



## **The Office of Ratepayer Advocates Reply Comments to the CPUC's July 30th Solicitation for Input regarding the Role of Safety Intervenors**

August 31, 2015

The Office of Ratepayer Advocates (ORA) is the independent consumer advocate within the California Public Utilities Commission (Commission or CPUC). ORA's statutory mandate is to obtain the lowest possible rates for utility services consistent with reliable and safe service levels. ORA also advocates for customer and environmental protections in connection with utility service. ORA provides the following reply comments in response to a narrow set of issues raised in the Solicitation for Input (SFI) regarding a Safety Intervenor. Please direct any questions to Philip Weismehl, ORA Deputy Chief Counsel.

ORA has made safety a priority in its workload and agrees with parties that it should be balanced with other important issues such as just and reasonable rates and reliability.

That is why ORA agrees with The Utility Reform Network (TURN) and Southern California Gas Company and San Diego Gas & Electric Company (SCG/SDG&E) that the goals of safety and reasonable rates must be considered together. In particular, as noted by TURN, if improvements made under the mantle of safety drive costs too high, there may be deleterious health impacts as customers are forced to decide between heating or cooling their homes and paying for other necessities.

The Utility Workers Union of America (UWUA) also provided particularly insightful comments on several issues regarding safety. In particular ORA agrees with UWUA that there is a need for improved transparency of the CPUC's Safety and Enforcement Division's (SED) work to the public, and to the Commission as a whole (as necessary). Just like the cop on the beat, SED's visibility in safety issues is an important tool to promote safety in the industries the CPUC regulates. SED has had a greater presence in some recent proceedings, such as the 2015 PG&E Gas Transmission and Storage Application, including the critically important ability for parties in that proceeding to provide comment on SED's recommendations and reports.

UWUA's comments on the impediments of the litigated processes should be explored. UWUA comments that the current process is potentially a deterrent to participation. Depending on the type of proceeding, there may be alternatives available, such as workshops with court reporters to create transcripts and comments that allow more accessible participation by parties with less resources or experience and the creation of a more robust record for the Commission to base its decisions upon. While this suggestion warrants further discussion, the CPUC should explore all ways to maximize participation so that the record is as robust and comprehensive as possible.