

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA



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Order Instituting Investigation on the
Commission's Own Motion to
Determine Whether Pacific Gas and
Electric Company and PG&E
Corporation's Organizational Culture
and Governance Prioritize Safety.

I.15-08-019
(Filed August 27, 2015)

**CENTER FOR ACCESSIBLE TECHNOLOGY'S REPLY COMMENTS
ON ALTERNATIVE APPROACHES TO PROVIDING ELECTRIC AND
NATURAL GAS SERVICE TO CUSTOMERS CURRENTLY SERVED BY
PACIFIC GAS AND ELECTRIC COMPANY**

Melissa W. Kasnitz
Center for Accessible Technology
3075 Adeline Street, Suite 220
Berkeley, CA 94703
Phone: (510) 841-3224
Fax: (510) 841-7936
E-mail: service@cforat.org

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I. INTRODUCTION

In accordance with the schedule set in the Assigned Commissioner's Scoping Memo and Ruling (Phase 3 Scoping Memo) issued on December 21, 2018, the Center for Accessible Technology (CforAT) submits these reply comments addressing potential alternatives to the current management and operational structures for providing electric and gas service in Northern California, and the opening comments submitted by various parties on the issues identified in the Phase 3 Scoping Memo.

CforAT directly represents the interests of PG&E's customers with disabilities; these customers are disproportionately low-income and are also highly dependent on affordable and reliable utility service to support their ability to live independently in their community. CforAT also represents the interests of vulnerable utility customers more generally, consistent with the interests of customers with disabilities. In order to represent the interests of these constituencies, CforAT focuses in these limited comments on those issues raised in the Phase 3 Scoping Memo that impact the availability, affordability, and reliability of gas and electric service for customers who are currently served by PG&E.

II. PRINCIPLES TO CONSIDER WITH REGARD TO THE NEEDS OF VULNERABLE CUSTOMERS WHILE EVALUATING OPTIONS FOR PG&E

In response to comments submitted by various parties, including TURN, the Office of Safety Advocates (OSA) (including their attached recommendations from the Center for Catastrophic Risk Management (CCRM)), and the Office of the Public Advocates, CforAT agrees that any action taken by the Commission must be done based on consideration of a set of guiding principles. The questions and concerns about how to safely, reliably, and affordably provide service to utility customers in Northern California cannot be resolved if action is only taken on a piecemeal basis, treating questions such as the appropriate qualifications for people to

serve on Boards of Directors or whether there should be a standing working group with union leadership as isolated pathways to improvement. Rather, any changes adopted by the Commission should be elements of a larger review and reconsideration of utility service.¹

In this context, and with a specific focus on the needs of vulnerable customers, CforAT supports key principles advanced by other parties in their opening comments. In particular:

- CforAT supports TURN's articulation of the necessary end state to be achieved through Commission action, namely that "Californians living in PG&E's service territory have access to safe, reliable, and affordable energy utility services, and that the manner in which such services are provided supports the State's energy policies, including environmental and equity goals."²
- CforAT believes that it is vital to ensure that all customers have access to utility service from a provider who is subject to the full jurisdiction and oversight of the Commission. This is needed to ensure that low-income customers have access to appropriate support,³ and that all service appropriately addresses affordability concerns (including concerns about the potential bill impacts of de-averaging).⁴ It also is needed to ensure that various consumer protections are provided and enforced, and that equity issues are considered in conjunction with other key

¹ CforAT supports the recommendation of CCRM that "the CPUC should approach this review and assessment of options as a longer-term R&D undertaking, before it is defined as a decision-driven process." CCRM Recommendations, Attachment A to OSA Opening Comments, at p. 6.

² TURN Opening Comments at p. 9.

³ See TURN Opening Comments at pp. 13-15.

⁴ See TURN Opening Comments at pp. 12-13; *see also* Public Advocates Opening Comments at p. 3; CCRM Recommendations, Attachment A to OSA Opening Comments, at pp. 3-4 (comparing potential risks and benefits of dividing PG&E into multiple smaller companies or transferring it to public ownership, including risks to ratepayers).

elements of energy policy.⁵

- CforAT supports and agrees with TURN, OSA, and CCRM that the Commission must be prepared to engage in more proactive and assertive oversight of regulated energy utilities such as PG&E,⁶ and CforAT would support efforts to obtain resources to conduct such oversight.

However the Commission acts to shape the energy system for millions of customers going forward, it must remain cognizant that all customers need safe, reliable and affordable service, and that this does not look exactly the same for every customer. Low-income, disabled, and/or rural customers may cost more to serve, and may require targeted support to ensure that they can obtain access to essential supplies of electricity at affordable rates.⁷ California's clean energy goals and commitments to environmental justice cannot be sidetracked. Good intentions must not get lost in exercises of "box-checking." Overall, the Commission must avoid losing track of the key needs and policy goals of California and of PG&E's customers or getting mired in smaller issues at the expense of the big picture. There is no obvious set of recommendations that can solve all of the concerns raised by parties, but the Commission must evaluate all reasonable options, and be open to a continuous process of review, evaluation, and revision of utility services and structure.

III. CONCLUSION

The complexities of the current undertaking to consider options for utility service in territory now served by PG&E are substantial, and CforAT respectfully requests that the

⁵ See e.g. TURN Opening Comments at pp. 10-12, 15-19 (noting risks ratepayers losing the benefit of their investment in PG&E's assets, as well as the risks of fragmentation in the procurement process that might undermine reliability or GHG goals and risks of excessive utility market power).

⁶ See TURN Opening Comments at pp. 24-27; OSA Opening Comments at pp. 5-7; CCRM Recommendations. Attachment A to OSA Comments at pp. 7-8.

⁷ See Cal. Pub. Util. Code §382(b).

Commission keep the needs of the most vulnerable in mind as it attempts to navigate an effective and appropriate path forward.

Respectfully submitted,

/s/ Melissa W. Kasnitz

MELISSA W. KASNITZ
Attorney for Center for Accessible Technology
3075 Adeline Street, Suite 220
Berkeley, CA 94703
Phone: 510-841-3224
Fax: 510-841-7936
Email: service@cforat.org

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