

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of PACIFIC GAS AND  
ELECTRIC COMPANY for Authority  
to Increase Revenue Requirements to  
Recover the Costs to Upgrade its  
SmartMeter™ Program

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

**THE COALITION OF CALIFORNIA UTILITY EMPLOYEES'  
COMMENTS ON PACIFIC GAS AND ELECTRIC COMPANY'S DATA ON  
THE ESTIMATED POTENTIAL COSTS ASSOCIATED WITH SUSPENSION  
OF PACIFIC GAS AND ELECTRIC COMPANY'S SMARTMETER™  
TECHNOLOGY DEPLOYMENT**

Pursuant to Administrative Law Judge Timothy Sullivan's ruling at the August 18, 2010 prehearing conference for the above-captioned proceeding, the Coalition of California Utility Employees (CUE) submits these comments on PG&E's data on the estimated potential costs associated with suspension of PG&E's SmartMeter™ technology deployment.

CUE is not blind to the fact that PG&E's SmartMeter™ program has faced problems and wholly supports the Commission's endeavor to independently investigate the program. But CUE also recognizes that the City and County of San Francisco's (CCSF) proposed suspension of PG&E SmartMeter™ installation comes with a set of problems all its own, not the least of which is putting hundreds of people out of work. At a time when Californians are suffering from the most devastating economic crisis in recent history, the Commission must seriously

consider the effects of granting CCSF's petition to immediately suspend installation of PG&E's SmartMeters™.

In its opposition to CCSF's petition, CUE explained that stopping deployment of SmartMeters™ would cost more than 400 people their jobs. Now, PG&E has provided evidence to support the fact that if the Commission grants CCSF's petition, several hundred people will lose their jobs. In fact, PG&E estimates that at least 625 jobs directly related to SmartMeter™ deployment would be lost if CCSF's requested moratorium is granted. CCSF ignores this fact. The Commission cannot. The loss of more than 600 jobs in this downtrodden economy is a significant consequence that the Commission must seriously consider.

CCSF also ignores the fact that a moratorium would result in real and substantial costs to PG&E related to rehiring and retraining the majority, if not all, of a very experienced labor workforce that would be lost. PG&E is currently in an advanced stage of deployment of its SmartMeter™ program. Thus, at this point, the installation workforce is a well-oiled machine. PG&E's data shows that stopping deployment of SmartMeters™ would result in significant workforce remobilization and ramp-up costs if the installation program was to resume. PG&E's loss of a fully trained, experienced workforce cannot be overlooked.

Of course, there is the chance that PG&E would not resume installation of SmartMeters™. According to PG&E's expert, the severe cost consequences associated with a moratorium could force PG&E to cancel the SmartMeter™ program altogether. In that case, a moratorium would result in a permanent loss of

over 600 jobs. Amidst the worst economic conditions since the Great Depression and staggering unemployment in California, is it really the time to eliminate more than 600 jobs?

In sum, it is not just PG&E that will suffer from a suspension of SmartMeter™ deployment; more than 600 workers will lose their jobs. Again, CUE fully supports the Commission's independent investigation of PG&E's SmartMeter™ program. However, considering that the investigation report will be released in a matter of days, it seems hasty to precipitously suspend installation now. CUE strongly urges the Commission to stop and think about the broad spectrum of effects that will result from granting CCSF's petition, including the loss of hundreds of jobs.

Dated: August 27, 2010

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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## CERTIFICATE OF SERVICE

I, Bonnie Heeley, declare that on August 27, 2010, I emailed, had hand delivered and/or deposited copies of the attached **THE COALITION OF CALIFORNIA UTILITY EMPLOYEES' COMMENTS ON PACIFIC GAS AND ELECTRIC COMPANY'S DATA ON THE ESTIMATED POTENTIAL COSTS ASSOCIATED WITH SUSPENSION OF PACIFIC GAS AND ELECTRIC COMPANY'S SMARTMETER™ TECHNOLOGY DEPLOYMENT** in the United States Mail at South San Francisco, California, with first class postage thereon fully prepaid and addressed as follows:

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I declare under penalty of perjury that the foregoing is true and correct.  
Executed at South San Francisco, California, this 27<sup>th</sup> day of August, 2010.

\_\_\_\_\_/s/\_\_\_\_\_  
Bonnie Heeley