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Sent: 9/10/2014 5:39:57 PM

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Cc: Campbell, Michael (Michael.Campbell@cpuc.ca.gov)

Bcc:

Subject: R.12-06-013 Rate Design: SDG&E PDF of a Power Point presentation

Dear ALJ McKinney:

The slides sent by the IOUs intended to provide background on the proceeding for the upcoming public participation hearings cover the relevant details. However, ORA is concerned

that the slide deck contains numerous value statements that represent the bias of the authors. It would not be appropriate for a decision-maker to present these slides at a PPH, as the language prejudices the outcome in the case.

For example, the slide on the effect of the rate freeze notes that higher usage customers are paying more than their “fair share.” Simply stating that “higher usage customers saw their rates and bills increase during the rate freeze, while lower usage customers did not” would also be factually correct, and avoid biased language.

The presentation of the utility positions are particularly biased. An example of this is SCE’s slide which states: “The \$10 proposal is still less than 1/3 of the minimum monthly cost of the power network.” This includes SCE’s argument for proposing the maximum fixed charge allowed by law, and the “minimum monthly costs of the power network” are not facts in evidence.

These are just a few examples.

As the slides were prepared before the intervenors have submitted testimony, I recognize it is difficult to have a “balanced” deck that represents all views, but at a minimum, the presentation to attendees of the PPHs should be stripped of bias and simply present the facts. It is important to elicit the public input without attempting to sway their opinions.

Thank you for your sensitivity to this matter.

Best,

Mike Campbell

Program Manager

Electric Pricing and Customer Programs | Office of Ratepayer Advocates