

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric  
Company (U 39 M) for Authority, Among  
Other Things, to Increase Rates and Charges  
for Electric and Gas Service Effective on  
January 1, 2020.

A.18-12-009

**RESPONSE OF THE OFFICE OF THE SAFETY ADOVCATE**

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January 17, 2019

## **I. INTRODUCTION**

Pursuant to Rule 2.6 of the Commission's (Commission) Rules of Practice and Procedure, the Office of the Safety Advocate (OSA) submits this Response to Pacific Gas and Electric Company's (PG&E) Test Year 2020 General Rate Case Application (Application).

OSA advocates for "effective public utility safety management and infrastructure improvements and for the transparency of safety information, including, but not limited to, information relating to past performance."<sup>1</sup> OSA also helps inform "the official record on safety related risks in applicable Commission proceedings and assist[s] the Commission in its efforts to hold public utilities accountable for their safe operation."<sup>2</sup> Pursuant to its statutory mandate to advocate for safety, OSA is reviewing select requests in PG&E's Application to determine how they will impact PG&E's ability to continually and effectively promote safety.<sup>3</sup>

## **II. DISCUSSION**

OSA has not completed its review of the Application but nevertheless requests party status. OSA intends to actively participate in this proceeding, conducting discovery, submitting testimony, and briefing issues consistent with OSA's statutory mandate.

Based upon its initial review, the issues that OSA may investigate in this proceeding include, but are not limited to:

1. How does PG&E incorporate lessons learned in development of its rate case programs, such as the 2017 and 2018 Wildfires, the 2018 Merrimack Valley gas explosions, the Lake Oroville Dam Spillway Failure, and the Discovery Bay Gas Shortage?

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<sup>1</sup> Cal. Pub. Util. Code §309.8 (b)(1). All subsequent references to code sections are to the Public Utilities Code.

<sup>2</sup> Cal. Pub. Util. Code §309.8 (b)(3).

<sup>3</sup> Cal. Pub. Util. Code § 451, The Commission should authorize rates that will allow a utility to take actions "necessary to promote the safety, health, and convenience of its patrons, employees, and public."

2. How are PG&E's requests informed by its past safety performance?
3. How has PG&E used safety management system standards and best practices in developing its rate case programs to effectively manage safety?
4. How has PG&E evaluated the effectiveness of its previous mitigation programs and used that to develop its rate case programs?

### **III. CATEGORIZATION, PROPOSED SCHEDULE, NEED FOR HEARINGS**

OSA agrees with PG&E that the Commission should categorize this proceeding as ratesetting.<sup>4</sup> OSA also agrees with the schedule proposed by PG&E and that hearings will likely be requested in this proceeding.

### **IV. CONCLUSION**

OSA intends to analyze and conduct discovery on safety issues raised in PG&E's Application and to develop recommendations. The Commission should establish a schedule that will allow all parties to conduct a thorough review of the Application and accommodate hearings, if necessary.

Respectfully submitted,

/s/ CHRISTOPHER CLAY

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<sup>4</sup> PG&E's Application, p. 13.