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Sent: 7/2/2014 3:21:40 PM
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Cc:
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Subject: Streamlining Ideas

Michael – here are some random ideas on improving the PUC processes. These ideas are my own and I'm not advocating on behalf of the company. You are welcome to use them as food for thought.

1) To encourage the use of new technologies, pre-approve some type of applied innovation program to fund implementation in advance that would set up a memorandum or balancing account for recovery. Consider requiring a simple Tier 1 advice letter filing for recovery. Under the current system, if technology or cutting edge material is available to use or be tested, we need to file an application to request funding that takes 12-24 months before it is approved or worse, we have to wait until the next three year GRC cycle. The world goes by too fast for that. Picarro is an example that took several years but luckily coincided with our GRC schedule. It would have been great to start using the application several years before approval (which is pending approval in our GRC).

2) Automatically set recovery of revenue requirements upon filing a new rate application (ex. 2017 GRC would assume rate recovery effective 1/1/17) instead of having to file a separate motion every time. This will reduce the number of motions filed with each application – motions that involve protests; answers; proposed decisions and final decisions that waste valuable resources.

3) Require all Administrative Law Judges to set focus on **scoping** proceedings clearly and so as to limit the pursuit and inclusion of extraneous, time consuming issues, including ongoing discovery rights, which are often limitless. Applicable issues should be defined up front as much as possible, and ALJs should be willing to rule adversely on data requests that go well beyond the scope of the proceeding. Scoping should include a clear indication of how **risk assessment and safety** will be considered or **not considered** in the proceeding and who is responsible for what (e.g., what is SED's role).

4) Limit all ALJ's to one 18-month statutory extension. If the ALJ can't meet the second extension deadline (which is now 36 months since the filing), then the ALJ should be automatically reassigned. This will encourage ALJs to get things done quicker.

5) Hold more Business Meetings outside of the Bay Area. Currently, only 2-3 meetings annually are generally held outside of the Bay Area. The Commission needs to see more of CA – right now things are far too Bay Area centric.

6) The Commission should be open to considering proposals by the utilities to eliminate many ongoing reports that have long passed their useful lives. Utilities and interveners could propose eliminating or modifying the timing of the reports. These proposals should be considered by one assigned specific ALJ or disposition by the Executive Director by a simple letter ruling. The utilities shouldn't have to file a Petitions for Modification for every single report which would be required under present rules. It would take forever and is one reason no one does it.

7) Require ALJs to keep parties informed – especially in big cases – about general **timing of the next steps** in their cases. As we approach the 4th year anniversary of San Bruno, it is absurd that we all have to speculate about the process and the timing. ALJs should provide parties with general timing updates, recognizing that anything may change. I am told that there is nothing in the rules that prohibits this.

8) Consider physically moving ORA out of the Commission building into a more neutral site. ORA is an **advocacy** organization that often takes positions contrary to Commission policy and doesn't always respect boundaries (my personal opinion).

9) Require that ORA employees have a 12-month cooling off period before they can be appointed as an Administrative Law Judge. Too often advocates get assigned to ALJ positions directly from the advocacy organizations. It is a perception issue.

10) Require that Administrative Law Judges rule on Petitions for Modifications within 3 months or they are automatically granted or dismissed. Petitions for Modification sometimes are never ruled on or resolved.

11) GRC revenue requests by category that are at or below the level of inflation and are less than \$20 million are automatically deemed reasonable and recoverable. This will eliminate reams of testimony and witnesses for minor issues (I may have suggested something like this before).