

Attachment C: Conclusions of Law

4. Electric Distribution

4.5. Electric Distribution Maintenance

4.5.1. Expense

45. The Commission must exercise greater oversight over PG&E's streetlight maintenance, repairs, recordkeeping and improvements to ensure that the revenue requirement and rates approved for these activities are just and reasonable.
46. The fact that PG&E does not track whether its performance satisfies written utility standards for streetlight repairs is unreasonable.
47. PG&E is required to: (1) report its performance regularly to the Commission and requesting municipalities; (2) consistently meet its performance goals as a condition of the approval of PG&E's forecasts; and (3) refund revenue to customers through a mechanism similar to PG&E's Quality Assurance Program if PG&E fails to meet any performance goal for two consecutive months.

4.19 LED Streetlight Replacement Program

10. Pacific Gas and Electric Company's proposed rate design for liquid-light emitting diode street lights is adopted.
48. PG&E is directed to promptly enter into negotiations with CCSF to develop an appropriate payment mechanism so that CCSF may participate in the benefits of LED Streetlight replacements, should CCSF desire to do so..

5.8. Customer Retention

49. Ratepayer funds should not be authorized for customer retention activities.
50. PG&E's forecast for customer retention activities is unreliable because it is not supported by adequate accounting.
51. PG&E's proposal to use ratepayer funds is contrary to longstanding state policy providing support for publicly-owned utilities.
52. The California Constitution gives a municipal entity the right to "to furnish its inhabitants with light, water, power, heat, transportation, or means of communication." Cal. Const. Article XI, § 9.