

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking on the)	
Commission's Proposed Policies Governing)	R.94-04-031
Restructuring California's Electric Services)	
Industry and Reforming Regulation)	
Order Instituting Investigation on the)	
Commission's Proposed Policies Governing)	I.94-04-032
Restructuring California's Electric Services)	
Industry and Reforming Regulation)	

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
ON METER WORKER CERTIFICATION IN RESPONSE TO
DECISION NO. 99-03-063**

I.

INTRODUCTION

Pursuant to Ordering Paragraph No. 1 of D.99-03-063, Southern California Edison (SCE) hereby provides its Comments on a meter worker certification program and addresses the two specific questions posed by the California Public Utilities Commission regarding the permanent and interim individual electrical meter worker certification process. SCE recommends that the Commission appoint its Safety Branch as the organization responsible for a permanent meter worker certification program, effective January 1, 2000. SCE also recommends that an interim Certification Committee be in place by June 15, 1999, to certify workers in the period prior to January 1, 2000 and develop permanent certification protocols for the use of the Safety Branch.

Pursuant to SCE's understanding of D.99-03-063, these comments address the interim and permanent process for certification of individual meter workers, not the certification process for Meter Service Providers (MSPs) adopted in D.97-12-048 and modified in D.98-12-080.

II.

DISCUSSION

A. The Commission's Safety Branch Should Administer a Permanent Meter Worker Certification Program.

In D.99-03-063, the Commission requested that all parties provide comments on what should be the composition of the entity to administer a permanent certification program for meter workers. That decision also identified other state agencies such as the State Contractor's Licensing Board as possible candidates to be the entity to administer a permanent certification program.

SCE recommends that the Commission appoint its Safety Branch as the most appropriate state agency to administer a permanent meter worker certification program. SCE makes this recommendation in recognition of the Safety Branch's extensive knowledge and expertise in electric distribution systems. In addition, the Safety Branch has substantial experience in administering permanent, comprehensive safety and inspection programs for both electric and natural gas distribution systems, including natural gas metering systems. SCE further recommends that the Safety Branch assume complete responsibility for the permanent administration of the meter certification program not later than January 1, 2000.

SCE had previously recommended in the July 29, 1998, Permanent Standards Working Group (PSWG) Report that a board with UDC and MSP representatives should have the permanent certification responsibilities. With

further experience in the deregulated market, we now believe that to avoid the inherent conflicts between market competitors and avoid any appearance of competitive impropriety, the Commission itself must serve as the neutral administrator of meter worker certification. The Commission also is the entity responsible for transition of the retail market, oversight of UDCs and registered ESPs and general oversight of consumer protection for electric consumers.

B. The Current Interim Certification Program Should Be Modified to Institute an Interim Individual Meter Worker Certification Committee Only Until the Permanent Entity is Operational.

The Commission in D.99-03-063 also sought comments from all parties on how the current interim meter worker certification program should be modified to alleviate potential competitive problems between UDCs and MSPs.

SCE recommends that, until the Safety Branch assumes its responsibilities on January 1, 2000, the current individual meter worker certification program should be modified to institute an interim Certification Committee.¹ This Committee would be responsible during the remainder of 1999 for:

(1) Review of the qualifications and training materials of MSPs, to perform training of Meter Worker Classes 1-3, described in the PSWG Report and adopted in D.98-12-080. Once a MSP receives authorization from the Committee it could issue individual Meter Worker Classes 1-3 certifications;

(2) Development and administration of the exam process for Meter Worker Classes 4-5;

¹ This recommendation is similar to SCE's recommendations in the PSWG Report that a Meter Certification Advisory Board (MCAB) be established. However, SCE now believes such an entity should only deal with the interim process and that the CPUC should have the permanent certification responsibility.

(3) Development of protocols (e.g. testing materials and guidelines) for the Safety Branch to use in the administration of a permanent certification process, as well as a recommended permanent certification process for use by the Safety Branch.²

Some responsibilities of the Committee could be performed by hiring a consultant. The cost recovery for the consultant's work would be fees from MSDs and exam fees.

In terms of the membership of the interim Certification Committee, SCE recommends that the head of the Safety Branch receive applications from interested representatives of ESPs, MSPs and UDCs for 30 days beginning on May 1, 1999. The Safety Branch head would then appoint seven members from qualified applicants, including UDC, ESP and MSP representatives by June 15, 1999.³ Selection and implementation of an interim committee by June 15, 1999 is necessary to allow sufficient time for the interim Certification Committee to certify workers and develop permanent protocols. This would alleviate any potential competitive problems until the Safety Branch assumes responsibility for administration.

III.

CONCLUSION

SCE recommends that the Commission appoint its Safety Branch as the entity to administer a permanent individual meter worker certification program beginning January 1, 2000. SCE further recommends that an interim Certification

² The Interim Committee may wish to hold a series of workshops to develop the permanent meter worker certification protocols.

³ The CPUC has created other Boards and Committees in various proceedings, including Restructuring (e.g. the Electric Education Trust) using a similar selection process.

Committee be created to certify meter workers through December 31, 1999 and to develop permanent certification protocols for use by the Safety Branch.

Respectfully submitted,

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