

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 THE
ADMINISTRATIVE LAW JUDGE'S SEPTEMBER 22, 2010 RULING**

I. INTRODUCTION

On September 22, 2010, the Assigned Administrative Law Judge (“ALJ”) issued a ruling denying the City’s motion for expedited treatment, and asking the parties to comment on what further steps should be taken.¹ The ALJ’s ruling arises from the City’s Petition to Modify D.09-03-026 to Temporarily Suspend Pacific Gas & Electric Company’s (“PG&E”) Installation of SmartMeters filed on June 18, 2010 (“Petition”).

In the Petition, the City asked the Commission to take the modest step of temporarily suspending SmartMeter installations until the time the Commission completed its investigation into SmartMeters. The Petition arose from the large number of customer complaints and general dissatisfaction with PG&E’s SmartMeter deployment, the pending investigation into PG&E’s deployment, and the fact that PG&E anticipated installing SmartMeters in San Francisco starting on July 1, 2010. The City was not alone in expressing concern over PG&E’s rollout of SmartMeters.²

¹ Administrative Law Judge’s Ruling of September 22, 2010 (“ALJ’s Ruling”) at p. 9.

²The Utility Reform Network (“TURN”), the City of Santa Cruz, the County of Santa Cruz, the Town of Fairfax, the City of Capitola, the City of Monte Sereno and the City of Scotts Valley all supported the City’s petition; the Division of Ratepayer Advocates (“DRA”) filed a response which acknowledged the seriousness of the problem with PG&E’s efforts. In addition, two parties filed separate applications related to PG&E’s

The City appreciates the opportunity to comment on the issue identified by the ALJ. Although the specific relief sought in the City’s Petition is no longer available, the Commission has a continuing obligation to ensure that ratepayers receive “adequate, efficient, just and reasonable service, instrumentalities, equipment and facilities.”³ The Commission can satisfy this mandate in two ways.

First, before adopting the methodology and findings in the report, the Commission should seek comment on and evaluate the Structure Group’s report, just as it would any other proffered report. Second, the Commission should prevent PG&E from increasing ratepayer costs associated with PG&E’s SmartMeter rollout absent compelling evidence that these additional costs could not have been avoided.

II. DISCUSSION

A. The Commission Should Use this Proceeding To Review the Structure Group Report.

The Commission cannot reasonably rely on the findings in the report unless it reviews the report, which would necessarily include allowing interested parties to first file comments. This is consistent with the ALJ’s earlier determinations that (i) PG&E must provide cost data to parties and parties should have an opportunity to comment on the data,⁴ and (ii) the Structure Group report should be provided to all parties.

The Commission does not typically accept the findings presented in a report by any party – whether that party is a utility, a customer, an independent consultant, or even Commission staff – without first reviewing the report to determine what weight it should be given. This proceeding is the appropriate place for the Commission to engage in such

SmartMeters. *See* Application of Heather Epps for Modification of D.06-07-027 and D.09-03-26 (A.10-09-015); and Application of the EMF Safety Network for Modification (A.10-04-018). Also, the Town of Fairfax, the County of Santa Cruz and the City of Watsonville each passed moratoria banning the installation of SmartMeters.

³ Public Utilities Code § 451.

⁴ Prehearing Conference Transcript at 31:23-32:19.

a review, which should include, at least, comments from interested parties and findings from the Commission.

This has been the Commission's practice under many similar circumstances. When the Commission sought to audit the utilities' energy efficiency efforts, it directed the Energy Division to prepare a report evaluating the efficacy of the programs. The Energy Division issued a report in mid-April 2010, which questioned the cost-effectiveness of the energy efficiency programs. The Commission published the report in early May 2010 and solicited comments on the report from the parties to the energy efficiency rulemaking.⁵

In their comments, interested parties either contested or supported the assumptions and methodologies used in the Energy Division's scenario analysis. Based on these comments, the Commission sought further clarification and ordered the utilities to produce additional data supporting their arguments.⁶ The Commission has yet to vote on a final decision, as there are two decisions pending: the ALJ's proposed decision finding that no further incentive payments are warranted, and Commissioner Bohn's alternate decision awarding \$77.3 million in incentive payments. Clearly, each proposed decision assigns a different evidentiary weight to the Energy Division's report, a fact that demonstrates that different conclusions may be reached from the same report.⁷

⁵ Assigned Commissioner's Ruling Providing Energy Division Report and Soliciting Comments on Scenario Runs issued May 4, 2010, at p. 2, *Order Instituting Rulemaking to Examine Commission's Energy Efficiency Risk/Reward Mechanisms* (R.09-01-019).

⁶ Administrative Law Judge's Ruling Directing Production of Supporting Data issued July 6, 2010, at p. 3, *Order Instituting Rulemaking to Examine Commission's Energy Efficiency Risk/Reward Mechanisms* (R.09-01-019).

⁷ The Commission used a similar process in R. 07-04-015, where the Commission prepared a report for the Legislature and determined how to proceed in light of that report. "Based on the comments received on the draft, the [Final Analysis Report] was revised and is included herein as Attachment A. This decision adopts the [Final Analysis Report] for transmittal to the Legislature and addresses the next steps the Commission should take." D.08-09-014 at p. 10, *Rulemaking on the Commission's Own Motion into Reliability Standards for Telecommunications Emergency Backup Power Systems and Emergency Notification Systems Pursuant to Assembly Bill 2393* (R.07-04-015).

In another instance, when PG&E sought to recover sunk costs associated with its Diablo Canyon facility, the Commission required an independent accounting firm to perform a financial verification audit of Diablo Canyon's plant accounts in order to ensure that the net book value amounts were independently established.⁸ However, before the Commission accepted the results of the independent audit, the Commission required the audit to be served on all parties to the proceeding, and ensured that the parties had an opportunity to respond to the audit report.⁹ Similarly, in the realm of resource adequacy requirements, before the Commission adopted the Load Capacity Requirements ("LCR") for load serving entities for 2007, it provided interested parties with an extensive opportunity to review and comment on the California Independent System Operator's LCR report.¹⁰ The Commission ultimately relied on much of the report, but did so subject to conditions and specified changes to the methodology for future years.¹¹ In these instances, and many others, the Commission recognized that it would benefit from having parties comment on a report before the Commission determined how to use the findings contained in that report.

Likewise, the Commission should provide opportunity for parties to comment on the Structure Group report in this proceeding as part of its determination of how to use the report. The Structure Group report is lengthy, convoluted and far from a ringing endorsement of PG&E's SmartMeter deployment. Furthermore, DRA already asked the Commission to hold this proceeding open to allow the parties to address the results of the investigation.¹² In addition, the City anticipates that the Commission itself may have

⁸ D.00-09-008, at p. 2, *Application to Modify Diablo Canyon Pricing and Adopt a Customer Electric Rate Freeze in Compliance with D.95-12-063* (A.96-03-054).

⁹ *Id.*

¹⁰ See D. 06-06-064 Opinion on Local Resource Adequacy Requirements, at pgs. 2-3, *Order Instituting Rulemaking to Consider Refinements to and Further Development of the Commission's Resource Adequacy Requirements Program* (R.05-12-013). See also pgs. 8, 13-14 for a description of the iterative process that led to the final LCR study.

¹¹ *Id.* at Ordering Paragraph 3 and p. 3.

¹² DRA Prehearing Conference Statement, p. 5.

questions about the Structure Group report, given that the report makes recommendations for changes in the Commission's own practices.

B. The Commission Must Enforce the Reasonableness Requirement if PG&E Exceeds the \$100 Million the Commission Allowed for Cost Overruns.

The City supports DRA's position that the Commission must closely examine whether or not PG&E's SmartMeter deployment costs are reasonable in light of PG&E's history of problems.¹³ Despite PG&E's argument that the moratorium requested in the Petition would have been costly, the Commission might find that PG&E should have voluntarily ceased deployment, rather than continuing to deploy meters that had known problems. If that proves to be the case, the Commission should not allow PG&E to recover those costs from ratepayers.

In addition to concerns over the accuracy of PG&E's SmartMeters, the City's Petition arose out of concern that the practices and means chosen by PG&E to implement its SmartMeter program were contributing to customer complaints, as the Structure Group report noted. PG&E's chosen practices and protocols used in deploying SmartMeters are relevant to the question of whether the costs were reasonably incurred.

Although the Structure Group report states that the meters are accurate, the scope of the report did not address the historical meter accuracy or the fact that PG&E was required to replace its initially chosen firmware. These issues are among many identified in the City's Petition and relate directly to whether or not PG&E was reasonable in incurring additional expense.

¹³ See D.06-07-027 Conclusion of Law No. 5.

III. CONCLUSION

While the Structure Group's report is useful in that it identifies issues and provides potential explanations for PG&E's deployment problems, the Commission should undertake a proper review of the report before it relies on those findings. This will enable the Commission to create a robust record and provide the greatest opportunity for the Commission, other parties, and PG&E to learn from past mistakes. The Commission should also be vigilant in ensuring that PG&E's costs were actually reasonably incurred.

Dated: October 15, 2010

Respectfully submitted,

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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 October 15, 2010, I served **RESPONSE OF THE CITY AND COUNTY OF SAN FRANCISCO TO THE ADMINISTRATIVE LAW JUDGE'S SEPTEMBER 22, 2010 RULING** by electronic mail on the CPUC Service List, Proceeding No. A0712009.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on October 15, 2010, at San Francisco, California.

/s/
PAULA FERNANDEZ



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