

BEFORE

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

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Workshop Statement of Utility Workers Union (UWUA)

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Workshop Statement of Utility Workers' Union (UWU)

Responding to the Ruling of the Appellate, 2014. The following Workshop Statement, consisting of a addressing the four topics described in the 2 and

General Statement

The Commission's rulemaking is an important legislative journey undertaken by the California policy makers in the public utility sector. The Legislature and the Commission's explosion. The determination to put the safety horse that clearly drives this rulemaking has been present at time. In just a few months ago the Commission began thinking through the implications of the San Bruno and the legislation responding to the formal workshop setting. No proceeding to reach closure on revisions to the basic rule. In addressing the Rulemaking the Commission eye on the goal of improved safety to the sky and less prone to failure in the essential services on which depend just and prudent rate payers. Much work has the past nearly four years since San Bruno. The work, and use it in making the safe, reliable, and transparent process for linking and safety. The Commission envisions in its Order commencing this proceeding:

...[W]e expect an evolution in the way utilities manage risks and justify the value of investments and, of course, to how we mitigate. Towards that end, we will take testimony in GRCs detailing the technical state of risk assessment of its physical and operational system assessment of its risk tolerance, identification of risks and providing underlying reasons for the assessments, as well as metrics underlying its analysis. We need to have

in terms of implementation of best practices, industry associated metrics of the security and safety of facilities. 201706 at page 7

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The Four Topics

(1) Scope of Issues

(A) Technical state of the utility system

This proceeding should elucidate ways to describe of the system, keeping in mind that utilities are basic infrastructure physical facilities and an energy source. Those facilities are useful for the public. Procedures to mitigate this proceeding should extend to physical and operational and amenable to evaluation risks to delivery.

(B) Risk

The proceeding should address questions of risk (the probability of injurious consequences from and the response of the public, the customers, the shareholders, etc.) are explicitly and specifically legislated by Code section 451 places an affirmative obligation on utilities:

Every public utility shall furnish and maintain such and reasonable service, instrumentalities, equipment, and telephone facilities, as defined in Section 454 of necessary to promote the safety, health, comfort, and patrons, employees, and the public (emphasis added)

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Customer-focused risks include

- explosions, fires and casualties caused by utility services;
- loss of service and identification of the causes of;
- interruption of service and the cause of service;
- timely restoration of service, including response and resiliency;
- inability to acquire service in a timely manner;

- abatement of health risks (as on leaks or pipe malfunctions)
- compromise of customer information
- placement on the correct rate to be paid which is a customer medical baseline, commercial rates

These types of harm focus on service outcomes. Commission has already established formal standards and such as electric service reliability, etc. The Commission, established standards and procedures for measuring, managing, but not necessarily abating risks. Identify the public is concerned about in terms of risks and public manner is at the heart of GRC reform.

Reliability and Proceedings

For gas utilities the Legislature has established requirements and hazards and developing plans to consistent with just and reasonable rates. Pub. Util. Code sections (Leno), Stats. 2011, Ch. 522. Pursuant to this statute and pursuant to the Commission authority the Commission has undertaken a rate of public utility safety the gas industry that taken together provide a framework and abating them while achieving specified service quality, leaks, reliability, etc. This proceeding should explore ongoing activities and legal requirements to GRC.

Proposals in addition to the Straw Proposals

The Straw Proposal is too modest and proposals by CCUE/UW which are structurally similar but different should be considered because they take the Commission journey. The Commission must have available it

scope and operations expenses in relation to how well... risks are in GRCs detailing the state of the utility risk assessment physical and operational systems well as an assessment of The structure of the Rev (RSP) with laws and those elements generic proceeding to establish standards MAP and practice assessment phase); (RAMP) regarding general. If each emptied of content it can provide a general outline of the actual RSP content is considered, fundamental weaknesses needs to be on obtaining safety for the public. UWUA will reserve a specific critique of that cor May 12. UWUA will note at this stage that the best practices mitigate risks, not best practices move safe assessment and funding with the urgency the Commission past.¹ The approach (S) explores risk assessment methodology procedures which are then applied to risk identification then drives mitigation activity) could delay meaningful practice on the ground to the rate cycle that begin To avoid inordinate delay in factoring in the generic leading properly focused on safety activities forward part of this proceeding.

The advance risk assessment procedure (RAMP) should the utility system as a high standard and reliability of both operational and financial conditions.

¹ The Commission notes that risks must first be identified and a much of this work has already been done, if incompletely and the safety plans emanating from that law. For metrics in effect for more than ten years and the governing construction and operation of transmission and distribution detailed guidance.

(3) Comment-only Process

Formal hearings are not necessary. However, the evaluate the Straw Proposal demonstrates that informal parties and stakeholders has real value to and refine our proposals. Finding ways to record these public but utilize them as the record in for reasons the decision of in the proceeding being forward.

Written comments and submissions as the primary for focusing the basis on (1) the workshops; (2) address Commission activities; (3) discovery by parties, utilities and others directed by the Commission based on regulatory requirements. These can help to refine the RCP filings and submissions. Utilities need certainty; parties transparency. These can both be achieved through role. There should be an emphasis on by Commissioners prior to final order in this proceeding

(4) Timing

UWUA has no position and will abide by the parties. For the reasons set forth, UWUA recognizes that expedition is important.

Respectfully submitted for the UWUA,

/s/

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