

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of PACIFIC GAS AND
ELECTRIC COMPANY (U-39-E) for
Authority to Increase Revenue
Requirements to Recover the Costs to
Upgrade its SmartMeter™ Program

Application No. 07-12-009
(Filed December 12, 2007)

**RESPONSE OF THE CITY AND COUNTY OF SAN FRANCISCO TO
PACIFIC GAS AND ELECTRIC COMPANY'S SUBMISSION OF DATA ON
THE ESTIMATED COSTS ASSOCIATED WITH SUSPENSION OF
SMARTMETER TECHNOLOGY DEPLOYMENT**

I. INTRODUCTION

On June 17, 2010, the City and County of San Francisco ("City") filed a Petition to Modify Decision 09-03-026. In its petition, the City asked the California Public Utilities Commission ("Commission") to temporarily suspend the further installation of SmartMeters by Pacific Gas and Electric Company ("PG&E") until the Commission concludes its investigation into the significant problems created by PG&E's deployment of its SmartMeters. The City understands that the Commission expects to release the results of that investigation sometime next week.

At a prehearing conference on August 18, 2010, Administrative Law Judge Timothy Sullivan ordered PG&E to file with the Commission cost data supporting PG&E's claim that "it would be extremely costly to order a moratorium."¹ According to PG&E, these costs are an important issue for the Commission to consider when deciding whether to grant the City's petition. Despite this position, PG&E failed to provide the relevant cost data in either its response to the City's petition or in its

¹ Transcript of August 18, 2010 Prehearing Conference, p.30, lines 6-8.

prehearing conference statement.² Furthermore, the cost data that PG&E has now filed with the Commission and provided to the parties in response to ALJ Sullivan's order is speculative and incomplete.

Moreover, as the City previously showed, there are a number of other important factors that the Commission must weigh in deciding whether to grant the City's petition. PG&E customers in San Francisco and other counties should not be forced to continue to bear the risk of excessive bills and other problems that have followed PG&E into every county where it has deployed SmartMeters. The Commission must act now in order to prevent any further harm to ratepayers, and to assuage increasing customer concern over the accuracy and safety of SmartMeters.

II. PG&E'S COST DATA PROVIDES NO BASIS FOR DENYING THE CITY'S PETITION

PG&E claims that it would either lose benefits or incur costs ranging from \$17 to \$87 million if the Commission were to temporarily suspend its SmartMeter deployment. According to PG&E, the actual amount of the lost benefits or costs would depend on a number of variables including the length of the suspension and whether PG&E decides to allow its contractor to retain its employees during the suspension. The low figure would be for a three-month suspension, while high figure would be for a nine-month suspension. Missing from PG&E's data, however, is an analysis or estimate of the costs that PG&E has already incurred, or might incur in the future, to rectify problems with PG&E's SmartMeter deployment.³

² One of PG&E's calculations also takes into account lost demand respond and energy conservation benefits. PG&E's own filings with the Commission demonstrate that few of those benefits are accruing at this time. (*See Revised Compliance Filing of Pacific Gas and Electric Company Pursuant to Decision 09-03-026 (May 27, 2010).*)

³ The cost data PG&E filed on August 27, 2010 has been available to PG&E for quite some time. PG&E compiled this data in response to a data request that DRA made on April 30, 2010, and provided the data to DRA in two separate data responses dated June 9, 2010 and June 23, 2010.

In its response to the City's petition, the Division of Ratepayer Advocates ("DRA") made it clear that this is a critical issue for the Commission to consider:

DRA acknowledges the potential seriousness of these [past] problems [with PG&E's SmartMeter deployment], and shares the City's concern that similar problems may continue to arise as SmartMeter deployment continues. But, as stated above, the cost of rectifying these problems must be balanced against the cost of suspending a massive deployment. At this time only PG&E has all the information necessary to make that decision. And only PG&E can determine whether the nature of the problems is such that they can be addressed more cost-effectively by suspending deployment or by rectifying those difficulties as the deployment proceeds.⁴

In fact, the Commission should be well aware that it is quite expensive for PG&E to go back and replace or modify a previously installed meter. When PG&E filed this application to upgrade its automated metering infrastructure ("AMI") to SmartMeters, PG&E asked the Commission to approve the following expenditures: (i) \$38 million to retrofit 230,000 electromechanical AMI meters procured for its Kern County customers (123,000 of which PG&E had already installed); and (ii) \$32 million to retrofit the nearly 288,000 solid state SmartMeters that PG&E had installed in Kern County to add Home Area Network capability that was not available when PG&E installed those meters. PG&E's imprudent decision making resulted in its requesting an additional \$70 million of ratepayer money that could have been avoided had PG&E deployed fully functional SmartMeters in the first instance.

PG&E has fared no better since the Commission approved its upgrade application in this proceeding. PG&E admits that it has had to replace 45,000 SmartMeters – 23,200 that were installed incorrectly, 12,376 that had data storage issues, and 9,000 that had wireless transmission problems. PG&E has obviously incurred substantial costs to replace these SmartMeters.⁵ Yet, PG&E has made no

⁴ DRA Response to the City's Petition dated July 19, 2010, p.3.

⁵ Baker, *PG&E SmartMeters' problems, and how to fix them*, San Francisco Chronicle (May 31, 2010).

attempt to quantify those costs, even though it is reasonable to assume that PG&E could easily do so. It is reasonable to assume that these additional expenditures could exceed the potential costs of suspending deployment for a short period.

Based on the nature and extent of other disclosed deployment problems, additional SmartMeters will likely have to be replaced, or at least repaired during a second visit from PG&E. As a result, PG&E will undoubtedly incur additional costs. Yet, without providing a relevant cost comparison, PG&E urges the Commission to find that continuing to deploy thousands of SmartMeters that eventually will have to be repaired or replaced is the most cost effective way to proceed.

The City understands that some of these costs may be difficult to quantify and would only be estimates. But that is no different than PG&E's cost estimates to temporarily suspend deployment. As PG&E readily admits, its analysis of those costs requires "multiple layers of simplifying assumptions" and "countless combinations of quantifiable and non-quantifiable variables."⁶ Despite the "significant uncertainty" that exists,⁷ PG&E was able to provide the Commission with an estimate of those costs. It is a telling failure on PG&E's part to omit from its cost calculations an estimate of the cost of forging ahead with its deployment despite the fact that thousands of additional SmartMeters might have to be replaced or repaired.

PG&E has also failed to consider the costs that PG&E has incurred to convince the public that there are no problems with its SmartMeter deployment. PG&E's television commercials touting its SmartMeter technology are clearly intended to diffuse mounting customer concern over PG&E's deployment. In addition, PG&E has been sending its representatives to places like the Town of Fairfax, the City of Watsonville, and the County of Santa Cruz to lobby local government officials and appear at public meetings to address those communities' support for a temporary

⁶ PG&E's Response in Compliance with ALJ's Ruling Requiring Cost Data, p.4.

⁷ PG&E's Response in Compliance with ALJ's Ruling Requiring Cost Data, p.4.

suspension of PG&E's SmartMeter deployment. These costs could have been avoided had the Commission acted on the City's petition when it was filed.

III. CONCLUSION

PG&E has failed to show that the costs of suspending deployment of SmartMeters would exceed the cost of replacing or repairing thousands of defective SmartMeters. For this reason, in deciding whether to grant the City's petition and temporarily suspend PG&E's SmartMeter deployment, the Commission should reject the assumption that a suspension would unreasonably costly to ratepayers. It in fact might save ratepayers money. There simply is not enough evidence for the Commission to make that determination.

The Commission should instead focus on the undisputed evidence that PG&E's SmartMeter deployment has been flawed from the outset, and that reining in that deployment now – while there are still millions of SmartMeters to be deployed – is the Commission's most prudent course of action. The City respectfully requests that the Commission grant its petition and temporarily suspend PG&E's SmartMeter deployment.

Dated: August 27, 2010

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CERTIFICATE OF SERVICE

I, **PAULA FERNANDEZ**, declare that:

I am employed in the City and County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is City Attorney's Office, City Hall, Room 234, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102; telephone (415) 554-4623.

On August 27, 2010, I served the foregoing **RESPONSE OF THE CITY AND COUNTY OF SAN FRANCISCO TO PACIFIC GAS AND ELECTRIC COMPANY'S SUBMISSION OF DATA ON THE ESTIMATED COSTS ASSOCIATED WITH SUSPENSION OF SMARTMETER TECHNOLOGY DEPLOYMENT** by electronic mail on the CPUC Service List, Proceeding No. A.07-12-009.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on August 27, 2010, at San Francisco, California.

/s/

PAULA FERNANDEZ



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