



Meredith E. Allen
Senior Director
Regulatory Affairs

Pacific Gas and Electric Company
77 Beale St., Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

Tel.: 415-973-2868
Fax: 415.973.7226

August 19, 2015

VIA EMAIL

April Mulqueen
Policy and Planning Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: SFI: Safety Intervenors

Dear Ms. Mulqueen:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to respond to the July 30, 2015 Solicitation for Input (SFI) on the role of safety intervenors in California Public Utility Commission (CPUC) proceedings. PG&E applauds the CPUC's ongoing efforts to implement its Safety Action Plan and believes consideration of the role of safety intervenors addressed in this SFI is an important component of those efforts.

1. Should the Commission ensure there is an organization specifically dedicated to utility safety issues in Commission proceedings?

Yes. There should be an organization at the Commission specifically dedicated to utility safety issues in Commission proceedings. The appropriate organization for that role is the CPUC's Safety and Enforcement Division (SED). PG&E would support enhanced staffing, expansion and possible reorganization of SED to ensure the appropriate resources are available to advocate for safety issues in Commission proceedings while at the same time ensuring transparency and separation of advisory and advocacy roles. PG&E would also support SED supervising qualified consultants to assist them in this effort.

As part of implementing its Safety Vision, the Commission has made great strides in improving risk assessment and safety in the ratemaking process. In recent changes to the Rate Case Plan for the energy utilities, the CPUC established new proceedings to address safety (i.e., the S-MAP and the RAMP) that are complementary to, or a part of, the rate case process.

SED has a valuable role to play in these proceedings and in the rate cases themselves, but does not need to intervene in every Commission proceeding. Instead, SED resources should be deployed where it is most useful to evaluate safety issues.

2. What organizations, new or existing, should intervene on utility safety issues?

See, response to question 1 related to the role of SED.

3. Should ORA or other intervenors on behalf of ratepayers be responsible for both safety and rate advocacy?

Safety and ratemaking are interrelated and all responsible intervenors should consider both. In fact, by statute, ORA's goal is "to obtain the lowest possible rate for service consistent with reliable and safe service levels." (California Public Utilities Code Section 309.5(a)). At the same time, specific skills and capabilities are required to fully participate in the complex issues involved with the investments and activities associated with safe operation of the utility systems which may differ from the vital work of rate advocacy.

4. Are there competencies the Commission must require for a safety intervenor?

The Commission should require safety intervenor's and their consultants to demonstrate relevant experience. A safety intervenor should have an engineering education with a minimum of 10 years of utility operations experience, experience as a safety regulator or experience in the particular technical area on which he or she is testifying. Safety intervenors should have knowledge of industry standards and best practices, as well as exposure to the best practices of other industries. Safety intervenors should also be fully conversant with the Commission's risk and safety decisions and the Commission's expectations regarding the utility risk and safety programs.

5. Are there conflicts that should be addressed in intervenor safety participation; for example, a ratepayer advocate who also seeks compensation as an advocate for a safety action or expenditure?

There appear to be no conflicts and compensation should be awarded consistent with the current law which requires a showing of financial need and a substantial contribution to a proceeding.

6. Are there barriers to safety advocate participation that the Commission must address?

PG&E does not believe there are barriers to such participation, but would be interested in the views of other parties.

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Thank you for the opportunity to comment. PG&E looks forward to participating in the Commission's ongoing efforts to enhance safety.

Sincerely,

A handwritten signature in black ink that reads "Meredith E. Allen". The signature is written in a cursive style with a large, stylized initial "M".

Meredith E. Allen
Senior Director - Regulatory Affairs