## Attachment B: Findings of Fact

### 4. Electric Distribution

### 4.5. Electric Distribution Maintenance

### 4.5.1. Expense

**Streetlight Maintenance**

324. From the period of 2008 to 2011, customer-reported incidents of streetlight burnouts have been increasing steadily. (Exhibit 17 (PG&E Opening Testimony PG&E-4, at p. 19-2)).

325. From 2008 to 2011 San Francisco experienced a disproportionate increase in burnouts of PG&E maintained streetlights. (Exhibit 144 (Testimony of Jonathan Cherry at p. 6)).

326. PG&E asserts that it tracks its streetlight maintenance activities pursuant to a set of performance goals that were developed in 2012. (Exhibit 204 (DR CCSF 004-13(a) and DR CCSF 004-13(b))).

327. As of July 12, 2013, PG&E did not have a written copy of these performance goals. (Exhibit 204 (DR CCSF 004-13(a) ("PG&E does not have a written copy of these performance goals.") and DR CCSF 004-13(b)).)

328. According to these performance goals, PG&E will "repair 90 percent of streetlight burnouts within 5 days, and complete 75 percent of underground and/or cable repairs related to streetlights within 30 days." (Exhibit 55 (PG&E Rebuttal Testimony, Electric Distribution at p. 5-18).)

329. PG&E's level of service has historically fallen short of the unwritten performance goals.

**Performance Reporting and Deficiency Charge**

121. The record is ~~not~~ sufficiently developed to adopt CCSF's proposal for payment of a deficiency charge to streetlight customers when PG&E fails to meet performance standards for two consecutive months in a municipality.

330. The principle that customers should be compensated in the event that PG&E provides substandard service is applicable to all customers.

### 4.19 LED Streetlight Program

119. PG&E's ~~liquid~~light-emitting diode (LED) Streetlight Replacement forecast of $18.6 million involves replacement of PG&E-owned High Pressure Sodium Vapor (HPSV) streetlights with LED streetlights.

### 5.8. Customer Retention

331. Since at least 1995, PG&E has sought ratepayer funding for these activities. (RT at p. 2630:9-15 (Rubin/PG&E).)

332. PG&E has never received authorization to use ratepayer funding to perform customer retention activities. (RT at p. 2630:9-15 (Rubin/PG&E)).

333. PG&E does not accurately track its customer retention costs by activity, location, requesting entity or otherwise to provide the Commission with any sense of exactly how the funds have been spent historically.( RT pp. 3454:2-28 and 3488:17-3489:26)

334. PG&E even admits that its spending requests are not certain and lack specificity. PG&E claims that "PG&E cannot know definitively, however, the locations or public agencies which may consider engaging in electric distribution activities." (Exhibit 57 (PG&E Rebuttal Testimony, PG&E-20 at p. 7-7).)

335. In 2001, PG&E spent more than $1 million to defeat two local public power measures on San Francisco's ballot. (Exhibits A, D & H CCSF Motion for Official Notice)

336. In 2002, PG&E spent more than $2 million to defeat one local public power measure on San Francisco's ballot. (Exhibits B, E & I CCSF Motion for Official Notice)

337. In 2006, PG&E spent approximately $12.6 million to defeat four ballot measures in Yolo and Sacramento counties (Exhibit K CCSF Motion for Official Notice)

338. In 2008, PG&E spent more than $10 million to defeat one local measure in San Francisco(Exhibits C, F & L CCSF Motion for Official Notice)

339. In 2010, PG&E spent more than $48 million in a failed effort to pass Proposition 16, an amendment to the State constitution (Exhibit J to CCSF Motion for Official Notice).