

OCT 15 1991

Decision 91-10-016 October 11, 1991

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Investigation on)	
the Commission's own motion to)	
develop policies and procedures)	I.91-01-012
for addressing the potential health)	(Filed January 15, 1991)
effects of electric and magnetic)	
fields of utility facilities.)	

OPINION GRANTING UTILITY MOTIONS TO PROVIDE
FUNDING FOR CONSENSUS GROUP MEMBERS

Summary

The Commission opened this investigation in an order dated January 15, 1991. In a ruling issued September 4, 1991, the assigned Administrative Law Judge (ALJ) announced the selection of the California Electromagnetic Fields (EMF) Consensus Group. The Consensus Group has been asked to return, within 120 days of this order, with recommendations for interim policies to be adopted by the Commission affecting electric utility responses to EMF concerns. In this order, we endorse the creation of the Consensus Group and authorize compensation and expense reimbursement for members of the Consensus Group who are not utility or government employees. In addition, we approve the use of memorandum accounts by Pacific Gas and Electric Company (PG&E), Southern California Edison (SCE) and San Diego Gas & Electric Company (SDG&E) to track expenses related to the Consensus Group.

Background

In the order instituting this investigation, we invited utilities and interested parties to provide their comments on issues related to EMFs and regulated utilities. All of those commenting on the progress of research scientists in investigating any potential relationship between low level EMF exposure and health problems agreed that more utility-funded research is needed. Many of those filing comments argued that electric utilities should

develop interim procedures for responding to EMF concerns raised while the scientific inquiry continues. Many of those filing out the comments also proposed that an advisory group be created to set priorities for utility-funded research and assist the Commission in developing interim policies.

In the months following the receipt of comments, extensive discussions were held about the purpose and composition of such an advisory group. In a ruling issued June 17, 1991, ALJ Steven Weissman responded to these suggestions by calling for the creation of a California EMF Consensus Group. All interested parties were asked to participate in the process of selecting the group's members. At the prehearing conferences held July 26 and August 26, 1991, many potential members were suggested. In a ruling issued September 4, 1991, ALJ Weissman invited the following people to participate as members of the Consensus Group:

Diana Brooks, PUC Division of Ratepayer Advocates
 John Dawsay, San Diego Gas & Electric Company
 Peter Frech, Citizens Concerned with EMFs
 Scott Hanlon, International Brotherhood of
 Electrical Workers
 Ellen Stern Harris, Fund for the Environment
 Audrey Krause, Toward Utility Rate Normalization
 Shirley Linde, Women For:
 Warren Luten, California Municipal Utilities Association
 Landis Martilla, International Brotherhood of
 Electrical Workers
 Catherine Moore, Pacific Gas and Electric Company
 Dr. Raymond Neutra, California Department of Health
 Services
 Dr. Obed Odoemelam, California Energy Commission
 Bernard Palk, Los Angeles Department of Water and Power
 Cindy Sage, Environmental Consultant
 Jack Sahl, Southern California Edison Company
 Dr. Donald Short, City of San Diego Quality of Life Board
 Kenneth Stuart, California Directors of Environmental
 Health

In addition to these members, the Commission's Safety Division, the Office of the State Architect and the California School Superintendents Association were invited to select one

individual each to serve as ex officio members. While the ex officio members were encouraged to attend all meetings and contribute fully to discussions, it would be the task of the seventeen individuals listed above to arrive at a collective opinion as to policies to be recommended to the Commission for adoption.

The Consensus Group is comprised largely of people with extensive experience in addressing EMF issues. It consists of four government employees, five utility representatives, two representatives of the International Brotherhood of Electrical Workers, one representative of a local government advisory board and five who either are unaffiliated or represent citizen groups. Of the last five, one (Shirley Linde) has indicated that the organization which she represents will pay her costs for participating in the Consensus Group, and another (Audrey Krause of TURN) has stated that her intention is to seek reimbursement at the end of this proceeding through the intervenor compensation process. The remaining three Consensus Group members have indicated they are without a source of funds in the near term to support their involvement. They argue that the traditional intervenor compensation process, which would provide the possibility of reimbursement of expenses at the end of the proceeding, would not allow them to participate effectively in all of the prehearing travel and meetings required by the Consensus Group process. They argue that, at a minimum, monthly reimbursement of actual expenses (including reimbursement for lost time) would be required.

Senate Bill 920, which is currently pending before the California Legislature, would provide this Commission with funds to support the Consensus Group. Although this bill is currently an urgency measure, we do not know whether it will ultimately become law. In the best of circumstances, it is likely to be several months before funds would be available as a result of SB 920. The

Division of Ratepayer Advocates (DRA) estimates that funds from SB 920 would not be available until some time in 1992 or 1993.

The Utilities' Proposals

At the prehearing conference held July 26, 1991, the Los Angeles Department of Water and Power (LADWP) offered to reimburse citizen Consensus Group members for expenses related to Consensus Group activities. On August 23, 1991, both SCE and PG&E filed motions proposing monthly reimbursement of Consensus Group expenses and requesting specific accounting treatment for related costs.

SCE's proposal asks the Commission to do four things:

1. To authorize use of SB 920 funds as soon as they become available to ensure citizen participation in the Consensus Group;
2. To authorize interim funding to ensure citizen participation in the Consensus Group until SB 920 funds become available by authorizing SCE and other California utilities to provide such interim funding on the following basis:
 - If membership in the Consensus Group is limited [with a fixed number of full-time members as adopted by the ALJ], citizen participant Consensus Group members should be found automatically eligible for reimbursement of expenses; and
 - If membership in the Consensus Group is unlimited [as had been recommended by some parties and rejected by the ALJ], citizen participant Consensus Group members should prove to the Commission they will make a substantial contribution and cannot participate without upfront funding.
3. To authorize SCE to record in the Company's EMF Memorandum Account, established in Commission Resolution No. E-3130, dated February 24, 1989, the costs of compliance with Commission orders in the EMF

investigation, including costs associated with citizen participant Consensus Group member expenses, if necessary; and

4. To authorize SCE to modify its Preliminary Statement, Part N.4, "Electric and Magnetic Fields Study (EMF) Memorandum Account" as proposed in an attachment to its motion.

PG&E also asks the Commission to use SB 920 funds for this purpose if and when they become available. In the interim, PG&E proposes to do the following:

1. To voluntarily fund public participation in the Consensus Group and expenses incurred for the hiring of scientists/experts to advise or participate on the Consensus Group up to a total of \$100,000, provided that the Commission authorizes the recovery in rates of these expenditures. PG&E proposes that the memorandum account authorized in Commission Resolution E-3130 be expanded to include costs associated with the funding of the Consensus Group, with the proviso that Consensus Group costs would not be subject to further reasonableness review.
2. To use these ratepayer funds to pay the reasonable travel, hotel and per diem expenses for eligible Consensus Group participants as well as a \$100 per day honorarium to compensate for lost time.
3. To determine eligibility for expense reimbursement by following a two-part test. First, the citizen group representatives would be required to make a showing of financial hardship similar to that required under Rule 76.56 of the Commission's Rules of Practice and Procedure (the intervenor compensation rules). Second, the citizen group representative would be required to explain how he or she proposed to make a substantial and meaningful contribution to the efforts of the Consensus Group.
4. To have the Commission Advisory and Compliance Division (CACD) advise PG&E as

to the eligibility of specific Consensus Group members, to whom PG&E would disburse payments.

5. To request that the Commission open a second phase in this investigation to determine how the utilities would be allowed to recover the costs of any mitigation measures required as a result of the investigation.

On September 6, 1991, responses to the utility motions were filed by TURN, DRA, and Citizens Concerned About EMFs. Specific comments will be addressed below. Generally, all of the parties who have expressed an opinion on the subject are supportive of providing monthly reimbursement to Consensus Group members whose participation would otherwise be impaired.

Discussion

1. The Consensus Group Process

We are pleased that so many parties have endorsed the creation of a working group to provide policy recommendations to the Commission. We support the Consensus Group as it has been established, and look forward to receiving its recommendations. The entities and interests represented on the Consensus Group may be facing a unique opportunity to work together. We anticipate that by working together, the Consensus Group members will be able to craft a collective opinion as to interim steps to be taken in response to the EMF issues outlined in our order initiating this investigation.

In order to be successful, the proposals presented by the Consensus Group must reflect consideration of a balanced set of facts and concerns. Toward that end, its fact-finding and deliberations must be open to the public. Obviously, we hope that the Consensus Group will propose interim solutions that we can adopt. However, its proposals must be tested in evidentiary hearings in which any other proposals would also be considered. We

will use the Consensus Group process to help focus the evidentiary dialogue.

Some, while endorsing the Consensus Group process, have argued that membership on the Consensus Group should be unlimited. Although it is critical that the membership of the Consensus Group reflect a broad range of interests, we are not persuaded that the creation of an open-ended committee would be most effective. We are concerned that all of those officially involved in the Consensus Group form a commitment to attend all meetings and work on an equal basis with all other members to form a consensus. An open-ended process would not assure that level of commitment and continuity. Nonetheless, the Consensus Group should not only conduct its business in public, its members should do all they can to incorporate the concerns of those interested parties who are not official members.

2. SB 920

In its current form, SB 920 calls for the Commission to create a working group such as the Consensus Group. In Section 1, the bill acknowledges that we have opened this investigation. Then, Section 5 states, in part:

The Commission, in consultation with the Department [of Health Services], shall, as part of its ongoing investigation of policies and procedures for addressing the potential health effects of utility generated electric and magnetic fields, establish a working group, which shall include citizen participation, to help identify and develop research objectives, interim utility procedures for addressing risks, and other objectives of the investigation.

We intend for the Consensus Group to serve as the working group envisioned in SB 920.

Section 5 continues as follows:

The Commission shall also consider measures to allow implementation of an interim policy of prudent avoidance of exposure to electric and

magnetic fields which would require utilities to incur a relatively small compliance cost which the utilities would be allowed to recover in Commission rate proceedings. On or before June 30, 1992, the Commission shall submit a report to the Legislature identifying prudent avoidance measures that were considered and indicating whether the commission has or intends to implement an interim policy of prudent avoidance.

This direction is consistent with the issues set forth by the Commission in the order instituting this investigation.

In its response to the utility motions, TURN points out that SB 920 has become an urgency measure and that its fate may soon be known. TURN argues that the Commission should, therefore, wait for SB 920 to either pass or fail before deciding whether there is a need to establish a special funding mechanism. We disagree. First, we are interested in continuing the Consensus Group process, whether or not the Legislature requires us to do so. Second, if SB 920 does pass as currently written, we will have a limited amount of time to produce the report on "prudent avoidance" that it would require. Since we intended to explore that strategy in any event, it is logical to proceed with the inquiry at once. Finally, we believe an interim funding mechanism for the Consensus Group process, including compensation and expense reimbursement for non-utility, non-government group members, is desirable regardless of the fate of SB 920. If SB 920 becomes law, the funds would not be available for our use for at least several months. If SB 920 fails, we will still need to provide financial support for the Consensus Group process.

At the writing of this decision, SB 920 has been approved by the Legislature and is awaiting approval from the Governor. SB 920 appropriates over \$4 million for EMF efforts by DHS and the CPUC over the next two years. The bill requires investor and publicly-owned utilities to contribute funds for DHS and CPUC efforts; the money would be deposited into the DHS EMF Study Fund, from which the CPUC will receive funds for its efforts.

We believe that the SB 920 money allocated to the CPUC should be used for expenses related to the operation of the EMF Consensus Group, supplanting the utility reimbursement mechanisms discussed earlier in this decision. We direct CACD, in consultation with the assigned ALJ, to work on procedures for compensating non-utility, non-governmental members of the Consensus Group with the funds received through SB 920. This money should also be available for any consulting or specialist services the Commission might require during this investigation. Both tasks will, of course, require the CPUC to enter into an inter-agency agreement with DHS for the allocation of the CPUC's share of SB 920 funds. We direct staff to begin and complete agreements with DHS as soon as possible in order to allow our EMF investigation to proceed.

3. Compensation and Expense Reimbursement

The consensus-building process envisioned here does not fit comfortably into the traditional intervenor funding process. For the following reasons we reject the intervenor funding paradigm and instead authorize compensation and reasonable expenses for non-utility, non-governmental Consensus Group members. First, we are encouraging certain Consensus Group members to participate in extensive meetings and creative work in advance of the hearing process. The work is likely to require advance preparation and travel to meetings. Second, reliance on the substantial contribution standard may be counterproductive if the goal is to reach consensus. We do not want participants to be discouraged from reaching otherwise appropriate compromise for fear that a failure to adhere to an earlier position could result in legitimate expenses not being reimbursed. Finally, the Consensus Group has been asked to create one or more subcommittees whose members may not be participating in any other phase of the proceeding but who nonetheless may face expenses that cannot otherwise be reimbursed.

In filing their motions, SCE and PG&E have acknowledged the importance of providing monthly reimbursement of expenses. LADWP has been in the forefront in encouraging this approach. SDG&E and the California Municipal Utilities Association have also spoken in support. There are, however, details of the compensation process that need to be addressed.

3.1 Level of Compensation

PG&E proposes that ratepayer funds be used to reimburse those Consensus Group members requiring economic assistance for reasonable travel, hotel and per diem expenses (at rates that would apply to state workers on occasional travel assignments) as well as a \$100 honorarium for each meeting day to compensate for lost time. SCE and SDG&E support this proposal. LADWP indicated that it had considered the possibility of providing a \$200 daily fee to help compensate for lost time.

DRA and Citizens Concerned About EMFs argue that a \$100 daily fee is insufficient to support those Consensus Group members who are self-employed and lose the opportunity to earn a living on the days when they are attending Consensus Group meetings. Several other parties raised this concern at the August 26, 1991 prehearing conference. In addition, several parties pointed out that participation in a consensus-building process could involve expenses not reflected in PG&E's suggested categories. Duplication, mailing and telephone costs are the most obvious. At the prehearing conference, the utility representatives indicated that they would not object to the reimbursement of these expenses, as well.

The \$100 amount is consistent with honoraria typically paid to those serving on governmental advisory committees. For this reason we will authorize compensation in the amount of \$100 per meeting day for non-utility, non-governmental Consensus Group members. Meetings of the committee and a subcommittee occurring on the same day will be eligible for a single \$100 compensation.

Our order in this case represents a selective departure from a policy which, in the past, has disfavored compensating voluntary participants on advisory committees beyond reimbursing their costs of attendance. In taking this step, we recognize that ratepayers' interests are well guarded by DRA's efforts, and that the health concerns of California citizens are protected by DHS. However, in this proceeding, we have become convinced that the public interest is best served by participation in the Consensus Group of as broad a cross-section of Californians as possible. We are also convinced that some of the designated members would be unwilling or unable to participate without the modest compensation we are approving.

Therefore, we approve the utilities' proposal to reimburse Consensus Group members to the following extent: Consensus Group members who are not employed by government or the utilities may claim reimbursement for reasonable travel, hotel, and per diem expenses discussed above when incurred in the performance of officially delegated committee and subcommittee work. In addition, the utilities shall recognize compensation claims made by non-utility, non-governmental Consensus Group members of \$100 per day for attendance and participation in official meetings of the committee or any subcommittees that may be formed. It will not be necessary for the utilities to seek any additional approval from the Commission to ensure recovery of payments at this level.

3.2 Continuing Applicability of Conventional Intervenor Funding

We anticipate holding hearings after receiving the reports of the Consensus Group. As such, Consensus Group participants may seek intervenor compensation pursuant to Article 18.7 of the Commission's Rules for expenses related to their participation as parties in the hearing and decisionmaking process. In order to receive compensation in this manner, participants will be subject to all the limitations set forth in the rules, including the need

to demonstrate eligibility and the need to have made a substantial contribution to a decision or order issued in this proceeding. However, for reasons addressed earlier, we do not find intervenor compensation to be an appropriate means of supporting Consensus Group activities. Compensation for Consensus Group activities will be limited to reasonable actual expenses and the \$100 compensation per day for committee and subcommittee meetings.

3.3 Eligibility for Monthly Expense and Compensation

SCE proposes that if the membership of the Consensus Group is to be limited, as we have determined it will, then those who have been chosen as members should automatically be eligible for monthly expense and per diem compensation. PG&E proposes that Consensus Group members seeking monthly reimbursement be required to follow the procedures that normally apply to requests for intervenor compensation. This would include a showing of financial hardship, an estimate of expenses and a statement of the nature and extent of planned participation in the proceeding. DRA agrees that a showing of financial hardship should be required.

We have discussed above our rationale for departing from the intervenor compensation paradigm in this case. For the limited purposes of reimbursing Consensus Group expenses, and awarding compensation in the amount of \$100 per day, a conventional showing of financial hardship is unnecessary.

3.4 Disbursement of Funds

In its proposal, SCE suggested that reimbursements to Consensus Group members be made by CACD with funds provided by participating utilities. One concern appears to be a desire to avoid judging which charges are reasonable and which are not. PG&E suggested that it would disburse its funds directly to the Consensus Group members with the approval of the Consensus Group. DRA suggests that CACD manage the funds and make disbursements. Several parties have asked that the funds be disbursed by CACD or some other office within the Commission, for fear that the

participation of members of the public may appear compromised if they receive payments from the utilities to support their own personal involvement.

We will ask those utilities contributing to the funding process to arrange among themselves for one utility to receive the monthly invoices, pay the amounts billed, and collect the appropriate amounts from the other utilities involved. We know of no convenient mechanism for having the funds processed by the Commission staff. In addition, we will not ask the utility to assess the reasonableness of the amounts requested, other than to determine if travel, food and lodging reimbursement requests appear consistent with the amounts allowed for state employees. Those requesting monthly reimbursement must maintain adequate records and make those records available for audit by CACD. Participants will be asked to reimburse the utility for amounts paid that are not adequately supported with records.

We are approving a process under which utility ratepayers, not shareholders, will be supporting public involvement in the consensus process. Thus, the utilities will not pay for public involvement, but merely will act as a conduit for ratepayer funds.

3.5 Limitations to Ratepayer Exposure

PG&E has proposed to provide no more than \$100,000 to support contemporaneous costs related to the Consensus Group process. TURN has asked that each utility be limited to spending \$100,000. We anticipate that three regulated utilities and LADWP will contribute to the funding process. We believe it would be unlikely for the costs relating to the Consensus Group to come close to the level of funds that would be available if \$100,000 per utility limit applied. It is reasonable to adopt that figure for a limitation on utility expenditures in the absence of further Commission action. In addition, we will place a one year limit on the initial period of time for which Consensus Group members can

seek monthly reimbursements. This should also serve to hold down the costs of public participation.

3.6 The Reasonableness of Utility Expenses

The utilities seek assurance that they will be allowed to recover through rates amounts paid for monthly reimbursements. We think that such assurance is appropriate in light of the unusual nature of the Consensus Group process and the limited amount of money involved. Amounts paid by the utilities for monthly reimbursements and compensation pursuant to this order (and which are not otherwise repaid to the utility) will be allowed as an expense for the purpose of establishing rates by way of a dollar-for-dollar adjustment to rates.

3.7 Allocation of Expenses Among the Utilities

Thus far, SCE, PG&E, SDG&E and LADWP have offered to participate in the monthly reimbursement process. SCE suggests that those utilities willing to share funding responsibility should provide funds in a proportion based on each utility's California jurisdictional 1990 kilowatt-hour sales, as calculated by CACD. This appears to be a fair method for allocating costs. We will ask CACD to contact all regulated and municipal electric utilities that have filed appearances, including those who have yet to indicate whether they would participate in the monthly reimbursement and compensation process, and develop the ratios for contributions from all utilities that agree to participate, no later than October 25, 1991.

3.8 Rate Recovery Mechanism

SCE and PG&E have requested permission to track payments to Consensus Group members in a memorandum account. SCE has gone further to ask that it be permitted to use a memorandum account to track implementation costs stemming from any order issued in this investigation. Since we are approving monthly reimbursements, we are finding them to be reasonable ratepayer expenses, and the exact costs are as yet unknown, it is appropriate to track these costs in

a memorandum account. In addition, other costs stemming from the Consensus Group process (costs related to staging meetings, and expenses necessary to providing outside expert assistance to the Consensus Group) should also be tracked in a memorandum account.

SCE and PG&E have proposed amending the existing EMF Memorandum Accounts established in Resolution No. E-3130, dated February 24, 1989, to capture these expenses. This account was established to track expenses related to earlier EMF legislation. For simplicity, we will direct SCE, PG&E and SDG&E to establish new EMF Consensus Group Memorandum Accounts to track the expenses specified in this order. The utilities will be directed to file advice letters in compliance with this order no later than October 1, 1991, to become effective on filing.

There are too many unknown factors concerning subsequent orders that may be issued in this investigation for us to agree now to allowing the new memorandum accounts to record any other types of expenses. PG&E has requested that a second phase of this investigation be reserved for considering rate setting implications of any implementation requirements to be placed on the utilities. For this purpose as well, there are too many unknowns for us to agree to a specific procedure this early in the investigation. The utilities are certainly free to offer procedural suggestions when we are closer to issuing a substantive order in this investigation.

Conclusion

Those invited to join the Consensus Group reflect a broad range of experience in addressing EMF concerns. We are optimistic that the work of the Consensus Group will make a substantial contribution to our EMF investigation. We encourage the Consensus Group to be open and inclusive in its exploration. We encourage those interested in this investigation who have not been invited to be members of the Consensus Group to participate fully in the Consensus Group process.

Findings of Fact

1. The Consensus Group is comprised largely of people with extensive experience in addressing EMF issues.
2. Senate Bill 920, which is currently pending before the California Legislature, would provide this Commission with funds to support the Consensus Group.
3. SCE and PG&E filed motions proposing compensation and monthly expense reimbursement of Consensus Group expenses and requesting specific accounting treatment for related costs.
4. By working together, we anticipate that the Consensus Group members will be able to craft a collective opinion as to interim steps to be taken in response to the EMF issues outlined in our order initiating this investigation.
5. If SB 920 becomes law, the funds would not be available for our use for at least several months.
6. The consensus-building process envisioned here does not fit comfortably into the traditional intervenor funding process.
7. The \$100 compensation is consistent with honoraria typically paid to those serving on governmental advisory committees.
8. The lengthy process that has gone into selecting the Consensus Group members assures us that they are likely to contribute significantly to the dialogue that is beginning to unfold.
9. The utilities will not pay for public involvement, but merely act as a conduit for ratepayer funds.
10. The costs related to the Consensus Group would be unlikely to approach the levels of funds that would be available if a \$100,000 per utility limit applied.

Conclusions of Law

1. The creation of the California EMF Consensus Group should be approved.

2. Consensus Group members who are not employed for the purposes of this process by a utility or by government should be allowed to receive compensation and monthly expense reimbursement in the manner set forth in this order.

3. The period of time during which monthly compensation and expense reimbursement will be allowed should initially be limited to one year from the date of this order.

4. Those receiving monthly reimbursement and compensation for Consensus Group participation will not be allowed to seek additional compensation or expense reimbursement for Consensus Group participation through the normal intervenor compensation process.

5. To allow the Consensus Group to begin its deliberations as quickly as possible, we should direct each participating utility to file, no later than October 15, 1991, an advice letter requesting establishment of a memorandum account for outside expenses related to the Consensus Group.

6. The memorandum account should be consistent with prior Commission practice for such accounts and should accrue interest in the standard fashion until recovered in rates.

7. The participating utilities should be allowed to recover, through rates, unreturned monthly reimbursements and monthly compensation payments to Consensus Group members, as described in this order.

8. To allow the Consensus Group to begin its deliberations as soon as possible, this order should be effective immediately.

ORDER

IT IS ORDERED that:

1. The creation of the California EMF Consensus Group, as described in this order, is approved.

2. Those members of the Consensus Group whose participation in the group's activities is not otherwise supported by a utility or government may receive monthly reimbursement for actual expenses and compensation at the rate described in this order.

3. Members of the Consensus Group may incur expenses subject to monthly reimbursement for a period not to exceed one year from the date of this order.

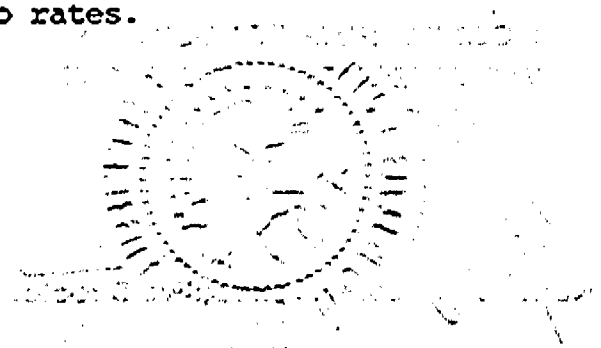
4. Consensus Group expenses shall not be eligible for reimbursement through the normal intervenor funding process.

5. Pacific Gas & Electric Company (PG&E), Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDG&E) shall contribute to the monthly reimbursement and compensation process described in this order.

6. PG&E, SCE and SDG&E shall file advice letters with the Commission no later than October 1, 1991, requesting the establishment of memorandum accounts in which monthly reimbursements and compensation payments to Consensus Group members and other costs to the Consensus Group process (as described in this order) shall be recorded.

7. The Memorandum Accounts described above shall become effective immediately upon filing of the advice letters.

8. Amounts paid by the utilities for monthly reimbursements and compensation payments pursuant to this order (and not otherwise repaid to the utilities) will be allowed as an expense for the purpose of establishing rates by way of a dollar-for-dollar adjustment to rates.



19. The motions of SCE and PG&E are granted to the extent discussed in this order. In all other respects, the motions are denied.

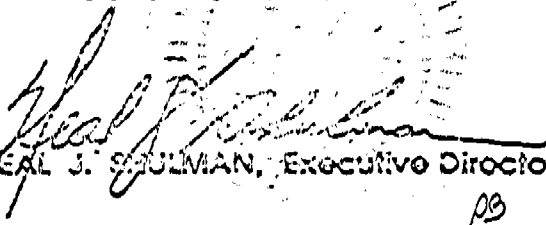
This order is effective today.

Dated October 11, 1991, at San Francisco, California.

JOHN B. OHANIAN
DANIEL Wm. FESSLER
NORMAN D. SHUMWAY
Commissioners

Commissioner Patricia M. Eckert, being necessarily absent, did not participate.

I CERTIFY THAT THIS DECISION
WAS APPROVED BY THE ABOVE
COMMISSIONERS TODAY


NEAL J. SHULMAN, Executive Director

PB