

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



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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

OCTOBER 18, 2019 - 9:30 A.M.

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ADMINISTRATIVE LAW JUDGE LIRAG: Let's go on the record. Good morning, everyone. This should be the last day of evidentiary hearings, unless we have another one on November 6th, which we shall discuss later on. We'll also take care of pending matters and matters that need to be addressed moving forward at the end of the hearing today.

So let's take care of Mr. Borden.

ERIC BORDEN, called as a witness by TURN, having been sworn, testified as follows:

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

THE WITNESS: Eric Borden, B-o-r-d-e-n. I'm with TURN, address 785 Market Street, San Francisco, 94103.

ALJ LIRAG: Let's identify some exhibits. First is Exhibit 288. This is the Prepared Testimony of Eric Borden.

Next is Exhibit 289. These are Attachments to the Testimony of Mr. Borden.

Exhibit 290, Mr. Hawiger, is this the cross exhibit pertaining to Mr. Calvert?

MR. HAWIGER: Yes, your Honor.

ALJ LIRAG: Exhibit 290 is a

1 cross-examination exhibit. It does not
2 relate to Mr. Borden's testimony. It relates
3 to Mr. Calvert's testimony. And the document
4 includes PG&E Response to Turn Data Request
5 088-10, SCE's Response to TURN Data Request
6 015 in Application 18-09-002, and then
7 relevant to PG&E Rebuttal Testimony page 9 to
8 20, Answer 40. So that's Exhibit 290.

9 (Exhibit No. 288 was marked for
10 identification.)

11 (Exhibit No. 289 was marked for
12 identification.)

13 (Exhibit No. 290 was marked for
14 identification.)

15 ALJ LIRAG: Next, PG&E Response to
16 TURN's Data Request 003, Question 11, Exhibit
17 291.

18 And then Exhibit 292 is PG&E's
19 Response to TURN's Data Request 088, Question
20 6 with Attachment 1.

21 Let's do the Direct Examination
22 first for Mr. Borden. We'll tackle this
23 exhibit for Mr. Calvert at the end of
24 Mr. Borden's cross-examination.

25 MR. HAWIGER: Thank you, your Honor.

26 ALJ LIRAG: Please proceed,
27 Mr. Hawiger.

28 MR. HAWIGER: Thank you.

1 DIRECT EXAMINATION

2 BY MR. HAWIGER:

3 Q Mr. Borden, do you have with you
4 what has been identified as Exhibits 288 and
5 289, your Direct Testimony and attachments?

6 A Yes.

7 Q Were these prepared by you or under
8 your supervision?

9 A Yes.

10 Q Do you have any changes or
11 corrections to make at this time?

12 A No.

13 Q Are the facts contained in your
14 testimony true and correct, to the best of
15 your knowledge?

16 A Yes.

17 Q And do the opinions contained in
18 your testimony represent your best
19 professional judgment?

20 A Yes.

21 Q Do you adopt these as your sworn
22 testimony in this proceeding?

23 A Yes.

24 MR. HAWIGER: Your Honor, Mr. Borden is
25 available for cross-examination.

26 I would just like to note
27 Mr. Borden's entire testimony was responsive
28 to PG&E's direct testimony on both vegetation

1 management and grid hardening. PG&E's
2 Rebuttal Testimony on grid hardening
3 introduced very substantial changes. Those
4 are not addressed in Mr. Borden's testimony.

5 If you would like Mr. Borden to take
6 two minutes to make a high-level observation,
7 we'd be happy to do that. It's totally up to
8 you.

9 ALJ LIRAG: Let's do that, but first,
10 there's also an Exhibit 287 that was
11 identified yesterday. I just want to make
12 sure Mr. Borden has a copy of that. It is
13 surrebuttal.

14 No. I guess this doesn't pertain to
15 Mr. Borden; is that correct, Ms. Gandesbery?

16 MS. GANDESBERY: Right. It does not.

17 ALJ LIRAG: All right. I'm sorry for
18 the error.

19 All right. Mr. Borden, let's have
20 the two-minute overview.

21 THE WITNESS: Sure. Thank you, your
22 Honor.

23 From the information PG&E has
24 presented, as well as the one round of
25 discovery we were able to do regarding PG&E's
26 rebuttal testimony, we are very concerned
27 with the safety implications of reducing the
28 scope of the overhead program so

1 dramatically. It's effective by around 50
2 percent. It's unclear whether this is really
3 warranted given the expected increase that
4 the rebuttal testimony introduces, around one
5 billion dollars.

6 And it's unclear to us whether PG&E
7 really is unable to find the labor to do this
8 work, given the one-billion-dollar increase
9 in undergrounding work that they expect.

10 With regard to that 153 miles of
11 undergrounding, we do not believe PG&E has
12 substantiated the reasonableness of that
13 forecast.

14 ALJ LIRAG: All right. Thank you.

15 And TURN and all the parties are
16 free to address the PG&E rebuttal in briefs.

17 MR. HAWIGER: Thank you.

18 ALJ LIRAG: Let's proceed with the
19 Cross-Examination by Mr. Middlekauff.

20 MR. MIDDLEKAUFF: Your Honor, did you
21 want to go over the exhibit from TURN, the
22 cross exhibit, or do you want to wait until
23 after Mr. Borden?

24 ALJ LIRAG: Do you mean the opinion of
25 Mr. Calvert?

26 MR. MIDDLEKAUFF: Yes, Exhibit 290.

27 ALJ LIRAG: All right. Let's do that.
28 So is there a move to admit Exhibit 290 into

1 the record?

2 MR. HAWIGER: Your Honor, I would move
3 for the admission of the Exhibit 290.

4 It is somewhat slightly usual in
5 that it contains a Data Response from Edison
6 that we received just yesterday, and I would
7 seek its admission without a witness to
8 authenticate it.

9 But based on my attestation because
10 this exhibit is extremely relevant to one of
11 the largest single cost issues in this case.
12 It contains data that is exactly comparable
13 to PG&E's data, also in this exhibit, and it
14 is basic inventory data that is not
15 reasonably subject to dispute.

16 If you'd like, I'd be happy to take
17 two minutes to provide a little background
18 and additional explanation of why I believe
19 this exhibit should be moved into evidence.

20 ALJ LIRAG: Let's first determine
21 whether PG&E is -- at least for the record, I
22 suppose PG&E is, but let's first hear PG&E's
23 response to the move to have this admitted
24 into the record.

25 Any objections to Exhibit 290?

26 MR. MIDDLEKAUFF: Yes, your Honor. I
27 have four reasons why this exhibit should not
28 be submitted into the record.

1 ALJ LIRAG: You are objecting to the
2 portion regarding SCE's response?

3 MR. MIDDLEKAUFF: That's correct, your
4 Honor.

5 ALJ LIRAG: You are not objecting to
6 PG&E's Data Response?

7 MR. MIDDLEKAUFF: That's correct.

8 ALJ LIRAG: All right. Let's hear the
9 objection first.

10 MR. MIDDLEKAUFF: Reason No. 1 is that
11 the witness that this is directed towards is
12 Mr. Calvert, who is not here today. So he
13 has no opportunity to address any of the
14 issues in this data request. He's already
15 come, I believe, three times to this hearing.

16 TURN had every opportunity to ask
17 him about this data request in his
18 cross-examination and decided not to, and so
19 now to wait until the very last date of
20 hearings to bring it, when Mr. Calvert isn't
21 here, is both prejudicial to PG&E -- or it is
22 prejudicial to PG&E; that's No. 1.

23 No. 2, there's no foundation for the
24 document. Other than counsel's
25 representation, we have no foundation. We
26 have no witness from Edison, who is
27 sponsoring the document or can explain the
28 source of the document when we are unable at

1 this point to ask any questions because
2 there's no witness to lay foundation.

3 No. 3, we have no ability to ask any
4 cross questions about this document of any
5 witness, beyond just an Edison witness, of
6 the source of the information.

7 No. 4, I would note, your Honor,
8 that the document is incomplete. If you take
9 a look at the document itself, the question
10 references a workpaper that Edison had. That
11 workpaper is not included. The question asks
12 for workpapers and sources in Excel file.

13 If you look at the Response, Edison
14 says, "The source data can be found in an MS
15 Excel file." That's not provided either.

16 So I just feel like, your Honor, to
17 have an incomplete, last-minute exhibit is
18 something that's clearly objectionable,
19 especially when there's no witness or no
20 opportunity for cross-examination.

21 ALJ LIRAG: All right. I believe
22 Mr. Hawiger has a response to that, but
23 pardon my ignorance, but I'm only seeing a
24 number. So what is A.18-09-002?

25 MR. HAWIGER: I'm sorry. What number
26 are you referring to, your Honor?

27 ALJ LIRAG: So the document is
28 entitled, at least a portion of it, "SCE

1 Response to TURN Data Request 15 in
2 Application 18-09-002." So I'm asking, what
3 application is that?

4 MR. HAWIGER: Your Honor, that's
5 Edison's Grid Safety and Reliability Program
6 Application, which was Edison's application
7 to do cover conductor installation and
8 enhanced vegetation management for the years
9 2018 and 2019.

10 ALJ LIRAG: All right.

11 MR. HAWIGER: And I just might add, it
12 is the application from which PG&E took
13 workpapers regarding pole loading studies and
14 included them in their Rebuttal Testimony and
15 Attachments.

16 ALJ LIRAG: What is the status of that
17 application?

18 MR. HAWIGER: That application there is
19 a settlement that has been submitted and it
20 is pending. It is still open, that
21 application, pending any decision on the
22 proposed settlement.

23 ALJ LIRAG: What is your response to
24 Mr. Middlekauff's argument?

25 MR. HAWIGER: Your Honor, I'd be glad
26 to respond to his points, and then I would
27 like to just add a little context, or maybe I
28 could do the context first?

1 ALJ LIRAG: All right.

2 MR. HAWIGER: One of the key disputes
3 between TURN and PG&E in this case has been
4 the cost for covered conductor. The grid
5 hardening, the \$2.5 billion for grid harding
6 is the largest single capital cost forecast
7 increase in this rate case. About 1.5
8 billion of that is for covered conductor.

9 TURN has been trying to ascertain
10 why PG&E's unit costs were about three times
11 as high as Edison's.

12 In it's Rebuttal Testimony, PG&E
13 provided various answers. It's key response
14 was that its system is different than
15 Edison's, and in the cited rebuttal page,
16 page 9-20, in the Rebuttal, PG&E said:
17 "Edison already has much -- has a larger
18 percentage of heavier wire and a much larger
19 percentage of bigger poles, and that's why
20 they do not have to replace as many poles."

21 TURN did obtain the data from PG&E
22 on the distribution of its poles in Tier 3
23 based on the classification of poles, which
24 is a size classification. We were able,
25 after some effort, to obtain -- and PG&E
26 showed the distribution of about 194,000
27 poles it has in Tier 3, and that is the data
28 contained in the first part of this exhibit.

1 We finally got exactly the same
2 comparable data from Edison showing the
3 distribution of its, approximately, 178,000
4 poles located in Tier 3. Edison also
5 provided Tier 2 data.

6 And so this data in this exhibit is
7 exactly the same comparable data for poles by
8 class of poles in Tier 3 and Tier 2 for
9 Edison.

10 Now, it is absolutely true Edison
11 provided us with an Excel spreadsheet with,
12 approximately, 300,000 lines showing data for
13 each pole Tier 2 and Tier 3 and what class is
14 that pole.

15 We would have loved it if PG&E would
16 have provided us with a similar spreadsheet,
17 but PG&E has not provided that, and PG&E has
18 been unable to provide a lot of data around
19 poles that we have requested.

20 I presumed your Honor did not wish
21 to have about - you know, I don't know how
22 many pages - hundreds of pages of Excel
23 spreadsheets underlying this data response in
24 this exhibit. So I did not copy it, but if
25 PG&E would like it, I'd be happy to put it
26 in.

27 With respect to the specific points
28 made by Mr. Middlekauff, it is true;

1 Mr. Calvert is not here. Unfortunately, we
2 did not obtain this response from Edison
3 until yesterday.

4 We had repeatedly asked PG&E for
5 data on its pole loading studies. We asked
6 Mr. Calvert to provide data on why they had
7 to replace poles in 2019 during its covered
8 conductor program, and PG&E was unable to
9 provide it, but in their rebuttal, they say
10 that their understanding is that Edison has
11 much smaller poles.

12 This is the only piece of evidence
13 that goes to that very issue of what is the
14 distribution and nature of the poles in Tier
15 3 or is between PG&E and Edison.

16 With respect to foundation, I can
17 only say that the Data Request speaks for
18 itself. It was produced yesterday. It is an
19 exact printout of the response we obtained.
20 It is not complex. It just lists the
21 classifications of poles and the number of
22 poles.

23 The only difference is PG&E --
24 excuse me -- I mean Edison provided both
25 Tier 2 poles and provided a table showing
26 percentages; whereas, PG&E's Data Response
27 just has the pole count. Actually, it has
28 the percentages also just for Tier 3.

1 I don't think there's much to be
2 disputed in this type of inventory data. So
3 I would warrant that it is the most probative
4 information we have regarding PG&E's
5 assertion concerning the relative sizes of
6 its poles versus Edison's poles, and I
7 certainly would not object to Mr. Calvert
8 coming back.

9 I have no authority to have an
10 Edison witness appear. That's certainly, I
11 presume, within your Honor's prerogative to
12 do that.

13 You know, I just say in final, we
14 went this way because we could not obtain
15 much probative data from PG&E, and it's been
16 an ongoing question regarding the relative
17 cost between these companies, and it really
18 is the highest cost driver.

19 And, you know, the goal here, I
20 presume, is to authorize a reasonable
21 forecast for this work.

22 We understand from PG&E on rebuttal
23 that their scope is very unclear. Their
24 actual capital costs may be very different;
25 and, if so, they get trued-up in the future
26 rate case if there is cost overruns or not.
27 The goal here is come up with a forecast that
28 is reasonable, and we believe that this data

1 is extremely probative to one of the key
2 issues in order to determine that forecast
3 for grid hardening.

4 MR. MIDDLEKAUFF: Your Honor, may I
5 briefly respond one of the points made?

6 ALJ LIRAG: I was going to ask if you
7 had anything to add to the four points you
8 enunciated.

9 MR. MIDDLEKAUFF: I do, your Honor.

10 One of the comments that counsel for
11 TURN made was that in terms of they needed to
12 get this information about Edison to respond
13 to our rebuttal, and then he said, "We didn't
14 get it until yesterday."

15 But, of course, they've had our
16 rebuttal for two months, and if they had
17 believed in -- that rebuttal testimony did
18 describe the differences between PG&E and
19 Edison primarily because TURN had made that
20 an issue in its testimony, and because TURN
21 had raised that issue in its testimony, we
22 needed to respond to it.

23 Now, if they had wanted this
24 information from Edison, they certainly could
25 have asked when they got our rebuttal
26 testimony, but instead, they waited until --
27 if you look at the date the response was
28 sent, it wasn't sent until last Thursday. So

1 they've waited all this time until the last
2 minute to ask for this information, which we
3 have no chance to respond to.

4 ALJ LIRAG: Any response to the
5 statement regarding TURN trying to obtain
6 information about pole data that TURN -- that
7 Mr. Hawiger stated PG&E was not very
8 forthcoming with information relating to the
9 data being asked.

10 MR. MIDDLEKAUFF: I completely disagree
11 with that characterization, your Honor.

12 We have provided TURN the
13 information we have. Now, at certain points,
14 TURN may have felt like we should have had
15 different information or more information,
16 but the information that we had, we responded
17 in a timely way.

18 I think the fact that TURN never
19 bothered to file a motion to compel or even
20 raised any concerns about it until this
21 moment indicates that it really wasn't a
22 concern for them, and we gave them the
23 information we had. If they didn't like it,
24 they didn't like it, but it's not that we
25 were withholding information or that we
26 delayed in giving them information.

27 MR. HAWIGER: Let me just respond
28 briefly. I agree. PG&E has not withheld

1 information, that I know of. The problem was
2 lack of information.

3 In our first attempt to address --
4 the issue here was, really, what is the
5 overloading, potential for overloading,
6 irrespective -- whether -- and so our first
7 tack was to ask PG&E to provide the type of
8 analysis that Edison did that PG&E included
9 in their workpapers.

10 And that's, I think, in one of the
11 previous Data Requests that may be in the
12 record, and it's also subpart (d) of this
13 request that's in this exhibit right here.

14 What happened is PG&E said they
15 don't have any -- they have not done any
16 pole-loading studies. They don't have any
17 data like that, and all they could provide us
18 is distribution of poles. It was only after
19 that that we realized, okay, we need to get
20 something similar from Edison because PG&E
21 can't reproduce Edison's analysis.

22 I admit we had to do this twice.
23 The first time around, we asked the wrong
24 question, and Edison gave us a much more
25 thorough and detailed breakdown of their
26 pole-loading analysis, which, again, doesn't
27 help to compare with PG&E. So it is true
28 that we only asked for this data last week as

1 a last resort.

2 ALJ LIRAG: All right. I'm going to
3 ask a question to both of you: So is this
4 something that PG&E and TURN think they can
5 work out at the risk of getting unfavorable
6 ruling for your side?

7 So I can rule on it, but if you want
8 to pursue further talks regarding this
9 document or some other iteration of it or
10 some other conditions concerning this
11 document, then you're free to discuss;
12 otherwise, ALJ Lau and I can rule on what was
13 presented, but you run the risk of having a
14 ruling that is against your interests.

15 So if you want to take that time,
16 then I will set aside a decision, but if you
17 think that will not progress into some sort
18 of resolution, then I believe we are ready to
19 rule on this exhibit.

20 MR. MIDDLEKAUFF: Your Honor, we can
21 talk at the break. I'm more than happy to
22 talk at the break and then if we are unable
23 to reach a conclusion, we can let your Honor
24 know and then ask for you to make a ruling.

25 Can I make just one brief comment
26 based on something said?

27 ALJ LIRAG: All right.

28 MR. MIDDLEKAUFF: I'm really troubled

1 now because what TURN said is they got an
2 initial data response from Edison; they
3 didn't like it and they asked Edison to re-do
4 it, and that's why it's late. And so that's
5 really concerning because who knows what was
6 in the first response.

7 So now we've got a data response
8 that's the second iteration of it, which is
9 even a more troubling issue for us.

10 ALJ LIRAG: I take it to mean that the
11 data is either incomplete or -- I don't think
12 it means what you are thinking, but I'll let
13 Mr. Hawiger respond.

14 MR. HAWIGER: That's entirely false.

15 The first Data Response, we asked
16 the wrong question. We asked about the
17 pole-loading studies.

18 Edison gave us much more detail
19 about the pole-loading study numbers that are
20 in PG&E's Rebuttal Testimony. We could not
21 use that to compare to PG&E because PG&E had
22 no such pole-loading studies; so we asked
23 them -- we asked for the classification after
24 we reviewed PG&E's Data Response.

25 ALJ LIRAG: Yes. I think it relates to
26 the accuracy or the usefulness of the data as
27 opposed to the actual result.

28 So, anyway, take time to discuss it

1 with him today, and then we'll get back to
2 it.

3 MR. MIDDLEKAUFF: Thank you, your
4 Honor.

5 ALJ LIRAG: All right. Sorry for the
6 delay, Mr. Borden. Let's proceed with
7 cross-examination from Mr. Middlekauff.

8 MR. MIDDLEKAUFF: And I'll be doing
9 part of the cross-examination and my
10 co-counsel will do the other part.

11 ALJ LIRAG: All right. Mr. Buchsbaum
12 again. There's not too many numbers here,
13 though. Hopefully, you won't raise anymore
14 issues regarding the Sempra decision.

15 MR. BUCHSBAUM: No Sempra will be
16 discussed.

17 ALJ LIRAG: All right.
18 Mr. Middlekauff.

19 CROSS-EXAMINATION

20 BY MR. MIDDLEKAUFF:

21 Q Mr. Borden, I'm going to focus my
22 cross-examination on two areas of your
23 testimony: One is vegetation management; and
24 then the other one is the system hardening
25 part of your testimony.

26 Let me first start with, you would
27 agree with me that PG&E has a wildfire-prone
28 service territory.

1 A Yes.

2 Q On page 9 of your testimony, if I
3 can ask you to turn there. And I'm going to
4 point you to lines 7 and 8, and there you're
5 describing a risk reduction of 5 percent; do
6 you see that?

7 A Yes.

8 Q And the 5 percent number -- and
9 this deals with overhang clearing, and the 5
10 percent number that is in your testimony is
11 based on TURN's Data Request, Set No. 3,
12 Question 11; is that right?

13 A Yes.

14 Q And you state that you considered
15 5 percent to be a relatively, quote, "low
16 risk reduction"; do you see that?

17 A Yes.

18 Q And is the point that you're making
19 here, that a 5 percent reduction in risk is
20 very low compared to the cost?

21 A I'm saying those -- that -- that
22 should be considered, yes.

23 Q Okay. Would you consider a
24 reasonable percentage of risk reduction to
25 mitigate wildfires to be 25 percent? Would
26 that not be considered low in your mind?

27 A I don't have an exact threshold in
28 mind.

1 Q Would you consider 30 percent to be
2 not low anymore?

3 A Again, I don't have an exact
4 threshold.

5 Q Okay. Let me have you look at
6 Exhibit 291, which you should have before
7 you, and this is the Data Response that you
8 relied on - correct - TURN, Set No. 3,
9 Question 11?

10 A Yes.

11 ALJ LAU: Mr. Middlekauff, you might
12 want to bring the mic closer to you.

13 BY MR. MIDDLEKAUFF:

14 Q If I can ask you to turn to page 26
15 of your testimony. I'm sorry, Mr. Borden.
16 Stay on page 26, but let me ask you a
17 question about Exhibit 291. If you look at
18 the third page of the data response; do you
19 have that?

20 A Yes.

21 Q If you look at part H-2 down at the
22 bottom of the table, that's the overhang
23 clear; is that correct?

24 A Correct.

25 Q And that's -- the 5.1 percent is
26 the 5 percent you referred to in your
27 testimony; is that right?

28 A Yes.

1 Q Okay. And now we're on page 26 of
2 your testimony. Here, you're talking about
3 "nonexempt assets"; is that correct?

4 A Correct.

5 Q And here on line 1, again, you cite
6 to a number that's 3 percent of a risk
7 reduction here, and, again, you cite - if you
8 look at Footnote 62 - to the same Data
9 Response; is that correct?

10 A Correct.

11 Q And that would be consistent with
12 Item J on this table - right - "nonexempt
13 equipment, replacement 2.9 percent"; the 3
14 percent number that is referenced?

15 A Correct.

16 Q So you got -- so the 5 percent you
17 got from this table; the 3 percent you got
18 from this table; is that correct?

19 A Right. The sentence reads: "PG&E
20 believes the replacement of non-exempt
21 equipment results in a 3 percent" --

22 Q Now, your testimony addresses
23 different aspects of vegetation management
24 and system hardening of PG&E proposals; is
25 that correct?

26 A Yes.

27 Q Okay. So we've looked at some of
28 your testimony dealing with overhang

1 clearing. We've looked at some of your
2 testimony about non-exempt equipment. Your
3 testimony also deals with tree removal; is
4 that correct?

5 A Correct.

6 Q And, in fact, that would be pages
7 13 through 18 of your testimony. That's the
8 portion of your testimony that deals with
9 tree removals; is that correct?

10 A As I understand it, tree removal is
11 a part of PG&E's Enhanced Vegetation
12 Management Program.

13 Q I'm just asking you where it is in
14 your testimony; pages 13 through 18?

15 That's where you deal with the
16 issue of healthy tree removal; is that
17 correct?

18 A Yes.

19 Q And, Mr. Borden, in that section of
20 your testimony, pages 13 through 18, there is
21 no reference there to TURN, Set No. 3,
22 Question 11, what we've marked as Exhibit
23 291; is that correct?

24 A You mean, do I reference anywhere?

25 Q Yes. In pages 13 through 18 of
26 your testimony, do you reference TURN, Data
27 Set 3, Question 11?

28 A I do not believe so.]

1 Q Okay. And if I can direct your
2 attention back to Exhibit 291. Item, here,
3 H1 refers to high-risk species removal; is
4 that correct?

5 A Yes.

6 Q And that's generally the topic area
7 that you're addressing in lines 13 through
8 18; is that correct?

9 A I think you mean pages.

10 Q Pages. Thank you. Pages 13
11 through 18. So, you know, Mr. Borden, I
12 notice here that the risk reduction for that
13 aspect of PG&E's program is 30 percent; is
14 that correct?

15 A That's PG&E's calculation, yes.

16 Q Is there a reason why you decided
17 in your testimony not to bring up that point,
18 that at least for PG&E's calculation it was a
19 30 percent risk reduction when you brought it
20 up for two other areas?

21 A I think the purpose of much of my
22 testimony is to probe what is the actual
23 potential risk reduction from this program,
24 and what I find is that removal of living
25 healthy trees near power lines is unlikely to
26 have -- is likely to have a very low risk
27 mitigation potential.

28 Q Mr. Borden, you cited two of these

1 numbers in your testimony, but you ignored
2 that number. And I guess what I'm asking is
3 why you didn't include that number in your
4 testimony -- at least stating that this is
5 what PG&E says is the risk reduction?

6 A I don't have an exact answer. I
7 think, again, the purpose of my testimony was
8 to probe what the risk mitigation is based on
9 actual data. My understanding is PG&E's
10 calculation is just based on any time a
11 certain species was involved in an emission
12 that was counted as -- removal of that
13 species would be counted as a risk
14 mitigation. And so I was probing that
15 question.

16 Q Did you do, for your own testimony,
17 a risk reduction analysis?

18 A I effectively tried to get all the
19 data I could on the extent to which living
20 healthy trees are a major cause of wildfire
21 risk in PG&E's territory, and that's what I
22 outlined in testimony. I found that 7
23 percent of ignitions were due to living
24 healthy trees, and I also found that 72
25 percent of the time that supposedly healthy
26 trees fell on the lines they turned out to be
27 unhealthy trees.

28 So while I do think there is some

1 risk from living healthy trees, which is why
2 we support some funding for this program, we
3 don't find that it reaches the scale that
4 PG&E has proposed.

5 Q Mr. Borden, my question is a little
6 simpler than that. Did you do a risk
7 reduction analysis for your testimony?

8 A I don't know what you mean by "risk
9 reduction."

10 Q I talking about what PG&E gave you
11 in the data response.

12 MR. HAWIGER: Objection. Could you be
13 a little -- are you talking about risk
14 reduction analysis of a particular element or
15 of all of the elements or of -- it's a very
16 broad question.

17 BY MR. MIDDLEKAUFF:

18 Q I'm just talking about tree
19 removal. You talked about PG&E's response
20 and the data response of a risk reduction
21 analysis. It's a simple question. Did you
22 perform a risk reduction analysis on the tree
23 removal issue?

24 ALJ LIRAG: For guidance, Mr. Borden,
25 if you did perform a risk reduction analysis
26 on a certain topic or of any sort or
27 something analogous to that, you can clarify
28 your answer.

1 THE WITNESS: To my mind, there's no
2 exact definition of what a risk reduction
3 analysis is. PG&E has done an analysis here.
4 I've certainly looked at the risk posed by
5 living healthy trees. So to the extent that
6 that's a risk reduction analysis, then I have
7 done a risk reduction analysis.

8 BY MR. MIDDLEKAUFF:

9 Q Do you have a percentage in mind,
10 based on your proposal, of how much it would
11 reduce risk? I mean, PG&E put here
12 percentages for each one of its programs as
13 to how much it estimates the risk reduction
14 would be. What is your percentage risk
15 reduction based on your proposal?

16 A From the data that I've seen, our
17 proposal would be sufficient to eliminate the
18 risk from living healthy trees completely.

19 Q Do you have a percentage? So it's
20 a hundred percent in your mind?

21 A Yes. Well, I don't know that I've
22 calculated a percentage, but it kind of
23 depends on how PG&E implements the program as
24 well. A large part of this is can PG&E
25 identify the riskiest trees for removal. So
26 to the extent that it can, it would eliminate
27 the risk from living healthy trees. To the
28 extent that PG&E can't, then the risk

1 reduction would be less.

2 Q Do you have an expertise in
3 identifying trees that should be removed?

4 A I am not an arborist.

5 Q You did propose -- TURN proposes a
6 study on page 18 of your testimony; is that
7 correct?

8 A Correct.

9 Q Do you have an opinion about how
10 long this study would take?

11 A No.

12 Q Do you have an opinion, as you sit
13 here today, about when this study would get
14 started?

15 A So this is a proposal that we put
16 forward in Edison's GS&RP application as
17 well. And now I can't recall if the
18 settlement included all the utilities or just
19 Edison. But certainly the Commission could
20 find in that proceeding to begin the study,
21 and that could happen technically any day.
22 Or it would start when the Commission decides
23 on this application, but it could start as
24 soon as the Commission resolves the Edison
25 application.

26 Q Mr. Borden, let's look at page 16
27 of your testimony. And here on page 16,
28 lines -- I may have the wrong page. Mr.

1 Borden, you recommend -- I'm just going -- I
2 think I -- with the errata, I got the wrong
3 page numbers for this. But you recommend
4 generally the removal of 14,300 trees per
5 year; is that correct?

6 A Funding for that level of removal,
7 yes.

8 Q Has TURN performed an independent
9 analysis of the issue about the removal,
10 how -- whether there would be a risk
11 reduction as a result of 14,300 trees?

12 A That analysis is what I present in
13 testimony. What we find is that on average
14 we can say that around 10 living healthy
15 trees fall into power lines. Our proposal is
16 that PG&E can remove 14,000 -- up to 14,000
17 trees. And so we certainly -- we expect that
18 that would mitigate that risk.

19 MR. MIDDLEKAUFF: Your Honor, may I use
20 an exhibit to impeach the witness?

21 ALJ LIRAG: All right. Off the record.
22 (Off the record.)

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

25 And while we were off the record, an
26 exhibit was distributed, and we'll identify
27 it right now as Exhibit 293. This is TURN's
28 response to PG&E's Data Request, Set No. 2,

1 Question 14.

2 (Exhibit No. 293 was marked for
3 identification.)

4 ALJ LIRAG: Mr. Middlekauff.

5 MR. MIDDLEKAUFF: Thank you, your
6 Honor.

7 Q Mr. Borden, this is a data request
8 response that you sponsored; is that correct?

9 A Yes.

10 Q And the data request says, "How
11 much ignition risk reduction associated with
12 contact between a healthy tree and PG&E's
13 overhang equipment could result from a
14 program that would remove 14,300 trees
15 annually in PG&E's Tier 2 and Tier 3
16 high-fire threat district as proposed on page
17 16 of Exhibit TURN-1, line 15 of Mr. Borden's
18 testimony. Please state all facts and
19 provide all calculations that support your
20 response." And your response to that was,
21 "TURN has not conducted an independent
22 analysis for this issue."

23 Is that your response?

24 A Yes.

25 Q Thank you. Mr. Borden, let's talk
26 a little bit about vegetation management
27 costs. If I can have you turn to page 19 of
28 your testimony where table 5 is.

1 A Okay.

2 MR. HAWIGER: Sorry. Could you repeat
3 that, please.

4 MR. MIDDLEKAUFF: Page 19. And we're
5 going to look at table 5.

6 Q And table 5 provides PG&E's
7 proposal regarding various aspects of its veg
8 management program to a particular overhang
9 clearing and maintenance and tree species
10 removal and then terms proposal.

11 Do you see that?

12 A Yes.

13 Q And I notice for both lines,
14 actually, but for -- I'll focus on TURN here.
15 I notice for TURN that you use the exact same
16 numbers for 2020, 2021 and 2022; is that
17 correct?

18 A You mean for tree species removal?

19 Q For both. For both items that --
20 I'm sorry. You don't use -- yes, for -- hold
21 on. I'm sorry. I'm focusing on the lines
22 for -- you know, I will have to withdraw
23 that. It is different than what I taught.
24 So we will move on, Mr. Borden.

25 Let's talk a little bit about pole
26 replacement and system hardening. And if I
27 can direct you to page 26 of your testimony.
28 You can let me know when you're there.

1 ALJ LAU: Counsel, can I ask a couple
2 of questions --

3 MR. MIDDLEKAUFF: Sure.

4 ALJ LAU: -- since we're still on the
5 topic of removal of healthy trees.

6 EXAMINATION

7 BY ALJ LAU:

8 Q Mr. Borden, you said -- you
9 analyzed and concluded that 7 percent of
10 living healthy trees cause ignition. How did
11 you come up with that conclusion or analysis?
12 I think if you want to refer to testimony, I
13 see on page 15 that you said 4 percent on
14 line 7 -- 4 percent of 2000 ignitions. And
15 then on line 9 you said 7 percent for Tier 2
16 and Tier 3.

17 A Correct.

18 Q So how did you come up with those
19 figures?

20 A So this was through data
21 requests -- a series of data requests where
22 we ascertained information on all ignitions
23 that are in PG&E's database that starts in
24 2014. Then we asked a series of questions on
25 was this due to a tree falling over? Was the
26 tree found to be healthy or not healthy, et
27 cetera? So the 7 percent is the subset of
28 trees that fell into lines that were found to

1 be healthy upon inspection as the numerator,
2 and then the denominator is just all
3 ignitions in the territory over that time
4 period.

5 Q So this is a number that you
6 extrapolated from the data, and it's not
7 provided by PG&E; is that correct?

8 A You mean the 7 percent
9 specifically?

10 Q The 4 percent and 7 percent.

11 A Right. That's something that I
12 calculated from the data that PG&E provided.

13 Q All right. Can you provide a
14 little more context of the study that you're
15 proposing? What is the study that has been
16 proposed in Edison's grid hardening
17 proceeding and that TURN is proposing also in
18 this proceeding? It is to do -- conduct a
19 healthy tree analysis removal?

20 A Right. It's to really get some
21 independent information independent of
22 utilities on what is the risk from living
23 healthy trees and to what extent should they
24 be removed. I think it's really important
25 that unhealthy trees, so dead, dying, sick,
26 should be removed that pose a risk to
27 ignition lines. Those should be removed
28 under utility existing programs, so either

1 under routine vegetation management or CEMA.
2 And so if the focus really is living healthy
3 trees, how often should they be removed?
4 What kind of risk do they actually pose?
5 That's something that we think we need more
6 independent information on independent of
7 utility claims about that.

8 Q So how would that independent
9 information come through? Like through an
10 arborist or --

11 A Yeah. I would suspect. For
12 example, there are research groups that -- at
13 universities. But certainly, I think
14 arborists would be involved in helping us and
15 the Commission asses this risk.

16 ALJ LAU: Okay. Judge Lirag.

17 ALJ LIRAG: We'll let Mr. Middlekauff
18 continue.

19 BY MR. MIDDLEKAUFF:

20 Q I have refound my questioning on
21 table 5.

22 A Okay.

23 Q So I appreciate the break because
24 it gave me a chance to look at it. So now --
25 we'll go to system hardening in a minute.
26 But let's just finish up on veg management on
27 table 5 on page 19. And here, Mr. Borden --
28 and I think you pointed this out earlier.

1 You're correct. For TURN's recommendation
2 for tree species removal, that number is the
3 same for all three years; is that right?

4 A Correct.

5 Q In your mind, your testimony does
6 not address escalation; is that correct?

7 A Correct.

8 Q And is it generally your
9 understanding that on a year-over-year basis
10 costs will increase for labor and so forth?

11 A My understanding is that escalation
12 is applied to calculate nominal dollars, and
13 as it says in the second line under table 5,
14 this is 2018 dollars.

15 Q So you would expect, when the
16 calculations are done of TURN's proposal,
17 that it should factor escalation; is that
18 correct?

19 A Yeah. It would need to be
20 converted to nominal dollars.

21 Q Now let's talk a little bit about
22 system hardening. If you could go to page
23 26. And this is the -- let me ask you first.
24 TURN would support the replacement of wood
25 poles if replacement is needed as a part of
26 the System Hardening program to support the
27 covered conductor; is that correct?

28 A Correct.

1 Q Does TURN oppose replacing the wood
2 poles with non-wood poles as a part of system
3 hardening when pole replacement is needed to
4 support the additional weight of the covered
5 conductor?

6 A Honestly, I have not looked at the
7 cost differential between replacing with
8 other wood poles versus non-wood poles. To
9 the extent that the costs are similar, it may
10 make sense to use non-wood poles.

11 Q Let me direct your attention back
12 to -- I'm sorry. We're going to go back a
13 page or two -- to page 24. And here you have
14 a figure 4, which assumes the actual costs
15 for -- this is just covered conductor -- is
16 that correct -- this table?

17 A This is covered conductor. It does
18 include the cost of any necessary pole
19 replacements.

20 Q And how did you determine that for
21 PG&E, that it includes the cost of any
22 necessary pole replacements?

23 A So that's what I cover in my
24 testimony. I expect this -- PG&E's costs
25 shown here is compared to actual and forecast
26 Edison costs, both of which include any
27 necessary pole replacements. And so I'm
28 showing -- that chart shows those two

1 figures.

2 Q So because the PG&E number is
3 higher, you're just assuming that it includes
4 pole replacement costs? Is that how I
5 understand your testimony?

6 A I'm sorry. I think I have a
7 sentence that explains this somewhere. Can
8 you ask your question again.

9 Q Sure. I'm just trying to get to --
10 PG&E gave you a forecast of covered
11 conductor. Their forecast didn't include
12 poles, but you've assumed that pole costs
13 would be included in that. And I'm trying to
14 understand is the reason for your
15 assumption -- the basis for your assumption
16 simply because PG&E's forecast is higher than
17 the forecast of Edison?

18 MR. HAWIGER: I think -- if I may
19 point, Mr. Borden, I think it's the previous
20 page 23, the paragraph at lines 1 through 7
21 that addresses this issue.

22 THE WITNESS: Thank you.

23 ALJ LIRAG: All right. I won't
24 consider that as coaching.

25 All right. Please provide an
26 answer, Mr. Borden.

27 THE WITNESS: So what that says is that
28 PG&E's unit forecast for covered conductor is

1 5 percent higher than Edison forecast, and
2 SCE's forecast was already higher than its
3 actual cost. And so what I conclude in lines
4 8 to 10 is that TURN therefore adopts PG&E's
5 estimate for covered conductor installation
6 as sufficient to fund both covered conductor
7 and any pole replacements required due to the
8 additional weight posed by covered conductor.
9 BY MR. MIDDLEKAUFF:

10 Q And that's the point I'm trying to
11 get to. You make this assumption on lines 8
12 and 9. You say, "Because of these
13 differences in costs." I'm just going to
14 assume that that would cover pole
15 replacements as well even though the forecast
16 was only for the covered conductor. That's
17 all I'm trying to ask you is is that solely
18 because of the difference in cost?

19 MR. HAWIGER: I would just object to
20 the word "assume." That misstates the
21 evidence -- the testimony. Excuse me.

22 ALJ LIRAG: I'm going to sustain. You
23 can rephrase or substitute another word.

24 BY MR. MIDDLEKAUFF:

25 Q Okay. Is it my understanding, Mr.
26 Borden, that the reason you adopted, as you
27 say, on line 8 the concept that PG&E's
28 covered conductor includes both poles and

1 covered conductors solely based on the fact
2 that there's a difference in the cost?

3 A I think it's fairly clear here.
4 I'm comparing PG&E's forecasted costs for
5 covered conductor to actual costs incurred by
6 Edison. This issue about what -- PG&E's
7 position here is that it needs to replace
8 every single pole in a 7,100 mile circuit
9 area to support covered conductor. And what
10 this shows is that Edison's actual cost based
11 on its poles that they clearly have not had
12 to do that and their costs, which assumed
13 that one-third of poles would need to be
14 replaced, have actually come in lower so far.

15 And I'll add that their GRC
16 proposal is for \$420,000 per circuit mile,
17 even lower than their GS&RP proposal. I have
18 now had a chance to look at some of the pole
19 data comparing Edison poles versus PG&E
20 poles. PG&E made the claim our poles are
21 much smaller than Edison's. And looking that
22 distribution from a data request we received
23 yesterday, it's clear to me that that
24 statement is just not true.

25 MR. MIDDLEKAUFF: Your Honor, I would
26 move to strike. The witness has just been
27 completely nonresponsive. I just asked him
28 for the difference. He just put into the

1 record the information that counsel have been
2 trying to get in through a data response
3 before with no basis for it. So your Honor,
4 I would just move to strike. I have a very
5 simple question for Mr. Borden.

6 ALJ LIRAG: Mr. Hawiger.

7 MR. HAWIGER: You know, Counsel is
8 trying to ask why Mr. Borden made this
9 assumption that the amount for covered
10 conductor is sufficient to cover all the work
11 including the poles, and that is the exact
12 issue that he just addressed.

13 ALJ LIRAG: All right. I'll allow the
14 answer. If the witness explained something
15 relating to Edison, then if it has no
16 substantiation, then we are able to apply the
17 proper weight to the answer.

18 BY MR. MIDDLEKAUFF:

19 Q Mr. Borden, just to be clear, the
20 forecast that you asked PG&E for here was
21 just for covered conductor, and that's the
22 \$475,200 that's in figure 4; is that correct?

23 A Yes. That's from a PG&E workpaper.

24 Q Right. And you also separately
25 asked PG&E information for the cost of poles;
26 is that correct?

27 A I believe that's right. Most of
28 PG&E's costs for its program were contained

1 in one workpaper, which included its estimate
2 for pole replacement.

3 Q Mr. Borden, is it your
4 understanding that as a part of PG&E's
5 overhead system hardening it will be
6 relocating portions of its circuits to
7 address vehicular exposure issues, in other
8 words, the risk of cars hitting poles?

9 A That's in PG&E's testimony.

10 Q I'm just asking for your
11 understanding one way or the other.

12 A PG&E has stated that it may move
13 poles also due to egress issues, but exactly
14 what PG&E will do has been somewhat of a
15 moving target.

16 Q Does TURN oppose the relocation of
17 facilities and poles as a part of the System
18 Hardening program to address the risks of a
19 car hitting the power pole?

20 A I have not analyzed that specific
21 issue.

22 Q So you don't have an opinion one
23 way or the other?

24 A Not at this time.

25 Q Do you believe that whether a pole
26 needs to be replaced to support covered
27 conductor is a determination that needs to be
28 made through engineering calculations?

1 A My general understanding is that a
2 pole loading study would need to be performed
3 as covered conductor is being deployed to
4 ensure that the pole can support the
5 additional weight.

6 Q You are not an expert in pole
7 loading studies; is that correct?

8 A No.

9 Q You did not do pole loading studies
10 as a part of preparing your testimony; is
11 that correct?

12 A I asked PG&E multiple times to
13 provide information on its poles, and it was
14 very difficult to get anything useful.

15 Q Mr. Borden, the question is simple.
16 You did not do a pole loading study as a part
17 of your testimony; is that correct?

18 A That is something I would expect
19 PG&E to do.

20 Q You did not?

21 A I did not do a pole loading study.

22 Q Mr. Borden, while we're still on
23 page 24, you reference here on lines 8
24 through 9 PG&E's estimated pole replacement
25 costs of \$600,000 per circuit mile.

26 Do you see that?

27 A Yes.

28 Q And you also state here that PG&E's

1 forecast includes replacing 30 miles -- or 30
2 poles per mile; is that correct?

3 A Yes.

4 Q And do you understand -- to kind of
5 do simple math here, do you understand that
6 that would be approximately \$20,000 a pole?

7 A That was PG&E's estimate, yes.

8 Q As you sit here today, do you have
9 any reason to disagree with the estimate of
10 approximately \$20,000 per pole?

11 A I have seen information that PG&E
12 replaces poles for a much lower cost than
13 rural areas, but it's not something that I
14 specifically address in testimony.

15 Q Mr. Borden, can I have you take a
16 look at what we've marked as Exhibit 292, and
17 this is a data request propounded by TURN,
18 correct?

19 A Yes.

20 Q And part of this request asks for
21 information about pole replacements and so
22 forth.

23 Do you see that?

24 A Yes.

25 Q Did your counsel give you a copy of
26 this data request before you took the stand
27 today?

28 A I believe you did. So I have a

1 copy.

2 Q And if I can direct you to the very
3 last page of it, this has unit costs, and I
4 will represent to you that this is with
5 regards to poles. This has actual unit costs
6 for 2018 and unit costs through August of
7 2019 year-to-date.

8 Do you see that?

9 A Yes.

10 Q As you look at the bottom line here
11 on pole replacements, for 2018, the unit cost
12 was approximately \$17,557, and for
13 year-to-date 2019, it was \$26,408.

14 Do you see that?

15 A I haven't checked the math on that,
16 but that appears to be the weighted average
17 of the pole replacement costs across
18 different areas.

19 Q I wanted to talk to you a little
20 bit about the non-exempt assets as a part of
21 system hardening. And Mr. Borden, if you can
22 go to page 26 of your testimony.

23 A Okay.

24 Q And let me direct you. Let's start
25 on line 7. It says, "While certainly
26 transformers and other types of non-exempt
27 equipment should be replaced as they fail,
28 preemptive replacement is incompatible with

1 cost effective risk mitigation and results in
2 stranded or preemptive replacement costs
3 whereby ratepayers may be forced to pay for
4 two assets despite one being operational."

5 Do you see that testimony?

6 A Yes.

7 Q Let me ask you a couple questions,
8 though, to set a framework for our discussion
9 on this. What is the difference in your mind
10 between exempt and nonexempt equipment?

11 A This is a designation that Cal Fire
12 makes for various types of equipment. My
13 understanding is that for non-exempt
14 equipment vegetation clearance pursuant to
15 the Public Resources Code needs to be done --
16 I think -- I believe it's a 10-foot radius
17 around each pole where that equipment is
18 deployed.]

19 Q Okay. Mr. Borden, now let me
20 direct you back to your testimony. In line
21 8, I notice you say, "replace as they fail."
22 Is it TURN's position that equipment should
23 be run to failure and only replaced when it
24 fails?

25 A Certainly if there are indications
26 that a piece of equipment will fail or that
27 it's damaged in some way, then we would
28 expect that equipment to also be replaced.

1 Q If PG&E is performing its system
2 hardening work on a specific circuit mile and
3 the existing equipment is deteriorated, but
4 has not yet failed, is it TURN's position
5 that the existing equipment should continue
6 to be used on that rebuilt circuit mile?

7 MR. HAWIGER: Can counsel qualify the
8 word "deteriorated"?

9 MR. MIDDLEKAUFF: Not failed yet. As
10 in poor condition.

11 Q You said "damaged" a minute ago.
12 So I'm going to use your terminology of
13 "damaged" and then your terminology of
14 "fail." If the equipment is damaged or
15 somehow deteriorated, is it your position
16 that that equipment should somehow be put
17 back up?

18 A To the extent that equipment is
19 extremely damaged and it's clear that it will
20 fail, then I would expect it to be replaced,
21 and I believe that would occur under
22 traditional O&M programs by the utility
23 pursuant to other regulations independent of
24 the Grid Hardening program.

25 Q Okay. Your statement was that if
26 it's clearly damaged. What if it is
27 partially damaged?

28 A I don't have an opinion on

1 exactly -- again, I think this is relevant to
2 other programs that the utility traditionally
3 does to adhere to Public Resources Code.

4 Q What if it is 30 years old, the
5 piece of equipment?

6 MR. HAWIGER: Can you be more specific?
7 Are you talking about any equipment that's 30
8 years old that --

9 MR. MIDDLEKAUFF: The non-exempt
10 assets, which are exactly right here in his
11 testimony. That's what we're talking about.

12 MR. HAWIGER: There are also various
13 different categories of non-exempt assets and
14 so I'd just like you to clarify.

15 MR. MIDDLEKAUFF: The non-exempt assets
16 that you are referring to in your testimony.

17 Q I'm focused on this concept of
18 failure. And so what I'm trying to get from
19 you, Mr. Borden, is if the equipment, the
20 non-exempt assets, as PG&E is doing its
21 system hardening, is a piece of equipment
22 that's 30 years old, would your proposal be
23 that should be put back up because it hasn't
24 failed yet?

25 A I don't have a specific proposal
26 for what age of equipment requires
27 replacement. Again, this is not relevant in
28 my mind to the Grid Hardening program.

1 Q Okay. Would you agree with me, as
2 PG&E is doing its System Hardening program,
3 that it should use its best professional
4 judgment to decide what equipment gets --
5 what existing equipment gets reused and what
6 existing equipment is no longer used?

7 A So my general understanding is that
8 that that type of maintenance would be
9 included under other programs.

10 To the extent that PG&E hasn't been
11 inspecting assets and just finding problems
12 on its system, of course, those should be
13 addressed. But, again, hopefully, PG&E is
14 adhering to the law, to the regulations,
15 around maintaining its equipment.

16 Q I'm not focused on that,
17 Mr. Borden. I'm saying imagine for yourself
18 a PG&E crew has gone out to do a specific
19 circuit mile of system hardening. As they're
20 going along that circuit mile, there's a
21 piece of non-exempt equipment that, in PG&E's
22 professional judgment, should not be
23 replaced; in other words, a new piece of
24 equipment should be put up.

25 Is it your position that that is
26 acceptable for PG&E to make that decision as
27 it goes along in its System Hardening
28 program?

1 A I guess the difficulty I'm having
2 is that you seem to be discussing a
3 traditional maintenance program that happens
4 to be - now you're saying - a portion of grid
5 hardening. Grid hardening is really -- the
6 point of it is to address wildfire risk.

7 Again, if PG&E is finding equipment
8 that is unsafe or will likely fail in the
9 near term, that's something that it should
10 already be maintaining and replacing.

11 Q So I'm just trying to get to your
12 point here of the System Hardening program.
13 When that work is being done, is it
14 acceptable in TURN's mind that there will be
15 some equipment which will be replaced with
16 new equipment? Some existing equipment, when
17 the system is hardened, will be replaced with
18 new equipment; is that acceptable in your
19 mind?

20 A I think I've answered.

21 ALJ LIRAG: Let's move on from that
22 line of questioning.

23 MR. MIDDLEKAUFF: Okay. Thank you,
24 your Honor.

25 Q Mr. Borden, keep the same scenario
26 in mind, but we'll change the facts slightly.

27 If PG&E is going out and doing
28 system hardening and it finds a piece of

1 equipment that does not meet PG&E's current
2 construction standards - it wouldn't have
3 been required to remove it - but, let's say,
4 the standards have changed, and it doesn't
5 meet the current construction standards,
6 would it be TURN's position that that
7 existing piece of equipment should continue
8 to be used even though it doesn't meet
9 current standards?

10 A I've not analyzed that issue.

11 Q Okay. Mr. Borden, is it your
12 understanding that as a part of PG&E's
13 Overhead System Hardening program that PG&E
14 is proposing to replace existing
15 transformers, as needed, with new
16 transformers, which have a fire-resistant
17 fluid in them?

18 A Yes.

19 Q Does TURN oppose the use of new
20 transformers with fire-resistance fluid?

21 A TURN opposes replacement of
22 non-exempt equipment as part of this program.

23 Q So would TURN expect then, if PG&E
24 had a transformer which did not have
25 fire-resistant fluid in it, then should it,
26 in part of its System Hardening program, put
27 that transformer back up?

28 A Whether or not transformer has

1 fire-resistance fluid doesn't reflect on the
2 ignition risk of that asset. So to the
3 extent that's the existing asset, and it
4 appears to be in good shape, then, yes, it
5 would go back up.

6 Q So let me have you -- we're still
7 on page 26, up on lines 3 through 4, and you
8 see here that the ignition data that you
9 cited indicated that there were 3 percent of
10 the ignitions were from transformers; is that
11 correct?

12 A Yes.

13 Q Is it also your testimony that the
14 new transformers are more fire resistant than
15 existing transformers?

16 A I don't think I stated that.

17 Q So can I direct your attention back
18 to page 25?

19 A Yes.

20 Q And here you state -- on lines 24
21 and 25 that you're talking about the
22 description of non-exempt equipment, you say,
23 "If accomplished according to these
24 regulations" - and that's Public Resources
25 Code - "the operation of non-exempt equipment
26 poses a low likelihood of ignitions or
27 catastrophic wildfire"; do you understand
28 that?

1 A Yes.

2 Q So is it your -- generally your
3 understanding that non-exempt equipment poses
4 a low likelihood of ignitions or catastrophic
5 wildfire?

6 A Yes. Particularly given the
7 preceding sentence: "Vegetation near
8 non-exempt equipment is required to be
9 cleared."

10 Q Okay. Mr. Borden, you mentioned
11 earlier a statement about PG&E's rebuttal
12 testimony and changes in system hardening.
13 Let me just ask you generally, do you oppose
14 undergrounding as a means of mitigating the
15 wildfire risk?

16 A To the extent that undergrounding
17 is necessary, then I don't think we would
18 oppose it, but a lot of our concern goes to
19 the fact that there are both financial, as
20 well as labor constraints, or at least PG&E's
21 stated that, and we want to be doing the most
22 amount of risk mitigation possible at least
23 cost over this next year C cycle.

24 Q I just want to be clear. TURN
25 doesn't, per se, oppose undergrounding. I
26 recognize you gave some caveats, but you
27 don't have, per se, objection to
28 undergrounding?

1 A No.

2 Q Let me go back for a few more
3 questions about vegetation management.

4 A Okay.

5 Q Would you agree that an arborist's
6 recommendation would be -- and this is - I'm
7 sorry. I'll give you context here - this is
8 on the issue of healthy tree removal.

9 A Okay.

10 Q Would you agree that an arborist's
11 recommendation would be a sufficient basis to
12 remove a healthy tree?

13 A I don't know that I have an exact
14 criteria. I think if arborists are finding
15 that a tree has a high likelihood of falling
16 into lines and sparking a fire, then that
17 tree should be removed, generally speaking.

18 Q Yeah. I'm just trying to get to --
19 you're not arborist. I'm not an arborist.

20 If an arborist goes out and says:
21 "This tree looks healthy, but I think it
22 should be removed," you wouldn't oppose that
23 tree being removed; is that correct?

24 A It might depend on the
25 circumstances. I don't want to answer, you
26 know, in a blanket fashion.

27 Q But you personally wouldn't have
28 any bases for making that decision because

1 you're not an arborist; right?

2 A I'm not an arborist.

3 Q Is it your understanding that PG&E
4 does have arborists in the field who are
5 approving the removal of each healthy tree?

6 A I'm not sure about that.

7 Q So when you say you're not sure,
8 you mean you don't know one way or the other?

9 A Correct.

10 MR. MIDDLEKAUFF: Your Honors, I
11 believe that's all the questions I have, but
12 Mr. Buchsbaum has got some questions as well.

13 ALJ LAU: I just have a quick
14 clarifying question. This is in relation to
15 the numbers that Mr. Middlekauff was
16 referring to, which was in your testimony on
17 page 26, the 3 percent of risk -- or 3
18 percent of emissions can be avoided with
19 replacement of these equipment, again, and
20 also 2 percent of incidences can be
21 attributed to fuses and 3 percent attributed
22 to transformers. Were these numbers also
23 something that TURN extrapolated from PG&E's
24 data or were these data that PG&E provided?

25 THE WITNESS: Yes. Correct. It's from
26 an ignition database that PG&E provided.

27 ALJ LAU: So TURN extrapolated it?

28 THE WITNESS: Yes.

1 ALJ LAU: Thank you.

2 ALJ LIRAG: Mr. Buchsbaum's cross is on
3 a different topic.

4 MR. MIDDLEKAUFF: That's correct, your
5 Honor.

6 ALJ LIRAG: I'll have Mr. Hawiger to do
7 redirect regarding your topic.

8 Let's go off the record.

9 (Recess taken.)

10 ALJ LIRAG: Let's go back on the
11 record. Any redirect off the questions by
12 Mr. Middlekauff?

13 MR. HAWIGER: Yes, your Honor. But if
14 I also could clarify, there was also a
15 question from Judge Lau.

16 ALJ LIRAG: That's fine.

17 MR. HAWIGER: Thank you.

18 REDIRECT EXAMINATION

19 BY MR. HAWIGER:

20 Q Mr. Borden, first, let me ask you
21 to turn to your exhibit, Exhibit 288, your
22 testimony, page 26, and Judge Lau asked you
23 whether some of the percentage figures, shown
24 at lines 1 through 3, you calculated from
25 PG&E's database or you took directly from
26 PG&E.

27 So let me ask you first, the
28 3 percent figure on Row 1 that says "3

1 percent of ignitions can be avoided," was
2 that based on PG&E's data as shown in
3 Exhibit 291?

4 A Yes.

5 Q And then, subsequently, you have
6 figures of 2 percent and 3 percent in lines 2
7 and 3. And were those from PG&E's --
8 directed from PG&E or did you calculate
9 those?

10 A I calculated those numbers.

11 Q Can you clarify, were those based
12 on the same database that is used in
13 Exhibit 291 or were those a different
14 database?

15 A I believe they are different time
16 periods.

17 Q Can you say -- do you know offhand
18 which time period is used in the PG&E exhibit
19 that is based on the 414 ignitions?

20 A Yes. PG&E's data 2015 to 2017, and
21 I have data from June 2014 to June 2018.

22 Q Thank you.

23 You were also asked some questions,
24 I think, by Judge Lau regarding the
25 independent study, and you testified that you
26 thought that Edison's settlement was -- you
27 weren't sure if it was for Edison only or for
28 all utilities.

1 Did you refresh your memory about
2 that, about that settlement?

3 A Yes. The settlement is just for
4 Edison.

5 Q And then regarding the cross by
6 PG&E, PG&E asked you whether you conducted
7 pole-loading studies, and you said, no.

8 Did you ask PG&E for pole-loading
9 studies as part of discovery?

10 A Yes.

11 Q And did PG&E provide any such
12 studies?

13 A No.

14 Q PG&E asked you whether you would
15 support replacing wood poles with non-wood
16 poles in certain situations.

17 Do you have anything to add to your
18 response regarding the use of non-wood poles?

19 A Yes. PG&E's primary contention for
20 the use of non-wood poles was for what they
21 term "fire resiliency," and my understanding
22 is that with wood poles PG&E currently uses,
23 that's commonly used, they use a
24 fire-retardant material that can be put on
25 wood poles to inhibit them from burning and
26 contributing to a wildfire.

27 Q Lastly, some questions about the
28 healthy tree removal analysis that you did.

1 And PG&E asked why did you not use
2 the 29.5 percent risk reduction figure in
3 Exhibit 291. If you could turn to page 15 of
4 Exhibit 288.

5 A Okay.

6 Q Is it correct that you calculated
7 the 4 percent and 7 percent figures by using
8 a PG&E database of ignitions and
9 disaggregating vegetation-caused ignitions
10 between what you consider to be healthy trees
11 versus other trees that might be unhealthy?

12 A Yes.

13 Q And so this was looking, using
14 historical PG&E data, to analyze the cause of
15 historical ignitions; is that correct?

16 A Yes.

17 Q And then if you look at what has
18 been identified as -- I don't know the
19 Exhibit numbers for this exhibit. Oh, this
20 was the impeachment exhibit.

21 Exhibit 293, when you stated you
22 had not conducted an independent analysis of
23 risk reduction associated with your proposal
24 to remove 14,300 trees annually, can you
25 explain what you had in mind in making that
26 response?

27 A Yes. I had not conducted a
28 forward-looking assessment of risk reduction.

1 The testimony is really backward, or
2 historical looking.

3 Q And the testimony is based entirely
4 on PG&E numbers; correct?

5 A Yes, on PG&E data.

6 MR. HAWIGER: Thank you.

7 May I have a moment off the record,
8 your Honor?

9 ALJ LIRAG: Yes. Off the record.

10 (Off the record.)

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

13 MR. HAWIGER: Thank you, your Honor. I
14 have no further redirect.

15 ALJ LIRAG: Mr. Middlekauff, any
16 recross?

17 MR. MIDDLEKAUFF: Just one question,
18 your Honor.

19 RECCROSS-EXAMINATION

20 BY MR. MIDDLEKAUFF:

21 Q Mr. Borden, you said that you'd
22 asked PG&E to provide these pole-loading
23 studies and they hadn't. Which data request
24 was that?

25 ALJ LIRAG: Let's go off the record so
26 that Mr. Borden can search.

27 (Off the record.)

28 ALJ LIRAG: Let us go back on the

1 record then.

2 So Mr. Middlekauff's last question
3 will be a pending question, and Mr. Borden
4 will attempt to provide an answer after a
5 break to be able to search for a hard-to-find
6 data request.

7 Let's proceed directly to
8 Mr. Buchsbaum.

9 CROSS-EXAMINATION

10 BY MR. BUCHSBAUM:

11 Q Mr. Borden, can you turn to page 30
12 of your testimony? That's Exhibit 288 and on
13 lines 14 to 16, you discuss several of PG&E's
14 proposed investments will replace existing
15 assets, which are still operational, and do
16 not otherwise face any near risk of failure,
17 thus creating premature replaced-asset cost.
18 Do you see that sentence?

19 A Yes.

20 Q And then on lines 24 to 25, you
21 discuss your primary recommendation, and it
22 is to remove the net recorded amount for
23 assets installed less than five years ago
24 from rate base; do you see that?

25 A Yes.

26 Q And I want to focus on the words
27 "net recorded plan." What is your definition
28 of "net recorded plan"?

1 A At page 31, lines 14 to 15, I
2 discuss a possible calculation for that,
3 which would be the average cost of
4 replacement less the average amount
5 depreciated.

6 So it's the undepreciated portion
7 of that plant.

8 Q So which plant are we talking
9 about? Are we talking about the originally
10 installed? So you got a pole, and then
11 you're going to replace a pole; right?

12 A So a pole --

13 Q It's -- so which -- so Pole No. 1,
14 is the one, I think, you're targeting?

15 MR. HAWIGER: Objection. I think
16 you're making certain assumptions and
17 misstates the testimony. His testimony
18 specifies what assets of specific gauge. So
19 as long as you clarify that's what you're
20 talking about.

21 BY MR. BUCHSBAUM:

22 Q That's fine, but -- well, let's go
23 on the record. First, we really disagree
24 with your proposal, but I want to understand
25 it, and that's all I'm trying to do.

26 The net recorded plan, when you're
27 talking about that, and let's assume for
28 purposes of a hypothetical, you've installed

1 a plant in 2015, and now it gets replaced in
2 2020. Which net recorded plant are you
3 talking about; the 2015 plant or the 2020
4 plant? Do you understand the question?

5 A The pole has aged. So let's take a
6 pole.

7 Q Yeah.

8 A It's aged five years. That means
9 it's depreciated five years, whatever that's
10 worth, say 10 percent of its depreciation
11 life. So you would take the original cost of
12 replacement minus that depreciation that's
13 already occurred.

14 So as an example, maybe that's now
15 worth \$17,000 now that it's depreciated a
16 little bit, and that will be taken out at
17 least.

18 Q Well, I didn't understand the
19 answer. Were you taking the depreciation on
20 the 2015 cost or the 2020 cost?

21 A I thought I answered pretty
22 clearly. The pole has depreciated five
23 years. Say, it's depreciated \$1,000 per
24 year.

25 Q What was the cost of the -- for
26 purpose of this hypothetical, let's assume
27 the initial cost was \$20,000.

28 A Right.

1 Q And that was in 2015. And now
2 you're assuming there's \$1,000 a year of
3 depreciation --

4 A Right.

5 Q -- which would be \$5,000.

6 A Right.

7 Q How much do you remove from rate
8 base under your proposal?

9 A 15,000.

10 Q And so if the new replacement was
11 25,000, you're not touching that?

12 A Correct. That would be treated
13 formally.

14 Q Because when I read your testimony
15 on lines 13 to 15, you talked about the
16 average cost of replacement less the amount
17 depreciated, and I wanted to make sure, then,
18 that you were talking about the initial cost
19 in 2015; not the replacement cost in 2020.

20 A That's correct.

21 Q Now, later on, on page 31, you
22 complain the ratepayers are paying for two
23 poles when there's -- when there's only one
24 pole in service; is that correct?

25 MR. HAWIGER: Objection; argumentative.

26 MR. MIDDLEKAUFF: Well, I'll cite
27 the --

28 ALJ LIRAG: Let's replace the word

1 "complain." He's not complaining about
2 anything. Maybe he's stating.

3 BY MR. BUCHSBAUM:

4 Q So you're stating. You're stating.
5 Is that okay?

6 A Yeah.

7 Q So you're stating that ratepayers
8 are paying for two poles when only one pole
9 is in service; correct?

10 A Can you point me to the lines?

11 Q Yes. It's on the bottom of page
12 30, going to the top of page 31.

13 A It states --

14 Q It says that your primary proposal
15 is base; so the ratepayers do not, for
16 example, pay for two poles, where only one
17 pole is in service. Do you see that
18 statement?

19 A Yes.

20 Q And in making this assumption, are
21 you familiar with Commission Standard
22 Practice for cost recovery and depreciation
23 of mass assets like poles?

24 A I have a general awareness about
25 it. I certainly spoke with TURN's experts on
26 depreciation when making this recommendation,
27 but I'm not an expert on depreciation.

28 Q Has our reference exhibit on

1 Standard Practice U-4 been handed out?

2 ALJ LIRAG: No.

3 Let's go off the record.

4 (Off the record.)

5 ALJ LIRAG: Back on the record.

6 BY MR. BUCHSBAUM:

7 Q Can you turn to page 5 of
8 Commission Standard Practice, and you'll
9 notice that there's a table at the bottom,
10 and when you see the table, let me know.

11 A Okay.

12 Q And you can see that there's a
13 transaction for historical cost from
14 retirement from service; do you see that?

15 A Yes.

16 Q Do you see where credit entry is
17 made in the case of retirement?

18 A Yes.

19 Q And can you read that: "In the
20 case of historical cost on retirement from
21 service." Where is the credit entry made?

22 A "Plant account reduces the asset
23 balance."

24 Q So if it reduces the asset balance
25 in terms of that pole that was installed in
26 2015, why do you say the ratepayers are
27 paying for two sets of poles?]

28 A So my recommendation is not based

1 on this document per se. It's based on my
2 concern that this is a large program that may
3 replace very newly installed assets, and in
4 discussion with TURN's depreciation experts
5 or expert, we -- I understand that different
6 treatment of depreciation has been authorized
7 by the Commission in certain circumstances.

8 Q Do you know of any such
9 circumstance that involved a fractional
10 retirement like is involved here as opposed
11 to a retirement of an entire account?

12 A Yes. I believe Edison's -- I
13 believe it's called their pole loading
14 program as well as an aged pole program had
15 to do with fractional retirements of poles
16 that were treated differently from standard
17 depreciation accounting.

18 Q You know, can you give me the cite
19 on that case, because my recollection of that
20 case that it was a finding that Edison had
21 installed new poles -- had installed poles
22 earlier than necessary and that the new costs
23 were not allowed in the rate base. There was
24 no impact to the old plant.

25 A I'm not totally sure.

26 Q We can discuss this in the brief.

27 A I'm just saying -- well, what I
28 understood from our experts is that different

1 depreciation, treatments aside from this
2 strict manual, have been adopted by the
3 Commission. Frankly, it's a pretty
4 conservative treatment to only look at very
5 newly installed assets within the last five
6 years.

7 Q So you're saying that a deviation
8 from standard practice is warranted in this
9 case?

10 A Yes.

11 Q Can you turn now to page 20 of the
12 standard practice. And when you're there,
13 let me know.

14 A Okay.

15 Q Do you see the survivor curve?

16 A Yes.

17 Q Have you ever seen one of these
18 before?

19 A No.

20 Q Well, can you see that the Y axis
21 is a listing of survivors and the X axis has
22 the statement years under it?

23 A Yes.

24 Q So if you drew the survivor curve
25 and you had 100 poles, for example, some
26 would be retired early and some would be
27 retired late, correct? In other words, some
28 would be retired earlier than the average,

1 and some would be retired later than the
2 average?

3 A Sure. Yes.

4 Q And have you ever seen a situation
5 where someone comes into the Commission and
6 says because some of the assets are retired
7 early that they should go out of rate base in
8 the case of a mass asset account?

9 A Again, I'm asking for different
10 treatment for this program than standard
11 depreciation accounting.

12 Q So if the Commission were to, for
13 example, take your recommendation to
14 effectively penalize PG&E by taking early
15 retired assets out of rate base -- are you
16 with me so far?

17 A Yes. The net amount, yes.

18 Q What would happen when the
19 longer-lived assets -- when assets have lived
20 longer than their excepted life, what happens
21 there? Is PG&E -- is your recommendation
22 that PG&E get a bonus?

23 A I haven't made any recommendation
24 about longer-lived assets.

25 MR. BUCHSBAUM: Can I go off the record
26 for one second.

27 ALJ LIRAG: All right.

28 Off the record.

1 (Off the record.)

2 ALJ LIRAG: Let's state that on the
3 record.

4 No more questions from Mr.
5 Buchsbaum.

6 MR. BUCHSBAUM: Yes. No more
7 questions. Thank you.

8 ALJ LIRAG: Any redirect, Mr. Hawiger?

9 MR. HAWIGER: Just a couple of
10 questions.

11 ALJ LIRAG: All right.

12 REDIRECT EXAMINATION

13 BY MR. HAWIGER:

14 Q Mr. Borden, Mr. Buchsbaum mentioned
15 the issue of a fractional asset replacement.
16 Do you have a sense of what fraction of the
17 poles is being replaced in the Grid Hardening
18 program or proposed for replacement versus
19 nominal replacement?

20 A PG&E's proposal is to replace all
21 poles in over 7,100 circuit miles. That is
22 certainly not TURN's proposal, but that is
23 what PG&E has proposed.

24 Q And do you have any data, or is
25 there data on the record discussing the
26 number of poles that this would represent
27 compared to PG&E's pole inventory?

28 A Yes. I believe it was around

1 20,000 poles per year would be replaced under
2 this program, and that compares to a
3 traditional PG&E pole replacement program
4 that was also around 20,000 poles per year.

5 MR. HAWIGER: Thank you. Those are all
6 my questions.

7 ALJ LIRAG: All right.

8 MR. BUCHSBAUM: I have one further
9 question.

10 ALJ LIRAG: All right.

11 RE CROSS-EXAMINATION

12 BY MR. BUCHSBAUM:

13 Q Yes. Do you know how many total
14 poles PG&E has.

15 A I believe in Tier 3 PG&E has around
16 190,000 poles.

17 Q No. That's not what I asked. I
18 asked total poles.

19 A I don't know how many total poles
20 PG&E has.

21 Q Would you agree that it's in PG&E's
22 direct testimony on depreciation?

23 A I don't know.

24 Q Would you agree, subject to check,
25 that it's in the neighborhood of 2 million to
26 4 million poles?

27 A I have no idea. But, again, this
28 is a multi-year program under which PG&E's

1 proposal is to replace a large amount of
2 poles.

3 MR. BUCHSBAUM: I have no further
4 questions.

5 ALJ LIRAG: ALJ Lau?

6 ALJ LAU: No questions.

7 ALJ LIRAG: Mr. Hawiger, is there a
8 move to admit Exhibits 288 and 289 into the
9 record?

10 MR. HAWIGER: So moved, your Honor.

11 ALJ LIRAG: Any objections?

12 (No response.)

13 ALJ LIRAG: Hearing none, Exhibits 288
14 and 289 are received into the record.

15 (Exhibit No. 288 was received into
16 evidence.)

17 (Exhibit No. 289 was received into
18 evidence.)

19 ALJ LIRAG: Mr. Middlekauff, a move to
20 admit Exhibits 291, 292 and 293 into the
21 record?

22 MR. MIDDLEKAUFF: Yes, your Honor. I
23 move to move those Exhibits 291, 292 and 293
24 into the record.

25 ALJ LIRAG: Any objections?

26 MR. HAWIGER: No, your Honor.

27 ALJ LIRAG: Hearing none, Exhibits 291,
28 292 and 293 are received into the record.

1 (Exhibit No. 291 was received into
2 evidence.)

3 (Exhibit No. 292 was received into
4 evidence.291

5 (Exhibit No. 293 was received into
6 evidence.)

7 ALJ LIRAG: We are going to take a
8 10-minute break, and we'll be back at 11:30.
9 So just a small issue that I think might not
10 impact us. So the Commission had said that
11 they were not going to need this hearing
12 room, but there's a very, very, very small
13 chance that they will take the reporters,
14 which will have the same impact. So we're
15 going to confirm that that is not the case.
16 Otherwise, that 55 plus and 30 plus might
17 become 55 minus and 30 minus, minus, minus.
18 But I think that's not the case, but we'll
19 confirm that during the break.

20 All right. Off the record.

21 (Off the record.)]

22 ALJ LIRAG: Let us go back on the
23 record. We are back from our morning
24 break -- second morning break.

25 Good morning, Ms. Dowdell.

26 THE WITNESS: Good morning, your Honor.

27 ALJ LIRAG: Excuse me for a while.

28 We'll get to you. We'll deal with something

1 else first. Let's start with the pending
2 answer to the data request.

3 Is there an answer, Mr. Hawiger?

4 MR. HAWIGER: Yes, your Honor.

5 An example of the data request that
6 Mr. Middlekauff wanted is already in the
7 record in Exhibit 134, the Response to TURN,
8 Data Request 81, Question 4, which I think
9 the point being - to clarify - that PG&E did
10 not refuse to provide loading studies. PG&E
11 just stated they had not performed them, and
12 that's the gist of the data response.

13 ALJ LIRAG: And, Mr. Middlekauff, is
14 that fine?

15 MR. MIDDLEKAUFF: That's sufficient,
16 your Honor.

17 ALJ LIRAG: Next is on the subject of
18 Exhibit 290. So I believe the -- over the
19 break, there was some discussion, and the
20 answer is that there is no common agreement
21 and TURN and PG&E are going to take their
22 chances on their ruling, which we'll do.

23 MR. HAWIGER: Yes.

24 ALJ LIRAG: So we heard both arguments
25 from - we'll kind of keep the suspense
26 running - Mr. Middlekauff and Mr. Hawiger,
27 and so first, let's clear the PG&E Data
28 Response to DR088-10 so that portion is fine

1 and will be admitted.

2 With regards to the SCE portion, we
3 understood the importance of this piece of
4 information and we also understand that this
5 is an administrative hearing, wherein the
6 evidentiary rules may be slightly relaxed
7 compared to regular evidentiary rules.

8 But we sort of agree with PG&E that
9 this is an SCE witness, and so normally,
10 under normal circumstances, anything being
11 offered by that witness should be subject to
12 cross-examination.

13 Also, we took under consideration
14 that TURN is a party to Application
15 18-09-002; is that correct?

16 MR. HAWIGER: Yes, your Honor.

17 ALJ LIRAG: And also, there is the
18 ongoing SCE general rate case that is active
19 right now, and I believe TURN is also a party
20 to that proceeding, or plans to be.

21 If TURN is not yet a party to that
22 proceeding, and so I would just like to state
23 that there are certain types of documents and
24 information that the Commission can take
25 judicial notice of in either of those
26 proceedings.

27 And because the proceedings are
28 still active, I would like TURN to explore

1 ways to try to get this information into
2 those proceedings in such a way where we, the
3 Commission, can take judicial notice of the
4 same information you're trying to get
5 admitted here.

6 MR. HAWIGER: Your Honor, I appreciate
7 that guidance. It is technically impossible
8 at the moment because the 18-09-002
9 proceeding has been submitted. We had
10 hearings, and I can't remember when we
11 settled, but, anyway, we've submitted a
12 settlement. I don't know if there is an
13 opportunity to submit any other evidence in
14 the record.

15 ALJ LIRAG: There is also Edison's GRC
16 and I think Mr. Hawiger is savvy enough to
17 come up with some sort of -- I don't know if
18 you can come up with a way to get that in,
19 but please explore that possibility.

20 Also, once these evidentiary
21 hearings here conclude, ordinarily the record
22 would be closed, but we will explore ways to
23 take judicial notice of certain information
24 that TURN might be able to present regarding
25 this topic.

26 In any case, we are basing the
27 ruling on the fact that this is an SCE
28 witness's document and there's just no way to

1 determine the accuracy of the information or
2 the surrounding circumstances regarding the
3 information based on how this document was
4 presented and submitted in this proceeding.

5 MR. HAWIGER: Well, thank you, your
6 Honor. I am struggling a little with your
7 guidance because, normally, my understanding
8 is the Commission cannot take judicial notice
9 of an exhibit in another case.

10 ALJ LIRAG: Not an exhibit, but there
11 are types of filings that we can take
12 judicial notice of, such as rulings, scoping
13 memos, and other documents that are filed of
14 the same type or other analogous documents.

15 So you are correct that we do not
16 normally take judicial notice of an exhibit,
17 and I was referring to other types of
18 documents that the Commission can take
19 judicial notice of.

20 MR. HAWIGER: Well, I'm disappointed
21 because the record on this very important
22 issue is quite sparse on this type of
23 evidence.

24 ALJ LIRAG: Also, you reminded me that
25 if PG&E's testimony relies or compares itself
26 with facts or other information regarding
27 Edison's situation -- for example, there was
28 mention of the fact that Edison's pole costs

1 might be less than if PG&E's relying on that
2 argument or if any intervenor is relying on
3 any argument relating to that, then it is up
4 to the party alleging that that is the case
5 to provide information to support that
6 argument.

7 And if the argument is not
8 supported, then the Commission will apply the
9 proper weight to statements being presented;
10 in other words, if they're presenting certain
11 arguments and they're just saying this
12 without proper support for that, then it
13 doesn't seem like we can, you know -- I mean,
14 we'll take that into account.

15 MR. HAWIGER: Thank you.

16 ALJ LIRAG: All right.

17 MR. MIDDLEKAUFF: Thank you.

18 ALJ LIRAG: With that, the portion
19 relating to the Data Response to Exhibit 290
20 is admitted, but the SCE Response will be
21 denied, so that will be -- so I think based
22 on the document, page 1 and 2 is being
23 admitted, but then there are no markings on
24 the page, but pages 3 and 4 of Exhibit 290
25 are denied. So that's for clarity.

26 Ms. Dowdell, please raise your right
27 hand.

28 JENNIFER DOWDELL, called as a
witness by TURN, having been sworn,

1 testified as follows:

2 ALJ LIRAG: Please state your name,
3 spell your last name, and provide a business
4 address.

5 THE WITNESS: My name is Jennifer,
6 J-e-n-n-i-f-e-r, Dowdell, D-o-w-d-e-l-l.

7 My business address is The Utility
8 Reform Network, 785 Market Street, Suite 14,
9 San Francisco, California, and I do not know
10 the ZIP code -- oh, 94103.

11 ALJ LIRAG: I think it is Mr. Long who
12 is doing the direct.

13 MR. LONG: Can we go off record?

14 (Off the record.)

15 ALJ LIRAG: Let's go back on the
16 record. While we were off the record, there
17 was some discussion regarding the remainder
18 of today's schedule, and let's proceed with
19 Direct Examination by Mr. Long.

20 MR. LONG: Thank you.

21 ALJ LIRAG: Hang on. I don't think
22 I've identified the exhibits. I got thrown
23 off. Let's identify exhibits pertaining to
24 Ms. Dowdell. First is Exhibit 294, this is
25 the Prepared Testimony of Jennifer Dowdell.

26 MR. LONG: Your Honor, could I clarify?
27 Was that the one marked TURN-08?

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

1 (Off the record.)

2 ALJ LIRAG: Back on the record.

3 We've identified Exhibit 294.

4 Exhibit 295 is the Revised

5 Testimony, Ms. Dowdell.

6 Exhibit 295-R is the Redline Version
7 of Exhibit 295.

8 Exhibit 296 is a document entitled:
9 "2017 GRC, Exhibit PG&E-03, Testimony on
10 Corrosion Control, Page 6-B to, dash, 32"; so
11 it looks like an excerpt of testimony.

12 Next is Exhibit 297. It's a
13 document entitled, "2017 GRC Exhibit,
14 PG&E-03, Testimony on SCADA, page 7-19 to
15 7-21." So it looks like another excerpt of a
16 PG&E exhibit.

17 (Exhibit No. 294 was marked for
18 identification.)

19 (Exhibit No. 295 was marked for
20 identification.)

21 (Exhibit No. 295-R was marked for
22 identification.)

23 (Exhibit No. 296 was marked for
24 identification.)

25 (Exhibit No. 297 was marked for
26 identification.)

27 ALJ LIRAG: All right. Mr. Long.

28 DIRECT EXAMINATION

BY MR. LONG:

Q All right. Ms. Dowdell, do you

1 have in front of you what has been marked as
2 Exhibit 294, Exhibit 295, and Exhibit 295-R?

3 A I have 295, which is my Revised
4 Testimony. I have 29- --

5 MR. LONG: Can we go off the record,
6 your Honor?

7 ALJ LIRAG: Off the record.

8 (Off the record.)

9 ALJ LIRAG: Back on the record.

10 I believe Ms. Dowdell has the right
11 testimonies on hand.

12 BY MR. LONG:

13 Q We'll start with what has been
14 marked as Exhibit 294, Ms. Dowdell. Was that
15 document prepared by you or under your
16 direction?

17 A Yes, it was.

18 Q Do you have any changes to your
19 testimony in Exhibit 294?

20 A Not in particular, but in the 294
21 corrected version.

22 Q 294 corrected version. This is the
23 Affordability testimony.

24 A There was an errata.

25 Q This is the Affordability
26 testimony.

27 A Oh, forgive me. Sorry about that.

28 Q You're not used to the hearing

1 exhibit numbers.

2 A No, I'm not. And I have many
3 testimonies. Okay.

4 Q So we're talking about the
5 Affordability testimony first.

6 A Thank you.

7 Q Do you have any changes to that
8 testimony?

9 A Yes. I actually do have an errata
10 and that is on page 14.

11 Q Okay. Again, we're talking about
12 the Affordability testimony.

13 MR. LONG: Can we go off the record?

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

15 (Off the record.)

16 ALJ LIRAG: Let us go back on the
17 record.

18 While we were off the record, we
19 were discussing a little bit regarding
20 corrections, and I think we have an equitable
21 solution, Ms. Goodson, which is Ms. Goodson
22 providing guidance with what may not need to
23 be corrected anymore, but just clarify.

24 MS. GOODSON: Thank you, your Honor.

25 Ms. Dowdell, please correct me if
26 I'm wrong, but I believe the Statement of
27 Qualifications of yours, which is
28 Attachment 1 in Exhibit 294, is a truncated

1 version of the full Statement of
2 Qualifications, which appears as Attachment 1
3 to Exhibit 295; is that correct?

4 THE WITNESS: That is correct.

5 MS. GOODSON: Thank you.

6 ALJ LIRAG: So you're more qualified in
7 Exhibit 295. So for the full version, we'll
8 take what is in Exhibit 295.

9 Mr. Long.

10 BY MR. LONG:

11 Q Turning to Exhibit 295 and 295-R -
12 that's the Accountability testimony - were
13 these documents prepared by you or under your
14 direction?

15 A They were.

16 Q On these, do you have any changes
17 to your testimony?

18 A I do.

19 Q If you could explain them by
20 reference to Exhibit 295, that is, the clean
21 version so that we don't get confused, that
22 would be helpful. So can you tell us the
23 changes one by one?

24 A Yes, I can.

25 On page 14, both changes are on
26 page 14. And at the top of page 14, line 1,
27 where it begins: "Based on TURN's reduced
28 scope," that should be stricken from "based

1 on TURN's reduced scope" all the way through
2 line 4, "costs for this program."

3 Q Let me stop you there and make sure
4 we have that. So you're basically saying the
5 sentence that begins at the end of line 1
6 beginning with the words, "Based on TURN's,"
7 that entire sentence should be stricken
8 through line 4, the word "program."

9 A That is correct.

10 Q Can you briefly explain the reason
11 for that change?

12 A Yes. When we revised our
13 testimony, we inadvertently did not strike
14 that sentence, which confuses our proposal,
15 and so removing that sentence clarifies the
16 intent of our proposal, we believe.

17 Q It relates to your testimony
18 concerning PG&E's original work plan for
19 2019; is that right?

20 A Yes.

21 Q Now, is there another correction on
22 that page?

23 A There is -- at line 7, there's a
24 typographical error. It says: "Includes a
25 disallowance of 9.89 million." It should
26 say: "Includes a disallowance of 9.59
27 million."

28 Q Thank you. Do you have any other

1 changes?

2 A No, I do not.

3 Q Now, with these changes, are the
4 facts stated in these exhibits -- that is,
5 Exhibit 294, 295, and 295-R, are the facts
6 stated in these exhibits true and correct, to
7 the best of your knowledge?

8 A They are.

9 Q And do the opinions expressed in
10 these exhibits reflect your best professional
11 judgment?

12 A They do.

13 MR. LONG: Your Honor, Ms. Dowdell is
14 ready for cross-examination.

15 ALJ LIRAG: Just for the record, we are
16 also making the same corrections on 295-R.

17 MR. LONG: Thank you, your Honor.

18 ALJ LIRAG: All right. Let us take a
19 lunch break right now and be back at 1:00
20 p.m.

21 Just to clarify a little bit
22 regarding the schedule, I did say we would
23 proceed normally, but there is an issue,
24 though. We are trying to convince our
25 reporter to go home early, so that might come
26 into play. But right now, she's saying she's
27 fine; so we'll just assume that we're
28 proceeding normally and that we're not under

1 any time pressure. But we'll clarify when we
2 come back from our lunch break at 1:00 p.m.

3 Off the record.

4 (Whereupon, at the hour of 12:00
5 p.m., a recess was taken until 1:00
6 p.m.)

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1 AFTERNOON SESSION - 1:00 P.M.

2 * * * * *

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

4 We're back from our lunch break, and
5 we'll take care of a little side business,
6 Ms. Dowdell.

7 First, we'll identify as Exhibit
8 298, and this is an excerpt from PG&E-03,
9 pre-marked PG&E-03, which is the Workpapers,
10 page 7-32, and Workpapers 7-37. So that's
11 Exhibit 298.

12 (Exhibit No. 298 was marked for
13 identification.)

14 ALJ LIRAG: I think we can have a move
15 from Mr. Ouborg to admit Exhibits 296, 297,
16 and 298. My understanding is that these do
17 not pertain to Ms. Dowdell; is that correct?

18 MR. OUBORG: Yes, your Honor.

19 ALJ LIRAG: Who do these pertain to?

20 MR. OUBORG: The first one, 296, deals
21 with testimony from PG&E's original exhibit
22 PG&E-03, which is, I think, Exhibit 10, and
23 it deals with corrosion control. This is a
24 part of PG&E's testimony that Cal Advocates
25 responded to, and we referenced this page
26 from 2017 GRC in our testimony, and we
27 consulted with Ms. Shek before this, and she
28 authorized me to say that Cal Advocates does

1 not object to admitting this document to the
2 record.

3 ALJ LIRAG: So I will still say it out
4 there, any objections?

5 And no need for Ms. Shek to respond
6 all the way from the back.

7 (No response.)

8 ALJ LIRAG: Hearing none.

9 Exhibits 296, 297, and 298 are
10 received into the record.

11 (Exhibit No. 296 was received into
12 evidence.)

13 MR. LONG: I think Mr. Ouborg was just
14 speaking to Exhibit 296. I think Exhibits
15 297 and 298 are different and we do intend to
16 object.

17 ALJ LIRAG: Let us withdraw the
18 admission then. So only 296 is received into
19 the record.

20 Thank you, Mr. Long. I apologize
21 for jumping ahead. Please go ahead,
22 Mr. Ouborg.

23 MR. OUBORG: So Exhibit 297, your
24 Honor, this is some pages from the 2017 GRC
25 that relate to our SCADA testimony, and I
26 believe on this one, TURN is agreeable to
27 admit this page into the record.

28 ALJ LIRAG: All right. Is that

1 correct, Mr. Long?

2 MR. LONG: No objection, your Honor.

3 (Exhibit No. 297 was received into
4 evidence.)

5 ALJ LIRAG: So no objection; Exhibit
6 297 is received into the record. I suppose
7 the objection is on Exhibit 298.

8 MR. OUBORG: Yes. 298 is another
9 exhibit relating to SCADA testimony. This
10 one attaches two workpapers from the 2017 GRC
11 that relate to one of the tables in our
12 testimony.

13 So there's a table in our testimony
14 that has a footnote that refers to the 2017
15 GRC as the source for certain efficiencies
16 that are included in the table in our SCADA
17 costs.

18 Unfortunately, we did not cite
19 precisely to the exact workpaper pages in the
20 2017 GRC, but we think that since those
21 pages, which contain those efficiencies, that
22 are used in the table in our current
23 testimony, we think the record would be
24 enhanced by having those workpapers added,
25 and I'll let TURN respond.

26 ALJ LIRAG: Any objections?

27 MR. LONG: Yes, your Honor.

28 TURN's objection is that as

1 Mr. Ouborg stated, the proffered exhibit
2 includes workpaper pages that are not cited
3 in the table that Mr. Ouborg is referencing.
4 And if you look at the workpaper pages, it's
5 just not immediately apparent how they relate
6 to the proper testimony.

7 They had an opportunity to make
8 these workpapers part of their testimony, and
9 they did not. And I'm just concerned about
10 adding something to the record that I don't
11 understand, and I don't see how it relates to
12 the table that they say it relates to.

13 ALJ LIRAG: Mr. Ouborg, is there any
14 chance of revising this to include the proper
15 footnote?

16 There is additional exhibits that we
17 will get in, which is the update testimony
18 and the comparison exhibit. So if this can
19 be revised to include the footnote, we can
20 include this when we determine the
21 admissibility of those other exhibits.

22 MR. OUBORG: So, your Honor, you're
23 suggesting we revise the footnote in the
24 table in our current GRC testimony to
25 specifically refer to the 2017 pages that
26 it's based on?

27 ALJ LIRAG: So I don't know if it's an
28 incorrect footnote or a missing footnote in

1 Exhibit 298, but I believe that is Mr. Long's
2 objection; so if that can be placed in, then
3 we can resubmit this document.

4 MR. LONG: If I can clarify, your
5 Honor?

6 ALJ LIRAG: Yes.

7 MR. LONG: The objection is that what
8 counsel is asking to have happen is,
9 essentially to buttress the testimony that
10 PG&E presented in rebuttal with additional
11 workpapers that they didn't include in their
12 rebuttal.

13 And we were okay with that for
14 Exhibit 297 because there was a citation in
15 the Rebuttal Testimony to what is included in
16 Exhibit 297. The problem is PG&E's Rebuttal
17 Testimony does not include a citation to
18 these workpaper pages in Exhibit 298, so the
19 lack of citation is in PG&E's Rebuttal
20 Testimony.

21 And they're trying to add something
22 to their Rebuttal Testimony that wasn't
23 there. So that's the issue.

24 And as I explained, the problem is
25 it's not immediately apparent from their
26 Rebuttal Testimony that these workpaper pages
27 are related to their Rebuttal Testimony and
28 support their Rebuttal Testimony. I don't

1 understand how they do relate.

2 ALJ LIRAG: So I think the argument is
3 that this information is already in the, I
4 guess, PG&E's prior GRC workpapers; am I
5 understanding it correctly?

6 MR. LONG: No. It's -- this is --
7 again, the issue is, and I don't mean this --
8 I mean, mistakes happen, but there was an
9 opportunity to include these workpapers in
10 the attachments to their Rebuttal Testimony,
11 and they just missed that opportunity, and
12 now they're asking to make up for that at a
13 rather late point and with workpapers that
14 are not -- do not, to me at least, seem to be
15 apparently or evidently related to what PG&E
16 is trying to buttress.

17 MR. OUBORG: So, your Honor --

18 MR. LONG: The problem is lateness here
19 and not having an opportunity to see this and
20 analyze this and do cross on it and that kind
21 of thing.

22 MR. OUBORG: Your Honor, the footnote
23 in our rebuttal testimony in this case states
24 that certain numbers in a table, excluding
25 efficiencies, applied the percentage of total
26 unit cost that PG&E removed from its 2017
27 Forecast because of anticipated efficiencies.

28 So where we erred is we didn't

1 specifically cite to the pages in the 2017
2 Forecast where we got those numbers. So - I
3 agree - we should be more specific, but it is
4 clear that the efficiencies that are
5 considered in this table come from the 2017
6 Forecast, and all we're trying to do is just
7 add that workpaper to show those efficiencies
8 in 2017 so the record is complete.

9 ALJ LIRAG: I'm going to set it aside
10 for now. We'll have another break in the
11 afternoon. I'll give you and Mr. Long a
12 chance to confer, and then if there's no --
13 if we're still at the point where Mr. Long is
14 objecting, then we'll take the objection
15 under consideration.

16 But my inclination is if there's a
17 way to just correct the information, then
18 let's try and do that, but, if not, we'll
19 take Mr. Long's objections under
20 consideration, disregarding the fact that
21 something may have just been admitted.

22 All right. So we'll set that aside.

23 Next, let's identify Exhibit 299,
24 and this is the Prepared Testimony of Thomas
25 Long addressing PG&E's Risk Analysis and
26 Continuation of Deferred Work Settlement
27 Requirements.

28 I guess cross had been waived for

1 Mr. Long, so I think I'll have Ms. Goodson
2 move this into the record.

3 A motion to move into the record?

4 MS. GOODSON: Yes, your Honor.

5 ALJ LIRAG: Any objections?

6 (No response.)

7 ALJ LIRAG: Hearing none.

8 Exhibit 299 is received into the
9 record.

10 (Exhibit No. 299 was received into
11 evidence.)

12 ALJ LIRAG: Next, we have several cross
13 exhibits and this is for Ms. Dowdell. First,
14 is Exhibit 300, and it's a document entitled:
15 "Disconnections OIR, Phase 1, Scoping Memo."

16 Next is Exhibit 301, and these are
17 Excerpts from PG&E's Supplemental Response to
18 TURN Data Request 011, Question 01, with one
19 attachment.

20 Next is Exhibit 302. It's a
21 document entitled, "CPUC PPD Call-In Review
22 of Residential Customer Disconnection
23 Influences and Trends."

24 Next is Exhibit 303. This is a
25 document entitled, "Unemployment Data, Bureau
26 of Labor Statistics."

27 Next is Exhibit 304, and this is a
28 copy of "PG&E Advice Letter

1 4059-G-A/5467-E-A."

2 And, finally, we have Exhibit 305.

3 This contains Excerpt from Decision

4 18-12-013.

5 (Exhibit No. 300 was marked for
identification.)

6 (Exhibit No. 301 was marked for
7 identification.)

8 (Exhibit No. 302 was marked for
identification.)

9 (Exhibit No. 303 was marked for
10 identification.)

11 (Exhibit No. 304 was marked for
identification.)

12 (Exhibit No. 305 was marked for
13 identification.)

14 ALJ LIRAG: Let's proceed with
15 cross-examination by Ms. Slocum.

16 MS. SLOCUM: After conferring with
17 counsel before lunch, there will be one
18 additional document that is being prepared
19 right now, so we'll bring that at the
20 appropriate time.

21 ALJ LIRAG: All right.

22 CROSS-EXAMINATION

23 BY MS. SLOCUM:

24 Q Good afternoon, Ms. Dowdell.

25 A Good afternoon.

26 Q As you know, I'm Gail Slocum for
27 PG&E. I see from your Statement of
28 Qualifications that you have been working as

1 an energy policy analyst for TURN since March
2 2019, so a little over six months; is that
3 right?

4 A That is correct.

5 Q And before that, you were a
6 consultant for about five years?

7 A That is correct.

8 Q And before that, you worked at PG&E
9 for about 13 years, either as a consultant or
10 as an employee?

11 A Yes. That is correct.

12 Q And just for full disclosure, we've
13 known each other during and since that time;
14 isn't that correct?

15 A Absolutely. And it is always a
16 pleasure.

17 Q Me, too. It's kind of awkward,
18 but...

19 A Everybody's got a job.

20 Q So in talking about your testimony
21 in Exhibit 294, you talk about the issue of
22 disconnections. And forgive me if I get some
23 of the pages wrong because I think I may be
24 looking at the pre-revisions version.

25 But what I have is page 15, line
26 15. It will probably be a little bit lower
27 than that for you. It's got three bullet
28 points followed by a paragraph that starts,

1 "In offering these findings."

2 A Yes, I'm there.

3 Q What page is that?

4 A That is page 14, and I think the
5 first of those bullet points is because
6 there's a high correlation --

7 Q Yes. I'm not looking now at the
8 bullet points. I'm looking at the sentence
9 that's after them. It starts: "In offering
10 these findings, TURN recognizes that PG&E
11 could choose to mitigate these impacts
12 through its credit collection packages such
13 as those under consideration in the CPUC's
14 Disconnections Rulemaking, and you cite the
15 Rulemaking No. 18-07-005.

16 Do you see that?

17 A Yes, I do.

18 Q I'd like to get a sense of your
19 familiarity with the Disconnections OIR.

20 Do you agree that in the
21 Disconnections OIR, the CPUC is working with
22 many active parties, including TURN, to
23 develop policies and rules that reduce
24 disconnections and improve reconnection
25 processes and outcomes for disconnected
26 customers?

27 A Yes, I do.

28 Q And during these GRC hearings last

1 Monday, October 14th, your colleague David
2 Chang of TURN testified that he has been
3 representing TURN in the CPUC's
4 Disconnections OIR since July 2008 when it
5 began; are you aware of that?

6 A I'm aware of his participation in
7 the disconnections, yes.

8 Q And during your work at TURN since
9 March 2019, have you, yourself, been directly
10 involved in working on the CPUC's
11 Disconnections OIR?

12 A Yes.

13 Q What has been your role?

14 A I have supported the TURN team
15 working on the Disconnections OIR, and I have
16 looked at some analysis.

17 Q Okay. When you were preparing your
18 July 26, 2019 testimony here, when you were
19 referencing disconnections, what did you do
20 to get up to speed on the Disconnections OIR?

21 A Can you clarify the question,
22 please?

23 Q Sure. You started work at TURN in
24 March, and then in late July, you submitted
25 this testimony; correct?

26 A Yes.

27 Q I'm trying to understand in that
28 period of time what you did to get up to

1 speed about the Disconnections OIR because it
2 was already underway.

3 A Well, one of the things I did in
4 preparing this testimony is I became familiar
5 with - I have it here - SB 598, which is, I
6 think, the direct, relevant part, and I
7 became familiar with the obligation incumbent
8 upon the CPUC and then sort of passed through
9 to the utilities.

10 And I think that's -- well, in
11 particular Section 2, 718A, part B, "to
12 conduct an assessment of improperly
13 identified impact of any proposed increase in
14 rates on disconnections or nonpayment, which
15 shall be included in the record of the
16 proceeding."

17 Q Okay. Would you please look at the
18 cross exhibit that has been marked as Exhibit
19 300?

20 A I have it.

21 Q It's entitled: "Disconnections OIR
22 Phase 1, Scoping Memo."

23 A Yes.

24 Q Could you please read aloud the
25 first two sentences under the topic,
26 "Background" at page 1?

27 A "On July 20th, 2018, the Commission
28 approved this Order Instituting Rulemaking,

1 OIR, pursuant to Senate Bill, SB 598 to
2 address disconnection rates across
3 California's electric and gas Investor-Owned
4 Utilities.

5 Among other things, the goal of
6 this proceeding is to adopt rules and
7 policies that will ultimately reduce
8 disconnections and improve reconnection
9 processes for disconnected customers.

10 Q Thank you.

11 Is that consistent with your
12 understanding of the purpose of the
13 Disconnection OIR?

14 A I think, yes. Yes, in part.

15 Q By including disconnections-related
16 arguments in TURN's GRC Phase I Testimony
17 here, TURN is not suggesting that the CPUC
18 should discontinue addressing disconnections
19 comprehensively in its Disconnections and
20 Reconnections OIR; is it?

21 A Absolutely not, but the
22 disconnection piece is really only part of
23 the story in terms of thinking about
24 affordability. It's what you're doing to
25 help customers given a level of rates.

26 And then the other lever is, in
27 fact, doing something about the actual level
28 of rates.

1 Q Understood.

2 A Okay.

3 Q I'm speaking about your testimony
4 on disconnections at this point.

5 A Okay.

6 Q So, please, look at PG&E's rebuttal
7 testimony in Exhibit 93. Do you have that?

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

9 (Off the record.)

10 ALJ LIRAG: Let's go back on the
11 record. So let's proceed, Ms. Slocum.

12 BY MS. SLOCUM:

13 Q Do you have what's before you
14 what's been marked as Exhibit 93 PG&E's
15 Rebuttal?

16 A I do. Thank you.

17 Q And at page 7-2, in Q and A 8, and
18 starting specifically at line 14 through page
19 7-3, line 7, does TURN agree that
20 disconnections should continue to be
21 addressed comprehensively in the CPUC's
22 energy disconnections and reconnections
23 Rulemaking, R.18-07-005?

24 A Yes.

25 Q Now, turning back to your testimony
26 in Section 2C, which is about page 14, I
27 believe.

28 A Yes, I'm there.

1 Q TURN criticizes PG&E's initial
2 analysis, which used a regression approach
3 that looked at whether there might be a
4 relationship between bills and disconnections
5 by using --

6 A Can I have that line?

7 Q Oh, I'm sorry.

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

9 (Off the record.)

10 ALJ LIRAG: Let's continue, Ms. Slocum.

11 MS. SLOCUM: Yes. Thank you, your
12 Honor.

13 Q So your testimony at page 14,
14 lines 18 through 20, criticizes PG&E's
15 initial analysis, which had used a regression
16 approach that looked at whether there might
17 be a relationship between bills and
18 disconnections by using an annual average of
19 the months of year; correct?

20 A Yes.

21 Q And didn't PG&E's initial
22 comparison to annual bill amounts to annual
23 number of disconnections find a none-to-weak
24 correlation; in other words, not a
25 statistically significant correlation?

26 A This is PG&E's original annual -- I
27 don't think that's the case for all
28 customers.

1 Q Okay. We'll return to that in a
2 moment. Your testimony talks a lot about
3 regression analysis, so I'd like to just get
4 a little sense of your understanding about
5 how regressions work.

6 I see from your Statement of
7 Qualifications that your undergraduate work
8 was in Mechanical Engineering, after which
9 you got an MBA in Economics and Finance, as
10 well as a CPA certificate and are licensed as
11 a CPA; is that correct?

12 A That is correct.

13 Q How many regression analyses have
14 you performed in your career?

15 A Are we counting grad school or all
16 told?

17 Q In your work life.

18 A Maybe a dozen complex regression
19 analyses.

20 Q Thank you.

21 A But what I will say --

22 Q There's no question pending.

23 A Okay.

24 Q You can handle that on direct, if
25 you wish.

26 So looking back at your testimony
27 that we were just looking at at page 14, line
28 20, you go on to say, "For this type of

1 assessment to be capable of identifying the
2 impact of any proposed rate increases on
3 disconnections, the relationship between
4 rates and disconnection would have to be
5 linear for all customers, and the level of
6 rates would have to be the primary driver."

7 Do you see that?

8 A Yes.

9 Q And then you present your opinion
10 at page 15 -- no. Wait. I'm sorry.

11 ALJ LIRAG: Off the record.

12 (Off the record.)

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

15 BY MS. SLOCUM:

16 Q Page 16, line 13, that a linear
17 correlation between the levels of rates and
18 the rates of disconnection, quote, "seems
19 unlikely," unquote; do you see that?

20 A I do.

21 Q Do you agree that a definitive
22 conclusion about whether there's a linear
23 correlation between the level of rates and
24 the level of disconnections should be based
25 on analysis of the most recent available
26 data?

27 A It depends on the data series, but
28 if you want to know the current relationship,

1 you would need to look at the most recent
2 appropriate data. Yeah, I think that's
3 right.

4 Q And do you agree that a definitive
5 conclusion about whether there's a linear
6 correlation between the level of rates and
7 the level of disconnection over time should
8 be based on analysis of data in that same
9 time period?

10 A Help me understand what you're
11 asking me.

12 Q You were just speaking about most
13 recent. And now I'm talking about a series
14 over a period of time.

15 Would you agree that that period of
16 time should align with the period of time
17 that's being reviewed for purposes of the
18 analysis?

19 A Yes. The data series and the
20 period of time about which the conclusion is
21 being drawn should be contemporaneous, I
22 think.

23 Q I didn't see in your testimony any
24 independent regression that TURN performed to
25 analyze for itself, whether there might be
26 any correlation, linear or otherwise, between
27 changes in the level of PG&E's rates and the
28 number of disconnections. Did I miss

1 something?

2 A That's not TURN's role.

3 Q So you did not perform any
4 independent regression analysis using the
5 data that you were provided?

6 A We looked at some of the data.

7 Q And didn't perform a regression
8 analysis of your own; did you?

9 A We performed some ZIP code level
10 regression.

11 Q Why didn't you present it in your
12 testimony?

13 A Because we felt like the data that
14 we were given would not be data that was
15 likely to be dispositive either way for a lot
16 of reasons.

17 Q Okay. Isn't it true that in Data
18 Request, TURN 11, Question 4, issued on April
19 18th, 2019 by TURN, TURN asked PG&E for Excel
20 format data for the years 2010 and 2014 for
21 PG&E's disconnection rates by zip code?

22 A Yes, we did.

23 Q And TURN received data from PG&E in
24 response to this request on May 9th, 2019;
25 correct?

26 A Yes, we did.

27 Q Did TURN choose not to include the
28 regression analysis that you've just stated

1 you performed for some ZIP codes because the
2 results were not what TURN wanted to present?

3 A No. TURN was having some trouble
4 with the data that we were getting from PG&E,
5 and there was some question about the data
6 sets that we had versus the data sets that we
7 were being given over the period of years.

8 Additionally, TURN sent the ZIP
9 code level data to our numerical analyst who
10 wove it up into county level data.

11 So that's primarily what we did
12 with it because we had a hard time with the
13 changing data sets.

14 Q Is it your opinion -- well, did
15 TURN's analysis, given the data that you had,
16 reach a conclusion?

17 A It did not. And we had some
18 thoughts as to why that was the case. We
19 thought about the data. We looked at it.
20 And we said, okay, so the data doesn't
21 include the lag around billing. And then we
22 got other data that included a two-month lag,
23 but then we thought about payment plans,
24 which are --

25 Q Okay. Yeah. Okay.

26 ALJ LIRAG: Let me interrupt. Sorry to
27 interrupt the flow of your questioning, but
28 I'm going to call a five-minute break to give

1 Shannon some relief.

2 So let's go off the record.

3 Mr. Long, can you use that time to
4 confer with Mr. Ouborg? If there's no
5 resolution, then I think I have something in
6 mind. So five-minute break.

7 MR. LONG: Sure.

8 (Recess taken.)

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

10 While we were off the record, PG&E
11 served another exhibit, and this is a
12 cross-examination exhibit from PG&E. We'll
13 identify it as Exhibit 306. This is "Excerpt
14 from Dowdell Errata Testimony, Redline."

15 (Exhibit No. 306 was marked for
16 identification.)

17 ALJ LAU: Ms. Slocum, you may continue
18 your cross.

19 BY MS. SLOCUM:

20 Q Now, Ms. Dowdell, we've already
21 talked about PG&E's Rebuttal Testimony in
22 Exhibit 93, and I assume you reviewed that
23 rebuttal testimony after you received it on
24 September 4th.

25 A I did.

26 Q And, please, turn to -- in the
27 rebuttal, Exhibit 93, to page 7-3, line 25.

28 A Yes.

1 Q Did you agree that after seeing
2 concerns that were expressed in TURN's
3 testimony about PG&E's original linear
4 regression analysis of annual average data,
5 upon further review, PG&E presented a monthly
6 analysis, which it believed would provide a
7 more accurate assessment of the relationship
8 between the two variables?

9 A Yes. I agree that PG&E submitted
10 that analysis, yes.

11 Q And in its rebuttal testimony, PG&E
12 presented its results from comparing the
13 bills for a particular month with the
14 disconnections in that same month; that is,
15 January 2010 bills were compared with January
16 2010 disconnects; correct?

17 A Yes.

18 Q And looking specifically at page
19 7-5 of the rebuttal, Table 7-2 --

20 A Yes.

21 Q -- do you see that PG&E's monthly
22 regression analysis there produced - that's
23 in the second column from the right -
24 R-squared values that PG&E stated indicate
25 there is no correlation between monthly bills
26 and monthly disconnections for CARE FERA and
27 non-CARE FERA customers from 2010 to 2017?

28 A Yes. I agree that's what the

1 rebuttal says.

2 Q Are you aware that earlier in these
3 GRC hearings on October 3rd, TURN
4 cross-examined PG&E witness Travis Brown on
5 the subject of the monthly regression
6 analysis that was in PG&E's rebuttal?

7 A I'm not aware of the date, but I
8 know Mr. Brown was cross-examined.

9 Q Did you help prepare those
10 cross-examination questions?

11 A Actually, no.

12 Q Okay. During that
13 cross-examination, Ms. Goodson for TURN
14 questioned the appropriateness of comparing
15 the same month's bill amounts to that month's
16 number of disconnections, and asked Mr. Brown
17 questions establishing that under PG&E's
18 bill-collection protocols, a customer cannot
19 be disconnected between 43 and 58 days after
20 they received their bill assuming no previous
21 outstanding balances; is that also your
22 understanding?

23 A I think it's about a two-month lag,
24 yeah.

25 Q Do you believe that any monthly
26 regression analysis of the relationship
27 between monthly bills and monthly disconnects
28 should incorporate this, approximately,

1 two-month delay such that, for example,
2 January 2010 bills should be compared to
3 March 2010 disconnects?

4 A I do not. I mean, I think there
5 should be a lag. I just don't think it
6 should be two months.

7 Q What amount do you think it should
8 be?

9 A Well, I think it needs to consider
10 the fact that there is -- so you use the
11 electricity; you get the bill, so that's your
12 roughly two-month lag, but there are about --
13 it's taking me a minute.

14 So if you look at PG&E's
15 disconnections report, and you look at the
16 total number of payment plans for 2017, which
17 is also in your data series, you'll find --
18 and if you'll indulge me because I do have it
19 here so you can verify it. I think you'll
20 find that there's -- there's like 1,189,000
21 payment plans created.

22 And the average payment plan, so,
23 like, over 60 percent of payment plans, is
24 actually three to six months. And then
25 there's another tranche that's probably about
26 an additional 10 percent - it's like 100,000
27 - and it's like six to nine months.

28 So I think that the lag issue is

1 more complex than just adding the additional
2 two months.

3 MS. SLOCUM: Your Honor, may we go off
4 the record for a minute?

5 ALJ LIRAG: Off the record.

6 (Off the record.)

7 ALJ LIRAG: Let's go back on the
8 record. I believe I have identified Exhibit
9 298, and is there a solution to the
10 objection, Mr. Long?

11 MR. LONG: Yes, your Honor.

12 Mr. Ouborg and I have discussed the
13 matter. TURN is going to remove its
14 objection, and just with the understanding
15 that the table that this workpaper is
16 intended to support, which is Table 2-3 in
17 PG&E's Rebuttal Testimony, which I believe is
18 Hearing Exhibit 6.

19 This workpaper is intended solely
20 for the purpose of supporting certain numbers
21 that are associated with Footnote B in that
22 table, and that's the sole purpose for which
23 PG&E would be using Exhibit 298.

24 ALJ LIRAG: Agree with that
25 qualification, Mr. Ouborg?

26 MR. OUBORG: Yes, your Honor, we do.

27 (Exhibit No. 298 was received into
28 evidence.)

1 ALJ LIRAG: So the objection is
2 removed. With that, we shall admit Exhibit
3 298 into the record. Let's go back off the
4 record.

5 (Off the record.)

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

8 MS. SLOCUM: Thank you, your Honor.

9 Q Ms. Dowdell, did you do an analysis
10 that incorporated your belief about what the
11 appropriate delay factors would be?

12 A We did not.

13 Q But you would agree that there is
14 some group of customers for whom the
15 disconnection would occur between 53 and 58
16 days, such as those who don't qualify for a
17 payment plan; correct?

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

19 (Off the record.)

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

22 I believe Ms. Dowdell has answered.

23 MS. GOODSON: Let me just interject and
24 ask Ms. Slocum to clarify. Are you simply
25 asking Ms. Dowdell whether that's
26 conceivable, whether that's plausible, or are
27 you asking whether she has any knowledge
28 about whether the customers who've been

1 disconnected that are reflected in PG&E's
2 data series, whether any of them had no pay
3 plan prior to disconnection?

4 MS. SLOCUM: I could do it either way,
5 but, I think, probably the easiest way to do
6 this is to say, when PG&E asked you the
7 question before, I had mentioned the idea
8 of -- that we've been assuming no previous
9 outstanding balances; do you recall that?

10 A No. I don't recall presuming no
11 previous outstanding balances.

12 Q Okay. So maybe that's where the
13 disconnect occurred. We were saying a
14 customer could not be disconnected for
15 between 53 and 58 days, after they received
16 their bill, assuming they have no previous
17 outstanding balance.

18 And there I'm referring to the
19 group of customers for whom they're -- they
20 are not on a pay plan and they are due; do
21 you have that in mind?

22 A Okay. Let me just make sure I
23 understand the question.

24 So what you're saying is, consider
25 the group of customers who have no
26 outstanding balance and are not on a pay
27 plan.

28 Q Correct.

1 A And for that group of customers,
2 what are you asking me?

3 Q If the period of the lag is between
4 53 and 58 days, in that instance.

5 A I have no specific, direct
6 knowledge, but that seems like it's about the
7 billing cycle, so wouldn't fight with you
8 over that. I'm, you know...

9 Q Do you have any knowledge about
10 what proportion of customers falls into this
11 category we've been discussing?

12 A The one that has no outstanding
13 balance and is not on a pay plan? It would
14 have to be -- well, I have no personal
15 knowledge. I could look at this study and
16 say, you know, the ones that aren't on a pay
17 plan might fall into your category.

18 So if there's -- so are you asking
19 me to make the calculation?

20 Q No. I think you've answered the
21 question.

22 A Okay.

23 Q Look at what's been marked as
24 Exhibit 301. Since receiving PG&E's
25 Rebuttal -- first of all, when you talked
26 about TURN attempting to run its own monthly
27 regression analysis, when did that happen?

28 A That happened kind of shortly after

1 getting the data, but then it was the long
2 data.

3 Q So we're talking about the period
4 before your testimony?

5 A Yes.

6 Q Okay. Great. So after you
7 received PG&E's Rebuttal, did TURN perform
8 any additional monthly regression analysis?

9 A No. We didn't because we felt like
10 the lag period didn't make sense to us based
11 on what we knew about payment plans and other
12 factors. I mean, there's was nothing --

13 Q Hold on. Hold on. Let me just
14 understand what you said there.

15 So when you looked at PG&E's
16 Rebuttal, you did not see a lag factor there;
17 correct?

18 A No. We saw -- you're talking
19 about -- are you talking about 301?

20 Q No. I'm talking about the
21 rebuttal.

22 ALJ LIRAG: One at a time.

23 THE WITNESS: Okay. Okay. Yeah. No,
24 we didn't see that in the rebuttal.

25 BY MS. SLOCUM:

26 Q And looking at Exhibit 301, do you
27 recognize this as a supplemental data
28 response that PG&E provided to TURN, updating

1 PG&E's prior monthly regression analysis so
2 that it incorporated the two-month delay
3 suggested during TURN's cross of Mr. Brown?

4 A Yes.

5 Q Okay. And this was provided to
6 TURN on October 10th, 2019; correct?

7 A Yes.

8 Q Have you reviewed the table
9 provided at the end of Exhibit 301 comparing
10 the findings from all three of the regression
11 analyses that PG&E has now performed?

12 A Yes, I have.

13 Q The right-most column includes the
14 findings from the analysis provided to TURN
15 in May 2019.

16 A Uh-huh.

17 Q And the second column from right
18 includes the findings from the monthly
19 analysis from PG&E's Rebuttal Testimony that
20 we just discussed.

21 A Yes, I see that.

22 Q And, finally, the third column from
23 the right includes the findings from the
24 revised monthly analysis that incorporates a
25 two-month delay; do you see that as well?

26 A Yes, I do.

27 Q Do you have any data to dispute
28 that a monthly analysis that reflects a

1 two-month delay, like this one, would
2 indicate that in most scenarios, there's
3 still no correlation between monthly bills
4 and monthly disconnects, and in only two
5 scenarios, there's only a weak correlation?

6 Do you have any data to dispute
7 that?

8 A No. We didn't run the analysis,
9 but it doesn't make intuitive sense.

10 Q Looking, again, your testimony in
11 July at page 15, lines 6 to 16, you cite to a
12 December 2017 report from the Commission's
13 Policy and Planning Division on Residential
14 Customer Disconnections, Influences, and
15 Trends; correct?

16 A Yes.

17 Q Did you read this report in full
18 before you finalized your July 2019
19 testimony?

20 A Yes, I think I did. Yes.

21 Q And your testimony there at lines 8
22 through 10, notes that CPUC's PPD concluded
23 that disconnections have dependancies on both
24 income and unemployment, which means there
25 may be a number of variables besides the
26 amount of PG&E's monthly bills that have
27 predictive value for disconnections; correct?

28 A Yes. I think that's the meaning I

1 took from the report, yes.

2 Q So you generally agree there are a
3 variety of reasons that a given PG&E customer
4 could end up being disconnected, even if only
5 for less than 24 hours?

6 A Yes. But they might be -- they
7 might be co-linear; they might be related.

8 Q Let me just go through a couple of
9 examples.

10 A Sorry. Sorry.

11 Q Would you expect someone who lost
12 their job, and, unfortunately, remained
13 unemployed for many months might be at
14 greater risk of seeing a disconnection than a
15 customer would have been, given the same bill
16 if they still had their job?

17 A Yes.

18 Q And what about if a PG&E customer
19 suffered a health problem that prohibited or
20 limited the amount he or she could work?

21 A Yes. God forbid. But, yes.

22 Q And what about someone who didn't
23 lose their income in any way or experience a
24 health problem, but experienced a significant
25 new expense or expenses, in a given month,
26 outside of whatever level their PG&E bill was
27 for that month?

28 A Let me make sure I understand the

1 hypothetical. You're saying somebody who
2 just had a credit card that month, or a high
3 expense that was not ongoing, but that was
4 one time in a given month, do I think that
5 they would not pay their PG&E bill or and go
6 to disconnection; is that question?

7 Q Yes. A significant new expense or
8 set of expenses in a given month outside of
9 whatever level their PG&E was for that month.

10 A Then is it ongoing or is it one
11 time?

12 Q Does it matter to you?

13 A Yeah, it does. Because people
14 don't like to be disconnected from essential
15 services. So in an ongoing situation where,
16 essentially, their income isn't sufficient to
17 cover their other essential services, like
18 housing and food and childcare, yeah, I think
19 it matters whether it's ongoing or whether
20 it's a sudden shock.

21 Q So let's assume that they don't
22 lose their income and they don't have a
23 health problem, but over a period of months,
24 they have some very significant other
25 expenses, like they've got to buy a car for
26 their kid that's going off to college, or
27 they've got to do something with their
28 mother-in-law who falls, you know, many

1 number of things can be significant expenses
2 over a period of months - correct - that
3 could affect their ability to pay their PG&E
4 bill and might lead to disconnection?

5 A So I got to push back --

6 Q That is a yes or no question to
7 begin with.

8 A Okay.

9 Q Does it or does it not represent a
10 situation in which this is another type of
11 reason that a customer could end up being
12 disconnected, but not because of their PG&E
13 bill?

14 A Yeah. In an instance, sure,
15 somebody might make that choice.

16 Q Okay. Your testimony at page 15,
17 lines 6 through 16, summarized the 2017 CPUC
18 PPD report as having concluded that
19 disconnections have what you call a
20 dependency on income and unemployment;
21 correct?

22 A Well, among other things, yeah.

23 Q Please look at Exhibit 302. Isn't
24 it this that same December 2017 CPUC PPD
25 report that you referenced in your testimony?

26 A It is.

27 Q Doesn't this report at page 2, in
28 the second bullet point, specifically

1 conclude that the unemployment rate, in the
2 absence of policy shifts, is a very strong
3 independent predictor of the disconnection
4 rate?

5 A Yes.

6 Q And in the next bullet point, you
7 don't dispute that this same Policy Planning
8 Division report found that income also has
9 predictive value, but is only moderately
10 correlated with disconnections?

11 A Yes. That's what it says here.

12 Q And you don't dispute that; do you?

13 A Well, I don't know what their
14 intent was in income. There are a number of
15 ways to look at this. There's, essentially,
16 what we looked at, which is sufficiency
17 income, and I think what they found was that
18 it was moderately correlated only because it
19 took a certain level of income not to have a
20 linear relationship that they found.

21 I think, on page 5, they look at,
22 essentially, if you don't get to \$90,000,
23 it's sort of linear, and then after about
24 \$90,000, which is around the sufficiency
25 income, where you're not living month to
26 month, you tend to want to pay your electric
27 bill.

28 Q So if you had been writing this

1 report, you might have written that bullet
2 point a little bit more precisely?

3 A I have would have written it
4 differently, yes.

5 Q And looking at PG&E's Rebuttal
6 Testimony in Exhibit 93 --

7 ALJ LIRAG: What's a time check for the
8 remainder of your cross?

9 MS. SLOCUM: I have about 15 more
10 minutes, your Honor.

11 ALJ LIRAG: All right. Let's proceed.
12 I might call a break in between.

13 BY MS. SLOCUM:

14 Q Didn't PG&E attach, as one of the
15 attachments, a January 13, 2015 Disconnection
16 report to the CPUC on which some of your
17 testimony from TURN relied?

18 A Wait a second. I'm confused.
19 Where's that?

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

21 (Off the record.)

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

24 BY MS. SLOCUM:

25 Q So, Ms. Dowdell, have you had an
26 opportunity to compare what's attached to
27 PG&E's Rebuttal as Attachment A, the January
28 13, 2015 Disconnection report, and compare to

1 Exhibit 306, the excerpt from your testimony
2 showing the redlines for your errata?

3 A Yeah.

4 Q Do you agree that this is the same
5 report you are referring at page 13 of your
6 redline version of your errata testimony?

7 A That's what it says in the
8 footnote, but I'm not sure that's right
9 because I think I -- I think part of the
10 reason this is removed is because we had an
11 apples-to-oranges comparison in our data set.

12 Q Well, I'm really actually asking
13 you, given what your footnote says and what
14 was removed from your testimony, is that
15 report -- is the data that you're looking at
16 here in the attachment similar to the data
17 that you saw before you presented your
18 testimony?

19 A Ah --

20 Q That annual report on
21 disconnections.

22 MS. GOODSON: Your Honor, I'm going to
23 interject here. The witness is clearly
24 confused, and I will alert Ms. Slocum. We
25 removed this table. It's erroneous for
26 several reasons, and Ms. Dowdell will be
27 happy to talk about that.

28 But that footnote is incorrect. The

1 reference is actually to the disconnections
2 data that PG&E provided to the Commission and
3 many parties in the Residential Rates
4 Rulemaking, R.12-06-013, as part of the CARE
5 restructuring phase.

6 There was a fairly robust data set
7 provided by all of the utilities on electric
8 disconnections at the ZIP code, and that's
9 the data set that Ms. Dowdell used.

10 MS. SLOCUM: Okay. Thank you very
11 much, Counsel.

12 MS. GOODSON: You're welcome.

13 BY MS. SLOCUM:

14 Q Ms. Dowdell, did you have the
15 opportunity to review what's in Attachment A
16 to PG&E's Rebuttal after you received the
17 rebuttal?

18 A Not carefully.

19 Q Do you agree with TURN's
20 rebuttal -- excuse me. Do you agree PG&E's
21 Rebuttal when it concluded that there had not
22 been an increase between 2014 and 2018 as you
23 had asserted in your original testimony, but
24 rather there had been a decrease in the
25 number of disconnections during that same
26 period?

27 A Yes. I agree with PG&E's Rebuttal
28 Testimony on that point. Yes, absolutely.

1 Q And you don't disagree - do you -
2 that the vast majority of customers who are
3 disconnected get reconnected within the first
4 24 hours; right?

5 A I don't have -- I don't have direct
6 knowledge. I can't say whether that's right
7 or wrong, but if you're citing to this report
8 and it's on this report, then, yes, I'm
9 comfortable with that.

10 Q Okay.

11 A If it's coming off this report, I'm
12 comfortable with that.

13 Q Okay.

14 ALJ LIRAG: Let's take a five-minute
15 break right now. Off the record.

16 (Recess taken.)

17 ALJ LIRAG: Back on the record.

18 BY MS. SLOCUM:

19 Q Ms. Dowdell, are you aware that the
20 Disconnections OIR resulted in D.18-12-013,
21 which established three additional customer
22 protections, including new disconnection
23 exemptions?

24 A Yes. Generally, yes.

25 Q And looking at cross Exhibit 304,
26 the Advice Letter, is it your understanding
27 that these three new customer protections
28 from disconnections were added to PG&E's

1 tariffs effective last January 2019?

2 A Yes.

3 Q And I'd like to confirm with you
4 what those three new disconnection
5 protections were by having you look at cross
6 Exhibit 305, which is excerpts from that
7 decision, specifically referring to pages 30
8 to 31.

9 A 305. Okay. Yes, I got it. I got
10 it.

11 Q Right. And the first new
12 protection, seen at page 30, provides,
13 "Effective January 1, each respective utility
14 shall set a goal of limiting residential
15 customer disconnections using recorded 2017
16 percentages for each respective utility"; do
17 you see that?

18 A Yes.

19 Q Isn't the next one that "Effective
20 no later than the close of business December
21 21, 2018, residential customers shall not be
22 disconnected for nonpayment if they qualify
23 for medical baseline and are above 65 years
24 old as long as the customer agrees to a
25 payment plan"?

26 A Yes.

27 Q And is it your understanding that
28 third new protection from that decision is

1 that "residential customers shall not be
2 disconnected when temperatures above 100
3 degrees or below 32 degrees are forecasted
4 based on a 72-hour-look-ahead period";
5 correct?

6 A Yes.

7 Q In general, going forward from
8 January 2019 on, with these new protections
9 in place, wouldn't you expect the number of
10 disconnections to be lower than it otherwise
11 would have been?

12 A Yes, that's a good thing. It's
13 only half of the equation, though.

14 Q In your testimony, you state that
15 PG&E could choose -- on page 14 --

16 A Yes.

17 Q -- "PG&E could choose to mitigate
18 these impacts through its existing and/or new
19 credit collection practices such as those
20 under consideration in the Disconnections
21 OIR"; do you see that?

22 A Yes.

23 Q But then you assert that there's no
24 guarantee that PG&E will do so; do you see
25 that?

26 A Yes, I do.

27 Q That is not -- does that testimony,
28 then, seek to dispute that these three new

1 disconnection protections are currently
2 embedded in PG&E tariffs and are required
3 starting January 2019, and will remain in
4 place until any CPUC reconsideration of them?

5 A No. It does not dispute that.

6 Q And you don't disagree that there's
7 an ongoing follow-up phase of the OIR for
8 disconnections looking at the potential for
9 further new policies that are expected to
10 lead to the adoption of even more
11 restrictions or protections relating to
12 disconnections; do you?

13 A Yes. That's why the proceedings
14 say PG&E could choose.

15 Q Now, your testimony generally
16 expresses concerns about the increase in
17 level of customer bills; right?

18 A Yes, it does.

19 Q And are you aware that PG&E's
20 disconnection rate, as of the end of 2018
21 was, approximately, 4.5 percent; whereas,
22 Southern California Edison's, during that
23 same time, was about 10 percent?

24 A I wasn't aware of those exact
25 numbers, but I did know that PG&E's rate is
26 lower than Southern California Edison's.

27 Q And isn't it true that rate design
28 changes can increase a customer's bill even

1 if the revenue requirement remains the same?

2 A Yes. I think that that is
3 accurate.

4 MS. SLOCUM: Thank you, your Honor.
5 Those are all my questions.

6 ALJ LIRAG: Ms. Goodson.

7 MS. GOODSON: Thank you, your Honor.

8 REDIRECT EXAMINATION

9 BY MS. GOODSON:

10 Q Ms. Dowdell, do you recall that
11 PG&E asked you whether you agreed that the
12 Commission should continue to comprehensively
13 address disconnections in Rulemaking
14 18-07-005?

15 A I do.

16 Q And you said, yes, the Commission
17 should continue to do so. Is that your
18 recollection?

19 A Yes, it is.

20 Q And in your opinion, is that the
21 only place that the Commission should
22 consider disconnections or is considering?

23 A No, it's not. Basically, in my
24 testimony, I make clear that the Commission
25 should consider disconnections in this
26 proceeding.

27 And in general when I think about
28 disconnections, as an outcome, I think there

1 are two sides that you can address reducing
2 that outcome.

3 And first side is what PG&E is
4 doing and what some of the other utilities
5 are doing, and that is quite laudable; that's
6 to create programs, customer programs, and to
7 begin to think about understanding the
8 function that describes or causes
9 disconnections, but the other side is to be
10 mindful of the level of bills because, truly,
11 in California, the cost of living is such
12 that people are squeezed.

13 And even if there's employment, if
14 you aren't making enough to cover your basic
15 needs, then you come under financial
16 insecurity and potentially energy insecurity,
17 to make a long story short.

18 Q Ms. Dowdell, to your knowledge,
19 does the Commission have any other current
20 proceedings, aside from the disconnections
21 rulemaking where it's looking at
22 affordability?

23 A There is affordability proceeding,
24 and, once again, two sides of the same coin,
25 and both very important.

26 Q And do you recall that Ms. Slocum
27 asked you to affirm her characterization of
28 PG&E's position in its original annual

1 analysis of the correlation between
2 disconnections and bills and she asked you to
3 confirm that PG&E found a none-to-weak
4 correlation; do you recall that?

5 A I recall that question.

6 Q And please turn to PG&E's Rebuttal
7 Testimony - that's Exhibit 93 - and,
8 specifically, page 7-5. This is a table that
9 Ms. Slocum referred you to. This is table
10 7-2.

11 A Yes.

12 Q In the column to the right, it
13 refers to the "Annual Analysis Finding," and
14 if you go down to Rows 13 to 18, do you see
15 that PG&E's conclusions for those data sets
16 were Moderate -- Moderate, Weak to Moderate,
17 and High correlations?

18 A I do.

19 Q And do you recall that Ms. Slocum
20 asked about your experience conducting
21 regression analysis?

22 A Yes.

23 Q And you told her that you would
24 probably have done a dozen complex analyses,
25 and you were starting to explain your
26 experience further; do you recall that?

27 A Yes.

28 Q Can you talk a little bit more

1 about your experience with regression
2 analysis?

3 A So - it's true - I've done about a
4 dozen complex regression analyses.

5 When I was acting as a consultant,
6 before joining TURN, one of my jobs was to
7 look at employment data and determine for a
8 client over three years, in other words, each
9 year, whether there was a correlation around
10 demographics and employment outcomes, and so
11 I did perform that work.

12 Additionally, the most complex
13 regression analysis I performed was a program
14 I prepared while I was at the University of
15 Chicago, Graduate School of Business, where I
16 undertook to create an analysis that we
17 predict football pool winners. It was
18 complex.

19 Q Thank you.

20 And do you recall Ms. Slocum asking
21 you some questions about what the lag should
22 be between the issuance of a bill and the
23 time of disconnection?

24 A Yes.

25 Q And she asked you to consider
26 customers that aren't on a pay plan; there
27 are no other intervening factors that might
28 influence lag, and they get a bill, and she

1 asked you whether it was your understanding
2 that they could be disconnected within 53 to
3 58 days following the issuance of that bill;
4 do you recall that?

5 A Yes.

6 Q Is it your understanding that that
7 would be the earliest time they'd be eligible
8 for disconnection as opposed to the time when
9 they would be disconnected?

10 A Yes. They'd get, I think, a 30-day
11 notice, then a 15-day notice, then a 7-day.

12 Q My question was actually a little
13 bit different. My question was - I'll ask it
14 in a different way - do you have any
15 knowledge as to whether PG&E implements
16 disconnection on the first day a customer is
17 eligible for disconnection as opposed to
18 doing it at a later time?

19 A My understanding is they do not on
20 the first day.

21 Q Do you recall that Ms. Slocum asked
22 you some questions about what's been
23 identified as Hearing Exhibit 301, and
24 this -- particularly Table 2, which shows
25 PG&E's brand-new regression analysis
26 following TURN's cross-examination of PG&E?
27 Do you have --

28 A I do.

1 Q You do.

2 And Ms. Slocum asked you whether
3 you had any data to dispute PG&E's, the
4 result of PG&E's regression analysis. Do you
5 recall that?

6 A Yes.

7 Q And did you have any concerns about
8 that regression analysis aside from having
9 any data to question their results?

10 A I did. So a couple of things: The
11 first thing, which I think I've already said,
12 is people are on payment plans and that's a
13 significant number of people that's going to
14 affect your lag. I don't know what the
15 precise lag would be, but my thinking, it's
16 probably more than two months.

17 Then there's the other fact that in
18 the policy and planning report - ah, here,
19 302 - they do a nice job of talking about a
20 variety of influences, and so if I were doing
21 a regression and trying to figure out,
22 essentially, a model that describes how
23 disconnections relate to a lot of independent
24 variables, I would add multiple variables,
25 when something that is likely a highly
26 predictive variable, such as bill levels,
27 came up with a low correlation because
28 sometimes when variables are interrelated -

1 and I say this not as an expert statistician;
2 I just say this as a user of regression on
3 occasion - sometimes you find that when
4 variables are interrelated, that the
5 R-squared changes based on the addition of
6 additional variables.

7 The other thing I would have looked
8 at was the significance factor. So sometimes
9 you find a fairly low R-squared for something
10 that would be predictive, but its significant
11 factor is extremely high. It's P-factor or
12 if you do it in Excel, I think they use
13 F-factor, so that would be a way that you
14 could begin to kind of get to where I think
15 598 wants to do, which is what are the
16 predictive factors? How do we understand
17 this?

18 Sorry. That was a little long, but
19 those are my thoughts and feelings on it.

20 MS. GOODSON: Thank you, your Honor. I
21 have no further questions on direct.

22 ALJ LIRAG: Ms. Slocum?

23 MS. SLOCUM: No recross.

24 ALJ LIRAG: Are the cross exhibits
25 ready to be moved into the record?

26 MS. SLOCUM: Yes, your Honor.

27 ALJ LIRAG: Is there a motion to admit
28 Exhibits 300 to 306 into the record?

1 MS. SLOCUM: Yes, your Honor.

2 ALJ LIRAG: Any objection?

3 MS. GOODSON: Yes, your Honor.

4 TURN objects to 303, which was not
5 used in the cross-examination. TURN objects
6 to 305, which is an excerpt from a Commission
7 decision so we can all brief it. It doesn't
8 need to be an exhibit. TURN objects to --
9 that's it. No objection to the others.

10 ALJ LIRAG: So let us admit Exhibits
11 300, 301, and 302.

12 (Exhibit No. 300 was received into
13 evidence.)

14 (Exhibit No. 301 was received into
15 evidence.)

16 (Exhibit No. 302 was received into
17 evidence.)

18 ALJ LIRAG: Any response, Ms. Slocum,
19 regarding the objections to 303?

20 MS. SLOCUM: No, your Honor. This
21 presents Bureau of Labor statistics
22 information that we believe we should be able
23 to be officially noticed.

24 ALJ LIRAG: Let us then withdraw the
25 exhibit on your agreement to withdraw it.

26 MS. SLOCUM: As long as we can cite to
27 Bureau of Labor Statistics data under
28 official notice request.

ALJ LIRAG: Under normal circumstances,

1 you can, but if you are going to do that, I'd
2 rather you submit a motion to have the
3 specific information. Just so we're not
4 citing randomly, but on documents that we've
5 agreed can be cited from.

6 MS. SLOCUM: Very well, your Honor.

7 (Exhibit No. 304 was received into
8 evidence.)

9 ALJ LIRAG: So Exhibit 303 is
10 withdrawn. Exhibit 304 is admitted.

11 And then any response regarding
12 Exhibit 305?

13 MS. SLOCUM: Your Honor, I recognize
14 Ms. Goodson's point, but I think in other
15 instances, when we've questioned somebody on
16 something, provided this is a courtesy -- I
17 don't care whether it comes in or not, but I
18 think it might just be easier for it to come
19 in, just to have it to refer to instead of
20 people finding a decision.

21 ALJ LIRAG: I will accept Exhibit 305
22 on the explanation that if a portion of the
23 exhibit needs to be cited, it might be easier
24 to refer to Exhibit 305 than the entire
25 decision, which we would have to look at.

26 We might have to look it up anyway,
27 but let's just admit the exhibit, and then we
28 also admit Exhibit 306.

1 (Exhibit No. 305 was received into
evidence.)

2 (Exhibit No. 306 was received into
3 evidence.)

4 MS. SLOCUM: Thank you, your Honor.

5 ALJ LIRAG: Let us pause to give
6 Mr. Ouborg a chance to move forward.

7 Let's go off the record.

8 (Recess taken.)

9 ALJ LIRAG: Let's go back on the record
10 for cross-examination by Mr. Ouborg.

11 CROSS-EXAMINATION

12 BY MR. OUBORG:

13 Q Good afternoon, Ms. Dowdell.

14 A Good afternoon.

15 Q Could you turn to your testimony,
16 which I believe is Exhibit 295, page 10?

17 ALJ LIRAG: Let me pause for a second.
18 I think Mr. Long is ready to move Exhibit 294
19 into the record.

20 MR. LONG: Yes. So moved, your Honor.

21 ALJ LIRAG: All right. This pertains
22 to the portion of the testimony that
23 Ms. Goodson and Ms. Slocum took care of.

24 Any objections?

25 (No response.)

26 ALJ LIRAG: Hearing none.

27 Exhibit 294 is received into the
28 record.

1 (Exhibit No. 294 was received into
2 evidence.)

3 ALJ LIRAG: Let's continue.

4 MR. OUBORG: Thank you, your Honor.

5 Q Ms. Dowdell, by way of an
6 introduction as to what I'm going to talk
7 about, this cross will be related to your
8 testimony regarding PG&E's Cross Bore
9 Program, just to provide context for the
10 record.

11 So are you on page 10 of your
12 testimony?

13 A I am.

14 Q And I'm going to read from line 16
15 where it says: "PG&E in its Rebuttal
16 Testimony explains that it now intends to
17 perform at least 21,766 more units than in
18 its original GRC Forecast, and that
19 completion of these units will eliminate any
20 cross bore deferred work."

21 You go on to say, "TURN disagrees
22 with this characterization because PG&E is
23 still deferring the 10,000 high-risk San
24 Francisco UTA inspections that it originally
25 planned and was funded to perform in 2017 to
26 2019, and is seeking to have ratepayers pay a
27 second time for that high-cost work in 2020
28 to 2022."

1 So I want to explore and discuss
2 PG&E's 2017 GRC Forecast for cross bores and
3 to do that, I would ask you to turn to the
4 attachment to PG&E's recently filed -- or
5 recently submitted Surrebuttal Testimony.

6 A Yes, I'm there.

7 Q Ms. Dowdell, have you had a chance
8 to review those pages?

9 A Yes, I have.

10 Q And would you agree that they are
11 the testimony that was submitted by PG&E in
12 2017 GRC regarding its Cross Bore Program
13 and its Forecast for that program in that
14 case?

15 A Yes.

16 Q And would you agree that this
17 testimony was submitted around sometime in
18 2015?

19 A Yes.

20 Q Can you point to anything in the
21 testimony or these workpapers, Ms. Dowdell,
22 that refers to "Unable To Access Cross Bore
23 Inspections" or "UTAs" as they've become
24 known as?

25 A No. I don't see anything that says
26 "UTA."

27 Q And, now, I want to refer you to
28 what was previously identified as Hearing

1 Exhibit 32. Do you have that in front of
2 you?

3 MR. OUBORG: Your Honor, I have a spare
4 copy.

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

7 ALJ LIRAG: Let's go back on the
8 record. Please continue, Mr. Ouborg.

9 BY MR. OUBORG:

10 Q You have in front of you Hearing
11 Exhibit 32. It's a response PG&E provided to
12 a TURN data request, and I want to read
13 Answer 3-A, and there it states: "PG&E did
14 not have an established and published
15 procedure in place for documenting incomplete
16 inspections, or UTAs, prior to 2017.

17 "During the beginning stages of the
18 Cross Bore Program, the program's focus was
19 on the development and refinement of the
20 program, including identifying inspection
21 criteria, performed records review, and
22 establishing an inspection process, along
23 with documenting the results of complete
24 inspections. It was not until 2017, when
25 PG&E noticed the higher rates of unsuccessful
26 inspections, and began to categorize these
27 locations and refer to them as UTAs and PG&E
28 started to create a plan to address these

1 locations for completion."

2 Do you see that?

3 A Yes, I do.

4 Q And since PG&E filed this 2017 GRC
5 in 2015, do you agree that based on that
6 response PG&E gave to that data request, the
7 2017 GRC Forecast could not have included
8 estimation or cost estimates of UTAs?

9 A I'm not sure I agree with that
10 because -- so PG&E had done -- by 2016, it
11 had done 92,000 of these inspections.

12 So whether they were called "UTAs"
13 or whether they were called something else,
14 it would seem to me that, given the first
15 cross bore, I believe, started in -- the
16 first activity started 2011 and 2012, I would
17 think that PG&E would be aware of the issue
18 around Unable To Access.

19 So, yes, I agree that there was no
20 "UTA" name used, but I can't imagine PG&E
21 would not be aware that there were, in fact,
22 UTA locations.

23 Q So are you saying you do not agree
24 with the response PG&E gave that we just read
25 from Hearing Exhibit 32?

26 A No. What it says is that PG&E did
27 not have an established, published -- and
28 published procedure for documenting UTAs

1 prior to 2017. So I believe that. And I
2 believe that there was not -- as attached,
3 there wasn't even a procedure for doing the
4 inspections before 2016, but what I'm
5 disagreeing with is that PG&E could not have
6 known about UTA locations.

7 Q All right. Thank you.

8 Can you now look at the testimony
9 from 2017 that was attached to the
10 surrebuttal, and could you turn to page
11 WP 4-42 of that? Sorry. It's App A-18, but
12 the original number --

13 A Got you. Got you. I'm there.

14 Q Okay. And at the bottom it says,
15 "Cost Assumptions." Do you see that?

16 A Uh-huh.

17 MR. LONG: I'm sorry. What page again?

18 MR. OUBORG: Appendix A-18 to the
19 Surrebuttal, and the original workpaper is
20 WP 4-42, Project Summary.

21 MR. LONG: Thank you.

22 BY MR. LONG:

23 Q And then at the bottom it says,
24 "Cost Assumptions." It states, "The costs
25 for the Cross Bore Program are based on the
26 2014 costs for performing records reviews and
27 conducting approximately 33,570 inspections."

28 A Uh-huh.

1 Q So would you agree that PG&E's cost
2 forecast and its number of units at forecast
3 was based on 2014 data?

4 A Yes, that's seems right.

5 Q So based on our foregoing
6 discussion, would you agree that PG&E's 2017
7 GRC Cross Bore Forecast, which was submitted
8 in 2015, did not include analysis for
9 performing UTAs in the Forecast?

10 A I don't think I can make that
11 assumption.

12 Q But you see nothing in the
13 workpapers or testimony that --

14 A I see nothing.

15 Q -- indicates --

16 A I'm sorry. I didn't mean to
17 interrupt you.

18 Q Sorry. I thought earlier you
19 agreed that there was nothing that you saw in
20 the testimony or workpapers that indicated
21 that this type of Cross Bore Inspection had
22 been contemplated or was forecast?

23 A I saw nothing in the testimony and
24 workpapers that said something called "UTA"
25 had been considered in the testimony. But as
26 I said before, I think that PG&E would have
27 to -- given the volume of the inspections it
28 had performed, some of them in San Francisco,

1 had encountered this situation, whether it
2 was called "UTA" or not.

3 Q But that's just an assumption of
4 yours. There's no evidence that PG&E knew
5 about these or was documenting that these
6 existed?

7 A I believe PG&E's Data Response that
8 it was not documenting that these existed.

9 Q Thank you.

10 Next, I want to turn to "Deferred
11 Work Principles," and I provided a reference
12 exhibit on that.

13 A Got it.

14 MR. OUBORG: Your Honor, do you have
15 it?

16 ALJ LIRAG: I can follow along.

17 BY MR. OUBORG:

18 Q These are pages from the 2017 GRC
19 Settlement, and particularly the pages that
20 address the principles for deferred work.
21 Can you look at page 1-30 of that document?

22 A Yes.

23 Q And there, it states about a third
24 of the way down, that "PG&E agrees that in
25 the next GRC and its next gas transmission
26 and storage rate case, that PG&E will need to
27 take additional steps in order to seek
28 ratepayer funding for work that was

1 previously authorized and funded when all the
2 following are true: (a), the work was
3 requested and authorized based on
4 representations that it was needed to provide
5 safe and reliable service."

6 With respect to that first
7 criteria, (a), Ms. Dowdell, do you agree that
8 "requested and authorized based" refers to
9 the 2017 GRC?

10 A Yes.

11 Q Right. And with respect to the
12 second -- I'll read the second criteria, (b),
13 "PG&E did not perform all of the authorized
14 and funded work as measured by authorized
15 explicit or imputed units of work"; do you
16 see that?

17 A Yes.

18 Q And would you agree that where it
19 says "as measured by authorized explicit or
20 imputed units of work," it is referring to
21 the "imputed units of work" adopted in the
22 2017 GRC?

23 A Yes. I believe that is the
24 reference.

25 Q Thank you.

26 Ms. Dowdell, do you agree that the
27 imputed units of work for Cross Bore
28 Inspections from the 2017 GRC was 123,307

1 inspections?

2 A Yeah, that sounds right.

3 Q And do you agree that PG&E has now
4 testified that it expects to perform all
5 those units that are imputed?

6 A PG&E has testified that, yes.

7 Q Do you agree that PG&E expects to
8 spend \$21.8 million more than its 2017 GRC
9 authorized funding to complete all the
10 imputed units?

11 MR. LONG: Objection; I don't know how
12 the witness could testify to PG&E's
13 expectations.

14 ALJ LIRAG: Sustained.

15 MR. OUBORG: Let me rephrase the
16 question.

17 Q Do you agree that PG&E has
18 testified that it will spend 21.8 million
19 more than its 2017 GRC authorized funding to
20 complete all the imputed units?

21 A Yes. PG&E has testified to that
22 effect and it's provided its data responses
23 as to that.

24 Q Ms. Dowdell, can you refer to your
25 testimony at page 14?

26 A Yes.

27 Q And on my version, it says line 6,
28 but it may slightly changed. I'm referring

1 to the last sentence of the first block of
2 text at the top, which says, "TURN's Forecast
3 is \$10.64 million" --

4 A Yes.

5 Q -- "2020 Forecast"; right?

6 A Yes.

7 Q And you also propose, I believe,
8 that PG&E performed an average of 30,000
9 inspections per year?

10 A Yes.

11 Q And so your proposed funding
12 level -- do you agree with me that your
13 proposed funding level will result in about
14 \$32 million of revenue for PG&E?

15 A So...

16 Q That's 10.64 times three.

17 A No, I don't think so. I think that
18 PG&E's requesting something like \$29 million
19 in 2020, and what my recommendation is saying
20 is that there are 10,000 UTA inspections
21 which are for the shareholder's account.

22 And so my forecast would take that
23 \$29 million and would deduct the cost,
24 assuming the TURN/Cal Advocates unit cost
25 from that for 10,000 UTA inspections, which
26 would be disallowed and would be at the
27 shareholder's account.

28 And then going forward, we would

1 then fund the remaining amounts at -- well, I
2 think I've calculated this -- so then we
3 would have --

4 Q Can I -- can I stop you there?

5 A Yes.

6 Q Can you point to me in your
7 testimony where you state what PG&E's funding
8 levels should be in 2021 and 2022?

9 A It's on page 14, Footnote 36 is
10 where I make that calculation. And we struck
11 the sentence that we talked about at the
12 beginning of this session because it was
13 unclear.

14 So I'm trying to clarify that our
15 proposal is not that PG&E would sustain a
16 disallowance of \$10 million for three years,
17 but that the total disallowance would be
18 10.64 -- oh, I'm sorry. It would be \$9.89
19 million.

20 Q Ms. Dowdell, do you understand how
21 expense ratemaking works in the GRC; in other
22 words, the Commission adopts a, in this
23 particular rate case, 2020 amount. This is
24 an expense program; isn't it?

25 A Yes.

26 Q And if the Commission adopted your
27 \$10.64 million recommendation, that's what
28 PG&E gets subject to post-test-year

1 ratemaking, it pretty much gets that for the
2 next three years.

3 A So I think that I do understand how
4 GRC ratemaking works, and I'm attempting to
5 clarify this because when I read the
6 surrebuttal, it became clear that PG&E had
7 misunderstood TURN's intention in our
8 proposal, and I apologize if our proposal was
9 not clear, but the intention of the proposal
10 is not -- it is to have a disallowance of
11 9.89 million --

12 MR. LONG: Just so we don't have a
13 wrong number in the record, it's 9.59 --

14 THE WITNESS: I'm sorry.

15 MR. LONG: -- we corrected that.

16 THE WITNESS: Yeah, sorry about that.

17 9.59 for 10,000 UTAs that ratepayers
18 reasonably believe that we should have
19 received, and funding for 30,000 inspections
20 a year, and so if you ignore the disallowance
21 for the purposes of the 2020 Forecast, the
22 2020 Forecast would be built off of 20.2 --
23 \$20.237 million.

24 So that I explain that in my
25 Footnote 36. And, again, I apologize because
26 that is not very clear in my revised
27 testimony. Does that help?

28 BY MR. LONG:

1 Q So the total amount you're
2 recommending would be - I'm speaking
3 generally here - about 10 million in 2020
4 with the disallowance?

5 A Yes.

6 Q And then 20 million, and 20 million
7 for the following GRC; so you're talking
8 about 50 million, roughly?

9 A Yes.

10 Q Would you agree that given the
11 90,000 inspections you're recommending over
12 the three years, that that results -- would
13 you accept, subject to check my lawyer math,
14 that that's about \$588 per inspection?

15 A Sure. I'm going to assume that
16 your math is correct.

17 Q And you're agreeing with Cal
18 Advocates that non-UTA inspection should cost
19 about \$639; is that correct?

20 A Yes, I am. But what I'm saying is
21 that there were 10,000 UTA inspections that
22 TURN believes were part and parcel of what
23 was funded in the 2017 GRC.

24 They were not performed. They are
25 high-risk area. It's important. And by not
26 performing them, by performing lower-risk
27 inspections, ratepayers didn't get the safety
28 package that we thought we were going to get.

1 Q Would you also agree that the 588
2 average unit cost that you're recommending
3 is, you know, slightly over half of what you
4 believe a UTA inspection would cost of 959?

5 A Yes. The math works out that way,
6 but upshot of my recommendation is that
7 10,000 UTA inspections --

8 Q I -- I --

9 A -- would be at the shareholders --

10 Q I think we got that.

11 A Okay.

12 Q So do you still have that exhibit
13 in front of you, the Deferred Work
14 Principles? Can you look at Deferred Work
15 Principle 6, which appears on 1-30?

16 A Yes.

17 Q Do you think that severely
18 underfunding a critical safety program is
19 consistent with Deferred Work Principle 6,
20 which states in the second part of principle
21 there, "Adopted revenue requirements and the
22 disposition of disputed ratemaking issues
23 should be consistent of the goal supporting
24 PG&E's ability to provide safe and reliable
25 service"?

26 MR. LONG: Objection. Are you asking
27 the witness to accept that she's proposing a
28 severe underfunding of the program or are you

1 just asking in general, an abstraction?

2 MR. OUBORG: I'm asking the witness to
3 accept that her recommendation is
4 underfunding a program.

5 MR. LONG: Maybe you should break up
6 your question.

7 ALJ LIRAG: Ask it one at a time.

8 BY MR. OUBORG:

9 Q Would you agree that based on your
10 recommendation, the program is underfunded
11 with respect to routine Cross Bore
12 Inspections and significantly underfunded
13 with respect to UTA inspections given the
14 unit cost that you're recommending?

15 A I don't think that's true.

16 Q So you don't think giving \$588 for
17 inspections that you're saying cost almost a
18 \$1,000; you don't think that's a significant
19 underfunding?

20 A Well, your number is an average,
21 and it falls out of the pact that
22 shareholders will need to fund the 10,000 UTA
23 inspections that were not delivered in this
24 proposal.

25 Q Ms. Dowdell, do you think it's a
26 reasonable outcome or application of the
27 deferred work principles to take funding from
28 the 2020 GRC for a program where PG&E

1 performed all the authorized units and spent
2 \$20 million more than was authorized in the
3 previous rate case?

4 Do you think that's a reasonable
5 and fair outcome, an application of those
6 principles?

7 A It's the proposal that I'm
8 sponsoring, so I most certainly support the
9 proposal. It is -- to me, given the history
10 of the program, given the UTA situation,
11 given the recent ramp-up relative to past
12 performance, it ultimately is really part of
13 what the deferred work settlement is about.

14 And if we're talking about relative
15 disallowances in terms of moving this process
16 to a clear showing, which is, you know, the
17 reasonableness that underlies the showing
18 that was done in deferred work, frankly, if
19 we can get there with a \$10 million
20 disallowance, I'd rather us not be in this
21 situation where we're talking about a much
22 larger disallowance.

23 Q Would you agree that PG&E performed
24 all units of work, as measured by the imputed
25 units -- we went over this earlier.

26 I'm just trying to understand where
27 the deferred work comes from.

28 A Oh.

1 Q Deferred work principles don't
2 apply unless there's deferred work in the
3 first. All the units, the imputed units,
4 were performed.

5 A So I understand what you're asking
6 me. And here's why I think that the
7 assertion that no deferred work principles
8 apply here is wrong.

9 The reason I think it's wrong is
10 because underlying everything about this
11 proceeding we're in, is the idea
12 reasonableness.

13 ALJ LIRAG: Let's get directly at the
14 answer. Let's cut off a little of the
15 explanation.

16 THE WITNESS: Okay. It's never -- the
17 deferred work settlement requires
18 reasonableness. And so it's never
19 reasonable --

20 BY MR. OUBORG:

21 Q Sorry. Sorry. Where does it say
22 that? I mean, it's very explicit. It has
23 three criteria where if those are met,
24 there's deferred work. Then the utility has
25 to make certain showings.

26 In this case, PG&E's authorized
27 funding and requested units from last GRC
28 were the numbers we talked about. PG&E

1 performed all those. And under the explicit
2 wording, and it says explicitly, "as measured
3 by the imputed units of work."

4 A The explicit wording says that, but
5 implicit is that PG&E's cost request must
6 always be reasonable.

7 And it's not reasonable to perform
8 low risk work when you could be performing
9 high-risk work.

10 ALJ LIRAG: Let's get a little bit to
11 the question and answer. I think we're
12 arguing over a difference in opinion, and
13 this is better argued in briefs.

14 MR. OUBORG: Your Honor, I agree. Can
15 you give me one moment off the record?

16 ALJ LIRAG: Yes.

17 (Off the record.)

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

20 MR. OUBORG: Your Honor, that concludes
21 my cross-questions of Ms. Dowdell.

22 ALJ LIRAG: Are you ready, Mr. Long?

23 MR. LONG: Can I take a short break?

24 ALJ LIRAG: Let's take a five-minute
25 break then. Off the record.

26 (Recess taken.)

27 ALJ LIRAG: Back on the record.

28 Mr. Long.

1 MR. LONG: Thank you, your Honor.

2 REDIRECT EXAMINATION

3 BY MR. LONG:

4 Q Ms. Dowdell, you were asked
5 questions about -- let me find the page, page
6 14 -- the top of page 14 of your testimony,
7 and Mr. Ouborg was concerned that TURN was
8 effectively seeking a funding level of - I
9 believe he said - \$32 million over three
10 years.

11 And I know you tried to clarify
12 your recommendation in your response to his
13 questions, but my first question is: "TURN
14 is proposing a 9.59 million disallowance for
15 10,000 UTA inspections that were not
16 completed in 2017 to 2019." That's in your
17 testimony.

18 A Yes.

19 Q Are you proposing that that
20 disallowance be applied in each year of the
21 upcoming rate period?

22 A No, I am not.

23 Q So your total disallowance then
24 would be \$9.59 million; is that right?

25 A Yes.

26 Q And if it were spread equally over
27 three years, would TURN have a problem with
28 that?

1 A Not at all.

2 Q And then he was quoting a figure of
3 \$588 per inspection; do you recall that?

4 A Yes, I do.

5 Q And that that included the
6 disallowance that we just talked about; is
7 that right?

8 A Yes, it did.

9 Q So what is your actual proposed
10 funding, proposed level, or unit cost
11 proposal for non-UTA inspections and UTA
12 inspections?

13 A Let me quickly do the math here to
14 make sure.

15 Q I think it's Footnote 36 on your
16 testimony.

17 A Yes, but the unit cost --

18 Q I think they're right there.

19 A Thank you.

20 So, yes, for UTA inspections, we're
21 proposing \$959 and for non-UTA, we're
22 proposing \$639 per inspection.

23 Q Thank you.

24 Now, you were asked about the
25 reasonableness, essentially, of TURN's
26 proposal to disallow funding for 10,000 UTA
27 inspections. Where does TURN -- what is the
28 basis of TURN's concern regarding PG&E's

1 deferral of the originally planned 10,000 UTA
2 San Francisco inspections and deferring those
3 to the next rate case period?

4 A TURN's concern is that there is an
5 expectation that PG&E will always do the
6 highest risk, most important work first, and
7 PG&E itself has said that these San Francisco
8 UTAs are highest risk, most important work,
9 and yet it is deferring them.

10 And TURN is concerned about the
11 safety implications of those deferrals and it
12 doesn't seem reasonable to us to defer the
13 most important, you know, highest risk work.

14 Q And if that work were performed in
15 the 2017 to 2019 period, what are the
16 financial implications to PG&E of deferring
17 that work -- I should say, what are the
18 financial implications to PG&E of deferring
19 that work to the 2020-to-2022 period?

20 MR. OUBORG: Objection, your Honor.

21 That is outside the scope of what I
22 was asking Ms. Dowdell about. We were not
23 talking about financial consequences. That
24 was something that was covered in previous
25 testimony.

26 ALJ LIRAG: I'll allow it to provide
27 additional clarity.

28 THE WITNESS: And I will make it brief.

1 If the UTAs are performed within the
2 rate-case cycle, then any overage is paid for
3 by shareholders and it's paid for at the
4 current expected rate.

5 If it's pushed into the next
6 rate-case cycle, then ratepayers pay for work
7 twice, which is what our deferred work issue
8 is all about, and we pay at a higher rate
9 because there's an escalation on these
10 things.

11 MR. LONG: That's all my questions.

12 Thank you, your Honor.

13 ALJ LIRAG: Mr. Ouborg, recross?

14 MR. OUBORG: Yes.

15 REDIRECT EXAMINATION

16 BY MR. OUBORG:

17 Q Ms. Dowdell, your counsel asked you
18 whether -- well, I think you testified that
19 PG&E should do the highest risk work first;
20 is that correct?

21 A Yes, I did.

22 Q And that you're objecting to PG&E
23 not doing 10,000 UTAs in San Francisco in
24 2019 as they -- not forecasting the rate
25 case, but planned to do in late 2018 when
26 they looked at the 2019 work; isn't that
27 correct?

28 A Well, to be specific, our objection

1 comes from the fact that the UTAs are the
2 most important work, and there is a general
3 expectation regardless of work plan that the
4 work plan would contain doing the most
5 important work first.

6 Q And if the consequences of doing
7 those 10,000 units slowed PG&E's program,
8 absorbed its resources, to the extent where
9 it underperformed generally on the Cross Bore
10 Program, few units in other areas; would that
11 be acceptable?

12 A That's a hypothetical that doesn't
13 have a lot of parameters around it. I don't
14 know.

15 Q The other thing you said is, and
16 you keep saying, and your testimony is full
17 of it -- full of this reference. Sorry.
18 Your Honor, I'll rephrase my question.

19 ALJ LIRAG: We got the meaning.
20 BY MR. OUBORG:

21 Q You say several times that
22 ratepayers shouldn't pay twice.

23 A Yes.

24 Q And as we established, PG&E did not
25 forecast in its 2017 GRC UTAs, they're not
26 even mentioned in there.

27 So are you saying that the
28 authorized funding and the units adopted in

1 the 2017 GRC included funding for 10,000
2 UTAs?

3 A I'm saying that it included funding
4 for the most important work. And that
5 ratepayers rely on PG&E to understand its
6 business such that it can identify the most
7 important work.

8 And I am also saying that given the
9 volume of work that was performed prior to
10 the Forecast and given the period of time and
11 the severity of the risk, that TURN would
12 expect PG&E to be aware of circumstances like
13 UTAs which should have impacted its Forecast.

14 MR. OUBORG: May I have a moment off
15 the record?

16 ALJ LIRAG: All right. Off the record.
17 (Off the record.)

18 ALJ LIRAG: All right. Back on the
19 record.

20 BY MR. OUBORG:

21 Q Ms. Dowdell, would you agree that
22 the reason PG&E said that UTAs in San
23 Francisco were high-risk work is because that
24 work is San Francisco where cross bore find
25 rates are higher and the consequences of a
26 cross bore incident would be higher?

27 A Yes, in part. But let me just say
28 that if you haven't done any UTAs, then the

1 find rate might not be the same. It's kind
2 of a black hole of risk, the way we see it.

3 Q I'm just asking, if you agree that
4 the higher risk you referred to refers to the
5 fact these are Cross Bore Inspections in San
6 Francisco.

7 A That they're urban area cross
8 bores, yes, where the building denser and the
9 likelihood of an ignition, the downside is
10 worse, yeah.

11 Q Correct. So if PG&E performed
12 equivalent cross bore work in San Francisco
13 that wasn't UTA-related, wouldn't that be an
14 equivalent risk reduction to what PG&E
15 originally planned for 2019?

16 A See, I don't know. And I -- this
17 is -- this is the concern that TURN has --

18 ALJ LIRAG: Let's just cut it to "I
19 don't know" and that's your answer.

20 THE WITNESS: Okay. Fair enough.

21 ALJ LIRAG: I do have one question
22 regarding one of your answers.

23 So your proposal regarding the 9.59
24 million reduction over three years, on that
25 topic.

26 THE WITNESS: Yes, your Honor.

27 ALJ LIRAG: So if we were to take
28 one-third of that and reduced the 2020

1 revenue requirement for PG&E, because of this
2 reduction, would that still fall under your
3 proposal?

4 THE WITNESS: Sure.

5 ALJ LIRAG: All right. No further
6 questions.

7 Are we ready to move 295 and 295-R
8 into the record?

9 MR. LONG: Yes, your Honor. So moved.

10 ALJ LIRAG: Any objection?

11 (No response.)

12 ALJ LIRAG: Hearing none.

13 Exhibit 295 and 295-R are moved into
14 the record. Thank you, Ms. Dowdell. You're
15 excused.

16 THE WITNESS: Thank you, your Honor.

17 (Exhibit No. 295 was received into
18 evidence.)

19 (Exhibit No. 295-R was received into
20 evidence.)

21 ALJ LIRAG: Off the record.

22 (Off the record.)

23 ALJ LIRAG: Let's go back on the
24 record. Good afternoon, Mr. Kerans. It
25 should have been good morning, but it's good
afternoon.

26 MICHAEL KERANS, called as a witness
27 by PG&E, having been sworn, testified
as follows:

28 ALJ LIRAG: Thank you for coming back.

1 And since you are a repeat witness,
2 we know who you are, and I believe the record
3 has where you work.

4 THE WITNESS: Thank you.

5 ALJ LIRAG: And in the interest of
6 time, I will assume you prepared the
7 surrebuttal.

8 THE WITNESS: Yes.

9 (Reporter requests clarification.)

10 ALJ LIRAG: Michael Kerans,
11 K-e-r-a-n-s.

12 In the interest of time, I will ask
13 if you have any corrections to what has been
14 identified as an Exhibit 287, which is your
15 Surrebuttal Testimony.

16 THE WITNESS: I do not.

17 May I get my bottle of water?

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

19 (Off the record.)

20 ALJ LIRAG: Back on the record.

21 No corrections to Exhibit 287, and I
22 believe somewhere in the record of this
23 proceeding, we already have your
24 qualifications.

25 Mr. Ouborg, is he ready for cross?

26 MR. OUBORG: Yes, your Honor.

27 ALJ LIRAG: Mr. Long.

28 MR. LONG: Thank you, your Honor.

1 CROSS-EXAMINATION

2 BY MR. LONG:

3 Q Good afternoon, Mr. Kerans.

4 Could we start with page 3 of your
5 surrebuttal?

6 A Yes.

7 Q Question-Answer 8, you are saying
8 there that, essentially, that risk reduction
9 from UTA and non-UTA inspection in San
10 Francisco is the same?

11 A That's correct. They're the same.

12 Q Now, before we talk about comparing
13 risk for UTAs versus non-UTAs, are we agreed
14 that San Francisco cross bores pose the
15 highest risk in the PG&E system?

16 A Yeah. Given the information we
17 have today, that's a factual statement.

18 Q Now, about this UTA versus non-UTA
19 risk question, on lines 7 and 8 of your
20 testimony on page 3 -- I'm sorry.

21 Lines 10 and 11, you say that, "Any
22 San Francisco Cross Bore Inspection has the
23 same expected cross bore find rate"; is that
24 correct?

25 A Yeah. For San Francisco, that's
26 correct.

27 Q Okay. And you cite there in
28 Footnote 9 to Hearing Exhibit 10, PG&E-03,

1 page 4-12, lines 2 to 4; do you see that?

2 A Yes, I do.

3 Q Now, that testimony, we can pull it
4 out if need be, but if you want --

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 BY MR. LONG:

10 Q Page 4-12, that testimony you
11 referenced just gives the find rate. It
12 doesn't compare the find rates for UTA and
13 non-UTA; is that right?

14 A That's correct. Our experience is
15 with cross bore find rates.

16 Q Now, I believe PG&E has testified
17 in this case that there have been no UTA
18 inspections performed in San Francisco to
19 date; isn't that right?

20 A That's correct. I believe we
21 testified to that earlier.

22 Q So then if you haven't performed -
23 according to PG&E - any UTA inspections in
24 San Francisco, what is your evidence that the
25 UTA and non-UTA inspections have the same
26 find rate?

27 A It's a fairly straightforward
28 answer: It's that throughout all the

1 inspections we performed during the UTA --
2 I'm sorry -- the Cross Bore Program, we have
3 an experience with the find rate, and that
4 find rate should carry through similarly and
5 statistically as you would expect for the UTA
6 location. There's nothing distinguishing
7 them from installation practice; so there
8 shouldn't be anything distinguishing them
9 unnecessarily from a find rate.

10 Q But this has not been empirically
11 tested?

12 This proposition that the UTA and
13 non-UTA find rates are the same has not been
14 empirically tested; isn't that right?

15 A Are you saying that there has been
16 calculated evidence of it by finding them; is
17 that what you mean by "empirical"?

18 Q Right. You do not have any
19 empirical evidence to support the position
20 that the find rates for the two types of
21 inspections are the same?

22 A So, I guess, I would disagree with
23 that. And the reason being is the way cross
24 bores are created is through directional
25 drilling, trenchless technology, and that's
26 how they're created.

27 Since they are all created in the
28 same fashion, whether they propagate in a

1 location that results in a UTA or they
2 propagate in a routine location, there would
3 be no difference between the two based on the
4 installation method.

5 Q My question was about evidence as
6 opposed to -- the answer you just gave is
7 sort of theory in my opinion. It's not --
8 it's not based on doing UTAs in San
9 Francisco, and saying: This is the find rate
10 we found. It's not evidence-based; isn't
11 that right?

12 A No. I disagree completely.

13 Q So, again, let me ask the question:
14 What is the evidence, given the fact that
15 PG&E's position is that it's done no UTA
16 inspections, yet in San Francisco at least
17 what you're calling UTA inspections --

18 MR. OUBORG: Objection, your Honor.

19 MR. LONG: -- that the find rate is the
20 same.

21 MR. OUBORG: He's answered this
22 question. He said he disagrees and he said
23 what he thinks the evidence is. It's based
24 on the way these are created. He believes
25 that's the evidence. I think he's answered
26 the question.

27 MR. LONG: I feel like I have gotten
28 two different answers. When I asked the

1 question the first time, he said, "Yes, we
2 haven't done any; we don't have evidence."

3 Now he's saying, "We do have
4 evidence." So I don't understand the
5 testimony.

6 ALJ LIRAG: For clarity, let's repeat
7 the question, and let's let Mr. Kerans answer
8 it whether or not he has answered it before
9 or twice or twice but differently.

10 BY MR. LONG:

11 Q So PG&E has done, by your
12 reckoning, no UTA Cross Bore Inspections. So
13 you do not have any evidence from doing UTA
14 Cross Bore Inspections of what the find rate
15 is; is that fair to say?

16 A Are you asking about a UTA find
17 rate comparatively to a cross bore find rate
18 for routine inspections?

19 Q Based on doing UTA inspections,
20 yes.

21 A No. We haven't done any
22 inspections; so there's not a value to be had
23 there.

24 Q All right. So a moment ago, you
25 agreed that San Francisco cross bores posed
26 the highest risk; am I remembering correctly?

27 A Yes.

28 Q From the standpoint of reducing the

1 most risk, does it not make the most sense to
2 do the highest risk work before doing lowest
3 risk work?

4 A I think, generally, that would be
5 the case. I think there are instances, just
6 broadly speaking, where you can create
7 volumes of work in other locations that
8 exceed risk reduction levels by doing
9 different levels of risk if the volumes are
10 higher.

11 Q So let's turn to what's been
12 previously marked and admitted as Hearing
13 Exhibit 31. It's PG&E's Response to TURN
14 Data Response 87-2. Let me know when you
15 have that.

16 A I have this here.

17 Q Okay. And just as a foundational
18 fact, PG&E was authorized in 2017 through
19 2019 to perform roughly 123,000 inspections
20 over that period; isn't that right?

21 A Yeah, that's roughly correct.

22 Q Yet, in 2017, the number of San
23 Francisco Cross Bore Inspections fell from
24 17,886 in the previous year to 3,113; is that
25 right?

26 A That's correct. That's the line on
27 the bottom there.

28 Q Right. And if you go to the next

1 page, the year after, the number declined
2 further to 801 inspections; do you see that?

3 A Yes.

4 Q Is that accurate?

5 A Yes, I see that. It is accurate.

6 Q Okay. So now from your Surrebuttal
7 Testimony, Answer 9, you're telling us that
8 if we were to fill in the number for 2019 in
9 this table, it would be a total of 10,340
10 broken out by 8,840 recorded through October
11 14th, 2019, and a projected 1,500 for the
12 rest of 2019; is that right?

13 A Yes, that's what it says.

14 Q And these 10,340 are all non-UTA
15 inspections; is that right?

16 A That's correct.

17 Q So here's the question I have: If
18 San Francisco cross bores - you've agreed -
19 pose the highest risk, why didn't PG&E
20 perform these 10,000 non-UTA San Francisco
21 inspections in 2017 or 2018 or over that
22 two-year period instead of waiting to do that
23 work in 2019?

24 A So, my involvement with the Cross
25 Bore Program was largely through this
26 proceeding in the rate case, which largely
27 began midway through 2018.

28 So I'm not necessarily able to

1 present exactly what happened in '17 and '18,
2 but what I would cite to is in our workpaper,
3 and it's on 4-15 of the original testimony.

4 And in there, we calculate from
5 2017 - I'll call it the "UTA find rate" - I
6 believe that's what it's cited to there,
7 which shows a condition where while work was
8 attempted in San Francisco, there was a high
9 rate of UTAs being identified, which,
10 obviously, created a situation that, I
11 believe, Mr. Abranches and I spoke to earlier
12 where while inspections were happening, they
13 weren't necessarily being completed.

14 And if you don't complete an
15 inspection, you're not necessarily reducing
16 any risk at all; thus, there was a decision
17 that was made to work in locations where
18 there could be complete inspections and risk
19 reduction would occur.

20 Q So San Francisco inspections are
21 the highest risk. Those are the cross bores
22 PG&E is most worried about, but you don't do
23 those inspections in 2017 and 2018 because
24 you had been concerned about UTAs? I'm just
25 not quite following the explanation.

26 A Well, I'll restate it, and it's
27 from our previous testifying, but it was
28 along the lines that as you progress through

1 work and if you're not successfully
2 completing inspections, you're not really
3 reducing any risk.

4 The ratepayers aren't receiving any
5 risk reduction for that; and if you continue
6 down that road and you don't have any risk
7 reduction, you haven't really done much
8 there.

9 Whereas, if you adjust and look for
10 ways you can address these issues that you
11 can go through and come back to them, you can
12 proceed with risk reduction in other areas
13 where you know you have success, and then you
14 have UTAs still, obviously, which is what
15 we're talking about.

16 Q But then come 2019, you're able to
17 do 10,000 inspections. What changed?

18 A I don't have a specific answer for
19 that. I know we talked about the WFR
20 document.

21 Q I'm sorry, "WFR"?

22 A That what a -- when we came with
23 Andrew Abranches, the second day we spoke to
24 a work and financial review document, and it
25 spoke to the plan that was originally
26 outlined related to the UTAs, and then it
27 spoke to the revised plan.

28 And there was a determination made

1 there to make more attempts understanding
2 that they would have a high fail rate into
3 the UTAs, but still progress into a
4 successful inspection rate of roughly 50
5 percent in that scenario, and that is where
6 these 8,000 are currently coming from.

7 Q Let me ask a different question
8 now. So we see from Hearing Exhibit 31 that
9 for whatever reason, PG&E did not do that
10 many non-UTA Cross Bore Inspections 2017 and
11 2018, and based on Surrebuttal Testimony,
12 you're telling us there were at least 10,000
13 more non-UTA inspections that needed to be
14 done in San Francisco.

15 So that leads me to the following
16 question: If 10,000 or more non-UTA cross
17 bore inspections in San Francisco still
18 needed to be done in 2019, why was there so
19 much emphasis in PG&E's original plan on
20 doing UTA inspections?

21 A I'm sorry. Could you repeat the
22 question?

23 Q You recall that PG&E's original
24 plan in your testimony, in your very
25 testimony, was to do 10,000 UTA inspections.
26 It didn't say "non-UTA inspections." It was
27 all about UTAs.

28 If there were 10,000 non-UTA

1 inspections still to be done, why was there
2 almost -- why was there so much focus,
3 exclusive focus, on UTA inspections?

4 A So that plan is, again, referenced
5 in my Workpaper 415, and it does focus on
6 UTAs. There's 10,000 units of UTAs it speaks
7 to, but there's an additional almost 14,000.

8 So I don't know that it was
9 exclusively focusing on UTAs as you've noted.

10 Q Well, when it comes to San
11 Francisco, it was all about doing UTA
12 inspections in San Francisco; isn't that
13 right?

14 A So, we developed a plan to complete
15 the UTAs in San Francisco as the rest of the
16 testimony speaks to.

17 It initially focused on 2019,
18 starting that plan, continuing into 2020, and
19 working to finish in 2021.

20 The focus at the time was to start
21 that plan, which involved the UTAs. And, as
22 I should note, at the time of this workpaper
23 being prepared, there was actually only 5,212
24 UTAs noted, which meant in order to continue
25 to complete UTAs at the rate we expected to
26 find them, you'd continue to inspect San
27 Francisco in that year. The UTAs would then
28 materialize, and you'd complete the 10,000

1 UTAs. So that was the original focus.

2 Does that help answer the question?

3 Q I'm sorry. I'm just not getting
4 it.

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

6 (Off the record.)

7 ALJ LIRAG: Let's go back on the
8 record. You can continue, Mr. Long.

9 THE WITNESS: Maybe I should just
10 clarify.

11 BY MR. LONG:

12 Q Let me try again.

13 I mean, are we agreed that PG&E's
14 Direct Testimony in this case was proposing
15 doing -- a key element was doing 10,000 San
16 Francisco UTA inspections, and there was a
17 discussion of why it was important to do
18 those UTA inspections; isn't that right?

19 A There was a plan to do the 10,000,
20 which shifted. I think there was a
21 discussion specific to the risk of inspecting
22 in San Francisco, but not specific to the
23 risk of UTA.

24 Q Are you saying now that in your
25 testimony, your direct testimony, it did not
26 emphasize UTA inspections in San Francisco?

27 It didn't distinguish between UTA
28 and non-UTA?

1 A No. I was saying it emphasized the
2 forecast to do them, but I was just citing
3 that the risk discussion was specific to San
4 Francisco Cross Bore Inspections in general.

5 Q So, again, my question is: If
6 there were 10,000 non-UTA inspections still
7 to be done, at least, why was the emphasis or
8 why was the focus in direct testimony on
9 doing UTA inspections?

10 I'm just not understanding why.

11 MR. OUBORG: Your Honor, objection.
12 This question's been asked over and over.

13 And I think it also assumes a fact
14 not in evidence. I think Castle (sic) is
15 saying that PG&E knew there were 10,000
16 non-UTAs in San Francisco that were just
17 waiting to be done. I don't think that's
18 what the witness testified to.

19 ALJ LIRAG: All right. I'll sustain.

20 Let me just ask, though, the 10,000
21 non-UTAs you're referring to, Mr. Long, is
22 that located in San Francisco as well or not
23 in San Francisco?

24 MR. LONG: Well, yeah. I mean, the
25 surrebuttal is they found 10,000 non-UTAs to
26 do.

27 ALJ LIRAG: In San Francisco?

28 MR. LONG: In San Francisco.

1 ALJ LIRAG: All right.

2 MR. LONG: And my question is, they
3 weren't talking about that in their original
4 proposal. It was all about UTAs. And I'm
5 trying to understand why it was all about
6 UTAs in the original.

7 ALJ LIRAG: Is part of this included in
8 the 14,000 non-UTAs?

9 THE WITNESS: So, yeah. I think you're
10 speaking to the workpaper work. There's a
11 volume of inspections remaining.

12 And then there was -- I believe
13 there was 21,000 that were going to be UTA,
14 and then the remainder of those would turn
15 into routine inspection. So, yeah, that
16 would be within that.

17 So, I guess, to clarify it, it's
18 really that in order to go perform UTAs, you
19 have to start inspecting, and then UTAs will
20 eventually be found through the normal
21 inspection process, which is what's happened
22 over time.

23 However, when we did the 2019 plan
24 and revised it, we understood that we were
25 going to find a lot of unsuccessful locations
26 and that meant that we would get to this
27 volume we are speaking to now because some
28 would turn into UTAs, as expected.

1 Others would become successful
2 inspections that we're noting here in this
3 conversation.

4 BY MR. LONG:

5 Q All right. Let's move on.

6 We noted earlier your testimony on
7 page 3 of your surrebuttal, that is
8 indicating that for 2019, PG&E's current plan
9 is to do 10,340 non-UTA inspections; right?

10 MR. OUBORG: What page is that,
11 Counsel?

12 MR. LONG: Page 3 of the surrebuttal.

13 MR. OUBORG: And the line?

14 MR. LONG: It's answer 9.

15 THE WITNESS: I see it.

16 BY MR. LONG:

17 Q It's broken out by 8,849 UTA Cross
18 Bore Inspections that are completed,
19 according to this as of October 14th, 2019,
20 and another 1,500 projected to be done in the
21 remainder of 2019; do you see that,
22 Mr. Kerans?

23 A Yes, I see that.

24 Q Where did you get those numbers
25 from?

26 A Those numbers in Answer 9?

27 Q Yes.

28 A Those come from the cross bore

1 team.

2 Q Cross bore team. Who in particular
3 gave you those numbers?

4 A So as I discussed previous, Austin
5 Hastings is the Director.

6 Q Okay.

7 A And one of his employees has
8 provided those numbers.

9 Q So somebody gave numbers to
10 Mr. Hastings, who gave numbers to you?

11 A We requested Austin Hastings
12 support it, and he directed an employee to
13 work with us.

14 Q Okay. Did the employee give them
15 directly to you?

16 A Yeah. They were sent to us via
17 e-mail.

18 Q How did the employee get the
19 numbers?

20 A They go into their database of the
21 work they manage, and they pull these numbers
22 out.

23 Q So somebody else - not testifying -
24 went into a database, and supplied you with
25 numbers that that person pulled out of a
26 database; is that right?

27 A That's roughly correct.

28 Q And what did you do to verify the

1 accuracy of the numbers that you were given?

2 A Yeah. So, they sent me a
3 spreadsheet because I asked, I'd like to see
4 where this is. I just didn't want to see a
5 number. So I asked to see a spreadsheet, and
6 then I reviewed -- for the 8,800 locations, I
7 looked at that, and then I checked if they
8 were in San Francisco, and then I
9 sporadically checked to ensure if these
10 looked like what I would expect.

11 Q Looked like what you would expect;
12 I don't follow that.

13 A Addresses in San Francisco,
14 roughly, and then, roughly, within regions
15 within San Francisco where I would expect
16 them to be.

17 Q So what's the spreadsheet that
18 you're referring to? What did that consist
19 of?

20 A It was, I guess -- I don't have it
21 memorized. It had a lot of columns to it.
22 It had addresses. It had -- I believe it had
23 sewer, ID numbers, the routine things that
24 they would catalog in a database.

25 Q So you have a spreadsheet that
26 shows cross bore inspections just by San
27 Francisco or performed systemwide, or how
28 does that work?

1 A So the database, obviously, has
2 everything, and then we selected for San
3 Francisco to see the work that's completed in
4 San Francisco.

5 Q Is that something that could be
6 made available for TURN for us to look at?

7 MR. OUBORG: Can we go off the record?

8 ALJ LIRAG: Off the record.

9 (Off the record.)

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

11 There's discussion of providing
12 documents regarding Cross Bore Inspections
13 and let's have Mr. Long and Mr. Ouborg or
14 someone else from PG&E work out the details
15 on that. If something needs to be redacted,
16 then discuss it, and then just have the
17 document. All right.

18 MR. LONG: Thank you, your Honor.

19 Yes. That's the end of my
20 questions. Thank you, Mr. Kerans.

21 ALJ LIRAG: Redirect, Mr. Ouborg?

22 MR. OUBORG: One second, your Honor.

23 ALJ LIRAG: Off the record.

24 (Off the record.)

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

27 MR. OUBORG: One question, your Honor.

28 ///

1 REDIRECT EXAMINATION

2 BY MR. OUBORG:

3 Q Mr. Kerans, you were asked 8,840
4 non-UTA cross bore inspections that PG&E has
5 now done in San Francisco. Can you clarify
6 how PG&E became aware that those existed so
7 that they -- well, can you identify how and
8 when PG&E generated the identity of those so
9 that they could perform those inspections?

10 A Yeah. So there remains a
11 population of inspections to do in San
12 Francisco and each one has a likelihood of
13 being completed or turned into a UTA. So
14 that was part of the remaining population
15 that I've noted in the Workpaper 4-15.

16 So that had been there, and we
17 elected to inspect those in order to get to
18 this volume of work, knowing that many would
19 turn into UTAs and would be an incomplete
20 inspection, but if we continued to inspect,
21 we would ultimately get to the volume we
22 expected under the original work plan.

23 Q When did we decide to go and
24 inspect those remaining locations in San
25 Francisco, roughly; do you know?

26 A I would say roughly that was in the
27 February time frame when that work of the
28 financial review committee was done.

1 MR. OUBORG: That was my redirect
2 question, your Honor.

3 ALJ LIRAG: Any question off that,
4 Mr. Long?

5 MR. LONG: No, your Honor.

6 ALJ LIRAG: So move, Mr. Ouborg, to
7 admit Exhibit 287 into the record?

8 MR. OUBORG: So moved.

9 ALJ LIRAG: Any objection?

10 (No response.)

11 (Exhibit No. 287 was received into
12 evidence.)

13 ALJ LIRAG: Hearing none.

14 Exhibit 287 is moved into the
15 record. Thank you, Mr. Kerans, and all the
16 witnesses that appeared and were made
17 available for cross. So you're excused,
18 Mr. Kerans, finally.

19 This will take probably five
20 minutes. We shall just go over some
21 reminders about the proceeding moving
22 forward.

23 I believe on November 1, we have
24 several things to do: One is the briefing
25 document regarding the AB 1054 Revenue
26 Requirement, and the updated testimony, and
27 the comparison exhibit, and then we also have
28 the Revised Declaration from Mr. Lipps.

1 This will either be a joint proposal
2 between the City and County of San Francisco
3 and PG&E or separate documents, and then our
4 possible Rebuttal Testimony from PG&E if it
5 chooses to do so.

6 And then we are currently scheduled
7 to have hearings on November 6th. We shall
8 set that 10:00 a.m. on November 6th, and this
9 is solely for the purpose of possible
10 cross-exam to Mr. Lipps, and if PG&E provides
11 rebuttal testimony, then whoever the witness
12 is that sponsors that. Also, possible
13 hearing regarding updated testimony.

14 So parties will confer with PG&E.
15 PG&E has until November 5, noon, to notify
16 the service list whether or not the hearing
17 can be canceled or, otherwise, as of now, we
18 will assume that the hearing will occur.

19 So for purposes of briefing, the
20 RAMP report -- I think I said this before,
21 but just to make sure, the RAMP report and
22 the SED report, anything off those two
23 documents, parties can just directly cite off
24 those documents. There's no need to move
25 these into the record of this proceeding,
26 understanding that these are documents from
27 PG&E's RAMP proceeding.

28 I believe comments to the interim

1 decision regarding the interim rates motion
2 are due, I believe, on Tuesday. That date
3 may not be accurate.

4 Let's talk about when the transcript
5 corrections proposal can be due. Do we have
6 a date?

7 MS. GANDESBERY: We talked to TURN,
8 your Honor, about November 2nd, given that
9 the transcripts are taking about four or five
10 days.

11 ALJ LIRAG: Is that enough time,
12 Mr. Long? I understand that PG&E has more
13 resources than intervenors.

14 MR. LONG: I think that can work for
15 TURN, of course, with the exception of any
16 hearing dates, like November 6th, that happen
17 after that.

18 ALJ LIRAG: So we're talking about
19 transcript corrections up to this day,
20 October 18th.

21 Is that fine, Mr. Burns?

22 MR. BURNS: Yes.

23 ALJ LIRAG: I'll have you speak for
24 Cal PA.

25 MR. BURNS: I think we can do that.

26 ALJ LIRAG: We'll set November 2 as the
27 date for --

28 MS. GANDESBERY: It looks like that's a

1 Saturday.

2 ALJ LIRAG: So we'll make it the next
3 Monday after that date, which is November 4.

4 So any proposed adjustments to the
5 briefing schedule, which is currently set at
6 November 15 for the opening briefs?

7 MR. LONG: Yes, your Honor.

8 TURN would request that the opening
9 briefs be submitted one week after the
10 schedule in the scoping ruling, November
11 22nd, and that reply briefs also be moved
12 back one week so that they would be due on
13 December 13th.

14 We ask this for a variety of
15 reasons: One is cross bore issues still
16 potentially being up in the air; the
17 transcripts might not be available; and,
18 candidly, factors such as exhaustion,
19 vacation schedules, and parental illnesses,
20 and things like that have come up in these
21 hearings.

22 ALJ LIRAG: That's fine. I'm not going
23 to ask PG&E. I will accept that date. It's
24 delaying the briefs by a week.

25 So any comments, Mr. Burns?

26 MR. BURNS: No, your Honor.

27 ALJ LIRAG: Opening briefs are now due
28 November 22nd and reply briefs are now due

1 December 13th. It is one week later than
2 when they were originally due.

3 And as I stated yesterday, this will
4 not delay the schedule of the proposed
5 decision in any way.

6 Anything to say, Ms. Gandesbery?

7 MS. GANDESBERY: Well, your Honor, I
8 wanted to say that we prefer to keep things
9 moving along because it is so important to us
10 to have a proposed decision as soon as
11 possible. So we would be happy to keep to
12 the existing schedule. And then if something
13 comes up on the cross bore, we can deal with
14 that separately.

15 ALJ LIRAG: We will keep things moving
16 along.

17 ALJ Lau and I have developed a
18 schedule, and we are able to start working on
19 the proposed decision even without the briefs
20 submitted on November 15, as originally
21 scheduled in the scoping memo. So this won't
22 cause any delay. I guarantee that.

23 MS. GANDESBERY: Thank you, your Honor.

24 ALJ LIRAG: And, I guess, we can
25 guarantee we won't take as long as the Edison
26 decision. That's the only guarantee I can
27 give.

28 MS. GANDESBERY: I appreciate that,

1 your Honor.

2 ALJ LIRAG: So that takes care of all
3 the remaining business.

4 Any other things to address before
5 we conclude?

6 MR. BURNS: Thank you.

7 I have a one-minute correction for
8 one of our exhibits, referring to Exhibit 166
9 in the record.

10 ALJ LIRAG: All right. 166.

11 MR. BURNS: Which is premarked as Cal
12 Advocates 23. Cal Advocates exhibit
13 referring to page 12, line 5. There is a
14 number there: "137835." It turns out that
15 was in error, and the correct number is
16 "132961."

17 This was pointed out to us by PG&E,
18 I think, on October 7th or so. We just
19 wanted to correct that.

20 ALJ LIRAG: We'll correct that in our
21 records.

22 MR. BURNS: Thank you, your Honor.

23 ALJ LIRAG: Thank you. Any other
24 business?

25 (Hearing none.)

26 ALJ LIRAG: So on behalf of ALJ Lau,
27 again, we would like to thank all the
28 witnesses that submitted testimony. We are

1 not looking forward to reading all -- close
2 to 300 exhibits, but we'll do so. I think it
3 enhances the record.

4 We thank all the counsel that
5 participated in the hearings. I could
6 probably name all of them. I have a good
7 memory, but I'll just refer to
8 Ms. Gandesbery, Mr. Ouborg, Mr. Long,
9 Mr. Burns is here on behalf of Ms. Shek,
10 Mr. Gondai is here. And also special thanks
11 to Mr. Arnold, again, for facilitating the
12 schedule. We managed to finish very late on
13 the last day, but at least we don't have to
14 extend. Thank you also for maintaining that
15 schedule board.

16 Thank you also to Ms. Ramaiya, who
17 was facilitating the GRC proceeding on behalf
18 of PG&E. Thank you also very much to
19 Shannon, who took care of the entire day
20 today, for the most part, and all the other
21 reporters. Thank you to Nathan Poon, who was
22 substituting for Marian. And then thank you
23 also to ALJ Lau, and Commissioner Randolph,
24 who was here on some of the hearings.

25 All right. So with that, we
26 conclude. It should be Day 20, although we
27 had four days off, so Day 16 of our four
28 weeks of Evidentiary Hearings. We're still

1 scheduled for November 6th, but in the event
2 that that is cancelled, I would like to thank
3 everyone that's in this room, and everyone
4 that committed to hearings from Day 1. So
5 we'll work on the proposed decision. Thank
6 you. Let's go off the record.

7 (Whereupon, at the hour of 4:05
8 p.m., this matter having been continued
9 to 10:00 a.m., November 6, 2019 at
San Francisco, California, the
Commission then adjourned.)

10 * * * * *

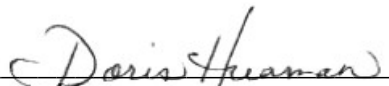
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, DORIS HUAMAN, CERTIFIED SHORTHAND REPORTER
NO. 10358, IN AND FOR THE STATE OF CALIFORNIA, DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
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TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON OCTOBER 18, 2019.

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

EXECUTED THIS OCTOBER 25, 2019.


DORIS HUAMAN
CSR NO. 10538

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

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