

June 15, 2020

Administrative Law Judge Sophia J. Park
Sophia.Park@cpuc.ca.gov
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Submitted via email

RE: Comments of the Union of Concerned Scientists on Draft Resolution ALJ-381

Dear ALJ Park,

The Union of Concerned Scientists (UCS) submits these comments on draft Resolution ALJ-381, issued May 14, 2020, which approves changes to the California Public Utilities Commission's (Commission) Rules of Practice and Procedure. These comments express UCS's strong support for new Rule 1.18, which promotes public participation in Commission proceedings.

More public participation in Commission proceedings will help create better outcomes for ratepayers. While stakeholders representing a variety of interests frequently intervene in Commission proceedings, the process of becoming a formal party can be too daunting for organizations or individuals that are unfamiliar with the Commission's rules. As a result, the Commission misses out on the opportunity to hear from organizations or individuals that will be impacted by Commission decisions and who could offer valuable insight to the Presiding Officer and other decision-makers (i.e. Commissioners).

New Rule 1.18 will make it easier for public comments to be considered by decision makers, and as a result will make it easier for people and organizations to contribute their expertise and experience without going through the process of becoming a formal party. UCS is a frequent participant in Commission proceedings, and we have seen that there are often voices missing from the conversation. For example, a local environmental justice group concerned about how a proposed decision might affect the operation of a power plant in their neighborhood may not have the time or resources to become a formal party and submit comments. But the new public comment tool will give them the ability to submit comments more easily, and Rule 1.18 will require that the Presiding Officer weigh their comments along with other evidence.

While UCS strongly supports this new rule, there is still more work to be done to make public participation easier and to ensure that public comments are meaningfully considered in Commission decisions. In future revisions of the Rules of Practice and Procedure, the Commission should continue to make changes that facilitate public involvement. For example, the Commission should consider rules changes that make it easier for people to

participate in Commission activities even if they are not based in or cannot travel to San Francisco.

Thank you for the opportunity to comment on this resolution and for taking steps to make it easier for the public to engage with the important work happening at the Commission.

Sincerely,

/s/ Mark Specht

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