	\$ 7,660,334	\$ 4,226,171	\$ 609,308	\$ 1,355,778	\$ -	\$ 16,117,540
<b>Total</b>	<b>\$ 6,234,323</b>	<b>\$ 26,728,027</b>	<b>\$ 130,028,056</b>	<b>\$ 51,579,857</b>	<b>\$ 7,443,398</b>	<b>\$ 17,048,406</b>	<b>\$ -</b>	<b>\$ 239,062,067</b>

Demand charge are net of CTA stranded cost, CTA capacity release,

\$ 239,062,067

\$ -

Pacific Gas and Electric Company  
 CPIM Year 29  
 November 1, 2021 - October 31, 2022  
 Other Commodity Costs and Revenues

	Cochrane Extraction Revenue	Non-Winter Hedge Costs and Revenues	Miscellaneous Costs and Revenues	Total
Nov-21	\$ (355,728)	\$ 515,603	\$ 57,089	\$ 216,964
Dec-21	\$ (425,718)	\$ (75,916)	\$ 55,806	\$ (445,828)
Jan-22	\$ (563,964)	\$ (7,916,412)	\$ 55,960	\$ (8,424,416)
Feb-22	\$ (515,377)	\$ (403,963)	\$ 60,206	\$ (859,134)
Mar-22	\$ (586,146)	\$ (153,644)	\$ 50,185	\$ (689,605)
Apr-22	\$ (484,488)	\$ (192,375)	\$ 35,218	\$ (641,645)
May-22	\$ (433,193)	\$ (298,065)	\$ 57,279	\$ (673,979)
Jun-22	\$ (462,349)	\$ (2,413,425)	\$ 34,719	\$ (2,841,055)
Jul-22	\$ (366,626)	\$ 6,836,167	\$ 39,038	\$ 6,508,579
Aug-22	\$ (386,746)	\$ 10,508,512	\$ 34,871	\$ 10,156,637
Sep-22	\$ (359,666)	\$ 5,154,750	\$ (7,694)	\$ 4,787,390
Oct-22	\$ (320,286)	\$ 1,294,763	\$ (3,702)	\$ 970,775
Total	\$ (5,260,287)	\$ 12,855,995	\$ 468,975	\$ 8,064,683

Pacific Gas and Electric Company  
 CPIM Year 29  
 November 1, 2021 - October 31, 2022  
 Winter Hedge Transaction

	Option Premiums	Option and Swap Settlements	Commissoin and Fee	Winter Hedge Costs Total	
Nov-21	\$ -	\$ -	\$ -	\$ -	\$ -
Dec-21	\$ 4,956,203	\$ (3,328,625)	\$ 8,306	\$	\$ 1,635,884
Jan-22	\$ 7,699,083	\$ (10,793,425)	\$ 10,590	\$	\$ (3,083,752)
Feb-22	\$ 6,954,010	\$ (2,057,246)	\$ 8,817	\$	\$ 4,905,581
Mar-22	\$ -	\$ -	\$ -	\$	\$ -
Apr-22	\$ -	\$ -	\$ -	\$	\$ -
May-22	\$ -	\$ -	\$ -	\$	\$ -
Jun-22	\$ -	\$ -	\$ -	\$	\$ -
Jul-22	\$ -	\$ -	\$ -	\$	\$ -
Aug-22	\$ -	\$ -	\$ -	\$	\$ -
Sep-22	\$ -	\$ -	\$ -	\$	\$ -
Oct-22	\$ -	\$ -	\$ -	\$	\$ -
Total	\$ 19,609,296	\$ (16,179,296)	\$ 27,713	\$	\$ 3,457,713

Pacific Gas and Electric Company  
 CPIM Year 29  
 November 1, 2021 - October 31, 2022  
 Demand Charge Discounts Summary

	El Paso Natural Gas Company LLC	Gas Transmission Northwest LLC	Transwestern Pipeline Company	Total
Nov-21	\$ (12,969)	\$ -	\$ -	\$ (12,969)
Dec-21	\$ (12,969)	\$ -	\$ -	\$ (12,969)
Jan-22	\$ (12,969)	\$ -	\$ -	\$ (12,969)
Feb-22	\$ (12,969)	\$ -	\$ -	\$ (12,969)
Mar-22	\$ (12,602)	\$ -	\$ -	\$ (12,602)
Apr-22	\$ -	\$ -	\$ -	\$ -
May-22	\$ -	\$ -	\$ -	\$ -
Jun-22	\$ -	\$ -	\$ -	\$ -
Jul-22	\$ -	\$ -	\$ -	\$ -
Aug-22	\$ -	\$ -	\$ -	\$ -
Sep-22	\$ -	\$ -	\$ -	\$ -
Oct-22	\$ -	\$ -	\$ -	\$ -
Total	\$ (64,478)	\$ -	\$ -	\$ (64,478)





Pacific Gas and Electric Company  
 CPIM Year 29  
 November 1, 2021 - October 31, 2022  
 Firm Incremental Storage

	PG&E California Transmission	Independent Storage Providers	Total
Nov-21	\$ 1,906,042	\$ 2,530,665	\$ 4,436,707
Dec-21	\$ 1,906,042	\$ 2,530,665	\$ 4,436,707
Jan-22	\$ 1,938,707	\$ 2,530,665	\$ 4,469,372
Feb-22	\$ 1,938,707	\$ 2,530,665	\$ 4,469,372
Mar-22	\$ 1,938,707	\$ 2,530,665	\$ 4,469,372
Apr-22	\$ 1,959,606	\$ 2,530,665	\$ 4,490,271
May-22	\$ 1,959,606	\$ 2,530,665	\$ 4,490,271
Jun-22	\$ 1,959,606	\$ 2,530,665	\$ 4,490,271
Jul-22	\$ 1,959,606	\$ 2,530,665	\$ 4,490,271
Aug-22	\$ 1,959,606	\$ 2,530,665	\$ 4,490,271
Sep-22	\$ 1,963,192	\$ 2,530,665	\$ 4,493,857
Oct-22	\$ 1,963,192	\$ 2,530,665	\$ 4,493,857
Total	\$ 23,352,619	\$ 30,367,980	\$ 53,720,599

## Pacific Gas and Electric Company

CPIM Year 29

November 1, 2021 - October 31, 2022

## Benchmark Commodity Cost

	Ruby	Nova	El Paso	Malin	Topock	Citygate	Total
Nov-21	\$ 40,258,237	\$ 44,048,311	\$ -	\$ 36,526,189	\$ -	\$ 3,247,058	\$ 124,079,795
Dec-21	\$ 38,263,548	\$ 40,246,827	\$ 23,433,392	\$ 43,596,698	\$ 18,724,211	\$ 23,679,261	\$ 187,943,937
Jan-22	\$ 53,634,443	\$ 35,205,025	\$ 28,960,485	\$ 38,470,944	\$ 18,642,107	\$ 5,373,154	\$ 180,286,158
Feb-22	\$ 26,071,012	\$ 33,359,930	\$ 19,936,401	\$ 12,176,314	\$ 9,873,521	\$ 15,429,306	\$ 116,846,484
Mar-22	\$ 22,547,845	\$ 35,996,122	\$ -	\$ 11,298,091	\$ -	\$ 7,875,625	\$ 77,717,683
Apr-22	\$ 30,021,655	\$ 36,339,227	\$ -	\$ 756,439	\$ -	\$ 24,060,337	\$ 91,177,658
May-22	\$ 37,557,889	\$ 48,306,275	\$ -	\$ 627,719	\$ -	\$ 14,750,792	\$ 101,242,675
Jun-22	\$ 35,281,128	\$ 57,279,304	\$ -	\$ -	\$ -	\$ -	\$ 92,560,432
Jul-22	\$ 23,454,013	\$ 54,595,916	\$ -	\$ -	\$ -	\$ -	\$ 78,049,929
Aug-22	\$ 31,344,590	\$ 40,111,405	\$ -	\$ -	\$ -	\$ -	\$ 71,455,995
Sep-22	\$ 30,653,876	\$ 34,047,197	\$ -	\$ -	\$ -	\$ -	\$ 64,701,073
Oct-22	\$ 24,446,469	\$ 33,560,941	\$ -	\$ 219,418	\$ -	\$ 5,518,120	\$ 63,744,948
Total	\$ 393,534,705	\$ 493,096,480	\$ 72,330,278	\$ 143,671,812	\$ 47,239,839	\$ 99,933,653	\$ 1,249,806,767

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Pacific Gas and Electric Company  
CPIM Year 29  
November 1, 2021 - October 31, 2022  
Benchmark Winter Hedge Costs

	Option Premiums	Option and Swap Settlements	Commision and Fees	Total
Nov-21	\$ -	\$ -	\$ -	\$ -
Dec-21	\$ 3,964,962	\$ (2,662,900)	\$ 6,644	\$ 1,308,706
Jan-22	\$ 6,159,266	\$ (8,634,740)	\$ 8,472	\$ (2,467,002)
Feb-22	\$ 5,563,208	\$ (1,645,797)	\$ 7,053	\$ 3,924,464
Mar-22	\$ -	\$ -	\$ -	\$ -
Apr-22	\$ -	\$ -	\$ -	\$ -
May-22	\$ -	\$ -	\$ -	\$ -
Jun-22	\$ -	\$ -	\$ -	\$ -
Jul-22	\$ -	\$ -	\$ -	\$ -
Aug-22	\$ -	\$ -	\$ -	\$ -
Sep-22	\$ -	\$ -	\$ -	\$ -
Oct-22	\$ -	\$ -	\$ -	\$ -
Total	\$ 15,687,436	\$ (12,943,437)	\$ 22,169	\$ 2,766,168

## Pacific Gas and Electric Company

CPIM Year 29

November 1, 2021 - October 31, 2022

## Actual Commodity Purchases Volume Summary in MMBtu

	CGT- PGE Citygate	CGT	El Paso	GTN	Kern	Nova	Ruby	TW	WFS	Total
Nov-21	1,414,100	108,466	4,845,342	9,909,269	-	9,464,332	5,592,827	-	914,870	32,249,206
Dec-21	6,048,031	3,663,967	4,360,678	9,386,419	-	9,769,055	5,390,396	-	1,286,841	39,905,387
Jan-22	4,380,618	3,104,875	4,376,732	10,000,279	2,900	9,766,496	4,926,140	-	1,263,100	37,821,140
Feb-22	3,423,600	3,582,817	4,090,367	4,492,600	-	8,817,731	4,424,822	-	1,120,000	29,951,937
Mar-22	3,176,878	-	3,719,810	4,140,765	-	9,780,429	4,884,882	-	928,627	26,631,391
Apr-22	3,659,813	-	-	650,600	-	9,123,592	2,849,401	-	3,347,970	19,631,376
May-22	3,243,200	-	-	1,401,300	-	9,217,425	2,557,069	-	2,972,590	19,391,584
Jun-22	210,000	-	-	2,689,200	-	9,334,821	1,772,587	-	2,700,742	16,707,350
Jul-22	107,500	-	-	1,034,900	-	9,542,148	3,659,259	-	2,556,617	16,900,424
Aug-22	154,300	-	-	944,400	6,800	9,419,690	3,304,460	-	2,797,600	16,627,250
Sep-22	583,900	-	-	311,390	-	9,059,993	3,630,090	-	2,538,168	16,123,541
Oct-22	1,393,110	-	-	1,705,278	9,198	9,622,238	3,696,799	-	2,587,897	19,014,520
Total	27,795,050	10,460,125	21,392,929	46,666,400	18,898	112,917,950	46,688,732	-	25,015,022	290,955,106

Total Sale Volume: (60,257,642)  
Total Net Purchase Volume: 230,697,464

## Pacific Gas and Electric Company

CPIM Year 29

November 1, 2021 - October 31, 2022

## Actual Commodity Sale Volume in MMBtu Summary

	CGT- PGE Citygate	CGT- All	El Paso	GTN	Kern	Nova	Ruby	TW	WFS	Total
Nov-21	(4,125,600)	(1,813,397)	(3,103,843)	(285,533)	-	(694,560)	(169,816)	-	(20,000)	(10,212,749)
Dec-21	(1,984,999)	(267,707)	(65,962)	(2,017,864)	(347,300)	(109,947)	(169,000)	-	(475,500)	(5,438,279)
Jan-22	(1,128,000)	(500,798)	(507,256)	(1,142,631)	(354,799)	(19,051)	-	-	(616,093)	(4,268,628)
Feb-22	(1,737,700)	(97,661)	(1,364,420)	(213,400)	(280,000)	(5,213)	(134,970)	-	(1,067,473)	(4,900,837)
Mar-22	(817,500)	-	(3,719,810)	(20,000)	(245,000)	(401,806)	(163,722)	-	(295,340)	(5,663,178)
Apr-22	(159,395)	-	-	(5,000)	(25,000)	(160,939)	-	-	(247,868)	(598,202)
May-22	(519,016)	-	-	(651,211)	-	(545,563)	-	-	(1,143,811)	(2,859,601)
Jun-22	(1,820,600)	-	-	(114,600)	(188,500)	(295,016)	-	-	(1,098,100)	(3,516,816)
Jul-22	(4,761,451)	-	-	(15,000)	(49,800)	(690,106)	-	-	(16,100)	(5,532,457)
Aug-22	(4,475,900)	-	-	(578,355)	(84,800)	(585,467)	(116,495)	-	(255,216)	(6,096,233)
Sep-22	(5,870,500)	-	-	(105,259)	-	(117,624)	-	-	(90,317)	(6,183,700)
Oct-22	(1,999,700)	-	-	(402,300)	(237,256)	(1,080,985)	(30,000)	-	(1,236,721)	(4,986,962)
Total	(29,400,361)	(2,679,563)	(8,761,291)	(5,551,153)	(1,812,455)	(4,706,277)	(784,003)	-	(6,562,539)	(60,257,642)

(60,257,642)

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Pacific Gas and Electric Company  
 CPIM Year 29  
 November 1, 2021 - October 31, 2022  
 Benchmark Load Volume (MMBtu)

	Ruby	Nova	El Paso	Malin	Topock	Citygate	Total
Nov-21	6,045,633	8,954,280	-	6,127,724	-	550,208	21,677,845
Dec-21	6,267,597	9,194,724	4,219,782	7,263,203	3,207,681	3,811,638	33,964,625
Jan-22	6,511,984	9,194,724	4,219,751	6,024,274	3,588,507	743,523	30,282,763
Feb-22	4,855,524	8,069,124	3,609,006	2,309,901	1,796,315	2,758,111	23,397,981
Mar-22	4,801,250	8,548,535	-	2,449,505	-	1,419,094	17,218,384
Apr-22	5,803,330	8,735,280	-	113,832	-	3,215,799	17,868,241
May-22	5,579,107	8,960,891	-	82,284	-	1,631,546	16,253,828
Jun-22	3,855,904	8,652,774	-	-	-	-	12,508,678
Jul-22	3,609,378	8,895,512	-	-	-	-	12,504,890
Aug-22	3,563,648	8,913,027	-	-	-	-	12,476,675
Sep-22	3,376,708	8,580,236	-	-	-	-	11,956,944
Oct-22	4,200,980	8,805,724	-	37,971	-	789,605	13,834,280
Total	58,471,043	105,504,831	12,048,539	24,408,694	8,592,503	14,919,524	223,945,134

## Pacific Gas and Electric Company

CPIM Year 29

November 1, 2021 - October 31, 2022

## Custom &amp; Border Protection Merchandise

Processing Fee

Merchandise Processing Fee

Nov-21	\$12,000
Dec-21	\$12,400
Jan-22	\$12,400
Feb-22	\$11,200
Mar-22	\$12,400
Apr-22	\$12,000
May-22	\$12,400
Jun-22	\$12,000
Jul-22	\$12,400
Aug-22	\$12,400
Sep-22	\$12,000
Oct-22	\$12,400
Total	<u>\$ 146,000</u>

Pacific Gas and Electric Company  
CPIM Year 29  
November 1, 2021 - October 31, 2022  
Storage Inventory Summary

<b>Gas Storage Providers</b>	<b>Beginning Inventory 11/01/21 (MMBtus)</b>	<b>Ending Inventory 10/31/2022 (MMBtus)</b>
Firm Storage CGT	15,666,393	15,137,432
Incremental Storage	0	0
<b>Total Storage Inventory</b>	<b>15,666,393</b>	<b>15,137,432</b>