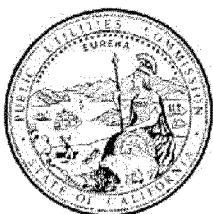


Docket:	:	<u>A.13-12-012</u>
Exhibit Number	:	<u>ORA-13</u>
Commissioner	:	<u>C. Peterman</u>
ALJ	:	<u>J. Wong</u>
Witness	:	<u>N. Skinner</u>



OFFICE OF RATEPAYER ADVOCATES
CALIFORNIA PUBLIC UTILITIES COMMISSION

**Report on the Results of Operations
for
Pacific Gas and Electric Company
Test Year 2015
Gas Transmission and Storage Rate Case**

Chapter 13
Reporting and Communications

San Francisco, California
August 11, 2014

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Chapter 13 – Reporting and Communications

I. INTRODUCTION

This exhibit presents the analyses and recommendations of the Office of Ratepayer Advocates (ORA) regarding Pacific Gas and Electric Company's (PG&E) "Reporting and Communication" proposals associated with its Test Year (TY) 2015 Gas Transmission and Storage (GT&S) rate case. Specifically, this exhibit addresses PG&E's proposals regarding revising reports and communication to the Commission.

II. SUMMARY OF RECOMMENDATIONS

ORA agrees with PG&E's proposal that Commission staff should be directed to hold workshops on aligning and consolidating reporting requirements. Additionally, PG&E should be required to submit a Tier 2 Advice Letter containing: 1) a matrix aligning past reporting requirements with the proposed reporting requirements; and 2) the new reporting templates. The timing of the reports should allow the use of recorded data.

III. GENERAL OVERVIEW

PG&E describes several categories of reports which it must provide either pursuant to Commission decisions or resolutions, public utilities code, federal requirements, or via informal CPUC direction.¹ Further, PG&E notes that it does not always receive feedback on the reports it must provide, but that ORA, Energy Division, and the Safety and Enforcement Division have provided feedback on more recent reports.² PG&E proposes Commission Staff lead workshops to develop

¹ PG&E Prepared Testimony, Volume 2 (Howe), pp. 13-2 to 13-3.

² PG&E Prepared Testimony, Volume 2 (Howe), p. 13-2.

1 a final report, primarily with Safety and Enforcement Division input.³ PG&E
2 also proposes quarterly meetings, led by Commission staff, to discuss reports
3 and answer questions related to PG&E’s asset management.⁴

4 **IV. DISCUSSION / ANALYSIS OF “Reporting Requirements”**

5 ORA concurs that reports must be useful in order to provide information
6 of value to the Commission and parties. PG&E’s proposal to have workshops
7 to review reporting requirements and develop new templates is an appropriate
8 mechanism for all requirements required by the Commission either formally or
9 informally. However, a different process may be necessary to address
10 requirements established via statute or to meet federal requirements.⁵

11 ORA recommends that the Commission order Staff-led workshops as
12 part of the decision adopting the 2015 Gas Transmission and Storage
13 Application. Upon conclusion of the workshops, PG&E should be required to
14 submit a Tier 2 Advice Letter containing: 1) a matrix aligning past reporting
15 requirements with the proposed reporting requirements; and 2) the new
16 reporting templates. Additionally, ORA recommends that the due date for
17 reports should be set to allow for the use of recorded data, as appropriate.⁶
18 Through the Staff-led workshops and Advice Letter process, the Commission
19 should also direct staff to ensure the needs of other parties are met through
20 any changes in the required reports.

³ PG&E Prepared Testimony, Volume 2 (Howe), p. 13-5.

⁴ *Id.*

⁵ PG&E Response to ORA-DR-041 Q02.

⁶ For example, an annual report using data from 2014 should be required in April 2015, allowing the use of recorded data for all of 2014.