

BEFORE THE

PUBLIC UTILITIES COMMISSION OF THE STATE OF

Order Instituting Rulemaking to
Based Decision Making Framework to
Safety and Reliability Programs and
the General Rate Case Plan

FILED
PUBLIC UTILITIES COMMISSION
NOVEMBER 14, 2013
SAN FRANCISCO, CALIFORNIA
RULEMAKING 31-006

Reply Comments of Utility Workers Union (UWUA)

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January 30, 2014

Reply Comment of the Workers Union in Article (UWUA)

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The Utility Workers Union of America (UWUA) supports California Coalition of Utility Employees (CCUE) Gate Case that focuses on safety and drinking water. This the importance of safety assessment of the results of utility spending and managing risks to the public (including customers) for driving revenue that appears to be supported by the OIR.¹

The importance of the current public utility and Reliability is that it places the nearly evaluation on the public to support and observe how these crucial operational revenue requirements are met. It gives visibility to the Commission's basic decisions about the concrete and more effective than proposed that provide between the utility, SED and, possibly, other providers managers.

The Commission has described in the approach to safety UWUA urges its to sustain this and apply to the from the opaque unilateral activity with its gaming complexity in favor of the safety among stakeholders.

¹ In addition to CCUE and UWUA, the evaluation part of and reliability programs and projects nearly in the GRC pr Advocates (OPA) Comment page 3 on assessment GRC revenue req PG&E Opening Comment page 2, and December 2014 assessment included in initial application; UOIRNE page 11 (six months Senator Hill has made a SB 900 metric on the proposing section 75 advance of or concurrent with application 2014.

² The UWUA supports CCUE's general approach to the position on relatively public Prehearing Conference (PHC), ongoing interaction among stakeholders on service quality issues advocated by UWUA in the Gas Safety Rulemaking, R.11

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and operational quality, periodic reports, meetings, workshops, proceedings, the best way to progress on a journey.³

These Reply Comments will focus on three issue

(1) Providing adequate service means risk (the probability events/outcomes) from a customer/public/employee standpoint

(2) In the focus on service adequacy, the focus is on service quality, safety, reliability, and the GRC.

(3) Improving achievement and simplification within the framework the Rate Case can plan (RAC) achieved consistent with articulation of service adequacy standards.

(1) Adequate Service Customer Service

UWUA has advocated for the third phase of the to pass all aspects of service adequacy. This is not and reliability,” the phrase used in the OIR. Nor is the approach that the OIR proposes. From the risk of injury or damage resulting from the service, the utility to provide the service, repair, and other matter consider “customer service” a financial issue.

The Public Utilities Act service that meets the needs of customers and employees. From a safety and reliability accidents, and associated with utility facilities that should be promptly repaired. It also means that essential service as the ability to acquire standards maintain service deficiencies promptly reported before and the rate schedule so that their primary challenges are addressed,

³ See UWUA comments at page 5. Commissioner Carl Woc also, See Open Gas Comments page 4 (“constantly be a focus of”
⁴ Pub. Util. Code section 451.

should be maintained. The failure to maintain these attributes of energy services and their interrelationships for economic, physical security.

Identifying and managing these risks is as important as by utility managers that they may not make their internal

(2) The Importance of Standards for Service Quality, Safety Reliability

ORA proposes a safety plan concept that enables ORA ultimately the Commission to evaluate that the utility may propose approach appears to be the question of utility's prior and current existing external regulations where they exist, and with existing established within authorized revenue levels where external requirements do not exist. This service and the safety, reliability to be achieved must be articulated to provide a spending levels (as escalated new standards) associated. The safety must be articulated in the

3) Agency and Procedural Simplification

The CCUE and modified NEXCAL dispenses with NOI and substitutes the new Phase 1 safety reliability service adequacy an SED evaluation through workshops and Comments. The new Phase 1 will not involve formal hearings interactions. Its will be a set of programs to achieve and service quality (adequacy) revenue requirements for the determined the next Phase 2.

⁵ For example, SoCal Gas identifies the goals of its public, customers and employees. Southern California Reports to page 17, Response to December 20, 2013. However, its include risks to customer safety. Southern California Reports to page 11, Response to December 20, 2013

⁶ Appendix C, page 4ff.

