

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



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In Attendance: COMMISSIONER LIANE M. RANDOLPH
ADMINISTRATIVE LAW JUDGES RAFAEL L. LIRAG and
ELAINE LAU, co-presiding

Application of Pacific Gas and
Electric Company for Authority,
Among Other Things, to Increase
Rates and Charges for Electric and
Gas Service Effective on January 1,
2020. (U39M)

) EVIDENTIARY
) HEARING
)
)
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) Application
) 18-12-009
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SAN FRANCISCO, CALIFORNIA
SEPTEMBER 23, 2019 - 9:31 A.M.
* * * * *

ADMINISTRATIVE LAW JUDGE LIRAG: We are
on the record.

Good morning, everyone. This is the
time and place for the evidentiary hearings
in Application 18-12-009, which is Pacific
Gas and Electric Company's, or PG&E's, Test
Year 2020 General Rate Case.

Good morning, everyone. My name is
Ralph Lirag. And beside me is Elaine Lau.
We are the assigned administrative law
judges, or ALJs.

Commissioner Liane Randolph is the
assigned commissioner. I believe
Commissioner Randolph will join us tomorrow
and on other days that she is available. But
her advisor should be monitoring the progress
of the hearing as it goes on.

To my right is Marianne Divina. She
will help us with the exhibits and basically
keeping this table clean of any clutter.

We have court reporters. You will
see them walk in and out. I believe you will
see our whole roster of court reporters.

This is day one of 20 evidentiary
hearing days. And for today, our schedule is

1 supposed lead us from 9:30 to around 3:30 to
2 4:00. Our reporters would appreciate if it
3 is closer to 3:30. So we will generally
4 start the hearings at 9:30 and end around
5 3:30 to 4:00. We will have a one-hour lunch
6 break, close to noon. It could be a little
7 bit longer, depending on how the witness's
8 schedule is progressing. We will probably
9 have one break in the morning and one break
10 in the afternoon. We will time it at the
11 middle of the morning and middle of the
12 afternoon. If we are finishing up a witness,
13 we might wrap that up and postpone the break
14 a little bit. We could have more breaks, if
15 it is requested. Please take that into
16 consideration when determining time.

17 We will use that clock as our
18 official designation of time. It does not
19 match with the real time, so figure it out.
20 So today we will go from 9:30, we did email
21 about a one-hour recess, that is going to
22 occur before 10:00 a.m.

23 Let's go off the record.

24 (Off the record.)

25 ALJ LIRAG: Let's go back on the
26 record.

27 We were discussing that there is
28 going to be a one-hour recess beginning at

1 10:00 a.m., and then we will resume at 11:00,
2 then we will go from 11:00 to around noon,
3 and take our lunch break and then resume at
4 around 1:00. But we will figure that out
5 later.

6 So for today we originally had
7 scheduled five witnesses, but I think it is
8 going to be four. And we will let
9 Ms. Gandesbery and Ms. Goodson talk about
10 that.

11 First of all, thank you to PG&E and
12 all the parties for preparing that schedule.
13 Thank you, again, for facilitating the
14 discussions that led to the schedule. We
15 will generally stick to that schedule as much
16 as possible in order to ensure that we finish
17 the cross-examinations and all hearing
18 matters within the four weeks that we are
19 allotted.

20 I believe there is about -- I
21 calculated it last night, but I forgot, but I
22 think there is close to 80 hours of hearings.
23 I think it is 77.1, if I recall correctly.
24 That may change to be longer, it could be
25 shorter. Anyway, we will determine that as
26 the hearing progresses. I'll let you know
27 about the daily schedule for the next few
28 days.

1 PG&E will be in charge of that white
2 board. They will put up three days of -- the
3 schedule for the next three days. Generally
4 it will contain the witnesses, the topic area
5 and then the estimated time for
6 cross-examination.

7 So for cross-examination, there were
8 cross estimates, please try to follow that,
9 but we are not going to hold you to that
10 exact amount of time. We will determine what
11 amount of time is proper, but I may prod you
12 along to speed things up if we are running
13 behind schedule. The goal is not to rush you
14 when you are doing cross. It is to make sure
15 we are on schedule. So that takes care of
16 the schedule.

17 So for exhibits, we will number them
18 chronologically as they are identified into
19 the record. So you may retain any
20 pre-numbers that you've done. You may use
21 that to reference the exhibit, but generally
22 we will follow the official designation of
23 the exhibit. This is for purposes of your
24 briefs, will be how we identify the exhibit.
25 So it will just be 01, 02, 03, et cetera. It
26 won't be, perhaps folks are used to, PG&E-1,
27 TURN-1. The reason for that is so we are not
28 trying to remember too many numbers. It will

1 be one number, which is the last exhibit
2 submitted.

3 Ms. Gandesbery.

4 MS. GANDESBERY: Yes, I did want to ask
5 you about that. If it is okay with you, we
6 will use the number that is assigned in the
7 proceeding, also use our exhibit numbers as
8 well. A lot of our testimony cross
9 references those other exhibits by numbers
10 that we provided already. I don't want to
11 create confusion on that.

12 ALJ LIRAG: Correct. If there is a way
13 to try and maintain the numbers, I'll let you
14 take care of the order in which you are
15 presenting exhibits. For example, if there
16 are exhibits where the witness has no cross,
17 it may be a good time to bring in those
18 exhibits so we at least maintain sort of the
19 general same sequence. But the numbers are
20 going to change because of the cross exhibits
21 that will come in. So let's just figure that
22 out as it goes along.

23 So for designating -- but when you
24 are cross-examining or referring to exhibits
25 during the hearing, you may refer to it as
26 however you premarked it. And we will make
27 clear that that is going to be available.
28 There is also I believe testimony already

1 that references the exhibit by the
2 pre-numbering that is done, that is fine. It
3 is just that the official designation will be
4 however we identify it.

5 Mr. Reid.

6 MR. REID: Yes. When are we going to
7 take up the issue of which witnesses do not
8 have to appear? In other words, witnesses
9 who have no cross and witnesses where the ALJ
10 does not have any questions, how their
11 testimony gets into the record?

12 ALJ LIRAG: We are going to discuss
13 that in the next minute. But I guess you
14 have foresight. For witnesses that have no
15 cross scheduled, what we will generally do is
16 first I'm going to ask PG&E to submit a list
17 of all these witnesses that have cross, that
18 have no cross planned. Let me know when that
19 will be available. So basically list the
20 witness, and then I'll let you do the list
21 for all the parties as well, since you
22 facilitated the -- is that fine?

23 MS. GANDESBERY: Yes. We will have
24 that today for you, your Honor.

25 ALJ LIRAG: Doesn't have to be today.
26 It could be tomorrow. Please also list the
27 topic that witness was covering. The purpose
28 of that is to help us determine whether or

1 not we are going to have questions for these
2 witnesses. So we will try not to make the
3 witnesses appear if no other party is -- has
4 cross planned for that witness. But in case
5 we have questions, we might require the
6 witness's presence. We will try to determine
7 that before the end of the week, but we will
8 base it on the list first.

9 Any questions, Mr. Reid?

10 MR. REID: Yeah. I mean, it would seem
11 to me that you can save hearing time. I mean
12 80 hours is really a lot, because there will
13 be -- there is certain amount of
14 administrative time. Witnesses might say
15 something while they are testifying that --
16 which will invite more cross. So 80 hours is
17 really not just 80 hours.

18 It seems that the best way to handle
19 this is to identify the individuals who do
20 not have to testify and order them or their
21 party to file a motion for inclusion of their
22 testimony in the record.

23 ALJ LIRAG: All right. We will
24 generally take up the exhibits when they are
25 submitted. So we will discuss admission. It
26 has to be in -- during the hearing. That is
27 how we prefer to do it. We can discuss your
28 timesaving tips probably in one of the

1 breaks. So you can come forward, and we can
2 confer. And then we will bring it up with
3 the rest of the parties, if that is a good
4 idea, then we will try to apply it.
5 Generally we will stick to what we had in
6 mind, which is we will find the time every
7 now and then when there is a break, or when
8 witnesses end early. Or if it is proper to
9 bring up these exhibits at a certain time in
10 order to maintain a certain sequence, then we
11 will do that.

12 As far as keeping on schedule, we
13 also have other contingencies to maintain the
14 schedule. So rest assured, all parties will
15 have enough time to present their
16 cross-examination and their exhibits and take
17 care of other matters for now.

18 Mr. Lindl.

19 MR. REID: Well, I mean, since I don't
20 know when my exhibit would come up, right, it
21 entails another trip. And for me, I'm in a
22 curious position where the party is the
23 witness.

24 ALJ LIRAG: All right. As for parties
25 that are scheduled to be crossed, that is in
26 the schedule, so you know when that will
27 happen. For parties that have no cross
28 scheduled, we can take care of -- or address

1 that witness's exhibits at a convenient time,
2 perhaps convenient to the party submitting it
3 or convenient to the Commission. We can
4 discuss that as it happens. There is no need
5 to account for everything right now.

6 Mr. Lindl.

7 MR. LINDL: Thank you, your Honor.
8 Just to clarify, so PG&E will provide you a
9 list of -- where there is no cross time
10 estimates?

11 ALJ LIRAG: Correct.

12 MR. LINDL: And then we can tentatively
13 assume that witness will not appear, unless
14 you let us know by the end of this week that
15 the ALJs have questions for those witnesses?

16 ALJ LIRAG: That is probably a good
17 assumption.

18 Other questions regarding that,
19 except for Mr. Reid?

20 MR. DENEBEIM: Yes, Daniel --

21 THE REPORTER: I'm sorry.

22 ALJ LIRAG: Too fast.

23 THE REPORTER: Can you stand up, I
24 can't --

25 MR. DENEBEIM: Daniel Denebeim,
26 D-e-n-e-b-e-i-m.

27 ALJ LIRAG: All right.

28 MR. DENEBEIM: We are a party. We are

1 not participating in cross-examination. But
2 you are saying we will have to have someone
3 here to attend all the hearings until
4 this day you are talking about comes about
5 where PG&E submits the list, and then we can
6 submit our testimony for the record; is that
7 correct?

8 ALJ LIRAG: If you have witnesses or
9 testimony where no cross is scheduled, we can
10 discuss when to present those exhibits. Are
11 you available only today?

12 MR. DENEBEIM: Not only today, but I
13 would like to not have to come to every day
14 of the hearings just to get our testimony
15 onto the record.

16 ALJ LIRAG: All right. You can discuss
17 with PG&E if you're generally -- we will try
18 to handle all of PG&E's witnesses and
19 exhibits first. But that doesn't mean we
20 can't insert any time for other parties'
21 exhibits. Does that make sense?

22 MR. DENEBEIM: I guess I'm just trying
23 to -- when would that time be?

24 ALJ LIRAG: Let's make it whenever you
25 are available, and then let's schedule your
26 exhibits for that time. Fair enough?

27 MR. DENEBEIM: Okay.

28 ALJ LIRAG: It will make sense as the

1 hearing progresses, I think. All right.

2 I have a question from the lady
3 behind you.

4 MS. SCHAEFER: Michelle Schaefer.

5 ALJ LIRAG: Ms. Schaefer, good morning.

6 MR. SCHAEFER: Good morning.

7 S-c-h-a-e-f-e-r. I'm with the Office of
8 Safety Advocates.

9 And along the lines of entering
10 testimony into the record, we would ask that
11 we can submit our attachments via CD-ROM, if
12 that is okay with parties and with your
13 Honors, as our attachments are very
14 voluminous and I would prefer to not have
15 that many trees wasted.

16 ALJ LIRAG: All right. So to
17 summarize, OSA has exhibits and they have
18 attachments that are voluminous. And OSA's
19 request is to submit a CD for the
20 attachments. So I'll let PG&E think about it
21 for now, and we will discuss it probably when
22 we resume either at 11:00 or after the lunch
23 break. Let's give them some time to figure
24 it out.

25 In the meantime, during the recess
26 you can also converse with them and try to
27 sort out any inconveniences that will occur
28 or that may result because of that.

1 MS. SCHAEFER: Thank you.

2 ALJ LIRAG: Any other questions?

3 Mr. Gondai.

4 MR. GONDAI: Thank you, your Honor.

5 Along those lines, I was just
6 curious. I understand that the rules of --
7 the Commission allows for parties to submit
8 documentation double-sided printed. I was
9 wondering if your Honors had any preference?

10 ALJ LIRAG: We are fine with
11 double-sided. We are fine with single-sided.

12 MR. GONDAI: Thank you.

13 ALJ LIRAG: Any --

14 MR. STRAUSS: Your Honor, Ariel Strauss
15 on behalf of Small Business Utility
16 Advocates.

17 With respect to the right time to
18 enter exhibits for those parties or
19 intervenors that do not have any witnesses
20 scheduled, would the right time be now before
21 we get started?

22 ALJ LIRAG: No. We are about to go
23 into recess pretty soon, and it will take a
24 much longer time to address all these
25 exhibits. Fair enough?

26 MR. STRAUSS: Yes. Would that then be
27 happening today?

28 ALJ LIRAG: We can handle some exhibits

1 today, since we have one witness that was
2 scheduled, I think the cross being waived.
3 So we can use that time to take care of some
4 exhibits that we already have.

5 MR. STRAUSS: Thank you, your Honor.

6 ALJ LIRAG: And then we will talk about
7 that.

8 So for today, we had scheduled
9 Mr. Cairns, Mr. Thomason, Jamie Martin,
10 Mr. Abranches and Terry White. And then I
11 believe there is an adjustment to that.
12 Either Ms. Gandesbery or Ms. Goodson?

13 MS. GANDESBERY: Yes, your Honor. Good
14 morning.

15 TURN has waived both David Thomason
16 and Jamie Martin.

17 ALJ LIRAG: All right.

18 Ms. Goodson, could you confirm.

19 MS. GOODSON: Yes, your Honor. That is
20 correct. TURN has waived cross. And in lieu
21 of cross of Mr. Thomason, PG&E has agreed to
22 not object to our introduction of an exhibit,
23 which we don't have a witness today, but
24 would request an opportunity to identify that
25 and seek to move it into evidence later this
26 week.

27 ALJ LIRAG: We will take care of that
28 later this week, then.

1 MS. GOODSON: Thank you.

2 ALJ LIRAG: We will take care of the
3 exhibits from those witnesses today.

4 Yes.

5 MR. PAK: Thank you, your Honor. Al
6 Pak for Alliance for Nuclear
7 Responsibilities.

8 Looking at the schedule prepared by
9 PG&E, our one and only witness is scheduled
10 for 20 minutes of cross-examination on
11 October 16th. Because my entire team is from
12 out of town, and the witness is from out of
13 town, we are going to request, if you will
14 entertain a request a date certain for that
15 witness. It doesn't matter what time. We
16 would just like to have our team here for as
17 limited amount of time as possible.

18 ALJ LIRAG: I believe there are certain
19 witnesses that were marked as date certain,
20 so those are date certain. And then if any
21 change occurs, please discuss with PG&E, or
22 confer with PG&E, and then we can take it up
23 during the hearing.

24 MR. PAK: Thank you, your Honor.

25 ALJ LIRAG: Anything else regarding
26 schedule, exhibits? Generally the exhibits
27 we will handle it per witness. Once the
28 witness is scheduled, we will take care of

1 that witness's exhibits. Generally that
2 order will be testimony, any supplemental or
3 any revised testimony, supplemental
4 testimony, followed by workpapers, and then
5 rebuttal testimony and then cross exhibits
6 from parties. And then we will move to the
7 next witness, and it will generally be that
8 same order.

9 So for parties that are scheduled or
10 planning to cross-examine, we generally want
11 you to move forward, especially if you have a
12 soft voice like Ms. Shek and Ms. Liotta. But
13 I think if your voice is loud enough, like
14 Mr. Finkelstein, the second row is fine. We
15 may ask -- he is not here.

16 (Laughter.)

17 ALJ LIRAG: Generally we may ask
18 parties to vacate the front row or the second
19 row temporarily, but I believe Cal PA
20 generally likes this side. And TURN, usually
21 you are at the second row in the middle
22 portion. But feel free to the steal seats
23 from them. PG&E usually takes the first two
24 rows on the left side. But, you know, you
25 can sit there.

26 All right. Any questions before we
27 head off?

28 (No response.)

1 ALJ LIRAG: There is a couple more
2 procedural aspects. Judge Lau and I will
3 take turns presiding. There is no set
4 schedule for when I will preside or when
5 Judge Lau will preside. Generally whoever
6 presides for that day will be presiding for
7 the entire day. So please direct any
8 objections or issues to the presiding judge.
9 If it is complicated, you may direct it to
10 both of us. Generally I'm much nicer than
11 Judge Lau, but please do not try to develop
12 any preference.

13 For pending issues, we have two
14 motions that are pending right now. One is
15 PG&E's motion regarding interim rates, that
16 will be resolved soon. The other is TURN's
17 motion concerning PG&E's reorganization plan.
18 That one we are still having to talk about a
19 solution, but we will try to come up with a
20 solution or a response to that pretty soon.

21 I think those are all the procedural
22 matters I wanted to address for the morning,
23 any questions? Yes, Mr. Lindl.

24 MR. LINDL: Apologies, your Honor.
25 Two, hopefully, quick clarifying questions.

26 On the exhibit numbers there will
27 not be PG&E Exhibit 1, just be Exhibit 1 for
28 the entire hearing?

1 ALJ LIRAG: Correct. You can refer to
2 however exhibits are pre-numbered while you
3 are doing your cross. I don't want to break
4 anyone's rhythm.

5 MR. LINDL: Understood. Thank you.

6 ALJ LIRAG: When referring to page
7 numbers, some page numbers say, usually it is
8 the witness's exhibit, initials like TL-01.
9 When doing your cross, you can omit referring
10 to that. We will just identify -- we will
11 just understand that that is the page number
12 without the initials. It helps the reporters
13 to not have to keep track of these initials,
14 but feel free to do it. If it breaks your
15 rhythm, you can do it however you want.

16 MR. LINDL: Thank you, your Honor.

17 The second one was simply for Ms.
18 Gandesbery and PG&E to ask to consider
19 CD-ROMs for other parties in addition to OSA.
20 We also have a couple of attachments that are
21 Excel spreadsheets that are voluminous when
22 printed out.

23 ALJ LIRAG: For these voluminous
24 spreadsheets or attachments, I suggest you
25 discuss it during this recess that is going
26 to occur, and then we will talk about it when
27 we resume at 11:00.

28 There is a phone that was turned on.

1 This is a listen-only phone. It is only for
2 internal use. It is going to be for the
3 Energy Division analyst. Mostly if they are
4 not in San Francisco, they are going to be
5 listening in on the hearings. It is a listen
6 only. It is muted. For the most part, just
7 ignore it.

8 Any other questions? We're about to
9 go into the recess. Hearing none. Let's
10 call a recess until 11:05 a.m. on that clock.
11 Off the record.

12 (Recess taken.)

13 ALJ LIRAG: Let's go back on the
14 record.

15 We are back from that one-hour
16 recess to take care of Commission business.

17 If you notice, there is a new crew
18 here. They are just going to be taking
19 pictures for their report, and we allowed it.
20 So I think they are going to be here for the
21 morning, probably not in the afternoon, but
22 they are here mostly to take pictures. They
23 won't be in the way.

24 This morning, about an hour ago, I
25 was saying that Commissioner Randolph is
26 going to be here tomorrow. She is actually
27 here right now. So I'll turn it over to
28 Commissioner Randolph for some brief remarks.

1 COMMISSIONER RANDOLPH: I actually
2 really don't have remarks prepared. I will
3 be trying to attend as much of the hearings
4 as possible. I will definitely need to be in
5 and out. Let's get started.

6 ALJ LIRAG: Thank you, Commissioner
7 Randolph.

8 So we have Mr. Cairns; is that
9 right?

10 MR. CAIRNS: That is correct.

11 ALJ LIRAG: Let's have Mr. Cairns'
12 exhibits. Let's go off the record for now.

13 (Off the record.)

14 ALJ LIRAG: Let's go back on the
15 record.

16 While we were off the record
17 exhibits were distributed. And we will
18 identify them in a moment. First, let's take
19 care of Mr. Cairns. Mr. Cairns, please raise
20 your right hand.

21 STEPHEN CAIRNS, called as a witness
22 by Pacific Gas and Electric Company,
23 having been sworn, testified as
follows:

24 THE WITNESS: I do.

25 ALJ LIRAG: Are you sure?

26 THE WITNESS: I am.

27 ALJ LIRAG: Please state your full
28 name, spell out your last name and provide a

1 business address.

2 THE WITNESS: My name is Stephen
3 Cairns, C-a-i-r-n-s. My business address is
4 245 Market Street, San Francisco.

5 ALJ LIRAG: I think folks in the back
6 would like you to probably speak closer to
7 the mic, because you have a nice accent but a
8 soft voice.

9 All right. Let's go to exhibits.
10 We will identify the exhibits right now. I
11 believe there is eight of them. First is
12 Exhibit 01 will be the Prepared Testimony of
13 Mr. Stephen Cairns.

14 (Exhibit No. 01 was marked for
15 identification.)

16 MS. GANDESBERY: It is not Mr. Cairns'
17 testimony. It is -- actually, PG&E Exhibit 1
18 is the testimony of witnesses who do not have
19 any cross-examination.

20 ALJ LIRAG: Right. I apologize. I
21 jumped right into Mr. Cairns. I forgot that
22 I asked for this exhibit to be Exhibit 1.
23 Let's redo that.

24 Exhibit 01 will be the prepared
25 testimony of primarily it is Ms. Ramaiya, but
26 it is also the testimony of various
27 witnesses. And this is the overall summary
28 of PG&E's general rate case testimony?

1 MS. GANDESBERY: Yes, your Honor.

2 ALJ LIRAG: Is that correct, Ms.

3 Gandesbery?

4 MS. GANDESBERY: Yes, your Honor.

5 ALJ LIRAG: I apologize for the

6 mistake. That is Exhibit 1.

7 Exhibit 2 is the prepared testimony

8 of Mr. Steven Cairns on Safety Risk and

9 Integrated Planning. So that is Exhibit 2,
10 correct?

11 MS. GANDESBERY: No, your Honor,
12 Exhibit 2 is the testimony of safety policy
13 of Todd Hohn, Integrated Planning Process and
14 Customer Affordability of Jamie Martin, and
15 Risk Management and Mitigation by Mr. Cairns.
16 The cross has been waived for the first two
17 witnesses.

18 ALJ LIRAG: Okay. So I apologize
19 again. So Exhibit 2 is prepared by various
20 witnesses, but it is all under one exhibit
21 number?

22 MS. GANDESBERY: Yes, your Honor.

23 (Exhibit No. 02 was marked for
24 identification.)

25 ALJ LIRAG: Mr. Cairns is sponsoring
26 Chapter 2?

27 MS. GANDESBERY: Chapter 3.

28 ALJ LIRAG: Chapter 3. All right.

1 Then another witness today will sponsor
2 Chapter 2?

3 MS. GANDESBERY: Those witnesses'
4 cross-examination have been waived.

5 ALJ LIRAG: Okay. All right. So that
6 is Exhibit 2.

7 MS. GANDESBERY: Yes, your Honor.

8 ALJ LIRAG: Exhibit 3 is the workpapers
9 of this time Mr. Cairns?

10 MS. GANDESBERY: Yes, your Honor.

11 ALJ LIRAG: On Safety Risk and
12 Integrated Planning, Exhibit 3.

13 (Exhibit No. 03 was marked for
14 identification.)

15 ALJ LIRAG: Exhibit 4 is the -- so
16 Exhibit 3 is Volume 1 of the workpapers of
17 Mr. Cairns, Exhibit 2 will be Volume 2 of the
18 workpapers to the testimony of Mr. Cairns.

19 (Exhibit No. 04 was marked for
20 identification.)

21 ALJ LIRAG: And then Exhibit 5 is the
22 rebuttal testimony of Ms. Ramaiya,
23 Mr. Thomason, and we have some appendices; is
24 that correct?

25 MS. GANDESBERY: Yes, your Honor.

26 ALJ LIRAG: Let's go off the record.

27 (Exhibit No. 05 was marked for
28 identification.)

1 (Off the record.)

2 ALJ LIRAG: Let's go back on the
3 record.

4 While we were off the record there
5 was a little bit of a discussion regarding
6 the exhibits. And I believe we cleared
7 everything up. Ms. Gandesbery will enlighten
8 us during the direct examination portion.

9 So let's move on. We have
10 identified Exhibit 5.

11 Next is Exhibit 6, and this should
12 be the rebuttal testimony of Mr. Cairns; is
13 that correct?

14 MS. GANDESBERY: It is. Exhibit 6
15 is what we've marked as PG&E Exhibit 16. It
16 is the rebuttal testimony of safety policy of
17 Todd Hohn rebuttal testimony, integrated
18 planning of various witnesses, and the
19 rebuttal testimony of risk management
20 mitigation of Mr. Cairns.

21 ALJ LIRAG: All right. So it is
22 rebuttal testimony of various witnesses, plus
23 Mr. Cairns?

24 MS. GANDESBERY: Yes.

25 ALJ LIRAG: All right. We are only
26 paying attention to Mr. Cairns right now,
27 apparently.

28 (Exhibit No. 06 was marked for
identification.)

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ALJ LIRAG: Next is Exhibit 07, and this is a cross-examination exhibit. It is the data response to -- the subject matter is Exhibit PG&E-16, Risk Management and Mitigation. So these are data responses to that topic submitted by TURN. So that will be Exhibit 07, Cal Advocates. Sorry, no, it is TURN. Let's go off the record.

(Off the record.)

ALJ LIRAG: Let's go back on the record.

Apparently I'm getting confused by these exhibits. Must be that one-hour recess that we had.

Anyway, Exhibit 7 is identified, except that it is Cal PA's cross exhibit. A little mischaracterization there.

(Exhibit No. 07 was marked for identification.)

ALJ LIRAG: Exhibit 08 is the PG&E Response to TURN Data Request 58-2 and contains an attachment. So that is Exhibit 08.

(Exhibit No. 08 was marked for identification.)

ALJ LIRAG: Exhibit 09 is PG&E Response to TURN Data Request 58-2, with Attachments 3

1 through 8. So that is Exhibit 9.

2 (Exhibit No. 09 was marked for
3 identification.)

4 ALJ LIRAG: All right. Ms. Gandesbery.

5 MS. GANDESBERY: Thank you, your Honor.

6 Would it help to read the exhibits
7 into the record?

8 ALJ LIRAG: As you identify each
9 exhibit.

10 MS. GANDESBERY: Okay.

11 ALJ LIRAG: That is fine. Do it
12 however you want.

13 MS. GANDESBERY: Okay. So we've
14 introduced as Hearing Exhibit 1, PG&E
15 Exhibit-1; Hearing Exhibit 2 is PG&E
16 Exhibit-2; Hearing Exhibit 3 is PG&E
17 Exhibit 2, first volume of workpapers
18 supporting Chapter 3; Hearing Exhibit 4 is
19 PG&E Exhibit 2 workpapers supporting
20 Chapter 3 Volume 2 of 2; Exhibit 5 is PG&E
21 Exhibit 15 Summary of PG&E's General Rate
22 Case; and Exhibit 6 is PG&E-16 Safety Risk,
23 and Integrated Planning.

24 ALJ LIRAG: Thank you. Please proceed.

25 MS. GANDESBERY: Thank you.

26 DIRECT EXAMINATION

27 BY MS. GANDESBERY:

28 Q Good morning, Mr. Cairns.

1 A Good morning.

2 Q I would like you to the confirm the
3 testimony you are sponsoring in this
4 proceeding in what has been marked for
5 identification as PG&E Exhibit 2 and PG&E
6 Exhibit 9. Are you sponsoring all of Exhibit
7 PG&E-2 Chapter 3 Risk Management and
8 Mitigation?

9 A Yes, I am.

10 Q And the workpapers for Exhibit 2
11 Chapter 3 is presented in PG&E Exhibit 2
12 Workpapers 3 Volumes 1 and 2?

13 A Yes, I am.

14 Q And all of the exhibit PG&E-9
15 Chapter 3 Risk Audit and Insurance
16 Department?

17 A Yes, I am.

18 Q And the workpapers for Exhibit 9
19 Chapter 3 is presented in Exhibit PG&E-9
20 Workpapers 1 through 9.

21 A Yes, I am.

22 MS. LONG: Excuse me, your Honor.

23 ALJ LIRAG: Mr. Long.

24 MR. LONG: I'm confused by reference to
25 PG&E Exhibit 9. Is that something that
26 should have been marked?

27 MS. GANDESBERY: These are exhibits
28 that will be presented later when Mr. Cairns

1 reappears to testify.

2 ALJ LIRAG: Let's identify exhibits by
3 how I've identified it. So let's go by the 1
4 through 9. The reference to the
5 pre-numbering was only to clarify, for
6 example, that Exhibit 2 is PG&E-2. So that
7 should only be mentioned perhaps one time, or
8 maybe twice or more, if you are
9 cross-examining. But let's try to designate
10 the -- so to avoid this confusion, let's try
11 to designate the exhibits how we've
12 officially identified them. Fair enough?

13 MS. GANDESBERY: Fair enough.

14 ALJ LIRAG: Let's proceed with that
15 directive. Thank you, Mr. Long.

16 BY MS. GANDESBERY:

17 Q Mr. Cairns, you are also sponsoring
18 Hearing Exhibit 6 Chapter 3 and rebuttal
19 testimony on risk management and mitigation?

20 A Yes, I am.

21 Q And in Exhibit PG&E -- PG&E-13 he
22 will be sponsoring statement of
23 qualifications. And we have not marked that
24 yet, your Honor.

25 ALJ LIRAG: So you bring up a good
26 point. So throughout the hearing we are
27 going to run across exhibits to be submitted
28 but have not yet been identified. So we can

1 refer to that, we will just reference those
2 exhibits and just say, "These are exhibits
3 that have not yet been marked." But you can
4 call them -- just state how you pre-numbered
5 them, or perhaps probably even better, state
6 the topic that it is covering. This applies
7 also to the rest of the parties, especially
8 when you are using your own witness's
9 testimony in your cross-examination. All
10 right?

11 Please continue, Ms. Gandesbery.

12 MS. GANDESBERY: Thank you, your Honor.

13 Q Mr. Cairns, were these materials
14 prepared by you or under your supervision?

15 A Yes, they were.

16 Q And do you have any changes or
17 corrections or additions to make?

18 A No, I do not.

19 Q Are the facts contained in these
20 exhibits true and correct to the best of your
21 knowledge?

22 A Yes, they are.

23 Q And do the opinions expressed
24 therein represent your best professional
25 judgment?

26 A Yes, they do.

27 MS. GANDESBERY: Thank you.

28 Your Honor, Mr. Cairns is now

1 available for cross-examination.

2 ALJ LIRAG: Thank you. So moving
3 forward for other witnesses, Ms. Gandesbery,
4 if the -- if there are any corrections to
5 testimony and they are lengthy, I may require
6 you to submit an errata document, and we will
7 identify that the next day. If it is just a
8 few items that need corrections, then you can
9 just correct it from the exhibit that we
10 have.

11 MS. GANDESBERY: Thank you, your Honor.

12 ALJ LIRAG: That is moving forward.

13 I think Mr. Sher wants to go first
14 or Mr. Long?

15 MR. SHER: Thank you, your Honor. I
16 appreciate it, Mr. Long.

17 MS. LONG: Thanks. Go ahead.

18 CROSS-EXAMINATION

19 BY MR. SHER:

20 Q Nicholas Sher on behalf of Public
21 Advocates. Good morning, Mr. Cairns.

22 A Good morning. Thank you.

23 Q If you could turn to page 3-7 of
24 PG&E-16, which is Exhibit 6. If you look at
25 lines 20 through 23, are you there?

26 A I am.

27 Q In here it states that RIBA, Risk
28 Informed Budget Allocation, will be updated

1 to use outputs of quantitative operational
2 risk modelling to enable consistent
3 data-driven risk, informed decision making
4 across LOBs, Lines of Business, in advance of
5 the 2023 GRC; is that correct?

6 A That is correct.

7 Q Why is this update to RIBA
8 necessary?

9 A So the current RIBA scoring is
10 based on the risk of not performing the work.
11 We identified that as a shortcoming, as also
12 been pointed out by others. This is to
13 improve the consistency of risk scoring
14 throughout the process. It is also in line
15 with the SMAP decision.

16 ALJ LIRAG: Which SMAP decision are you
17 referring to, is it the first decision or the
18 second decision?

19 THE WITNESS: The second decision.

20 ALJ LIRAG: Thank you. Please proceed,
21 Mr. Sher.

22 BY MR. SHER:

23 Q In your direct testimony, which is
24 marked as Exhibit 2, do you mention an
25 updated RIBA to RIBA 2.0?

26 A We do.

27 Q Can you point me to that?

28 ALJ LIRAG: Let's go off the record.

1 (Off the record.)

2 ALJ LIRAG: Let's go back on the
3 record.

4 While we were off the record
5 Mr. Cairns was looking for a particular item
6 in his testimony. Did you find it,
7 Mr. Cairns.

8 THE WITNESS: I did. Thank you.

9 ALJ LIRAG: Where is it?

10 THE WITNESS: It is on page 3-23
11 beginning on line 3. The goal of the RIBA
12 ongoing -- going forward is to use the
13 outputs of the qualitative operation risk
14 modeling to enable consistent data-driven
15 risk-informed decision making.

16 BY MR. SHER:

17 Q What will PG&E be updating in this
18 new RIBA?

19 A It will be using the output of the
20 risk models as the inputs to the RIBA model.

21 Q Is this when risk spend efficiency
22 comes in?

23 A Risk spend efficiency is the output
24 of the risk model and that will become the
25 input to the RIBA model.

26 Q With regards to risk spend
27 efficiency calculations, are they only
28 calculated for RAMP risk areas?

1 A So for the RAMP filing the only --
2 we only performed risk spend efficiency
3 calculations for mitigations, yes.

4 Q Is PG&E using risk efficiency
5 anywhere else other than RAMP?

6 A For the new modeling, it is broader
7 than RAMP. RAMP was just the top safety
8 risks. We are now looking at all of our top
9 risks, and we're using the RAMP methodology,
10 the bow tie and the risk modeling, with risk
11 spend efficiency.

12 Q If you can turn to what has been
13 marked as Exhibit 7, which is your Data
14 Response 244. If you can look in particular
15 at Question S(b)(iii) and your response
16 thereto.

17 A Yes.

18 Q I apologize. It is actually your
19 response to Question 2(b)(iii). Do you mind
20 reading that to yourself?

21 ALJ LIRAG: You want him to read it
22 into the record?

23 MR. SHER: No. He can read it to just
24 himself.

25 ALJ LIRAG: Let's go off the record for
26 that.

27 (Off the record.)

28 ALJ LIRAG: Let's go back on the

1 record.

2 Mr. Cairns has found, has read the
3 passage. Let's proceed, Mr. Sher.

4 MS. SHER: Thank you, your Honor.

5 Q In your response you mention that
6 the current RIBA scoring method will be
7 replaced by the methodology in the SMAP; is
8 that correct?

9 A That is correct.

10 Q Will the new risk method apply to
11 non-RAMP risks, i.e., PG&E's non-top risks?
12 Doesn't sound great, but you know what I
13 mean?

14 A So at the moment it will only apply
15 to those risks that we are evaluating using
16 the RAMP methodology. We are expanding from
17 top safety risk to include all "top risks."
18 At this time it won't be applied to non-top
19 risks.

20 Q You just made a distinction between
21 top safety risks and all non -- all top
22 safety risks?

23 ALJ LIRAG: Let's clarify. When we say
24 the top risks, we are referring to the top 22
25 risks that were identified in the RAMP
26 report?

27 THE WITNESS: They were the top 22
28 safety risks.

1 ALJ LIRAG: Top 22 safety risks.

2 Is that what you are referring to,
3 Mr. Sher.

4 MS. SHER: Correct.

5 ALJ LIRAG: We are referring to
6 those --

7 MR. SHER: Risks.

8 ALJ LIRAG: Please proceed, Mr. Sher.

9 BY MR. SHER:

10 Q Again, sorry, the updated RIBA will
11 address PG&E's non-top risks; is that
12 correct?

13 A Can you rephrase the question?

14 Q Sure. Will the updated RIBA
15 address PG&E's non-top safety risks?

16 A It will address the -- yeah, the
17 top risks that are not safety risks, yes.

18 Q Okay.

19 ALJ LIRAG: Could you repeat that
20 statement? It will not address?

21 THE WITNESS: Sorry, will address all
22 top risks, both safety top risks and
23 non-safety top risks.

24 ALJ LIRAG: It did not address non-top
25 risks?

26 THE WITNESS: Not at this time.

27 ALJ LIRAG: Thank you. Mr. Sher.

28 ///

1 BY MR. SHER:

2 Q If you could turn to Exhibit 6,
3 which is your rebuttal, page 3-8 line 30.

4 A 3-6 line?

5 Q 3-8 line 30. You see here it
6 states that PG&E will be working with the
7 Commission and other stakeholders on next
8 steps for determining --

9 A Yes.

10 Q -- risk tolerance for the many
11 risks inherent in its business.

12 What does the determination of risk
13 tolerance entail?

14 A So risk tolerance is a concept of
15 at what level is enough mitigation being
16 applied. I guess I should begin with it is
17 not possible to completely eliminate risk.
18 So what other mitigations that you can use to
19 lower the risk down to an acceptable level.
20 So the concept of risk tolerance is how does
21 one determine what is acceptable.

22 Q Does the determination of risk
23 tolerance requirement a comparison of modeled
24 risk observed data?

25 A That would be helpful, but there
26 are other considerations. What is tolerable
27 to one stakeholder may be intolerable to
28 another stakeholder. That is why we need to

1 work through the next set of SMAP workshops
2 to bring together the stakeholders to
3 determine how one should consider and
4 approach the subject of risk tolerance.

5 Q Regarding PG&E's risk reduction
6 goals, does PG&E have a stated risk reduction
7 goal between years 2020 and 2023?

8 A No, we don't.

9 Q Is PG&E trying to achieve -- sorry.
10 I'm going to rephrase that.

11 What is PG&E trying to achieve in
12 this GRC period in terms of risk reduction?

13 A So for each of the risk areas we
14 are seeking to achieve the maximum amount of
15 risk reduction, but we are currently unable
16 to optimize that across each risk. We need
17 to consider for each risk event what we are
18 seeking to avoid, understanding the drivers
19 of those events and the effectiveness of
20 current controls. How can we reduce either
21 the probability of that event occurring or
22 the consequence of that event if it were to
23 occur. So we are looking at it through an
24 individual risk lens.

25 Q Has PG&E considered its risk
26 reduction goals given constraints it may
27 face?

28 A That is one of the considerations.

1 For example, we may see a mitigation that can
2 effectively reduce that risk. But there may
3 be constraints in implementing that, such as
4 the ability of qualified labor, long lead
5 time for particular parts that may go into
6 that, permitting requirements, the ability to
7 take outages to complete the work, as
8 examples.

9 MS. SHER: Thank you. No further
10 questions.

11 ALJ LIRAG: All right. We have the
12 time, let's proceed to Mr. Long's cross.

13 MS. LONG: Thank you, your Honor.

14 CROSS-EXAMINATION

15 BY MR. LONG:

16 Q Good morning, Mr. Cairns. I'm Tom
17 Long with TURN.

18 A Good morning.

19 Q I think I saw two titles in your
20 testimony. You are PG&E's Risk and Audit
21 Officer. That is one title you give
22 yourself?

23 A My title is Vice President Internal
24 Audit and Chief Risk Officer.

25 Q You joined PG&E in 2006 as the
26 Senior Director of Internal Audit?

27 A That is correct.

28 Q You were promoted to the Vice

1 President position that you are now in in
2 2008; is that right?

3 A In 2008 I was promoted to the Vice
4 President, Controller.

5 Q And then after that how did you get
6 to this position?

7 A After that I was, became Vice
8 President of Internal Audit and Compliance.

9 Q That morphed into Vice President of
10 Internal Audit and Chief Risk Officer?

11 A In 2016, yes.

12 ALJ LIRAG: Let's pause a little bit,
13 Mr. Long. Let's go off the record.

14 (Off the record.)

15 ALJ LIRAG: Let's go back on the
16 record.

17 Sorry to interrupt, Mr. Long.
18 Please proceed.

19 MS. LONG: Thank you.

20 Q Mr. Cairns, I would like to direct
21 you to what has been marked as Exhibit 2,
22 that is your direct testimony. In
23 particular, I would like you to turn to
24 page 3-2 where you will see Heading B
25 Philosophy and Organization. And under that
26 Subheading 1, Philosophy. Do you see that?

27 A I do.

28 Q And just in general terms, you are

1 describing the value of quantitative risk
2 assessment in helping PG&E achieve the
3 Commission's affordability goals? Is that a
4 fair summary?

5 A That is correct.

6 Q Now, by meeting affordability
7 goals, do you mean keeping rates as well as
8 possible consistent with providing safe and
9 reliable service?

10 A That is a correct definition.

11 Q Is that a goal that PG&E goes with?

12 A Yes, it is.

13 Q And then you go on to say that
14 quantitative risk assessment, I'm
15 paraphrasing, allows us to better identify
16 the largest opportunities for risk reduction
17 and evaluate risk reduction investments
18 across the portfolio. Is that a fair
19 summary?

20 A Could you direct me to the
21 particular line item that you were
22 referencing?

23 Q I think it is pretty much lines 26
24 through 28, 26 -- actually, 25 and -- 25
25 through 27, I believe.

26 A Yes.

27 Q With that testimony in mind then,
28 would you agree with the following statement

1 from PG&E's GRC decision, I'm referring to
2 the handout that I distributed, which is an
3 excerpt from page 28 of that decision and
4 that decision number is Decision 14-08-032.
5 Do you have that handout in front of you?

6 A I do.

7 Q So I'm going to just read the
8 sentence at the first complete paragraph at
9 the top of that page and ask you if you agree
10 with that: Virtually everything a utility
11 does has some nexus to safety and can be
12 deemed to have some safety impact. But the
13 emphasis should be on those initiatives that
14 deliver the optimal safety improvement in
15 relation to the ratepayer dollars spent.

16 My question is: Do you agree with
17 that statement?

18 A Yes, I do.

19 Q Just before that sentence there is
20 another sentence that reads: It is not
21 enough to merely assert that safety would be
22 compromised, absent approval of a particular
23 work effort.

24 Would you agree that to justify its
25 forecasts in this GRC that it is not enough
26 for PG&E to merely assert the safety would be
27 compromised?

28 A That would be the desire, yes.

1 Q I'm going to ask you now to turn to
2 page 2-4 of that same exhibit. And at lines
3 1 and 2 you refer to something called the
4 Monthly Business Plan Review Dashboard. And
5 the Business Plan Review is abbreviated as
6 BPR. Do you see that?

7 A I do.

8 Q You are familiar with that
9 dashboard?

10 A I'm familiar with the concept of
11 the meeting, yes.

12 Q And this dashboard is provided to
13 the senior management team at monthly
14 meetings; is that right?

15 A That is my understanding, yes.

16 Q And the senior management team
17 consists of senior vice presidents and above;
18 is that right?

19 A That is correct.

20 Q Could you clarify for me, an
21 executive vice president, is that higher or
22 lower than a senior vice president?

23 A It is higher.

24 Q So now I would like you to turn to
25 a document that we had asked to be marked and
26 has been marked as Exhibit 7. This is -- I'm
27 sorry, it has been marked as Exhibit 8. This
28 is your response, PG&E's response to TURN

1 Data Request 58-2. It has Attachment 1,
2 which consists of two Excel worksheets that
3 have been combined.

4 First, do you have that in front of
5 you?

6 A Yes, I do.

7 Q In this, if you will look first
8 before we get into the Excel worksheets, if
9 you look at 58-2 Question A, and flipping
10 through to find the right -- this is actually
11 on page 1. We asked you to identify each of
12 the metrics in the BPR Dashboard and to
13 provide a complete definition what is
14 measured by each metric. Do you see that?

15 MS. GANDESBERY: Counsel, for the
16 record, this was sponsored by Jamie Martin
17 and not this witness.

18 MS. LONG: It is asking about his
19 testimony.

20 ALJ LIRAG: Let's have Mr. Long
21 continue. And then if Mr. Cairns cannot
22 answer, then he can say it is not part of his
23 testimony.

24 Let's proceed, Mr. Long.

25 BY MR. LONG:

26 Q I would like you now to -- okay.
27 So we were looking at 58-2(a). And we asked
28 you to identify each of the metrics, and then

1 the answer is the attachment to the exhibit;
2 is that right?

3 A That is correct.

4 Q And looking at the attachment then,
5 there are numerous pages of Exhibits that are
6 the 2018 metric definitions. Do you see that
7 heading at the top of the first page of
8 the --

9 A I do.

10 Q -- attachment?

11 If you go to the last page, I don't
12 know if it is on your copy, but I've
13 handwritten in this -- these are the 2019
14 Metric Definitions; is that right?

15 ALJ LIRAG: So there is no page number.
16 It is the very last page of Exhibit 08.

17 THE WITNESS: I see that last page.

18 BY MR. LONG:

19 Q Those are the 2019 Metric
20 Definition; is that right?

21 A As there is no heading, I don't
22 know.

23 Q I think the copy you have doesn't
24 have the -- what I've handwritten in. It is
25 the worksheet that is 2019 Metric
26 Definitions. We are on the same page?

27 A Yes.

28 Q All right. Now, from the Excel

1 worksheets I counted 179 metrics for 2018.
2 That is pretty much most of this attachment.
3 Those are the 2019 metrics. And then I
4 counted 26 metrics for 2019. Does that sound
5 about right to you?

6 A Without checking the math, it looks
7 about right.

8 ALJ LIRAG: You can say, "Yes, subject
9 to check" to answer that.

10 THE WITNESS: "Yes, subject to check."

11 ALJ LIRAG: It is a suggestion.

12 THE WITNESS: Thank you.

13 BY MR. LONG:

14 Q I just used the lines off the
15 number of rows and worked from the Excel
16 version. It made it kind of easier to check
17 that number?

18 All right. So can you explain why
19 there were approximately 179 metrics used for
20 the BPR Dashboard for 2018 and that number of
21 metrics went down to 26 for 2019?

22 A I have no hand in that. That
23 wasn't under my purview, so I'm afraid I
24 can't.

25 MR. LONG: Okay. I'm not aware of any
26 other witness that is testifying or talked
27 about the Business Plan Review Dashboard
28 Metrics. So I didn't understand why Jamie

1 Martin was listed as the sponsor when the
2 question related to testimony that was being
3 sponsored by Mr. Cairns. That is my
4 confusion. Anyway, is there a way we can get
5 an answer to that question?

6 ALJ LIRAG: Are you able to answer the
7 question, Mr. Cairns?

8 THE WITNESS: I'm not able to answer
9 that question.

10 MS. LONG: Maybe we can talk about it
11 offline with PG&E.

12 ALJ LIRAG: Let's go off the record.
13 (Off the record.)

14 ALJ LIRAG: Let's go back on the
15 record.

16 While we were off the record there
17 was some discussion regarding whether
18 Mr. Cairns or some other witnesses are able
19 to answer questions relating to a portion of
20 the document of Exhibit 2 that was not
21 sponsored by Mr. Cairns.

22 So the decision was to try, and
23 let's have Mr. Long just ask the questions.
24 And let's see if Mr. Cairns can answer as
25 much as he can.

26 Please proceed, Mr. Long.

27 MS. LONG: Thank you.

28 Q Mr. Cairns, looking at the 2018

1 metrics, and they are organized
2 alphabetically?

3 ALJ LIRAG: 2018.

4 MS. LONG: I'm sorry, 2018. Thank you.

5 Q For 2018 I'm going to ask you to
6 look at the metrics that begin with the line
7 of business showing as Finance and Risk.
8 They are not PG&E numbers. But if you can
9 turn to that page that shows the finance and
10 risk metrics where Finance and Risk is at the
11 top of the page?

12 A Yes, I have that.

13 Q The first metric listed there,
14 Analyst's Methods Within Projected Range. Do
15 you see that?

16 A I do.

17 Q What is this metric measuring?

18 A I could only answer based on
19 reading the definition.

20 Q Do you know what a cell site
21 analyst is?

22 A It is an analyst that looks at
23 different stocks, but I don't have any
24 knowledge of -- that is something that our
25 investment group looks at.

26 Q Okay. If you go down two metrics
27 on that same page, there is something that is
28 called "Count of L0 to L2 Initiatives." Do

1 you see that?

2 A I do.

3 Q Do you know what this metric is
4 measuring?

5 A I do not.

6 Q Do you know what a CAR initiative
7 is?

8 A I do not.

9 Q I'm going to forgo asking about the
10 other finance and risk metrics, which I think
11 we've established you are not able to answer
12 questions about that; is that right?

13 A Yes. This is under the Integrated
14 Planning Lead, Jamie Martin.

15 Q Okay. But again, it is in your
16 testimony. I don't believe Jamie Martin
17 referred to these metrics. Again, I'm
18 confused about not being able to get answers.

19 Let's now look at the next document
20 I handed out, which has been marked as
21 Exhibit 9. It is the same data request
22 response, but this has Attachments 3 through
23 8. Do you have that in front of you?

24 A I do.

25 Q Can you turn to page 9 of the data
26 request response. It has page 5 in the
27 bottom of the corner.

28 A Mm-mm, yes.

1 Q So the attachments are identified
2 on this page, and these attachments consist
3 of the agendas for the meetings where the
4 executive team or the senior management team
5 would review these metric results; is that
6 right?

7 A That is my understanding, yes.

8 Q So, for example, the first row on
9 that chart on that page says, "July 2018 BPR
10 Executive Agenda." That would be the
11 executive agenda for the meeting to go over
12 the July 2018 business plan review metrics;
13 is that right?

14 A Yes.

15 Q Have you had a chance to look
16 through these agendas?

17 A I have.

18 Q Are you familiar with, generally
19 familiar with these agendas?

20 A Only from reviewing it. I don't
21 attend these meetings. I don't have the
22 materials sent to me in advance.

23 Q Okay. You are not part of the
24 senior management team?

25 A I am not.

26 Q Okay. Because your position is one
27 level below the senior management team?

28 A That is correct.

1 Q All right. Let's see if you are
2 able to answer some of my questions about
3 these. Most of the metrics that show up in
4 these agendas are not doing well, and that
5 would be because these agendas tend to focus
6 on metrics where the performance is subpar.
7 Is that fair to say?

8 A My high-level understanding is
9 these meetings focus transparently on the
10 areas that need greatest attention by the
11 senior officers.

12 Q And then sometimes they are
13 reference to metrics that are amber and other
14 times to red. Could you explain those terms?

15 A So there is three layers of rating
16 performance. Red is off track without a plan
17 to recover, amber is off track but with a
18 plan, and green is on track.

19 Q Let's focus, for example, let's
20 look at the business plan review for -- it
21 will say on the top right corner August
22 Business Plan Review." Can you turn to that
23 page, please. Then if you turn to page 4
24 within that part of the document in that
25 attachment, you will see a heading that says
26 Compliance. Do you see that?

27 A Yes.

28 Q And the first item listed there is

1 Compliance Timely Reporting of Injuries. It
2 says "YTD," which I presume is year to date
3 performance, has been red with no calls
4 reported timely all year.

5 What does "red" mean in that
6 context?

7 A I don't know the answer to that.

8 Q Now let's stay with that same page.
9 If you go up the heading above is Finance and
10 Risk. There are two metrics at the bottom
11 there. Bottom of that box it says "BU,"
12 which I assume is business unit, "Expense
13 Forecast Accuracy (30 Days Ahead)" and then
14 the same for "Capital Forecast Accuracy"
15 below that. Those are not -- those do not
16 appear in the 2018 metrics in the attachment
17 we just looked at.

18 Are you able to explain that?

19 A I am not.

20 Q Do you have an understanding of
21 whether sometimes metrics, other than what
22 are in the business plan review metrics that
23 you shared with us, are sometimes used in
24 these meetings?

25 A I don't know. That is not part of
26 the process that I oversee.

27 Q All right. Let's move on then.

28 ALJ LIRAG: Let's do a little time

1 check, right now, Mr. Long. Not to rush you.
2 We have a lot of time in the afternoon. Do
3 you think you will wrap up the next
4 five minutes, or no? Otherwise, let's go
5 into the lunch break.

6 MS. LONG: Small chance of
7 five minutes, most likely 10. I don't think
8 I plan to go over too much.

9 ALJ LIRAG: This is only for purposes
10 of doing lunch.

11 MS. LONG: He may have redirect. For
12 his convenience, he may prefer we go through
13 all the questions now. I'm happy to do that.

14 ALJ LIRAG: Let's go along and do
15 another time check in five minutes. Please
16 proceed. Sorry to interrupt.

17 BY MR. LONG:

18 Q I would like you to turn now to
19 Exhibit 6 of your testimony and that is your
20 rebuttal testimony. Turn to page 3-10 of
21 that document. This touches a little bit on
22 questions that Mr. Sher was asking you.

23 In Answer 18, as I read that
24 answer, you are agreeing with TURN in saying
25 PG&E will replace the RIBA, R-I-B-A, scoring
26 approach with Risk Spend Efficiency, or RSE.
27 You will do that in accordance with the SMAP
28 settlement.

1 Is that a fair reading of that
2 answer?

3 A Yes; that is correct.

4 Q I think maybe key terms there is
5 the phrase "RIBA Scoring Approach." That is
6 what is going to be replaced --

7 A That is correct.

8 Q -- with the SMAP risk method; is
9 that right?

10 A Yes.

11 Q There are other elements of the
12 RIBA process, you say in that answer that
13 PG&E intends to continue to use. You
14 describe those in lines 20 to 24; is that
15 right?

16 A Yes.

17 Q Is it fair then to say that these
18 elements that you describe are something
19 different from the RSE score? First let's
20 start with that, these other elements --

21 A Yes.

22 Q -- that you are going to keep from
23 RIBA something other than scoring method; is
24 that right?

25 A Yes. These are the operational
26 constraints.

27 Q So these are elements -- see if I'm
28 understanding this -- these are elements

1 other than the score that PG&E intends to
2 consider, along with the risk spend
3 efficiency score, in deciding what worked to
4 propose in future rate cases; is that right?

5 A That is right.

6 Q On page -- if you can turn to
7 page 3-15, please.

8 A Yes.

9 Q Answer 30 on that page there you
10 discuss the issue of PG&E using 2016 as the
11 baseline for measuring risk reduction. Do
12 you see that?

13 A Yes.

14 Q Okay. There you are responding to
15 TURN's position that to calculate risk spend
16 efficiency, correctly for mitigation that are
17 proposed to be implemented beginning in 2020,
18 TURN's position being the baseline should be
19 through the end of 2019. Is that your
20 understanding of TURN's position?

21 A Yes, it is.

22 Q Would you agree that the right way
23 to measure risk reduction going forward is to
24 use the end of the year before the test year
25 as the baseline?

26 A If that is practical to do, then
27 yes. But when we put together the general
28 rate case, 2019 was the forecast. But we

1 thought using recorded actuals was much more
2 robust than a forecast.

3 Q And you are aware that under the
4 settlement that was adopted, the second SMAP
5 decision, Decision 18-12-014, that the
6 settling parties, including PG&E, agreed that
7 sometimes it is necessary to use subject
8 matter expertise to make the best estimates
9 that that can be made. Are you familiar with
10 that?

11 A I am.

12 Q And that could be one way to
13 estimate the -- to use the year prior to the
14 test year as the business line; isn't that
15 right?

16 A That is one way.

17 Q Okay. I would like you now to turn
18 to -- look at Answer 32, beginning at the
19 bottom of page 3-15, and then Answer 33 at
20 the top of page 3-16. If you could just
21 briefly familiarize yourself with those, and
22 I will have a question for you.

23 A Yes.

24 Q This is about issues and concerns
25 that TURN and others have raised about --
26 including PG&E, about the way that RSE was
27 calculated; is that fair?

28 A Yes.

1 Q And would you at least agree that
2 the Commission should -- the Commission
3 should take into account the problems with
4 PG&E's first generation RSE if it is thinking
5 of relying on RSE values in its decision
6 making in this case?

7 A So one of the things that we took
8 from the SED feedback was the mitigation
9 justification should be clearly outlined. So
10 if it was RSE based, then that would be an
11 error to pay attention to the RSE. If it was
12 some subject matter expert based, then the
13 basis for that subject matter expert will be
14 explained.

15 Q Okay. I think you answered maybe a
16 different question.

17 You are aware that TURN and you are
18 responding to TURN's recommendation that RSE
19 values have so many issues with them in the
20 first generation iteration that PG&E has put
21 forward here, that they are not really useful
22 for the Commission's decision-making process.
23 You are aware that is TURN's position?

24 A I am aware of that, yes.

25 Q I'm asking you if we can at least
26 agree that whether -- maybe not go as far as
27 what TURN said, but we can least agree the
28 Commission should take into account the

1 issues and problems with PG&E's first
2 generation RSE calculation in deciding what
3 weight to give those RSE calculations. Is
4 that something we can agree on?

5 A The limitations for the RSE should
6 be taken into account, yes.

7 MR. LONG: If I could have a moment off
8 the record, your Honor. I wanted to see if
9 there is a follow-up to one of Mr. Sher's
10 questions.

11 ALJ LIRAG: Let's go off the record.
12 (Off the record.)

13 ALJ LIRAG: Let's go back on the
14 record.

15 Mr. Long.

16 BY MR. LONG:

17 Q Mr. Cairns, in responding to
18 Mr. Sher's questions, you were talking about
19 the use -- what you call the "new risk
20 method" and what it would apply to. Do you
21 recall that?

22 A Yes.

23 Q And the new risk method is
24 basically the settlement that was adopted in
25 SMAP and that leads to the calculation of
26 RSE; is that right?

27 A Yes; that is correct.

28 Q And I wanted to just understand

1 this distinction you were making. You used
2 two different terms. You said that of course
3 the RSE will apply to the top safety risks.
4 You said PG&E would also have it apply to top
5 risks other than safety; is that right?

6 A Correct.

7 Q Could you help us understand what
8 is the difference between those two
9 categories? Help us understand what that
10 means?

11 A The top safety risks are those
12 risks where the event could lead to a safety,
13 either fatalities or serious injuries, but
14 there are other risks that the utility faces
15 that don't have the potential. But these
16 also could be very impactful if, for example,
17 the ability to serve load. Do you have
18 sufficient gas and power to meet that
19 forecast? That doesn't have a direct safety.
20 It has, I admit, an indirect safety. These
21 are risks that we also need to consider as a
22 utility.

23 Q And often folks refer to the
24 inability to serve load as a reliability
25 risk. Is that a term you use as well?

26 A Yes.

27 Q Do you have other non-safety risks
28 in mind when you talk about applying this new

1 risk method to something other than the top
2 safety risks?

3 A Sorry, could you rephrase?

4 Q I'm trying to figure out what
5 else -- I have this then diagram idea in my
6 mind. There is a something, a circle that is
7 top safety risks and then there is a circle
8 that is top risks other than safety.

9 What is in that circle other
10 than top risks other than safety? You just
11 said reliability could be in there. What
12 else?

13 A Business model. The nature of the
14 environment that the utilities are working in
15 changes. We have things like CCAs, Community
16 Choice Aggregation. The stated goal of
17 California to continue to reduce emissions
18 will have an impact on the gas business. So
19 these are other things that are
20 considerations for the utility.

21 Q So changes in the business
22 environment it sounds like you are describing
23 as another category?

24 A Yes.

25 Q That would be -- those would be
26 risk, because they pose a financial risk to
27 the utility. Is that fair to say?

28 A That is fair to say, yes.

1 Q Would there be other financial
2 risks that would be in the same category that
3 is not included in top safety risks?

4 A Sorry. Could you rephrase that
5 question?

6 Q Financial risks you just said
7 changes the business environment, would be an
8 example of one. Are there other financial
9 risks that would be something that PG&E would
10 include as a top risk other than safety?

11 A We linked all of these under what
12 we call "business model risk." So what are
13 the drivers that could impact the utility's
14 business and the longevity of that.

15 Q How do we know -- where is the
16 cutoff between top and not the top for this
17 exercise?

18 A So we follow the methodology, and
19 we look at the potential of the risk.
20 Understanding the event that you are seeking
21 to avoid, the drivers to those events, we
22 understand which one has the biggest impact
23 on the potential for that risk to occur, the
24 consequences on the left-hand side, the
25 right-hand side of the bow tie, and what
26 mitigations could reduce the impact of those
27 subsequences. And ultimately it is a
28 judgment call, does this rise to the level

1 that it is a potential that could be
2 significant to the organization's ability to
3 use objectives.

4 Q And I'm familiar, having been
5 involved in developing the SMAP settlement,
6 that there is a way in the settlement to
7 identify what -- figure out what the top
8 risks are that will be addressed under the
9 settlement.

10 But my question is: For these
11 other risks that are not safety risks, how
12 are you distinguishing between top and not
13 top?

14 A Judgment.

15 MS. LONG: All right. That is all my
16 questions.

17 EXAMINATION

18 BY ALJ LIRAG:

19 Q Let me just clarify something. So
20 the mitigation programs, activities, et
21 cetera, for the top safety risks, they are
22 not all safety related, just to clarify?

23 A For the top safety risk they are
24 all safety related, yes.

25 Q All activities relating to the
26 top -- the 22 risks in the RAMP report, they
27 are all safety?

28 A All safety related.

1 ALJ LIRAG: Any questions?

2 EXAMINATION

3 BY COMMISSIONER RANDOLPH:

4 Q Just to clarify, there is 22 top
5 safety risks and then there is 22 top risks?

6 A No.

7 Q I'm sorry. 27 top risks. So it is
8 two different categories, 27 top risks, 22
9 top safety risks?

10 A 27 top risks of which 22 are
11 safety.

12 Q Okay. That helps clarify.

13 ALJ LIRAG: The 22, those are what is
14 in the RAMP report?

15 THE WITNESS: That is correct.

16 ALJ LIRAG: Some of those are not
17 addressed in this GRC. I think there is one
18 that is FERC, then there is one for the I
19 believe it is the storage transmission GT&S
20 proceeding; is that correct?

21 THE WITNESS: That is correct.

22 ALJ LIRAG: Any further questions?

23 MS. LONG: Can I just ask a follow-up?

24 ALJ LIRAG: Yes, Mr. Long.

25 CROSS-EXAMINATION RESUMED

26 BY MR. LONG:

27 Q Where are the 27 risks that include
28 the 22 safety risks? Where have you

1 identified the 27?

2 A Can I ask counsel? I can't
3 remember.

4 MS. LONG: Absolutely.

5 ALJ LIRAG: Let's go off the record.
6 (Off the record.)

7 ALJ LIRAG: Let's go back on the
8 record.

9 Mr. Cairns, do you have an answer?

10 THE WITNESS: If I can refer you to
11 Workpaper 3-1 and Workpaper 3-2.

12 ALJ LIRAG: Are you looking at Volume 1
13 or Volume 2?

14 THE WITNESS: Volume 1 of 2.

15 ALJ LIRAG: So Exhibit 3 of 3?

16 THE WITNESS: Workpaper 3-1 shows the
17 top risks and which ones are identified as
18 enterprise risks.

19 COMMISSIONER RANDOLPH: I think, isn't
20 this -- sorry, I'm making sure I have the
21 right exhibit. Okay.

22 ALJ LIRAG: Please proceed, Mr. Cairns.

23 THE WITNESS: So Workpaper 3-1
24 identifies all top risks and which are
25 identified as enterprise risks. And over on
26 Workpaper 3-2 it shows which rate proceeding
27 these risks are applicable to.

28 MS. LONG: I apologize. I don't happen

1 to have those pages in front of me. Does it
2 identify the five that are top risks but not
3 top safety risks?

4 ALJ LIRAG: There is no one-to-one
5 correlation? We are trying to extract the
6 five risks in the 27 risks that are not
7 safety related. I think that is what we are
8 trying to extract.

9 Let's go off the record.

10 (Off the record.)

11 ALJ LIRAG: Let's go back on the
12 record.

13 While we were off the record we were
14 discussing the schedule, and so we've decided
15 we are going to take our lunch break right
16 now. Let's return back here at 1:30 on that
17 clock.

18 But before we go, Commissioner
19 Randolph, do you have any remarks or
20 questions?

21 COMMISSIONER RANDOLPH: No.

22 ALJ LIRAG: This is in the event that
23 you are not here in the afternoon.

24 COMMISSIONER RANDOLPH: No. Thank you.

25 ALJ LIRAG: We will follow-up on that.
26 Let's take our break right now. Off the
27 record.

28 (Off the record.)

1 (Whereupon, at the hour of 12:11
2 p.m., a recess was taken until 1:30
3 p.m.)

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AFTERNOON SESSION - 1:34 P.M.

* * * * *

ALJ LIRAG: Let's go back on the record. We're back from our lunch break. We'll continue with Mr. Cairns who remains under oath.

STEPHEN CAIRNS,
resumed the stand and testified further as follows:

ALJ LIRAG: We had a lot of questions for you, but then we had lunch so it's shortened the number of questions. I digress.

Mr. Long, any other questions?

MR. LONG: We were just going to give Mr. Cairns an opportunity to just explain for us the difference between the 22 RAMP risks and then the 27 top risks and how we can figure out which ones are which.

ALJ LIRAG: All right. Let's proceed with that, Mr. Cairns.

THE WITNESS: Thank you. If we could turn to Hearing Exhibit 03 and page WP3-1, here you'll see a list of the 27 top risks that existed at the time we did our RAMP filing, risk number 1, 6, 7, 13, and 27 are non-safety related risks.

1 ALJ LIRAG: Could you repeat that, 6,
2 7 --

3 THE WITNESS: Risk number 1.

4 ALJ LIRAG: Number 1.

5 THE WITNESS: Risk 6, risk 7, risk 13,
6 and risk 27.

7 ALJ LIRAG: Thank you.

8 MR. LONG: Could I ask one more
9 question following up on this morning's
10 discussion?

11 ALJ LIRAG: Of course.

12 MR. LONG: Thank you.

13 RECROSS-EXAMINATION RESUMED

14 BY MR. LONG:

15 Q Your testimony, Exhibit 6, Answer
16 18 on page 3-10 said you were replacing the
17 RIBA scoring method with the RSE calculated
18 in accordance with the SMAP settlement;
19 right?

20 A That's correct.

21 Q So the RIBA -- my understanding of
22 RIBA is that it was used to score all the
23 programs that were -- that are proposed in a
24 GRC; is that right?

25 A Correct.

26 Q So does that mean then that the RSE
27 calculated in accordance with the SMAP
28 settlement will be used to score all the --

1 in the future will be used to score all of
2 the proposed programs in the GRC?

3 A All of the proposed programs that
4 are safety related.

5 Q And is that how -- and RIBA is now
6 confined to safety-related programs?

7 A Rephrase. So this is still under
8 development. This is our intent and we
9 haven't ironed out all of the details behind
10 that, but we will be using the output from
11 the new risk models to feed into the RIBA
12 model.

13 Q And I'm focused on the scoring part
14 of it and, again, this concept that the RIBA
15 score is going to be replaced with an RSE
16 score?

17 A That's correct.

18 Q So for everything in the past when
19 you've been doing a RIBA score, there will
20 now be an RSE score; is that right?

21 A Where we have that RAMP-based model
22 that's based on the SMAP decision, that will
23 be. At the present time, I'm trying to think
24 about could there be certain items that go
25 into the GRC where we don't have that model.
26 That's my hesitation in giving you an
27 affirmative answer to that.

28 Q But the general intent is to use

1 RSE to replace the RIBA score and you just --
2 what you're sticking on here is just that
3 there may be some minor exceptions where that
4 wouldn't be the case?

5 A If there was something we didn't
6 have a model, then we wouldn't have an RSE.

7 Q Okay.

8 A That's my hesitation in answering
9 the question.

10 Q But for the most part, you will be
11 using RSE to replace the RIBA scores where
12 you now do a RIBA score?

13 A That's correct.

14 Q Thank you.

15 ALJ LIRAG: Just to add to that, so
16 once you've replaced the RIBA scores with the
17 RSE scores, there would still be items that
18 would contain a RIBA score?

19 THE WITNESS: That was my hesitation in
20 giving that complete answer. I don't know
21 off the top of my head if there could be
22 items that would not have been risk models.

23 ALJ LIRAG: All right. Fair enough.
24 So I have a couple questions. I'm not sure
25 if you're the one who sponsored this
26 testimony. I think it's part of
27 Ms. Ramaiya's testimony, but I'll ask you.
28 So this relates to how the Camp Fire affects

1 activities.

2 So according to the testimony,
3 PG&E's GRC testimony does not take into
4 account the Camp Fire events when the
5 testimony was prepared. Is that your
6 understanding or am I asking the wrong
7 witness?

8 THE WITNESS: I'm not the appropriate
9 witness to answer that question.

10 ALJ LIRAG: Let's go off the record.
11 (Off the record.)

12 ALJ LIRAG: Let's go back on the
13 record. While we were off the record, I
14 asked some clarifying questions on which
15 witness to ask and so I guess Mr. Cairns
16 doesn't have to answer any more questions
17 from me.

18 ALJ Lau, do you have any questions?

19 ALJ LAU: I don't.

20 ALJ LIRAG: Any of the other parties
21 have any questions?

22 (No response.)

23 ALJ LIRAG: Ms. Gandesbery, any
24 redirect?

25 MS. GANDESBERY: No, your Honor, but I
26 would like to move our exhibits into
27 evidence.

28 ALJ LIRAG: All right. Let's go off

1 the record for that.

2 (Off the record.)

3 ALJ LIRAG: Let's go back onto the
4 record.

5 Ms. Gandesbery, is there a move to
6 admit any of the exhibits we identified thus
7 far into the record?

8 MS. GANDESBERY: Yes, your Honor, thank
9 you. PG&E would like to move Exhibits 1
10 through 5 into the record.

11 ALJ LIRAG: Any objections from the
12 other parties?

13 (No response.)

14 ALJ LIRAG: Hearing none, Exhibits 1
15 through 5 are admitted into the record.

16 (Exhibit No. 01 was received into
17 evidence.)

18 (Exhibit No. 02 was received into
19 evidence.)

20 (Exhibit No. 03 was received into
21 evidence.)

22 (Exhibit No. 04 was received into
23 evidence.)

24 (Exhibit No. 05 was received into
25 evidence.)

26 ALJ LIRAG: And I understand Exhibit 6
27 is co-sponsored by another PG&E witness so
28 we're not admitting that today.

MS. GANDESBERY: That's right, your
Honor.

1 ALJ LIRAG: Mr. Sher, Exhibit 7.

2 MR. SHER: Good afternoon, your Honor,
3 yes, if Exhibit 7 can be moved into evidence,
4 please.

5 ALJ LIRAG: Any objections?

6 (No response.)

7 ALJ LIRAG: Hearing none, Exhibit 07 is
8 admitted into the record.

9 (Exhibit No. 07 was received into
10 evidence.)

11 ALJ LIRAG: Mr. Long, for 8 and 9?

12 MR. LONG: Yes, TURN moves those
13 exhibits into the record.

14 ALJ LIRAG: Any objections?

15 (No response.)

16 ALJ LIRAG: Hearing none, Exhibits 08
17 and 09 are admitted into the record.

18 (Exhibit No. 08 was received into
19 evidence.)

20 (Exhibit No. 09 was received into
21 evidence.)

22 ALJ LIRAG: I guess, Mr. Cairns, you
23 are excused.

24 THE WITNESS: Thank you.

25 ALJ LIRAG: Let's go off the record.

26 (Off the record.)

27 ALJ LIRAG: Let's go into the record.

28 While we were off the record, there was some

1 discussion regarding the exhibiting
2 numbering.

3 We'll start with Mr. Abranches.
4 Please raise your right hand.

5 ANDREW ABRANCHES, called as a
6 witness by PG&E, having been sworn,
testified as follows:

7 THE WITNESS: Yes, I do.

8 ALJ LIRAG: Please state your name,
9 spell your last name, and provide a business
10 address.

11 THE WITNESS: My name is Andrew, last
12 name Abranches, and my business address is 77
13 Beale Street, San Francisco. My last name is
14 spelled A-b-r-a-n-c-h-e-s.

15 ALJ LIRAG: Thank you. Now let's
16 identify some exhibits pertaining to
17 Mr. Abranches' testimony. First is
18 Exhibit 10. This is the prepared testimony
19 of various witnesses but contains the portion
20 sponsored by Mr. Abranches on gas
21 distribution, so that's 10.

22 (Exhibit No. 10 was marked for
23 identification.)

24 ALJ LIRAG: Exhibit 11 is the
25 Workpapers Supporting Gas Distribution. It
26 contains the portion being sponsored by
27 Mr. Abranches. This pertains to Chapters
28 2-2A. So that's Exhibit 11.

1 (Exhibit No. 11 was marked for
2 identification.)

3 ALJ LIRAG: Exhibit 12, Gas
4 Distribution Workpapers Supporting Chapters 3
5 to 5.

6 (Exhibit No. 12 was marked for
7 identification.)

8 ALJ LIRAG: Exhibit 13 is Gas
9 Distribution Workpapers Supporting Chapters 6
10 to 8.

11 (Exhibit No. 13 was marked for
12 identification.)

13 ALJ LIRAG: Exhibit 14 is the Gas
14 Distribution Workpapers Supporting Chapters 9
15 to 11.

16 (Exhibit No. 14 was marked for
17 identification.)

18 ALJ LIRAG: Exhibit 15 is the rebuttal
19 testimony of various witnesses but contains
20 the portion sponsored by Mr. Abranches on gas
21 distribution, so that's Exhibit 15.

22 (Exhibit No. 15 was marked for
23 identification.)

24 ALJ LIRAG: Exhibit 16 is the prepared
25 testimony of various witnesses containing the
26 portion sponsored by Mr. Abranches on
27 electric distribution, Chapters 1 through 10.

28 (Exhibit No. 16 was marked for
identification.)

1 ALJ LIRAG: Exhibit 17 is the prepared
2 testimony of various witnesses on electric
3 distribution, Chapters 11 through 19.

4 (Exhibit No. 17 was marked for
5 identification.)

6 ALJ LIRAG: Exhibit 18 is the
7 Workpapers For Electric Distribution
8 Supporting Chapters 1 through 10.

9 (Exhibit No. 18 was marked for
10 identification.)

11 ALJ LIRAG: Exhibit 19 is the Electric
12 Distribution Workpapers Supporting Chapters
13 11 through 19.

14 (Exhibit No. 19 was marked for
15 identification.)

16 ALJ LIRAG: Exhibit 20 is the rebuttal
17 testimony from various witnesses containing
18 Mr. Abranches' portion for electric
19 distribution, Chapters 1 through 19.

20 (Exhibit No. 20 was marked for
21 identification.)

22 ALJ LIRAG: Exhibit 21 is the Rebuttal
23 Testimony of Various Witnesses For Electric
24 Distribution and contains Appendix A.

25 (Exhibit No. 21 was marked for
26 identification.)

27 ALJ LIRAG: Exhibit 22 is the Electric
28 Distribution Rebuttal Testimony for

1 Workpapers, Chapters 7, 16, and 19. So
2 that's Exhibit 22.

3 (Exhibit No. 22 was marked for
4 identification.)

5 ALJ LIRAG: Let's proceed and identify
6 the exhibits from the Joint CCAs. These are
7 cross exhibits for Mr. Abranches. First is
8 Exhibit 23. These are excerpts from PG&E
9 Rule 21.

10 (Exhibit No. 23 was marked for
11 identification.)

12 ALJ LIRAG: Next is Exhibit 24, PG&E
13 Response to Joint CCA's Data Request 15,
14 Question 1.

15 (Exhibit No. 24 was marked for
16 identification.)

17 ALJ LIRAG: Finally, Exhibit 25 is the
18 PG&E Data Response to Joint CCA's Data
19 Request 18, Question 2.

20 (Exhibit No. 25 was marked for
21 identification.)

22 ALJ LIRAG: All right,
23 Ms. Gandesbery -- sorry, Mr. Ouborg.

24 MR. OUBORG: Thank you, your Honor.
25 Are we on the record?

26 ALJ LIRAG: Yes.

27 ///

28 ///

1 DIRECT EXAMINATION

2 BY MR. OUBORG:

3 Q Good afternoon, Mr. Abranches.

4 A Good afternoon.

5 Q Mr. Abranches, I'd like to confirm
6 the testimony that you're sponsoring in this
7 proceeding in what has been marked as
8 Exhibit 10, also known as PG&E-03 and
9 Exhibit 16, also referred to as PG&E-04.

10 Are you sponsoring the portion of
11 Exhibit 10, Chapter 2, Gas Distribution
12 Forecast Summary and Investment Planning; all
13 of Exhibit 10, Chapter 2A, Gas Distribution
14 Cost Forecasting Methodology; all of
15 Exhibit 10, Chapter 11, Gas Operations
16 Technology and Other Distribution Support;

17 A portion of Exhibit 16, Chapter 1,
18 Electric Distribution Operations Policy and
19 Introduction and the Workpapers presented in
20 Exhibit 10 related to Chapters 2 and 2A that
21 I just referred to and marked as Exhibit 11;
22 the Workpapers relating to Chapter 11 of
23 Exhibit 10, which has been marked as
24 Exhibit 14;

25 And, finally, the workpapers in
26 Exhibit 18 related to Chapter 1 of
27 Exhibit 18, this is your Electric Workpapers
28 related to Chapter 1 of your opening

1 testimony?

2 A That is true.

3 Q In addition, in what has been
4 marked Exhibits 6, 15, and -- your Honor, can
5 we go off the record?

6 ALJ LIRAG: All right, off the record.
7 (Off the record.)

8 ALJ LIRAG: Let's go back on the
9 record.

10 MR. OUBORG: Thank you, your Honor.

11 Q Mr. Abranches, in what have been
12 marked Exhibits 6, 15, and 21, are you
13 sponsoring a portion of PG&E -- of Exhibit 6,
14 Chapter 2, Rebuttal Testimony on Integrated
15 Planning and Affordability?

16 A I am.

17 Q All of Exhibit 15, Chapter 2,
18 Rebuttal Testimony on Gas Distribution
19 Forecast Summary and Investment Planning; all
20 of Exhibit 15, Chapter 2A, Rebuttal on Gas
21 Distribution Cost Forecasting Methodology;
22 all of Exhibit 15, Chapter 11, Rebuttal
23 Testimony on Gas Operations Technology and
24 Other Distribution Support;

25 All of Exhibit 20, Volume I,
26 Chapter 1, Rebuttal Testimony on Electric
27 Distribution Summary; and the documents in
28 Exhibit 6, Appendix A, Exhibit 15,

1 Appendix A, and Exhibit 21, Volume II,
2 Appendix A that relate to your sponsored
3 rebuttal testimony?

4 A I am.

5 MR. OUBORG: Can we go off the record
6 for a second, your Honor?

7 ALJ LIRAG: All right, off the record.
8 (Off the record.)

9 ALJ LIRAG: Let's go back on the
10 record. Mr. Ouborg, you were mentioning
11 about errata.

12 MR. OUBORG: Yes, your Honor, there are
13 two volumes of errata that PG&E has submitted
14 to date in this proceeding. They are quite
15 lengthy, numerous of those pages of that
16 errata would pertain to Mr. Abranches'
17 testimony, but those documents have not been
18 numbered or entered or provided at this
19 point.

20 ALJ LIRAG: Let's give a general
21 description of the errata, what is contained
22 in these errata volumes.

23 MR. OUBORG: Can we go off the record,
24 your Honor?

25 ALJ LIRAG: Off the record.
26 (Off the record.)

27 ALJ LIRAG: Let's go back on the record
28 and let's continue.

1 Mr. Ouborg, per our discussion while
2 we were off the record, there was a lot of
3 discussion regarding schedule and the errata
4 exhibits. The decision is to identify these
5 errata exhibits right now so we'll do that.

6 So Exhibit 26 would be errata for
7 the various exhibits that we just identified.
8 It's labeled Exhibit PG&E-14, so this is
9 errata. I think it should be Errata 1 to
10 make it clear. So that's Exhibit 26.

11 (Exhibit No. 26 was marked for
12 identification.)

13 ALJ LIRAG: Exhibit 27 will be errata
14 documents. Again, this will be Errata
15 Volume II.

16 Is that correct, Mr. Ouborg?

17 MR. OUBORG: Yes, your Honor.

18 (Exhibit No. 27 was marked for
19 identification.)

20 ALJ LIRAG: These errata are various
21 erratas to testimonies and tables and numbers
22 for exhibits that we just identified.

23 Is that an accurate description?

24 MR. OUBORG: Yes, your Honor.

25 ALJ LIRAG: All right, let's proceed
26 with the Direct Examination.

27 MR. OUBORG: Thank you, your Honor.

28 ///

1 DIRECT EXAMINATION RESUMED

2 BY MR. OUBORG:

3 Q Mr. Abranches, in what has been
4 just marked as Exhibit 26 and Exhibit 27,
5 PG&E's errata submissions, are you sponsoring
6 those pages of those errata submissions that
7 pertain to the testimony that we have
8 identified that you are sponsoring?

9 A I am.

10 Q And, finally, are you sponsoring
11 your statement of qualifications that were
12 submitted?

13 A I am.

14 Q Mr. Abranches, were these materials
15 prepared by you or under your supervision or,
16 to the extent they were not prepared by you
17 or under your supervision, do you
18 nevertheless adopt them as your sworn
19 testimony?

20 A I do.

21 Q And do you have any -- aside from
22 the Errata 1 and Errata 2 documents we just
23 identified, do you have any other changes or
24 corrections to make at this time to your
25 testimony?

26 A I do not.

27 Q Are the facts contained in these
28 exhibits true and correct to the best of your

1 knowledge?

2 A They are.

3 Q And to the extent they represent
4 opinion, do they reflect your best
5 professional judgment?

6 A They do.

7 Q Thank you.

8 Your Honor, Mr. Abranches is now
9 ready for cross-examination.

10 ALJ LIRAG: Thank you. Let's take our
11 afternoon break right now. So let's do a
12 10-minute break and be back at 2:35.

13 Any preference, Mr. Lindl or
14 Mr. Long, on who goes first?

15 MR. LONG: I would like to go first,
16 your Honor.

17 ALJ LIRAG: Is that fine, Mr. Lindl?

18 MR. LINDL: No problem here.

19 ALJ LIRAG: When we come back from
20 break, we'll have cross-examination by
21 Mr. Long. Let's go off the record.

22 (Off the record.)

23 ALJ LIRAG: Let's go back on the
24 record. We're back from our afternoon break.
25 We'll start with the cross-examination
26 conducted by Mr. Long of Mr. Abranches.

27 Mr. Long.

28 MR. LONG: Yes, thank you, your Honor.

CROSS-EXAMINATION

BY MR. LONG:

Q Good afternoon, Mr. Abranches.
Nice to see you again.

A Good afternoon, Mr. Long.

Q I want to first clarify what I'm
asking you about and the scope of what you're
testifying on and what is going to be
addressed at later times. So my questions
will all relate to the issue of the cross
bore program.

A Okay.

Q And my understanding is that you're
testifying today with respect to the cross
bore program about unit costs for the cross
bore program; is that fair?

A That is fair.

Q Okay. And then tomorrow I'll have
an opportunity to ask questions of another
PG&E witness, Mike Kerans, about other
aspects of the cross bore program. And then
on Wednesday, we'll have another opportunity
to ask more questions about the cross bore
program from the perspective of deferred
work; is that fair?

A That's correct.

Q Okay, good. So today it's about
unit costs for the cross bore program. To

1 get us focused on that, I would like you to
2 look at the hand-out I gave you, which I
3 believe is a couple of pages from Exhibit 11,
4 the Workpapers for Chapter 2A.

5 A That's correct.

6 Q So and specifically those are pages
7 Workpaper 2A-36 and 2A-37.

8 Do you have that?

9 A I do.

10 Q So this is where you presented the
11 unit costs in the direct testimony for cross
12 bore inspections; is that right?

13 A That is correct.

14 Q And if you'd look on the second
15 page, 2A-37, the bottom line is the forecast
16 unit cost for 2020 of \$1,251.21; is that
17 right?

18 A That is correct.

19 Q And that's a blended unit cost? Is
20 that fair to say?

21 A That is fair to say.

22 Q And blended in what respect?

23 A It's blended with regard to two
24 types of cross bore inspections. One is the
25 regular cross bore inspection, and then the
26 second one is more complicated where we've
27 got to go back. It's considered in the term
28 unable to access a UTA inspection.

1 It's specifically an inspection
2 where we attempted to do it before. For some
3 reason we are unable to access the location
4 of the sewer to insert a camera, so then we
5 come back -- we've got to come back to that
6 location.

7 Q Okay. So to get to this unit cost
8 of \$1,251, you broke that into two parts.
9 The first -- on your Workpaper, and that is
10 what I'm referring to -- on the Workpaper,
11 you started with a base unit cost of \$639
12 approximately?

13 A Correct.

14 Q On line six. And then you added to
15 that an adder of \$561 approximately on
16 row nine that's shown on the 2019 column; is
17 that right?

18 A That is correct.

19 Q That's how you got -- and then you
20 escalate and that's how you got to 1,251?

21 A That's correct.

22 Q So the \$561 adjustment you describe
23 on the previous page under the heading of
24 Adjustment to Forecasting Methodology; is
25 that right?

26 A Correct.

27 Q Is that the only explanation in the
28 Workpapers for that \$561 adjustment?

1 A That is the only explanation in the
2 workpapers. We did respond to Public
3 Advocates with a data request to provide a
4 basis for this.

5 Q And is it correct that this
6 Workpaper in the direct testimony does not
7 give separate unit costs for regular
8 inspections and UTA inspections?

9 A It does not.

10 Q All right. Now let's turn to your
11 rebuttal testimony. That has been marked as
12 Exhibit 15, otherwise known as PG&E-17.

13 Do you have that?

14 A Give me a minute.

15 ALJ LIRAG: Let's go off the record.

16 (Off the record.)

17 ALJ LIRAG: Let's go back on the
18 record.

19 Mr. Long.

20 MR. LONG: Thank you.

21 Q Mr. Abranches, you're sponsoring
22 Chapter 2A of Exhibit 15; is that right?

23 A That is correct.

24 Q And so this is your rebuttal on the
25 issue of cross bore unit cost; correct?

26 A Correct.

27 Q Is PG&E still proposing that the
28 blended cost of \$1,251 that we just looked

1 at, is that still PG&E's proposal for the
2 unit cost for the cross bore work?

3 A That is correct, yes.

4 Q So you're not proposing separate
5 unit costs then for UTA and non-UTA work?

6 A No, we are not.

7 Q So you want the Commission to just
8 affirm -- if PG&E had its way, then the
9 Commission would just affirm that 1,251 is
10 the unit cost that it should adopt for each
11 unit of work, whether it be a UTA or a
12 non-UTA unit of work; is that right?

13 A That is correct.

14 Q Okay. Then I'm a little bit
15 confused, especially in relationship to your
16 colleague Mr. Kerans who seems to be
17 proposing a methodology that uses two
18 different unit costs. And then if I could
19 direct you to page 2A-4, Answer 15. Let me
20 know when you are there.

21 Are you at Answer 15 now?

22 A Yes.

23 Q There you say PG&E used a separate
24 unit cost for UTA units \$2,080 and non-UTA
25 units \$655 to determine the blended unit cost
26 of 1,251. But still that is not your
27 proposal for the Commission to use two
28 separate unit costs. PG&E's proposal is to

1 use the blended unit cost.

2 Is that what you're saying?

3 A Yes, that's PG&E's proposal. What
4 I just stated was our proposal is to use
5 blended unit cost. We accept the
6 recommendation to use two separate unit costs
7 in my answer. PG&E recommends that they use
8 one unit cost, the blended unit cost.

9 Q I'm sorry, the two components of
10 that blended unit cost, those two different
11 cost numbers I just read --

12 A Right.

13 Q \$2,080 for UTA and 655 for non-UTA,
14 those were not in the direct testimony?

15 A Those are not in the direct
16 testimony. That was in the rebuttal.

17 Q All right. I will have some
18 questions, I think, for Mr. Kerans about how
19 his proposal works if PG&E is just proposing
20 a single-unit cost, but I think -- should I
21 save those for Mr. Kerans?

22 A Yeah, I think it would be best
23 saved for Mr. Kerans and myself on Wednesday.

24 Q Let's just look at this in
25 Answer 25-15, the \$2,080 unit cost for UTA
26 units. Is it fair to say that that \$2,000 --
27 2008 dollar figure is not based on costs for
28 any real-life work that has actually been

1 performed?

2 A That is not correct. It is not
3 based on any actual UTA work that has been
4 performed. It is based on similar work
5 that's close enough to a UTA to provide us a
6 basis.

7 The range for a UTA could range
8 anywhere from a thousand dollars up to
9 \$10,000 depending on the method that we need
10 to use to remediate or discover whether cross
11 bore exists at that location. So we had
12 proposed for UTAs approximately the \$2,000
13 cost on the lower end of the scale.

14 Q Okay. So PG&E has not actually
15 done any UTA inspections yet; is that right?

16 A That is correct.

17 Q So you don't have actual experience
18 doing UTA inspections and determining the
19 cost of that work; is that right?

20 A That is correct.

21 Q Now, on page 2A-1 -- I'm going to
22 skip that and move on. You just referred to
23 the range of costs and I think you speak to
24 that also at the top of page 2A-3 where
25 you're quoting from a response to a data
26 request from Cal Advocates; is that right?

27 A That is correct.

28 Q I quote you and I think you just

1 repeated it a moment ago, you cited a range
2 of unit costs for UTA work -- or, yeah, for
3 UTA inspections from \$1,000 to \$3,500 to as
4 high as \$10,000 or more; is that right?

5 A That is correct.

6 Q Are those numbers that you
7 developed personally?

8 A No. Those numbers I developed in
9 conjunction with the people who performed the
10 inspections or perform this type of work and
11 the engineers that support it.

12 Q So you did develop them or somebody
13 else did?

14 A Members of my team did develop
15 that, and I did oversee that development.

16 Q Okay. Now, you say something
17 called proximity clearance work in this quote
18 at the top of page 2A-3, you say proximity
19 clearance work is expected to cost \$1,000 per
20 unit. Now, proximity clearance work is
21 essentially a locating and marking exercise;
22 is that right?

23 A Not entirely. It's little bit more
24 than locating and marking exercise. Locate
25 and mark is one part of proximity clearance.
26 The other aspect of the proximity clearance
27 work is getting the data records from sewer
28 locations in geographic space, mapping that

1 up with the geographic records we have of our
2 facilities, checking to see from a location
3 base when you superimpose those, the locating
4 also validates, and you check to see if the
5 potential for a cross bore can exist at that
6 location.

7 Q Okay. So it's a matter of
8 determining the location of the PG&E
9 facilities, the PG&E gas lines --

10 A Correct.

11 Q -- and the other facilities that
12 you're worried that PG&E gas lines
13 penetrated?

14 A Exactly.

15 Q And if there's no potential for
16 them to intersect, then you're good; is that
17 right?

18 A That is correct.

19 Q Okay. And so that's a fairly -- a
20 relatively low cost way to determine whether
21 or not you have an issue within a UTA
22 inspection; is that correct?

23 A That is right.

24 Q Okay. So if it turned out that all
25 or most of the UTA work that PG&E needs to do
26 in the -- or ends up doing in the
27 2020-through-2022 period is based on
28 proximity clearance, then the unit cost for

1 that work would be much less than 2008
2 dollars; isn't that right?

3 A If it was all -- theoretically if
4 it was all based on proximity clearance, if
5 you cleared it on a proximity clearance, it
6 would be closer to the \$1,000; however, if I
7 can caveat that, the reason we feel a cross
8 bore exists at that location is because at
9 the time of construction when that gas main
10 was being put in, the technology in use was
11 directional bore technology.

12 And the directional bore technology
13 creates -- across the industry at that point
14 in time -- created a cross bore, which is why
15 we have this remediation program. We feel in
16 a few cases the proximity clearance will
17 provide us enough data to clear it, but
18 certainly not the majority.

19 Q So based on the range of unit costs
20 and different types of work that you describe
21 at the top of page 2A-3, would it be fair to
22 say that the unit costs for this work could
23 vary greatly depending upon the mix of UTA
24 work you do?

25 A That is what I've said specifically
26 in that testimony, yes.

27 Q Okay. And at this point PG&E is
28 not forecasting what type of UTA work or how

1 much UTA work it will do 2020 through 2022;
2 is that right?

3 A At the time we put together the
4 initial forecast, we were assuming we would
5 do in the San Francisco area roughly 10,000
6 in 2020 and about 1,000 in 2021. Since then,
7 there have been some changes to that
8 forecast.

9 Q And at this point PG&E is not
10 forecasting what type of UTA work or how much
11 UTA work it will do in the upcoming period;
12 is that right? That is 2020 through 2022.

13 A That is correct. But if I can add
14 some more context, the fact a UTA exists
15 means we are unable to access the sewer line
16 so it's hard to predict what exact
17 remediation will be done to allow us to
18 access the sewer line. So if you're asking
19 me what type of UTA it will fix, I say don't
20 know.

21 Q That's all my questions. As I say,
22 I think we'll be getting into this some more
23 with Mr. Kerans tomorrow and then on the
24 deferred work panel on Wednesday. Thank you
25 for now.

26 ALJ LIRAG: Thank you, Mr. Long.

27 Mr. Lindl.

28 MR. LINDL: Yes, thank you, your Honor.

CROSS-EXAMINATION

BY MR. LINDL:

Q Good afternoon, Mr. Abranches.

A Good afternoon.

Q My name is Tim Lindl, L-i-n-d-l,
with Council for the Joint CCAs. It's nice
to meet you. So I wanted to discuss with you
just one component of the Community Wildfire
Safety Plan. Within that plan, PG&E is
proposing what it is calling resilient zones;
correct?

A That is correct.

Q And the purpose of the resilient
zones is to provide temporary generation to
shelters and other services supporting public
safety during a Public Safety Power Shutoff
or PSPS; right?

A That is correct. I do want to say
I'm not the expert on that, but I do
understand in general terms what the
resilient zone purpose is and what resilient
zones are, yes.

Q Okay. Can you tell me or do you
agree that a core part of those resilient
zones is what PG&E calls pre-installed
interconnection hubs?

A Yes, yes.

Q Can you turn to your rebuttal

1 testimony, please, for electric. I have to
2 say I'm impressed with the breadth of topics
3 you're covering in this GRC.

4 A My wife is impressed as well.

5 Q This is exhibit -- it used to be
6 PG&E-18. It's now been marked as 21. It
7 will be Chapter 1, page 16.

8 A Got it.

9 Q Great. So on lines 19 to 20, you
10 state all of this work consists of the
11 installation of or support for assets on
12 PG&E's distribution system; is that right?

13 A That is correct.

14 Q And then below that is a bulletin
15 list of different items that fit within that
16 category; is that right?

17 A Correct.

18 Q And then on the next page,
19 page seven, lines eight through 13, you
20 describe the resilient zones program and you
21 state that resilient zones will be built
22 around pre-installed interconnection hubs
23 which are permanent plug-and-play
24 infrastructure that will enable temporary
25 generation to connect to the distribution
26 grid at predetermined locations; is that
27 right?

28 A That is correct.

1 Q And these are called
2 interconnection hubs because PG&E would
3 interconnect temporary generation hubs; is
4 that right?

5 A That is correct.

6 Q Okay. And the interconnection hubs
7 would also include some infrastructure that
8 PG&E has called grid isolation and protective
9 devices.

10 Does that sound right?

11 A It sounds right, but I will have to
12 say I'm not the expert on that. The witness
13 Mr. Calvert is.

14 Q Okay. Do you know or do you recall
15 if the purpose of those isolation protective
16 devices would be to allow PG&E to separate
17 targeted loads from the rest of the
18 de-energized grid during a PSPS event?

19 A I know specifically that these
20 resilient zones are being created so that we
21 can mitigate the impact from a PSPS event
22 should we exercise that need. The exact
23 technical details of that are stretching my
24 knowledge.

25 Q Okay. So based on your knowledge,
26 would you agree that essentially this
27 infrastructure is necessary to create a
28 small, energized microgrid during a PSPS

1 event?]

2 A At the high level, yes.

3 Q Thank you.

4 A If I could add the word
5 "temporary," because that is really my
6 testimony. The provision of temporary parts
7 during public safety power shutoff
8 operations.

9 Q It is temporary microgrids during
10 PSP events?

11 A Correct.

12 Q Do you know if the interconnection
13 hubs will be able to accommodate generators
14 around 2 megawatts in size?

15 A I do not know that answer directly.

16 Q Okay. So I can refer you to PG&E's
17 response to joint CCA-15 Question 1. It has
18 been marked as Exhibit 24 now.

19 A I have it in front of me.

20 Q Okay.

21 MR. OUBORG: Your Honor, if I may
22 clarify one thing before counsel proceeds on
23 this cross exhibit. I wanted to point out
24 that the sponsor of this cross exhibit is
25 actually a different witness, Steve Calvert.
26 Counsel and I discussed this ahead of time.
27 We agreed Mr. Abranches could answer best of
28 his ability. I wanted the record to reflect

1 he is in fact not the witness who sponsored
2 this response.

3 ALJ LIRAG: He will answer to the best
4 of his ability, and then Mr. Lindl can
5 follow-up with those questions not answered
6 with Mr. Calvert.

7 MR. LINDL: Thank you, your Honor.

8 ALJ LIRAG: Please proceed.

9 BY MR. LINDL:

10 Q Do you agree that Question 1(a)
11 there, the answer is that pre-installed
12 interconnection hub that has been located in
13 Angwin, California, is designed to
14 accommodate approximately 2 megawatts of
15 temporary generation?

16 A That is what it says in the answer.
17 It also says it is a pilot site.

18 Q Does it also say that PG&E intends
19 to standardize that design?

20 A That is true.

21 Q Thank you.

22 If a non-PG&E party, we will call
23 that a "third party," wanted to develop and
24 install a generation, that party would need
25 to go through PG&E's interconnection
26 procedures to interconnect their generation,
27 right?

28 A To the best of my knowledge,

1 correct.

2 Q Thank you. If a party wants to
3 develop and install a microgrid, that party
4 would need to go through PG&E's
5 interconnection procedures, correct?

6 A That is correct.

7 Q Thank you.

8 For that third party if there were
9 interconnection facilities or distribution
10 system upgrades that would need to be
11 installed in order to safely and reliably
12 operate that microgrid generator, the third
13 party would have to pay for those costs; is
14 that right?

15 A I think -- I don't know the exact
16 details of that tariff or that agreement. I
17 think Steve Calvert is the best person.
18 Mr. Calvert is the best person who
19 understands the nuances of that agreement to
20 answer your question.

21 Q Thank you.

22 So let's take a quick look then at
23 Exhibit 23, which is the pages from PG&E's
24 Rule 21. I understand that I may need to
25 follow-up with Mr. Calvert on this.

26 A Sure.

27 Q Are you familiar with Rule 21?

28 A I'm not intimately familiar. I

1 don't deal with it on a day-to-day basis. I
2 did read it. It is in our documents.

3 Q Thank you.

4 Do you know if Rule 21 governs cost
5 allocation for generators or microgrids that
6 are interconnected?

7 A As I read through it, it indicates
8 that it does, yes.

9 Q Okay. So then would you agree that
10 on Sheet 61 of this exhibit in Section E4,
11 I'll give you a minute to get there. The
12 sheet numbers are in the upper right. You
13 would agree that in the second sentence under
14 E4 it says: A producer that interconnects to
15 distribution providers' distribution or
16 transmission system is responsible for all
17 costs associated with parallel operation to
18 support the safe and reliable operation of
19 the distribution transmission system.

20 A That is what it says in this
21 document.

22 Q Okay. Generally speaking, Mr.
23 Abranches, do you know how PG&E recovers
24 costs for interconnection facilities or
25 upgrades for generators or microgrids from
26 third parties?

27 A I don't.

28 Q Okay. So you are not sure if a --

1 a third party interconnecting the
2 microgrid -- strike that. Let me rephrase,
3 please.

4 You are unsure if a third party
5 interconnecting a microgrid would have to
6 bear the cost for interconnection facilities
7 or distribution upgrades related to that
8 microgrid?

9 A I'm not the expert on that, no.

10 Q I have just a couple more
11 questions, please.

12 A Sure.

13 Q So currently neither the resilient
14 zones or the interconnection hub includes any
15 generating or storage equipment, right, just
16 equipment necessary to interconnect a mobile
17 diesel generator?

18 A Yes. The intent of the resilient
19 zone is to connect par. At this point in
20 time from what I do know, we are unclear on
21 what type, what is the source of that par.
22 These are generators that seem to be the most
23 logical one at this point in time.

24 Q Okay. Is PG&E planning to own or
25 source that generation from third parties, do
26 you recall?

27 A I can't speak exactly to that. I
28 don't know.

1 Q If PG&E owned the generation would
2 you agree that those costs would be
3 functionalized as generation?

4 MR. OUBORG: Objection, your Honor. He
5 is asking the witness to speculate.

6 ALJ LIRAG: I'll allow it. He is a --
7 he does many things, plus he is an expert.
8 If it is a question better answered by
9 Mr. Calvert, then please let us know. Let's
10 try to have you try and answer.

11 THE WITNESS: If you can repeat the
12 question.

13 BY MR. LINDL:

14 Q Sure. Let me rephrase that.

15 A Sure.

16 Q So your position in your testimony
17 is that these assets should be allocated to
18 distribution system costs, because they are
19 part of the distribution grid; is that right?

20 A That is correct.

21 Q So part of these assets was
22 generation that was owned by PG&E. Do you
23 think PG&E would revisit that
24 functionalization of those costs?

25 A If I could clarify. What we are
26 talking about here is the resilience zones.
27 If you are talking about in these resilience
28 zones is the ability to connect setting up

1 the distribution system so that we have the
2 ability to take in power and allow to the
3 point of a microgrid to get created when a
4 power -- public safety power shutoff event is
5 called so that zone can have power, right?
6 We are not speculating in any way that these
7 zones have generation, or we own the
8 generation, or someone else owns the
9 generation or type of generation.

10 And in my testimony over here, the
11 reason we are asking that it be included as
12 part of the distribution grid is what we have
13 asked for to -- for the cost to get allocated
14 to the distribution grid, because any costs
15 that are directly distribution type assets to
16 allow the distribution grid to function
17 effectively, to allow us to service that
18 distribution grid and to allow us to operate
19 that distribution grid flexibly, depending on
20 the situation, we've allocated those costs to
21 its electricity distribution costs. We are
22 not speculating anywhere about the generation
23 of energy that will traverse that
24 distribution grid.

25 MR. LINDL: One moment, please, your
26 Honor.

27 ALJ LIRAG: Off the record.

28 (Off the record.)

1 ALJ LIRAG: Back on the record.

2 MR. LINDL: Thank you, your Honor.

3 Q So if -- going back to the question
4 I asked earlier. If a third party was
5 interconnecting a microgrid or a generator,
6 would the cost of that interconnection go
7 into distribution rates or would the
8 developer pay for those costs?

9 A I would be then speculating the
10 conditions of the tariff, which I've
11 indicated I'm not the expert on that tariff.

12 MR. LINDL: No further questions, your
13 Honor.

14 EXAMINATION

15 BY ALJ LIRAG:

16 Q All right. I'm not sure if you can
17 answer this. I think it is for Mr. Singh,
18 but since you know a lot of things, let's try
19 it.

20 So this has to do with the
21 Community Wildfire Plan. You are familiar
22 with, it is called the Wildfire Mitigation
23 Plan OIR at the Commission R.18-10-007?

24 A I'm familiar with it. I've heard
25 of it. I am stretching my expertise to say
26 I'm --

27 Q My question is very direct.
28 Were there any changes to the

1 Community Wildfire Plan as a result of the
2 decision in this OIR that you know of? I'm
3 asking you about general changes to the
4 wildfire plan.

5 A To answer your question honestly,
6 my function in electric operations is to
7 manage the investment planning process and
8 manage actually all changes to our plans. So
9 on an ongoing basis there are changes. It is
10 hard for me to say there are no changes. I
11 have a hard time specifically explaining
12 which changes, but I'm sure there are
13 changes. I wouldn't describe it as no
14 changes.

15 ALJ LIRAG: That is fair. Let me go
16 off the record.

17 (Off the record.)

18 ALJ LIRAG: Let's go back on the
19 record.

20 All right. Mr. Abranches, thank
21 you. I thought Mr. Singh had no cross
22 scheduled, but I will ask Mr. Singh then.
23 Thank you.

24 ALJ Lau.

25 ALJ LAU: Nothing.

26 ALJ LIRAG: Any other questions for
27 parties? Hearing none.

28 Ms. Gandesbery, any redirect?

1 Sorry. Mr. Ouborg, I keep ignoring you, that
2 is because your name tag is not up.

3 Any redirect, Mr. Ouborg?

4 MR. OUBORG: May I confer the witness?
5 Is that your practice to allow that, or not?

6 ALJ LIRAG: That is fine. Let's take a
7 five-minute break. Let's go off the record.

8 (Off the record.)

9 ALJ LIRAG: Let's go back on the
10 record.

11 Mr. Ouborg, any redirect?

12 MR. OUBORG: Yes, your Honor.

13 REDIRECT EXAMINATION

14 BY OUBORG:

15 Q Mr. Abranches, a short while ago
16 when Mr. Long was cross-examining he referred
17 you to Question and Answer 15 in your
18 rebuttal testimony at page 2(a)(iv). Do you
19 have that in front of you?

20 A I do.

21 Q He specifically asked you about
22 whether PG&E is utilizing a single blended
23 unit cost for cross bores, or whether PG&E is
24 using two separate unit costs. And I wanted
25 to ask you if you would like to clarify to
26 your knowledge how PG&E is proposing to
27 utilize these two separate unit costs that
28 are stated here in this answer? In other

1 words, the \$2,080 for UTA cross bores that
2 PG&E is basically estimating, and the \$655 a
3 unit for the non-UTA units?

4 A I think the witness Mr. Kerans will
5 be on the stand on Wednesday, will be
6 explaining a formula that he is proposing to
7 allow us. Because we don't know what the
8 volume of UTAs that we will find to use the
9 UTA unit cost with that, with the volume we
10 find for UTAs and use the remainder of the
11 forecasted amount that we get for non-UTAs to
12 balance it between that formula.

13 Q Thank you.

14 The second thing I wanted to ask
15 you about was Mr. Long asked you whether PG&E
16 was forecasting to do any unable-to-access
17 cross bores in the current rate case. And
18 did you want to clarify your response to
19 Mr. Long?

20 A Yes. In the coming rate case we do
21 propose to do UTAs.

22 Q How many UTAs?

23 A The exact amount of UTAs we
24 don't -- we have -- we know we've got about
25 21,000 UTAs that we know of. As we do other
26 cross bore inspections, we may encounter
27 other locations that are unable-to-access
28 situations. Forecasting the exact number is

1 challenging.

2 Q Is it fair to say that PG&E will do
3 as many as they reasonable can, UTA
4 inspections?

5 A Yes.

6 MR. OUBORG: Thank you. That is the
7 end of my redirect, your Honor.

8 ALJ LIRAG: Any questions on that,
9 Mr. Long?

10 MR. LONG: Yes, your Honor.

11 RE CROSS-EXAMINATION

12 BY MR. LONG:

13 Q First, I'm still a little bit
14 confused about PG&E's proposal. You were
15 asked questions about what PG&E would
16 utilize. I want to know what you are
17 proposing. Are you proposing a single
18 blended unit cost, or are you proposing two
19 separate unit costs?

20 A In my original testimony I proposed
21 a blended unit cost. In rebuttal we provided
22 the opportunity to have two unit costs. We
23 said in the rebuttal that we accept the
24 recommendation to use two unit costs. But if
25 you ask for my proposal, I would prefer to
26 stay with one unit cost.

27 Q Which means then you are proposing
28 a certain number of units that are going to

1 be done, and then you want to multiply that
2 by the unit cost to the get to the forecast
3 cost; is that right?

4 A That is correct.

5 Q What is the number of units then
6 you are going to multiply by the blended
7 cost?

8 A Because we can't forecast the
9 volume of UTAs, as I just indicated where we
10 do UTAs, we will use the rough unit cost of
11 \$2,000 per UTA. When we do the others, we do
12 a -- we spend a lower amount, but we do a
13 higher volume of non-UTAs. So the volume
14 issue is not -- we are asking for a set
15 amount on the cross bore program to alleviate
16 cross bores on a consistent basis year over
17 year.

18 Q So where I'm still struggling is
19 the second line of questions from your
20 counsel were about forecasting UTAs in this
21 rate case. And you said, I think you said
22 yes, you are proposing to do UTA inspections
23 as many as you -- as PG&E reasonable can.
24 But you still don't have a forecast number of
25 UTA inspections that PG&E will be doing; is
26 that right?

27 A That is correct. The nature of --
28 nature are unable -- when you go do an

1 inspection you get -- you may or may not be
2 able to access the sewer line. That creates
3 the situation of unable to access.

4 I think Mr. Kerans in his testimony
5 will provide more descriptions on what are
6 unable-to-access locations and the level of
7 coordination that it requires to remediate
8 that situation. So the ability to forecast
9 the volume is extremely challenging.

10 Q Let's leave it there. Again, we
11 will get back to these issues tomorrow and
12 Wednesday, I believe.

13 A Thank you.

14 ALJ LIRAG: All right. Thank you.

15 Mr. Ouborg, are there any exhibits
16 that we can move into the record?

17 MR. OUBORG: Your Honor, I don't
18 believe they are any where there is not also
19 other material.

20 ALJ LIRAG: Let's leave all the
21 exhibits then.

22 Mr. Lindl, move to admit Exhibits 23
23 to 25?

24 MR. LINDL: Yes, your Honor. Joint
25 CCAs request Exhibit 23, 24 and 25 be moved
26 into the record.

27 ALJ LIRAG: Any objections?

28 MR. OUBORG: No, your Honor.

1 ALJ LIRAG: Hearing none, Exhibits 23,
2 24 and 25 are received into the record.

3 (Exhibit No. 23 was received into
4 evidence.)

5 (Exhibit No. 24 was received into
6 evidence.)

7 (Exhibit No. 25 was received into
8 evidence.)

9 ALJ LIRAG: Thank you, Mr. Abranches.
10 You are excused for today.

11 I think that is all the witnesses we
12 have today. We had a lot of, or several,
13 waivers of cross. We will talk more about
14 that.

15 For parties that want to move
16 exhibits into the record, let's try and
17 arrange with PG&E if you have a specific day
18 that you want to do that. Otherwise, we will
19 just fit it into the schedule whenever is
20 convenient, meaning towards the beginning of
21 the hearing there is usually not a lot of
22 time. But then as we move into the latter
23 weeks of the hearing, that is when we usually
24 have more waivers of cross as the record
25 becomes more fully developed. If there is a
26 date certain that you have to -- that you are
27 unable to make it other than that day, please
28 arrange with PG&E. So this is regarding the

1 schedule, and so we can take care of that and
2 spend a specific time for that. Or PG&E
3 can -- we will make an allowance to address
4 these exhibits, if there is a date certain.
5 But otherwise, we will just take it up
6 whenever there is time to do so.

7 Any questions?

8 MR. DENEBEIM: Is there a time right
9 now, your Honor?

10 ALJ LIRAG: I believe no.

11 Off the record.

12 (Off the record.)]

13 ALJ LIRAG: Let's go back onto the
14 record. While we were off the record,
15 exhibits were distributed. These are
16 exhibits for which witnesses have no cross
17 schedule and, due to scheduling conflicts, we
18 are taking these up right now.

19 So, first, Exhibit 28 is the direct
20 testimony of Alison Lechowicz.

21 MR. DENEBEIM: Lechowicz.

22 ALJ LIRAG: Lechowicz.

23 MR. DENEBEIM: Yes. That's just the
24 trigger line.

25 ALJ LIRAG: All right. It is. So that
26 is Exhibit 28.

27 PG&E, have you had a chance to
28 review this document?

1 MS. GANDESBERY: Yes.

2 ALJ LIRAG: Is there a move to have
3 this admitted into the record?

4 MR. DENEBEIM: Yes, your Honor, Daniel
5 Denebeim for the California City Council
6 Streetlight Association. We'd respectfully
7 request that you move Exhibit CalSLA 1 into
8 the record on evidence in this proceeding.

9 ALJ LIRAG: We've designated that as
10 Exhibit 28.

11 Any objections?

12 MS. GANDESBERY: No objection, your
13 Honor.

14 ALJ LIRAG: Hearing none, Exhibit 28 is
15 admitted into the record.

16 MR. DENEBEIM: Thank you, your Honor.

17 ALJ LIRAG: You're welcome.

18 (Exhibit No. 28 was received into
19 evidence.)

20 ALJ LIRAG: Next is Exhibit 29, the
21 Direct Testimony of Michael Brown for SBUA.
22 Exhibit 30 is the rebuttal testimony of
23 Mr. Brown.

24 Same question to PG&E, have you had
25 a chance to review these documents?

26 MS. GANDESBERY: Yes, we have, your
27 Honor.

28 ALJ LIRAG: Is there a move,

1 Mr. Strauss, to move this into the record?

2 MR. STRAUSS: Yes, your Honor.

3 ALJ LIRAG: Any objections?

4 MS. GANDESBERY: No objection, your
5 Honor.

6 ALJ LIRAG: All right, Exhibits 29 and
7 30 are received into the record. Thank you.

8 (Exhibit No. 29 was received into
9 evidence.)

10 (Exhibit No. 30 was received into
11 evidence.)

12 ALJ LIRAG: So tomorrow we'll have
13 testimony by Mr. Kerans, Mr. Calvert,
14 Mr. Dashner, Mr. Nagra, Mr. Wetzel, and
15 Mr. White. So we'll have those witnesses
16 tomorrow, we'll take up their exhibits, and
17 then we'll address any other issues that are
18 pending.

19 All right. Any other concerns?
20 Hopefully none. All right, let's call a
21 recess for today we'll continue tomorrow.
22 Off the record -- oh, Ms. Gandesbery, did you
23 want something in the record?

24 MS. GANDESBERY: Yes. Your Honor, we
25 have a schedule change on Thursday.

26 ALJ LIRAG: All right.

27 MS. GANDESBERY: Which is just a
28 Community Wildfire Safety Program panel.
It's not available. We will discuss this

1 with the parties. We have had discussions
2 with the parties. We'll have additional
3 discussions tonight and send a new calendar
4 around by e-mail tonight.

5 ALJ LIRAG: Okay. Let's take that up
6 tomorrow. No need to get that into the
7 record.

8 MS. GANDESBERY: All right. Thank you.

9 ALJ LIRAG: Off the record.

10 (Whereupon, at the hour of 3:30 p.m.
11 this matter having been continued to
12 Tuesday, September 24, 2019, at 9:30
a.m., in Francisco, California, the
Commission then adjourned.)]

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, ANA M. GONZALEZ, CERTIFIED SHORTHAND REPORTER
NO. 11320, IN AND FOR THE STATE OF CALIFORNIA, DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON SEPTEMBER 23, 2019.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.

EXECUTED THIS SEPTEMBER 24, 2019.


ANA M. GONZALEZ
CSR NO. 11320

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, ANDREA L. ROSS, CERTIFIED SHORTHAND REPORTER
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HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
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THIS MATTER ON SEPTEMBER 23, 2019.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.

EXECUTED THIS SEPTEMBER 24, 2019.

A handwritten signature in black ink, appearing to read "Andrea L. Ross", written over a horizontal line.

ANDREA L. ROSS
CSR NO. 7896

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