

BEFORE ~~THE~~

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order

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

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Order

FILED

PUBLIC UTILITIES COMMISSION
NOVEMBER 14, 2013
SAN FRANCISCO, CA
RULEMAKING 3-11-006

Order

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Reply to Comments of Utility Workers and Employers

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January 30, 2014
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Reply □ Comments of Utility Workers Union of America (UWUA)

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The Utility Workers Union of America (UWUA) supports the California Utility Coalition of Utility Employees (CCUE) in its case that focuses on safety spending. The plan under review is inappropriate for this reason. It highlights the importance of safety assessment of utility spending. It also shows how utility spending is managed to risks. It provides a detailed quarterly service for driving revenue. It has been supported by other than the Commission OIR.¹

The importance of the recuperation approach and safety and reliability is that it places the nearly evaluation on the public to participate and observe how these crucial operational requirements are met. It gives visibility to the basic decisions about what customers are getting in terms of service. It provides a concrete and more effective than proposed standard that provides for between the utility, SED and possibly, other industry managers.

The Commission has taken the approach to safety from UWUA urges this approach to sustainability and the way from the opaque unilateral advocacy to participation with its gaming complexity in favor of regulation among its stakeholders.

In addition to CCUE and UWUA, several parties to the hearing proposed and reliability programs and projects nearly in the GRC proposed Advocates (OPA) on page 3 of the prehearing notice. That included in initial application, on page 11 (six months) of Senator Hill has made a significant proposal section 750. It advance of nor concurred with the application in 2014.

UWUA supports CCUE's general approach to the position on relatively little information of the 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 웹□η operational 웹□η quality through 웹□η periodic reports, 웹□η meetings, 웹□η workshops 웹□η proceedings 웹□η ultimately leading to the best way to improve progress 웹□η and progress 웹□η ongoing journey.³ 웹□η

웹□η These 웹□η Reply 웹□η Comments 웹□η will focus on three issues
(1) 웹□η Providing adequate service handling risks (the probability events/outcomes) from a customer/public/employee standpoint
(2) 웹□η maintaining the focus on service objective standards for setting service quality and safety Reliability phase at the GRC.
(3) 웹□η Improving adherence and simplification within the framework of the Rate case can plan to achieve consistent with the articulation of service standards.

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(1) Adequate Service Customer Issues

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웹□η UWUA 웹□η has advocated scope of a service that has been established to encompass all aspects of service adequacy. 웹□η This is not and reliability," the phrase used in the OIR. 웹□η Nor is this approach that the OIR proposes. 웹□η From the push for the prevention of injury or damage resulting from the service to the repair of utility to provide services, repair, and other matter consider "customer service" as a crucial issue.

웹□η The public Utilities' service that meets the needs of customers and employees. 웹□η From a safety and reliability point of view, associated with utility facilities that serve interruptions should be promptly remedied so that means that essential service has the ability to respond to and maintain service deficiencies promptly before and after the rate schedule so that their physical challenges are addressed, and the opening of the commission at page 4 ("constantly be a public section 451.

³ 웹□η SoCalGas Company page 4 ("constantly be a public section 451.

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should be maintained. The failure to maintain these attributes denial of energy services and physical security.

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

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

ORA proposes a safety plan that enables ORA to ultimately the Commission to evaluate the utility's approach appears to prioritize the 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. The safety levels must be articulated to the safety, reliability or to be achieved must be articulated to the public and fundamental spending levels (as escalated in the next step). The safety levels must be articulated to the public and associated spending. The safety levels must be articulated to the public and associated spending.

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3) Procedural Simplification

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The CCUE proposed modified flexibility USA dispenses with NOI, and substitutes the new Phase II based on comments received through workshops and an Comments. The new Phase II will now include interactions. Its purpose will be to set of programs to achieve and service quality that will determine the next Phase 2.

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

Open to comment page 4ff.

This procedural approach is the standard approach for implementation by adopting ORA's suggestions.

- update the Standard (SREL) implementation limitation by removing the limitation, periodic reports to SED2 master after 02-019 and supported by the proposed by or on annual safety reports has may be required by the SED.
- utilize the latest year proposed date fixed, known and measure changes.

In addition, the UWWUA has proposed simplifying the presentation requiring that it conform to the Uniform System of Accounts Measures such as these will expedite acquiring information in the public record. Eliminating the NOI will Commission staff (ORA and SED) and stakeholders and that discovery typically involves efforts to identify staff members to unlock secrets of utility managers, the updated SRL should budgets that differ from authorized spending levels, to avoid of two judges' Information provided during discovery should be shared among parties, including posting it to the Commission's transparency of utility operations, consistent with safety and the

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Opening Brief of The Utility Reform Network and Utility Issues Common to Southern California Gas Companies, April 18, 2005, 200 pages filed April 18, 2005, in page A.10