

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



FILED
10/18/19
12:12 PM

ADMINISTRATIVE LAW JUDGE RAFAEL L. LIRAG, 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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REPORTER'S TRANSCRIPT
San Francisco, California
October 14, 2019
Pages 2344 - 2414
Volume - 21

Reported by: Jason Stacey, CSR No. 14092

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1 SAN FRANCISCO, CALIFORNIA

2 OCTOBER 14, 2019 9:31 a.m.

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4 ADMINISTRATIVE LAW JUDGE LIRAG: Let's
5 go on the record.

6 Good morning, everyone. We are at
7 the last week of our scheduled evidentiary
8 hearings. There may be an additional hearing
9 on November 6th based on what happens with
10 the updated testimony and as we await further
11 developments regarding the motion by the City
12 and County of San Francisco. So we'll set
13 that aside for now.

14 Today we have a short day. We'll
15 have Ms. Weaver and Mr. Cheng.

16 Good morning, Ms. Weaver. We'll get
17 to you in a little bit.

18 We're on schedule thanks in large
19 part, I guess, to Mr. Arnold. So I'll
20 acknowledge Mr. Arnold's excellent scheduling
21 efforts.

22 All right. First up let's identify
23 an exhibit by the Joint CCAs. I understand
24 this is was an exhibit in lieu of cross for
25 Mr. Marcus; is that correct, Mr. Lindl?

26 MR. LINDL: Yes, your Honor.

27 ALJ LIRAG: All right. I'll identify
28 this as Exhibit-173. And this is TURN's

1 Response to the Joint CCA's Data Request 1,
2 Question 1.

3 (Exhibit No. 173 was marked for
4 identification.)

5 ALJ LIRAG: A move to admit this into
6 the record, Mr. Lindl?

7 MR. LINDL: So moved, your Honor.

8 ALJ LIRAG: Any objections from TURN or
9 any other parties?

10 MS. GANDESBERY: No, your Honor.

11 MS. GOODSON: No, your Honor.

12 ALJ LIRAG: Hearing none, 173 is
13 received into the record.

14 (Exhibit No. 173 was received into
15 evidence.)

16 MR. LINDL: Thank you, your Honor.

17 ALJ LIRAG: Ms. Weaver, good morning
18 again. Please raise your right hand. Please
19 state your name, spell your last name, and
20 provide a business address.

21 THE WITNESS: Monica Weaver,
22 W-e-a-v-e-r. 505 Van Ness, San Francisco
23 California.

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

25 (Off the record.)

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

28 Thank you, Ms. Weaver. Let's

1 identify a couple of exhibits first.

2 First is Exhibit-174. And this is
3 The Prepared Testimony of Ms. Weaver
4 Regarding the Company Wide Administrative and
5 General Expenses for PG&E.

6 (Exhibit No. 174 was marked for
7 identification.)

8 ALJ LIRAG: Next is Exhibit-175.

9 Let me clarify. Ms. Weaver is a
10 witness for Cal PA.

11 Next is Exhibit-175, and this is The
12 Workpapers For the Testimony of Ms. Weaver.

13 (Exhibit No. 175 was marked for
14 identification.)

15 Mr. Sher?
DIRECT EXAMINATION

16 BY MR. SHER:

17 Q Good morning, your Honor. Nicholas
18 Sher on behalf of the Public Advocates
19 Office.

20 Good morning, Ms. Weaver. Did you
21 prepare what has been marked Exhibits 174 and
22 175?

23 A Yes.

24 Q Your qualifications are contained
25 in what is marked as Exhibit-174, your direct
26 testimony?

27 A Yes.

28 Q Do you have any additions or

1 corrections to make to your testimony?

2 A No.

3 Q Are the facts and opinions set
4 forth in your testimony and workpapers true
5 and correct to the best of your knowledge?

6 A Yes.

7 MR. SHER: Your Honor, the witness is
8 available for cross-examination.

9 ALJ LIRAG: All right. I believe we
10 have cross by Ms. Kantor.

11 MS. KANTOR: Yes, that's correct.

12 ALJ LIRAG: All right. Go ahead.

13 MS. KANTOR: We actually have one cross
14 exhibit.

15 ALJ LIRAG: Let's have that.

16 Let's go off the record.

17 (Off the record.)

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

20 While we were off the record, an
21 exhibit was distributed. And this is a
22 cross-exhibit by the Joint CCAs for
23 Ms. Weaver. So I will identify Exhibit-176.
24 This is Cal PA's Response to the Joint CCAs
25 Data Request No. 2.

26 (Exhibit No. 176 was marked for
27 identification.)

28 ALJ LIRAG: That's Exhibit-176.

1 All right. You may proceed,
2 Ms. Kantor. You can ignore that Mr. Lindl is
3 there when you do your cross.

4 MS. KANTOR: Sounds good.

5 CROSS-EXAMINATION

6 BY MS. KANTOR:

7 Q Good morning, Ms. Weaver.

8 A Good morning.

9 Q I'm Julia Kantor. I'm counsel for
10 the Joint CCAs. And I'm going to be asking
11 you some questions today on the allocation of
12 PG&E's insurance costs.

13 Do you have your testimony marked
14 just now as Exhibit Number 174 and a copy of
15 the Joint CCAs cross-exhibit in front of you?

16 A Yes.

17 Q In your testimony on page 15, lines
18 14 through 18, and just let me know when you
19 get there.

20 A I'm there.

21 Q You recommend that approximately
22 \$300 million of incremental costs from
23 general excess liability insurance expense be
24 allocated to electric distribution and
25 electric transmission; correct?

26 A Yes.

27 Q And you propose this reallocation
28 to reflect the increased number of wildfires

1 over the past several years, which you state
2 have been ignited by electrical components
3 rather than gas components or electric
4 generation components; correct?

5 A Correct.

6 Q And this \$300 million proposed
7 adjustment is an approximation of the
8 incremental insurance expense increase
9 calculated by comparing a five-year average
10 of 2013 to 2017 to what PG&E forecasts it
11 will need for 2020; correct?

12 A That is correct.

13 Q Great.

14 ALJ LIRAG: You have to speak up a
15 little bit more, Ms. Weaver. Thank you.

16 BY MS. KANTOR:

17 Q And the purpose of this insurance,
18 the general excess liability insurance, is to
19 ensure against the third-party liability
20 claims for all of PG&E's lines of business
21 for unbundled cost categories; correct?

22 A Can you please point to where in my
23 testimony I said that?

24 Q Sure. Pages 6 to 7. Starting at
25 line 27 on page 6 and going over to line 4 on
26 the next page. So here you state that PG&E
27 has 21 insurance policies for excess
28 liability. And you list the range of

1 liabilities that the policies cover; correct?

2 A Yes.

3 Q And the policies that you list
4 there cover workers' compensation, bodily and
5 property damage liability, bodily and
6 property damage liability non-wildfire only,
7 bodily injury and property damage liability,
8 property damage liability, property damage
9 liability wildfire only, and bodily and
10 property damage liability wildfire only;
11 correct?

12 A Correct.

13 Q So do you agree that these policies
14 would cover claims arising from various lines
15 of business like electric distribution, gas
16 distribution, electric generation, et cetera?

17 A Yes.

18 Q So payments on claims related to
19 liabilities caused by PG&E's gas storage
20 facilities, its gas pipelines, its generation
21 facilities, or its transmission system, those
22 would all come from this liability insurance;
23 correct?

24 A Probably.

25 Q Okay. Thank you. And do you agree
26 that the liability insurance expense is
27 currently classified as an administrative and
28 general expense functionalize as a common

1 cost?

2 A I'm not sure if it would be
3 classified as a common cost, but it would be
4 classified as AMG.

5 Q Okay. And just to clarify. By
6 common costs, I'm using that to mean across
7 all lines of business.

8 A Okay.

9 Q So you agree that this liability
10 insurance expense is functionalized across
11 all lines of business?

12 A Yes.

13 Q Great. To your knowledge, did the
14 Commission revise the functionalization of
15 PG&E's expenses for liability insurance
16 premiums after the 2010 gas pipeline
17 explosion in San Bruno?

18 A I'm not aware.

19 Q Okay. To your knowledge, does PG&E
20 as a general practice reallocate the cost of
21 insurance to a particular line of business
22 when premiums may have been affected by
23 industry risks related to that particular
24 line of business?

25 A I'm not aware.

26 Q Okay. Can you please turn to
27 Public Advocates Office Response to Joint
28 CCAs Data Request 2, which is the

1 cross-exhibit that's been marked as
2 Exhibit-176?

3 A I'm there.

4 Q In question 2.1-A, the Joint CCAs
5 ask you to provide the basis and any
6 underlying support for the statements that
7 the incremental increase in excess liability
8 insurance is mainly due to wildfires;
9 correct?

10 A Yes.

11 Q And in your answer, you provide
12 three references to PG&E's testimony where
13 PG&E generally states that liability
14 insurance prices have risen for the
15 California IOUs due to wildfire risk and that
16 the increase in PG&E's liability insurance
17 expense is largely due to the increased
18 wildfire risks; correct?

19 A Yes.

20 Q And those three references are the
21 entirety of your answer to question 2.1-A;
22 correct?

23 A Yes.

24 Q Other than relying on PG&E's
25 testimony, did you perform or review any
26 other analyses that explain what's driving
27 the increase in excess liability insurance
28 premiums?

1 A Based on PG&E's testimony, it's
2 stated that it was due to the wildfires.

3 Q Okay. But other than that
4 testimony, you didn't perform or review any
5 other analyses that explain that or show
6 that; correct?

7 A I also reviewed Cal Fire's report
8 on what caused the 12 wildfires in 2017.

9 Q Okay. On the causes of the
10 wildfires themselves?

11 A Yes.

12 Q Okay. But just to clarify those
13 other reports that you're referencing now,
14 those reports don't explain what's driving
15 the increase in the liability insurance
16 premiums; correct?

17 A Correct.

18 Q Thank you. Do you agree that
19 PG&E's rebuttal testimony states that in the
20 world of insurance pricing, specific portions
21 of increases and insurance premiums cannot be
22 attributed to specific events or factors?

23 A I don't have PG&E's rebuttal
24 testimony in front of me.

25 Q Okay.

26 MS. KANTOR: Your Honor, I have a
27 reference exhibit that's PG&E's rebuttal
28 testimony on administrative and general

1 expenses previously marked as PG&E-23. Can I
2 please distribute that?

3 ALJ LIRAG: All right. You can hand
4 one to PG&E and to Ms. Weaver and to
5 Mr. Sher.

6 MS. KANTOR: Okay.

7 ALJ LIRAG: Let's go off the record.
8 (Off the record.)

9 ALJ LIRAG: All right. Let's go back
10 on the record. Ms. Kantor distributed -- I
11 guess it's -- the Joint CCAs distributed a
12 reference exhibit, and this is PG&E's
13 rebuttal testimony. So Ms. Kantor was
14 directing Ms. Weaver to a certain line on
15 page 3-9.

16 Please proceed.

17 BY MS. KANTOR:

18 Q So, Ms. Weaver, you reviewed PG&E's
19 testimony on administrative and general
20 expenses in connection with your work in this
21 proceeding; correct?

22 A Correct.

23 Q So in this exhibit, PG&E 23,
24 page 3-9, lines 16 through 20, have you had a
25 chance to review those lines? Or should I
26 give you a moment now?

27 A I've reviewed.

28 Q Okay. So do you agree that here

1 PG&E is discussing how insurance pricing
2 works and generally states that specific and
3 identifiable portions of increases in
4 insurance premiums cannot be attributed to
5 specific individual events or factors?

6 A That's what it says.

7 Q Okay.

8 MS. KANTOR: Thank you. No further
9 questions.

10 ALJ LIRAG: Any questions, Mr. Sher?

11 REDIRECT EXAMINATION

12 BY MR. SHER:

13 Q Just one redirect, your Honor.

14 Ms. Weaver, you stay on page 3-9 of
15 rebuttal testimony and look at lines 20
16 through 23, can you read those to yourself?

17 And does it state there that
18 wildfire risk had led to increased premiums
19 due to inverse condemnation?

20 A Yes, it does.

21 MR. SHER: No further questions.

22 ALJ LIRAG: Any questions off that,
23 Ms. Kantor?

24 MS. KANTOR: Could I have a moment,
25 your Honor?

26 ALJ LIRAG: All right. Let's have
27 Ms. Gandesbery.

28 MS. GANDESBERY: I'd like to just talk

1 to counsel for a second if I could?

2 ALJ LIRAG: All right. Let's go off
3 the record.

4 (Off the record.)

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

7 Let's have Ms. Kantor first.

8 MS. KANTOR: I actually have no further
9 questions.

10 ALJ LIRAG: Okay. Ms. Gandesbery, is
11 there anything you wanted to address?

12 MS. GANDESBERY: Yes, your Honor.

13 CROSS-EXAMINATION

14 BY MS. GANDESBERY:

15 Q Good morning, Ms. Weaver.

16 A Good morning.

17 Q I'd like to direct your attention
18 to question and answer on page 2 of the
19 document that's been marked as 176.

20 A The data request?

21 Q Yes. The data request. And
22 there's one statement in particular I wanted
23 to ask you about.

24 A Which page are you on?

25 Q This is on page 2. It says -- I'd
26 like to turn your attention to the first, I
27 guess, AC on page 2.

28 A I'm there.

1 Q Do you see that? You stated you
2 reviewed CAL FIRE reports on the 2017
3 wildfires?

4 A I reviewed the CAL FIRE news
5 release that was released on June 8, 2018.

6 Q Okay. And are you -- did you
7 review the CAL FIRE news releases on all the
8 wildfires in 2017?

9 A This news release that I reviewed
10 investigated 12 of the Northern California
11 wildfires.

12 Q So did you review any CAL FIRE news
13 releases or reports about the Tubbs Fire?

14 A No.

15 Q And are you aware that CAL FIRE
16 determined the Tubbs Fire was not caused or
17 related to PG&E equipment?

18 A Yes.

19 Q Okay. And same question. Did you
20 review the CAL FIRE Report about the Carr
21 Fire?

22 A No.

23 Q And are you aware that CAL FIRE
24 found that was also not related to PG&E
25 equipment?

26 A I was not aware.

27 Q Okay. So you're not -- your
28 testimony says:

1 CAL FIRE determined the 12
2 wildfires that broke out in
3 2017.

4 You see that statement there?

5 A Yes.

6 Q Do you mean 12 of the wildfires?

7 A Yes.

8 Q Of the those 2017 wildfires?

9 A Yes.

10 Q Okay. And are you sure the number
11 12 is correct?

12 A According to the CAL FIRE news
13 release.

14 Q Okay. But you have no personal
15 knowledge of this?

16 A Aside from the release, no.

17 Q Okay.

18 MS. GANDESBERY: Thank you. I have
19 nothing further.

20 ALJ LIRAG: Any questions off that,
21 Mr. Sher?

22 MR. SHER: No, your Honor.

23 ALJ LIRAG: Any questions, Ms. Goodson?

24 MS. GOODSON: No, your Honor.

25 EXAMINATION

26 BY ALJ LIRAG:

27 Q I just have one question regarding
28 your direct testimony, page 9, the risk

1 transfer balancing account. So Cal PA's
2 proposal is that the RTBA be established but
3 to only apply to the first \$1.4 billion; is
4 that correct?

5 A To the \$1.4 billion in average.

6 Q What's the basis for the 1.4 --
7 your objection is to the amount. But what's
8 the basis for your proposal of \$1.4 billion?

9 A Cal Advocates determined that
10 \$1.4 billion in coverage was a reasonable
11 number due to the fact that we're in
12 unprecedented territory, and this is the
13 highest it's ever been.

14 So with the \$1.4 billion, it will
15 -- it should provide enough coverage. And if
16 PG&E determines that it's not adequate, they
17 can go out and procure more insurance with
18 either doing the tier 3 advice letter or
19 sharing the cost 50/50.

20 Q So, again, the basis for the
21 \$1.4 billion is that Cal PA's -- that is the
22 adequate amount of coverage? Was it based on
23 historical costs?

24 A This was the amount of coverage
25 that PG&E had procured in 2018.

26 Q Okay. Thank you.

27 ALJ LIRAG: Any questions off that,
28 Mr. Sher?

1 MR. SHER: No, your Honor.

2 ALJ LIRAG: All right.

3 A move to admit Exhibits 174 and 175
4 into the record?

5 MR. SHER: Please, your Honor.

6 ALJ LIRAG: Any objections?

7 (No response.)

8 ALJ LIRAG: Hearing none, Exhibits 174
9 and 175 are received into the record.

10 (Exhibit No. 174 was received into
11 evidence.)

12 (Exhibit No. 175 was received into
13 evidence.)

14 ALJ LIRAG: Ms. Kantor, same motion for
15 Exhibit-176?

16 MS. KANTOR: Yes, your Honor.

17 ALJ LIRAG: Any objections?

18 (No response.)

19 ALJ LIRAG: Hearing none, Exhibit-176
20 is received into the record.

21 (Exhibit No. 176 was received into
22 evidence.)

23 ALJ LIRAG: Off the record.

24 (Off the record.)

25 ALJ LIRAG: All right. Let's go back
26 on the record. And we have Mr. Cheng who is
27 raring to go.

28 Please raise your right hand. State
your name, spell your last name, and provide

1 a business address.

2 THE WITNESS: My name is David Cheng,
3 C-h-e-n-g. I'm with TURN. Business address
4 is 1620 5th Avenue, Suite 810, San Diego,
5 California 92101.

6 ALJ LIRAG: All right. Thank you,
7 Mr. Cheng.

8 So I'll identify as Exhibit-177, The
9 Prepared Testimony of David Cheng Related to
10 Customer Care and the Earnings Adjustment
11 Mechanism.

12 (Exhibit No. 177 was marked for
13 identification.)

14 ALJ LIRAG: Ms. Goodson?

15 DIRECT EXAMINATION

16 BY MS. GOODSON:

17 Q Thank you, your Honor.

18 Good morning, Mr. Cheng. Do you
19 have before you the document that's been
20 identified as Exhibit-177?

21 A Yes, I do.

22 Q And did you prepare this testimony,
23 Mr. Cheng?

24 A Yes.

25 Q And to the extent it contains
26 factual assertions, are those true and
27 correct to the best of your knowledge?

28 A Yes.

1 Q And to the extent it contains your
2 opinions, are they consistent with your best
3 professional judgment?

4 A Yes.

5 Q Thank you. I should ask one more
6 thing. Mr. Cheng, do you have any
7 corrections to make to your testimony?

8 A No.

9 Q All right.

10 MS. GOODSON: With that, your Honor,
11 this witness is available for
12 cross-examination.

13 ALJ LIRAG: All right. Ms. Slocum.

14 CROSS-EXAMINATION

15 BY MS. SLOCUM:

16 Q Thank you, your Honor.

17 Good morning, Mr. Cheng.

18 A Good morning.

19 Q Now, first I'd like to just review
20 the state of play on all of the issues that
21 are listed inside of Exhibit-177. PG&E and
22 TURN have met and successfully entered into
23 stipulations that are shown in Exhibits 97,
24 98, and 99, such that there's only one issue
25 in TURN's testimony that has not already been
26 addressed in the stipulation; is that
27 correct? And that would be the area of
28 manual meter reading?

1 A Correct.

2 Q Okay. Now, before I go into my
3 questions on manual meter reading, I'd like
4 to ask you a little bit about your statement
5 of qualifications at page 15 of your
6 Exhibit-177.

7 A Okay.

8 Q I see you have a bachelor of
9 science in computer science and that
10 thereafter you received and obtained a
11 masters of business administration in 2003;
12 correct?

13 A Correct.

14 Q Your statement didn't state what
15 the concentrations were in your MBA studies.
16 But I saw from your LinkedIn post that your
17 concentrations were in finance and strategy;
18 is that correct?

19 A Correct.

20 Q I see that during your time working
21 at Sempra, you were employed by San Diego Gas
22 & Electric; right?

23 A Yep.

24 Q And you list there some positions
25 that you held in your eight years at San
26 Diego Gas & Electric as being enterprise risk
27 management manager, new products and service
28 manager, new business development manager,

1 customer operations project manager, and what
2 you call other positions. Do you see that?

3 A Yep.

4 Q What other positions did you hold
5 at SDG&E in addition to these?

6 A I was a senior advisor, I was an
7 advisor, I was a team lead. Those are the
8 three other ones that I can remember right
9 now.

10 Q So when you were a senior advisor,
11 what substantive area of work at SDG&E were
12 you advising about?

13 A Customer services, which PG&E calls
14 "customer care."

15 Q And how long did you hold that
16 position?

17 A I was in customer services for more
18 than four years out of the eight years --
19 eight and a half years or so.

20 Q And were any of the -- was that --
21 is that continuous with or inclusive of some
22 of the items that you listed specifically as
23 responsibilities? Or is it completely in
24 addition to?

25 A Customer operations project manager
26 is the only other one within customer
27 services. The rest were not in customer
28 service.

1 Q I see. Okay. And so when you were
2 an advisor and team lead, was that also in
3 the same area of customer service, or was it
4 in a different area?

5 A Customer services.

6 Q Okay. So what did you specifically
7 work on as a customer operations project
8 manager?

9 A I worked on various projects
10 related to customer operations and customer
11 services. One of them included establishing
12 the remote disconnection functionality. And
13 plenty of other projects that I'm happy to
14 discuss if you believe it's relevant.

15 Q Did you say remote disconnection?

16 A Yes.

17 Q And what did you do? What were
18 your responsibilities with regard to remote
19 disconnection?

20 A For remote disconnection I was a
21 project lead so I designed the project,
22 designed the project specs, did the
23 forecasting, did the budget forecasting, did
24 the field services forecasting, did the head
25 count forecasting. Just all of the aspects
26 of planning. Also drafted all the
27 presentations that went to the executives for
28 approval of this project; did the cost

1 benefit analysis, and so on.

2 Q And the remote disconnection
3 project that you worked on, was that related
4 to the rollout of smart meters?

5 A It's because of smart meters that
6 enabled the functionality, yes.

7 Q I don't see any positions that you
8 held at SDG&E that had direct responsibility
9 for manual meter reading; is that right?

10 A The remote disconnection project I
11 just talked about had to do with manual field
12 services. I don't think specifically manual
13 reading per se.

14 Q All right. So you didn't have
15 direct responsibility to oversee the manual
16 meter readers at SDG&E did you?

17 A No. But I'm very familiar with the
18 forecasting.

19 Q Okay. Now, you've been a staff
20 attorney at TURN since July 2017. The last
21 two years and four months; correct?

22 A Correct.

23 Q Your statement of qualifications
24 lists several CPUC proceedings in which you
25 represented TURN, and I'd like to inquire as
26 to the nature of your roles in each. Were
27 you representing --

28 A I'm not sure that that's relevant

1 to my testimony here.

2 MS. SLOCUM: I'm trying to establish,
3 your Honor, what his expertise is on the
4 topics that we're talking about. And I think
5 it's relevant to TURN's positions in this
6 proceeding.

7 ALJ LIRAG: Well, let's hear a few of
8 the questions.

9 BY MS. SLOCUM:

10 Q One proceeding you listed was the
11 CPUC Disconnections OIR; correct?

12 A Correct.

13 Q Has your role been as TURN's
14 attorney throughout the proceeding? Or are
15 you representing TURN on a substantive basis
16 on that proceeding?

17 A Both.

18 Q Are you still representing TURN in
19 that proceeding?

20 A Yes.

21 Q Did you appear at the CPUC's
22 disconnection workshops?

23 A Yes.

24 Q Who else at TURN has been on the
25 disconnections team since July 2018?

26 A Gabriella Sandoval.

27 ALJ LIRAG: Let's try and skip a few of
28 these questions since it doesn't seem to be

1 leading to anything.

2 MS. SLOCUM: Can I just ask one more on
3 this line, your Honor?

4 ALJ LIRAG: All right.

5 BY MS. SLOCUM:

6 Q Why didn't you sponsor the portion
7 of TURN's testimony in what's premarked as
8 TURN Exhibit-08 relating to disconnections
9 instead of TURN's newer employee,
10 Ms. Dowdell?

11 MS. GOODSON: Objection, your Honor.
12 This really goes to how TURN allocates
13 resources to a proceeding. I'm not sure what
14 the relevance is. If Mr. Cheng would like to
15 explain how we did our best to spread
16 responsibilities across our very limited
17 staff, he can try to talk to that issue. But
18 I really don't understand the relevance here.

19 ALJ LIRAG: I'll sustain the objection.
20 Unless he was adopting someone else's
21 testimony.

22 MS. SLOCUM: Understood, your Honor.

23 ALJ LIRAG: All right.

24 BY MS. SLOCUM:

25 Q In your time at TURN as well as
26 your time with SDG&E, did you ever work on
27 another GRC Phase 1 proceeding?

28 A Yes.

1 Q Which one did you work on?

2 A I don't remember specifically which
3 one, but I definitely provided support for
4 GRC proceedings while I was at SDG&E.

5 Q Okay. Did you appear as a witness
6 in the SDG&E Phase 1 GRCs?

7 A I appeared as a witness in other
8 proceedings, not a Phase 1.

9 Q Okay. And did you ever work on a
10 GRC Phase 2 proceeding in your time either at
11 TURN or at SDG&E?

12 A Yes.

13 Q And when did you do that?

14 A I worked on the Edison Phase 2
15 proceeding. I was a witness in SDG&E's Phase
16 2 proceeding. And once again, I don't see
17 the relevance to my testimony.

18 Q All right. Turning to the subject
19 of manual meter reading at page 10, lines 1
20 through 10 of your testimony in Exhibit-177,
21 you introduce TURN's argument that PG&E's
22 2020 forecast in Chapter 6 of PG&E's
23 testimony of a little less than \$10 million
24 for manual meter reading an investigation
25 into meters should be reduced by
26 \$2.1 million; is that correct?

27 A Correct.

28 Q And specifically at line 8 you say

1 that this recommended reduction was based on
2 what you called TURN's quote "closer
3 examination of the forecasted meter reads and
4 meter reader head count." Unquote; correct?

5 A Yep.

6 Q Is it -- am I understanding
7 correctly that the basic premise of your
8 recommended \$2.1 million disallowance is your
9 concern that the reduction in the number of
10 meters needing to be manually read and the
11 reduction in meter reader head count doesn't
12 seem proportionate to the reduction in cost
13 projected for 2020 to do the manual meter
14 reading; correct?

15 A Those are just some of the factors,
16 yes.

17 Q Okay. At page 10, lines 11
18 through 12 of your testimony, you talk about
19 the number of meter reads in 2020 being
20 1,098,000 which you calculate as a 43 percent
21 decrease from recorded 2017 meter reads of
22 1,912,473; correct?

23 A Correct.

24 Q Your testimony's recommendation
25 uses this 43 percent decrease in meter reads
26 to argue that PG&E's 2020 expense cost
27 forecast should be 43 percent lower than 2017
28 recorded costs; correct?

1 A Correct.

2 Q So your calculated cost reduction
3 of 43 percent assumes that PG&E's manual
4 meter reading costs will decrease by the
5 exact same percentage as the reduction in the
6 units of work; correct?

7 A I don't think I'm assuming
8 anything. That's what I'm recommending.

9 Q Okay. Now, your testimony doesn't
10 mention any accounting for cost escalation
11 for labor hours does it?

12 A Escalation is taken care of
13 elsewhere outside of this -- elsewhere in the
14 GRC. Not here.

15 Q Wouldn't the labor costs escalation
16 affect the 2020 cost differential for manual
17 meter reading relative to 2017 and be
18 embedded in PG&E's costs for this proposal
19 here?

20 A It depends on if all the dollars
21 are in the same year dollars, which if you
22 look at --

23 ALJ LIRAG: Let's go off the record.
24 (Off the record.)

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

27 So please continue, Ms. Slocum.

28 ///

1 BY MS. SLOCUM:

2 Q Mr. Cheng, drawing your attention
3 to Exhibit-91 with regard to PG&E's metering
4 proposal that you are asking for the \$2.1
5 disallowance on, do you see at page 6-11,
6 lines 3 through 14, PG&E lists the expense
7 drivers for its 2020 forecast?

8 And specifically talks of its
9 forecast of \$28 million in metering labor
10 escalation costs for 2020 relative to the
11 2017 recorded expense costs. Do you see
12 that?

13 A Yeah. But I'm not -- I don't know
14 how much of that is related to meter reading.

15 Q Well, this chapter relates -- this
16 section relates to metering expenses?

17 A No. This covers more than metering.
18 The \$28 million covers more than just
19 metering.

20 Q So when it says \$2.8 million in
21 metering labor escalation costs for 2020, you
22 didn't take that into account in changing
23 your 43 percent to reflect the percentage
24 change that would erode because of labor
25 escalation, did you?

26 A So back to what we're talking
27 about --

28 Q That was a yes-or-no question.

1 A No. We're still talking about
2 whether or not the \$28 million is meter
3 reading or more than meter reading.

4 Q The \$27.7 million (sic).

5 A Yeah. The \$28.7 million is more
6 than manual meter reading. So I'm going to
7 point to your workpaper. If you look at PG&E
8 Workpaper 6-14, the meter reading portion is
9 only \$12.4 million in 2017.

10 Q But there's still the forecast of
11 \$2.8 million in metering labor escalation
12 costs that's listed in PG&E's testimony as
13 having been something that when you look at
14 page 6-3 of PG&E's testimony, it shows PG&E
15 increased the costs to reflect labor
16 escalation and then reduced the cost for
17 meter reading.

18 And I'm asking you whether you
19 adjusted your 43 percent to reflect the
20 impact of labor escalation, which will tend
21 to decrease that 43 percent to a lower
22 percent. Did you do that?

23 A No, I didn't.

24 Q Thank you. You don't dispute that
25 the average cost to accomplish an individual
26 meter read or the unit costs changes over
27 time including to reflect increases in such
28 costs of doing business as labor cost

1 escalations do you?

2 A Labor cost escalations are
3 reasonable, but not the reason PG&E listed
4 out.

5 Q Okay. You don't disagree that
6 labor costs have gone up between 2017 and
7 2020; correct?

8 A Correct.

9 Q Are you aware that TURN has not
10 objected to the continued use of PG&E's
11 standard labor escalation methodology across
12 the boards for all cost calculations in this
13 GRC that include labor?

14 A I'm not aware. That's not my area.

15 Q Did you inquire about labor
16 escalation?

17 A I believe we covered that already.
18 I did not count the labor escalation.

19 Q Okay. In PG&E's rebuttal
20 testimony, Exhibit-93, or premarked as
21 PG&E-20. Could you please turn to page 6-8?

22 A I'm there.

23 Q There PG&E calculated that taking
24 escalation into account for labor, PG&E
25 forecasts a lower reduction of costs than the
26 43 percent you propose. Namely, a 26 percent
27 gross reduction or a 17 percent reduction
28 after netting out escalation and labor costs.

1 Do you see that?

2 A I don't know what PG&E's including
3 in this calculation.

4 Q So you didn't do your own
5 calculation after you received PG&E's
6 rebuttal to come up with what you would say
7 the net reduction after -- including labor
8 escalation costs would be?

9 A Net escalation of what?

10 Q The net reduction in costs between
11 2017 and 2020. After you take into account
12 labor escalation, you're saying you don't
13 know what PG&E included to come up with
14 17 percent.

15 I'm asking you after you received
16 PG&E's rebuttal, did you make your own
17 calculation of what that percentage would be
18 after you take into account labor escalation?

19 A So are you arguing that PG&E's only
20 including labor escalation and it argues it
21 should be 17 percent? It's not including any
22 other increased costs?

23 Q Correct. Wait. I am sorry.

24 ALJ LIRAG: Let's go off the record.
25 (Off the record.)

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

28 Please continue, Ms. Slocum.

1 BY MS. SLOCUM:

2 Q Yes. So let me ask it a different
3 way, Mr. Cheng. After you received PG&E's
4 rebuttal testimony, did you perform any
5 calculations to include any of the kinds of
6 factors that would cause PG&E to come up with
7 a reduction that's more at 17 percent net
8 than your 43 percent?

9 A Like I said, I don't know how PG&E
10 came up with 17 percent, but I certainly did
11 my own calculation, which is why I concluded
12 once again that PG&E's theory is incorrect.

13 And I'll point you to the workpaper
14 to show that the data does not support PG&E's
15 theory that the unit cost of the meter read
16 is increasing because of the so-called
17 increase primarily due to the average time
18 traveled.

19 Q So I'd like to walk through that.
20 I have a series of questions with regard to
21 this topic. So I'd like to move forward with
22 that, please.

23 So prior to making your recommended
24 disallowance at 43 percent or \$2.1 million,
25 what did you do to familiarize yourself with
26 PG&E's actual manual meter reading
27 operations?

28 A I reviewed the testimony and the

1 workpaper.

2 Q Okay. And did you also submit to
3 PG&E the data request that appears at the
4 very end of your Exhibit-177? The very last
5 page TURN-61, Question 08, which indicates
6 that you did do a data request on manual
7 meter reading reductions related and
8 support-related items; correct?

9 A Correct.

10 Q And this data response was sent to
11 you on July 15, 2019. Do you see that?

12 A Yes.

13 Q And that was before you prepared or
14 finalized your 43 percent testimony; correct?

15 A Correct.

16 Q Look at the bottom of that data
17 request page, the one-page response. In the
18 last paragraph it says:

19 PG&E notes that a reduction
20 in its meter reader head
21 count does not directly
22 correlate with a reduction
23 in PG&E's manual meter
24 reading activities. PG&E
25 meter readers are retired
26 or seeking other job
27 alternatives as they become
28 available and PG&E does not

1 fill these vacancies.

2 Since reading a meter is a
3 basic and shared work task
4 across almost every field
5 classification, other
6 utility field employees
7 perform manual meter
8 reading work as part of
9 other routine job duties.

10 Do you see that?

11 A Yes.

12 Q So when you developed your proposed
13 disallowance, you knew that PG&E does not
14 rely exclusively on dedicated meter readers
15 to do its manual meter reading; correct?

16 A Correct.

17 Q And did you review PG&E's
18 workpapers before you prepared your
19 43 percent?

20 A Yes.

21 Q So turn in PG&E's opening testimony
22 in Exhibit-91 to page 6-18.

23 A I am sorry. Say that again.

24 Q Page 6-18?

25 A Of TURN's testimony?

26 Q No. Of PG&E's opening testimony,
27 Exhibit-91?

28 A Okay.

1 Q And look at line 12 under Major
2 Work Category for MWCAR entitled "Perform
3 Meter Reading." Do you see that?

4 A Yes.

5 Q PG&E describes the work it must do
6 under this major work category as being for
7 dedicated meter readers, other field
8 resources performing manual meter reading
9 activities, and the systems administrations
10 and clerical support necessary to effectively
11 perform these activities. Do you see that?

12 A That's what it says.

13 Q Do you have any basis to disagree
14 that this is an accurate general description
15 of the types of work PG&E does under Major
16 Work Category AR?

17 A No.

18 Q Are you familiar with the economic
19 principle of diminishing marginal returns or
20 the principle of -- well, let's start with
21 diminishing marginal returns?

22 A Yes.

23 Q And are you familiar with the
24 economic principle of increasing marginal
25 cost of production as the number -- as units
26 go up, there's an upward curve on costs;
27 correct?

28 A There's no such thing. Absolutely

1 not. I don't know what context you're
2 talking about. There's no such general
3 principle.

4 MS. SLOCUM: Your Honor, may I have a
5 moment off the record?

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

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

10 Ms. Slocum, proceed.

11 BY MS. SLOCUM:

12 Q Mr. Cheng, is it your understanding
13 that the number of meters PG&E still needs to
14 manually read has steadily and significantly
15 declined since the start of PG&E's smart
16 meter deployment?

17 A Yes.

18 Q Looking at PG&E's rebuttal in
19 Exhibit-93, page 6-7, lines 20 to 23.

20 A I'm there.

21 Q There PG&E recounts that back in
22 2008 at the start of its smart meter
23 deployment, it had over 9 million meters
24 needing to be manually read 12 times a year
25 at an average unit cost of \$0.84 per read.
26 Do you see that?

27 A Yes.

28 Q And then by 2017 that number -- and

1 this is at the top of page 6-8 in
2 Table 6-3 -- had fallen to about 1.9 million.
3 And as of the end of 2019, only 98.5 percent
4 of PG&E's meters are projected to be
5 electronically read through remote automated
6 data collection system instead of manually;
7 correct?

8 A I don't know where you're reading
9 after that sentence.

10 Q Let's just break it down. For 2017
11 looking at Table 6-3, that number of meters
12 and the cost per read both reflect a
13 reduction. 1.9 million meters with a
14 increase -- excuse me. An increase in
15 average unit cost of \$5.71. Do you see that?

16 A Yeah. That's what it says.

17 Q And is it your understanding that
18 as of the end of 2019 about 98.5 percent of
19 PG&E's meters are projected to be
20 electronically read?

21 A I don't know where the 98.5 percent
22 comes from if you want to point me to it.

23 Q If you look at the opening
24 testimony, PG&E's opening testimony, line 11
25 and 12 where it says:

26 More than 98 percent of
27 PG&E's meters are currently
28 read electronically through

1 an automated collection
2 system.

3 MS. GOODSON: Which page, Counsel?

4 MS. SLOCUM: 6-8. I am sorry.

5 MS. GOODSON: Thank you.

6 THE WITNESS: Okay. I believe you were
7 talking about 98.5 earlier. I'm not sure.

8 BY MS. SLOCUM:

9 Q It says more than 98 percent. If
10 you look at Table 6-1, that breaks down the
11 types of meters that -- the categories of
12 manually read meter, and it comes up to a
13 total of 154,199 as remaining by year end
14 2019. Do you see that?

15 A Yep.

16 Q So given that PG&E started at over
17 9 million meters when its -- when it was in
18 2008, and now it's come down to 154,199,
19 would you agree that that is approximately a
20 98.5 percent reduction?

21 A Subject to check, sure.

22 Q So with only about 1.5 percent of
23 all of its meters being manually read, one
24 could say that PG&E has gotten down pretty
25 close to the bottom of the barrel on
26 replacing those remaining manually read
27 meters. Wouldn't you agree?

28 A I don't know what "bottom of the

1 barrel" means. So I don't know. What does
2 bottom of the barrel mean?

3 Q The last remaining ones that
4 haven't been able to be addressed before?

5 A We can agree PG&E's replacing the
6 remaining 1.5 percent if that's how you'd
7 like to phrase it.

8 Q No. That's not how I would like to
9 phrase it, but I think I have an answer so
10 thank you.

11 So looking at PG&E's rebuttal
12 exhibit, PG&E-20 again. That's Exhibit-93,
13 at page 6-7, lines 14 to 28, PG&E explains
14 why as the number of manually read meters
15 declines, the unit costs for meter reads has
16 trended upwards year over year. Do you see
17 that?

18 A Yeah. I guess I disagree.

19 Q In addition to the changes in labor
20 escalation costs, would you agree that there
21 are also fixed overhead costs that with the
22 reduction in meters must be spread over fewer
23 meters?

24 A Possibly.

25 Q And would you also agree that the
26 fact that some meter reads are done is not
27 because they are on the monthly meter read,
28 but they might have a special read initiated

1 by a customer action such as opening an
2 account or closing an account?

3 A Yes.

4 Q And would you agree that the travel
5 time to -- for the meter reader to go the
6 distance to cover the route is another factor
7 that affects the cost remaining?

8 A No, I don't. I'll point you to
9 workpaper 6-15.

10 Q Of which workpapers?

11 A PG&E opening testimony workpapers
12 6-15.

13 Q I'm going to go through that. But
14 what I want to do is just lay a foundation.
15 Let me give you an illustrative hypothetical
16 example.

17 Suppose there's a PG&E dedicated
18 meter reader with an existing route of
19 50 meters a day in 2019. But in 2020, five
20 of those meters -- or 10 percent -- on his
21 route are converted to smart meters so that
22 45 still need manual meter reading. Do you
23 have that in mind?

24 A Sure.

25 Q The distance to cover the route
26 leaving from the service center and getting
27 to the remaining 45 meters is approximately
28 the same but just with five gaps interspersed

1 throughout the route. Do you have that in
2 mind?

3 A Sure.

4 Q So in that case, wouldn't the
5 savings only be the incremental time not to
6 stop at those five omitted meters?

7 A No. Because you can perform other
8 optimization routes.

9 Q You can change the route?

10 A Absolutely.

11 Q Okay. Have you done any studies
12 for PG&E to determine whether such changes in
13 route are feasible?

14 A Like I said, the data --

15 Q That's a yes-or-no question. Did
16 you do it? Did you perform any studies?

17 A Yes. I studied PG&E workpaper, and
18 the workpaper does not reflect that theory.
19 The data shows that theory as incorrect.

20 Q All right. Let's go through that.

21 ALJ LIRAG: Let's take a 10-minute
22 break.

23 Off the record.

24 (Off the record.)

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

27 We're back from our morning break.
28 We'll continue with the cross by Ms. Slocum.

1 MS. SLOCUM: Thank you, your Honor.

2 CROSS-EXAMINATION RESUMED

3 BY MS. SLOCUM:

4 Q Mr. Cheng, could you please confirm
5 that from your review of PG&E's opening
6 testimony, one of the reasons why some meters
7 that remain needing to be read manually is
8 because of gas and electric meter network
9 connectivity challenges?

10 A I think I remember seeing that.

11 Q Do you agree that there are network
12 connectivity challenges in general from your
13 knowledge of your work at SDG&E on remote
14 meter reading?

15 A Yes.

16 Q So earlier you had talked about
17 optimizing a route when I was talking about
18 the distances. And I'd like to just walk you
19 through something that is basically a
20 difference between PG&E and SDG&E. Now,
21 SDG&E's service territory is relatively
22 small. It's one county; correct?

23 A I think it covers more than one
24 county.

25 Q It's the smallest of all the
26 service territories of the major utilities;
27 correct?

28 A Sure.

1 Q But PG&E's is the largest of all
2 the major utilities in California; correct?

3 A Sure.

4 Q So let me give you an example of
5 network connectivity-related issues that
6 drive PG&E's per-unit cost based on distance.

7 The distance from -- take for
8 example with me the distance from service
9 center Merced to a location in Yosemite
10 National Park to read a meter that needs to
11 be manually read. Do you have that
12 hypothetical in mind?

13 A Yes.

14 Q Okay. And assume that this morning
15 according to Google Maps that's an hour and
16 45 minutes one way to get from the Merced
17 Service Center to the Yosemite National Park.
18 Would you agree to that subject to check?

19 A Sure.

20 Q Okay. Let's say that there are
21 five meters in Yosemite National Park, and
22 one of them becomes capable of being read
23 remotely, but the others don't. PG&E still
24 has to send someone from Merced to Yosemite
25 National Park regardless of what route that's
26 in. Someone has to cover that mileage;
27 correct?

28 A Sure.

1 Q And take for example the service
2 center in Auburn. The distance there that a
3 manual meter reader needs to go to the Sugar
4 Bowl Ski Resort in Soda Springs is about an
5 hour away. And regardless of how you might
6 change routes, someone from PG&E has to go
7 from that service center in Auburn to that
8 Sugar Bowl Ski Resort to manually read that
9 meter that either has network connectivity
10 problems or opted out of smart meters or some
11 other reason why it's manual?

12 A Someone has to read it. I don't
13 know if it needs to be from that service
14 center. But sure. Someone has to read it.

15 Q All right. Would you agree that
16 the situations where there are constraints on
17 network coverage that prevent a smart meter
18 from being used at a particular location and
19 require the meter to be manually read can be
20 in mountainous areas or in remote
21 agricultural fields due to constraints on the
22 network? In other words, as remote
23 locations?

24 A Yes. In fact I think in general
25 those -- a lot of those meters are clustered
26 together. Because they're in the same
27 regional geographic area. Mountainous areas
28 for example, a lot of meters have a problem

1 with signal.

2 Q Right. But did you do any
3 independent study to locate where the meters
4 are to see that they're clustered together?

5 A No. I'm saying that's a theory
6 that I've heard.

7 Q So how did you account for the fact
8 that every month those meters in Yosemite
9 National Park and at Sugar Bowl Ski Resort
10 have to be read and the distance stays the
11 same to get to them?

12 A So the hypothetical as you pose --

13 Q Actually, those are not
14 hypotheticals. Those are real meters.

15 A You said they're hypotheticals.

16 Q Okay. You're correct.

17 A The hypotheticals you pose are all
18 using examples of one meter or five meters.
19 That's why in theory that sounds nice. But
20 in reality, when you're reading -- when you
21 have millions of meter reads, they don't come
22 out. That's why the data doesn't support
23 that theory.

24 Q Well, it's not a theory that
25 someone has to go to those locations.

26 A I'm talking about the theory of
27 decreasing costs. That's the theory I'm
28 talking about.

1 ALJ LIRAG: Let's limit it to
2 question-and-answer type of discussion.

3 BY MS. SLOCUM:

4 Q Well, you can't optimize away the
5 fact that someone has to go from the service
6 center in Merced to Yosemite National Park,
7 can you?

8 A Like I said, I don't know which
9 service center they'd go from. But someone
10 has to read it.

11 MS. SLOCUM: Thank you, Your Honor.
12 Those are all my questions.

13 ALJ LIRAG: Any redirect, Ms. Goodson?

14 MS. GOODSON: Yes, your Honor.

15 REDIRECT EXAMINATION

16 BY MS. GOODSON:

17 Q Mr. Cheng, do you recall Ms. Slocum
18 asking you questions about labor escalation?

19 A Yes.

20 Q And you testified that you did not
21 account for labor escalation in your
22 recommendation; is that right?

23 A That's correct.

24 Q Do you believe that labor
25 escalation should be accounted for in the
26 2020 forecast?

27 A Yes, I do.

28 Q And how would you implement that?

1 A I think it would be reasonable to
2 adjust our recommendation based on that fact
3 and to implement -- to account for labor
4 escalation what I would do is I would take
5 the \$28.7 million of recorded in 2017 that
6 PG&E pointed to earlier -- if I can find the
7 page. Hold on a second.

8 In page 6-11 of the direct
9 testimony, I think it would be reasonable to
10 take that \$28.7 million, which led to a \$2.8
11 million escalation, and take a ratio for the
12 2017 recorded portion meter reading, which is
13 \$12 million. Which would result in
14 approximately \$1.1 million of labor
15 escalation, which would result in calculating
16 it a recommendation of \$1 million reduction
17 instead of a \$2.1 million reduction.

18 Q Thank you. And, Mr. Cheng, do you
19 recall Ms. Slocum's most recent line of
20 questions about reading -- about the costs of
21 reading -- manually reading meters and how
22 those costs change as the number of meters
23 declines?

24 A Yes.

25 Q And you said in response to her
26 questions that while you agree that meters
27 that continue to require manual meter reading
28 do need to be read, you disagree with PG&E's

1 theory that the marginal cost of reading
2 remaining manual meter reads as the volume
3 goes down will always increase. Do you
4 remember that?

5 A Yes.

6 Q And why is that your response,
7 Mr. Cheng? Can you explain that?

8 A Sure. If you take a look at PG&E's
9 workpaper, direct testimony workpaper 6-15,
10 the data is very evident that that theory
11 does not hold true. If you look at from 2014
12 to 2015, the number of regular meter reads
13 decreased by 15 percent.

14 Now, based on PG&E's theory, you
15 would expect that the average cause per
16 regular read would increase. In fact if you
17 look at the data, the unit cost of the
18 regular read actually decreased from \$4.22 to
19 \$4.04.

20 Q And is that line 14 on that
21 workpaper?

22 A Yes. It's on line 14. Actually it
23 happened again from 2016 to 2017 when the
24 total regular reads decreased by 22 percent.
25 The average unit cost actually decreased
26 again. And so PG&E's theory that average
27 unit costs goes up because the meter reads
28 are decreasing does not hold true as evident

1 in their own workpapers showing that has four
2 years of recorded data. Out of the four
3 years, two years does not comport with that
4 theory.

5 Q Thank you, Mr. Cheng.

6 ALJ LIRAG: Any questions off the
7 redirect, Ms. Slocum?

8 All right. Let's go off the record.
9 (Off the record.)

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

12 Ms. Slocum, any --

13 RE CROSS-EXAMINATION

14 BY MS. SLOCUM:

15 Q Yes. Mr. Cheng, looking at that
16 same Table 6-5 that you just referenced.

17 A Yes, I'm there.

18 Q If you look at the entire string of
19 numbers going from 2014 to 2020, we see that
20 even though there was a slight decrease
21 between 2014 and 2015, there were increases
22 shown for each of the years after 2017;
23 correct?

24 A After 2017 those are forecasted
25 numbers, and PG&E doesn't have a good basis
26 for those forecasted numbers. So I'm not
27 counting their forecasted number.

28 Q So there's -- okay. So you're only

1 counting through 2017?

2 A I'm using four years of the
3 recorded costs.

4 Q And I believe when you responded
5 earlier in 2008 the cost was .84 -- well,
6 \$0.84 for the 9 million meters. And then I
7 believe you answered earlier about the 2014
8 figure being \$4.22. Do you see that the
9 actual cost in 2016 was \$5.74 in that table?

10 A Sure.

11 Q So that's an upward trend from the
12 start of the rollout of smart meters in terms
13 of the unit cost to read?

14 A Incorrect. When you're trying to
15 forecast or isolate a factor in determining
16 per-unit cost for example, you want to use
17 data that's as close as possible to isolate
18 other factors. Like you talked about
19 earlier, Over a range of nine years, a lot of
20 factors going to the cost of -- the total
21 cost of the program.

22 But when you look at year-by-year
23 data, that's when you can isolate the factors
24 and try to focus on what changed from one
25 year to the next. And so it's more
26 reasonable to look at years that are closer
27 together than to look at years nine years
28 apart to create a trend.

1 Q What do you think changes from one
2 year to the next?

3 A A lot of factors could change from
4 nine years.

5 Q Could you tell me -- in your
6 analysis, you're telling me that this theory
7 is incorrect. That these forecast numbers
8 for 2018, 2019, and 2020 are incorrect. And
9 I'm asking you which -- what factors do you
10 see that would change the \$5.71 in 2017?

11 MS. GOODSON: Objection, your Honor.
12 Ms. Slocum is asking Mr. Cheng to speculate
13 about things that relate to PG&E's operations
14 that go beyond the information presented in
15 PG&E's testimony and workpapers.

16 If he has a response, I don't want
17 to cut him off. But I believe this is going
18 beyond the scope of appropriate re-cross.

19 ALJ LIRAG: Do you have a response,
20 Mr. Cheng?

21 THE WITNESS: I can explain why I
22 stated earlier PG&E's forecasting is flawed.
23 BY MS. SLOCUM:

24 Q That's not what the question was.
25 Okay. My question was about you and you're
26 saying that you disagree with our numbers.

27 A No, I didn't. I disagree with the
28 forecasting numbers, which I wanted to

1 explain why I disagreed, and you said you
2 don't want to hear it.

3 Q No. No. No. That's not what I'm
4 getting at. I'm getting at the actual
5 numbers, okay, and what happened on the trend
6 of the actual numbers.

7 Did you investigate what the causes
8 would be for that upward trend since 2008 to
9 2017?

10 A I am saying that --

11 Q I'm asking did you investigate it?

12 A Did I investigate what?

13 Q You said there could be many
14 causes, and you didn't want to answer what
15 those causes are. So I'm going to ask you
16 more generally. Did you investigate what
17 kind of causes --

18 A I have general knowledge, yes.

19 Q Did you investigate for PG&E's
20 numbers --

21 A I have a general knowledge of the
22 subject matter.

23 ALJ LIRAG: So let's just say the
24 answer is no.

25 MS. SLOCUM: Thank you, your Honor.
26 Those are all of my questions.

27 ALJ LIRAG: Just one question on the
28 time-of-use proposal by TURN.

1 Based on your review of PG&E's
2 proposed costs, the objection is -- well, let
3 me backtrack a little bit.

4 For the proposed costs regarding the
5 time-of-use transitioning that PG&E's
6 proposing, where are the bulk of the costs
7 at? Are they IT related? Labor related?
8 Education?

9 MS. SLOCUM: Excuse me, your Honor.
10 May I just clarify? When you say
11 "time-of-use," I'm not sure I'm understanding
12 how that relates to the metering issues.

13 ALJ LIRAG: This is not about the
14 metering. This is about Mr. Cheng's prepared
15 testimony.

16 MS. SLOCUM: Well, that is subject to a
17 stipulation.

18 ALJ LIRAG: Well, I'm asking him
19 questions.

20 MS. SLOCUM: All right.

21 EXAMINATION

22 BY ALJ LIRAG:

23 Q All right. So the bulk of the
24 costs for the time-of-use transitioning, is
25 it more related to labor, IT, or something
26 else like perhaps education?

27 A So keep in mind the transition that
28 we're talking about is only a transition of

1 the time period. They're not being
2 transitioned to a different rate.

3 Q Correct.

4 A So IT-wise that's a very simple
5 implementation. And so the bulk of the cost
6 is for outreach and education.

7 ALJ LIRAG: All right. Any questions
8 off that, Ms. Slocum?

9 MS. SLOCUM: Yes, your Honor.

10 EXAMINATION

11 BY MS. SLOCUM:

12 Q Mr. Cheng, when a nonresidential
13 customer's time-of-use period changes, there
14 has to be communication with that customer to
15 tell them what the new hours for the peak
16 period are so that they can avoid the high
17 cost period; is that correct?

18 A Yes. That's why I said outreach
19 and education.

20 Q And do you have any basis for
21 determining that there's no IT costs in
22 making a structural change to the billing
23 system?

24 ALJ LIRAG: Counsel, the question was
25 where were the bulk of the costs. Not all
26 the costs. So he acknowledged that there are
27 IT costs.

28 MS. SLOCUM: Thank you.

1 ALJ LIRAG: Does that help?

2 BY MS. SLOCUM:

3 Q Yes. Mr. Cheng, did you
4 investigate the specific IT costs for
5 changing the billing system to reflect the
6 structural change to put new hours into the
7 rate, which is different than a value change
8 just putting different values in the same TOU
9 period structure?

10 A Based on my background as a
11 computer scientist and my many years in the
12 IT field, yes. I'm comfortable that my
13 assessment would be correct.

14 Q I asked you did you investigate for
15 PG&E's billing system whether that is true?

16 MS. GOODSON: Objection, your Honor. I
17 just want to make clear for you what
18 Ms. Slocum tried to communicate before. TURN
19 no longer intends to advocate the
20 recommendations on this issue in TURN's
21 testimony in our brief because of the
22 stipulation we have with PG&E, which
23 addresses the cost for that chapter.

24 So I just want to be clear. I
25 certainly want Mr. Cheng to answer any
26 questions that you have. And I understand
27 the record will help you evaluate the
28 stipulations. I just wanted to be clear

1 before we go down this path.

2 ALJ LIRAG: Right. Thank you for the
3 clarification. And I was asking to determine
4 where the costs were. So regardless of
5 whether two parties have some sort of
6 agreement, it doesn't mean the Commission
7 will just agree to that even though no one
8 else is opposing that proposal.

9 We have the right to investigate and
10 review all the proposed costs whether or not
11 it's opposed or unopposed. That's just for
12 clarification.

13 Ms. Slocum, any more questions?

14 MS. SLOCUM: No, your Honor.

15 ALJ LIRAG: All right. Thank you,
16 Mr. Cheng. You're not off yet.

17 A move to admit Exhibit-177?

18 MS. GOODSON: Yes, your Honor.

19 ALJ LIRAG: Any objections?

20 (No response.)

21 ALJ LIRAG: Hearing none, 177 is
22 received into the record.

23 (Exhibit No. 177 was received into
24 evidence.)

25 ALJ LIRAG: Thank you, Mr. Cheng.
26 You're excused.

27 THE WITNESS: Thank you, your Honor.

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

1 (Off the record.)

2 ALJ LIRAG: Let's go back on the
3 record. Let's identify exhibits. These are
4 for witnesses where cross had been waived.

5 The first is Exhibit-178. And this
6 Is the Testimony of Mina Botros and
7 Ms. Pui-Wa Li on Safety and Risk and
8 Integrated Planning. So that's Exhibit-178.

9 (Exhibit No. 178 was marked for
10 identification.)

11 ALJ LIRAG: Exhibit-179 are The
12 Workpaper to the Testimony of Ms. Li and
13 Ms. Botros.

14 (Exhibit No. 179 was marked for
15 identification.)

16 ALJ LIRAG: I may get the gender wrong,
17 Ms. Shek. So my apologies for that.

18 MS. SHEK: Thank you.

19 ALJ LIRAG: Exhibit-180. This is The
20 Direct Testimony of Thomas Renaghan on Cost
21 Escalation.

22 (Exhibit No. 180 was marked for
23 identification.)

24 ALJ LIRAG: Exhibit-181 is The
25 Testimony of Mr. Dao Phan on Gas Distribution
26 Expenses.

27 (Exhibit No. 181 was marked for
28 identification.)

///
28

1 ALJ LIRAG: Exhibit-182 is The
2 Workpapers to the Testimony of Mr. Phan.

3 (Exhibit No. 182 was marked for
4 identification.)

5 ALJ LIRAG: And Exhibit-183 is The
6 Direct Testimony of a Tamera Godfrey on the
7 Electric Distribution Expenses.

8 (Exhibit No. 183 was marked for
9 identification.)

10 ALJ LIRAG: Exhibit-184 is The
11 Workpapers to Ms. Godfrey's Testimony.

12 (Exhibit No. 184 was marked for
13 identification.)

14 ALJ LIRAG: Exhibit-185 is The Direct
15 Testimony of Mr. Tom Roberts on Electric
16 Distribution Capital Part 1 and DER.

17 (Exhibit No. 185 was marked for
18 identification.)

19 ALJ LIRAG: Exhibit-186 is The
20 Workpapers to the Testimony of Mr. Roberts on
21 Part 1.

22 (Exhibit No. 186 was marked for
23 identification.)

24 ALJ LIRAG: Exhibit-187 is The
25 Workpapers -- let me backtrack.

26 So 186 is The Workpapers Book 1 of
27 2.

28 Exhibit-187 is the workpapers of

1 Mr. Roberts Book 2 of 2.

2 (Exhibit No. 187 was marked for
3 identification.)

4 ALJ LIRAG: Next is Exhibit-188. This
5 is The Direct Testimony of Mariana Campbell
6 on Energy Supply Part 1.

7 (Exhibit No. 188 was marked for
8 identification.)

9 ALJ LIRAG: Exhibit-189 is the
10 Workpapers of Ms. Campbell on Energy Supply
11 Part 1.

12 (Exhibit No. 189 was marked for
13 identification.)

14 ALJ LIRAG: Exhibit-190 is the
15 testimony of Mr. Scott Logan on Energy
16 Supply. This is part 2.

17 (Exhibit No. 190 was marked for
18 identification.)

19 ALJ LIRAG: Exhibit-191 is The
20 Workpapers of Mr. Logan's Testimony on Energy
21 Supply Part 2 of 2.

22 (Exhibit No. 191 was marked for
23 identification.)

24 ALJ LIRAG: Next is Exhibit-192. This
25 is The Direct Testimony of Mark Waterworth on
26 Shared Services.

27 (Exhibit No. 192 was marked for
28 identification.)

///
28

1 ALJ LIRAG: Exhibit-193 is The
2 Workpapers of Mr. Waterworth's Testimony.

3 (Exhibit No. 193 was marked for
4 identification.)

5 ALJ LIRAG: Exhibit-194 is The Direct
6 Testimony of Yakov Lasko on IT and
7 Cybersecurity.

8 (Exhibit No. 194 was marked for
9 identification.)

10 ALJ LIRAG: Exhibit-195 is The
11 Workpapers to the Testimony of Mr. Lasko.

12 (Exhibit No. 195 was marked for
13 identification.)

14 ALJ LIRAG: Exhibit 196 is The Direct
15 Testimony of Stacy Hunter on Human Resources.
16 This is a public version.

17 (Exhibit No. 196 was marked for
18 identification.)

19 ALJ LIRAG: Exhibit 196-C is The
20 Confidential Version of Ms. Hunter's
21 Testimony.

22 Ms. Shek, can you explain about the
23 confidential nature of Exhibit 196-C, which
24 we just identified?

25 MS. SHEK: It relates to information
26 mostly likely due to employment salaries and
27 information on individuals.

28 ALJ LIRAG: So it's PG&E that marked

1 the information that's --

2 MS. SHEK: Yes.

3 ALJ LIRAG: -- confidential as
4 confidential?

5 MS. SHEK: Yes.

6 ALJ LIRAG: Is that correct, Ms.
7 Gandesbery?

8 MS. GANDESBERY: Yes. To my
9 understanding.

10 ALJ LIRAG: So we'll just accept that,
11 and we'll -- I think we've granted
12 confidential treatment to that information on
13 PG&E's side. And so we'll accept the
14 confidential nature of the information that
15 is in Exhibit 196-C.

16 (Exhibit No. 196-C was marked for
17 identification.)

18 ALJ LIRAG: Next is Exhibit-197 is The
19 Workpapers of Ms. Hunter.

20 (Exhibit No. 197 was marked for
21 identification.)

22 ALJ LIRAG: Next is the Exhibit-198.
23 This is The Direct Testimony of Lindsay
24 Laserson on AMG.

25 (Exhibit No. 198 was marked for
26 identification.)

27 ALJ LIRAG: Exhibit-199 is The
28 Workpapers on Ms. Laserson.

1 (Exhibit No. 199 was marked for
2 identification.)

3 ALJ LIRAG: And then Exhibit-200 is The
4 Joint Testimony of Sophie Chia and Joyce Lee
5 on Financial Examination. So that's
6 Exhibit-200.

7 (Exhibit No. 200 was marked for
8 identification.)

9 ALJ LIRAG: So, Ms. Shek, a move to
10 admit Exhibits 178 through 200 including
11 196-C, which is the confidential version of
12 196?

13 MS. SHEK: Yes, your Honor.

14 ALJ LIRAG: Any objections?

15 MS. GANDESBERY: No, Your Honor.

16 ALJ LIRAG: Hearing none, Exhibits 178
17 through 196 are admitted into the record.

18 (Exhibit Nos. 178-196 were received
19 into evidence.)

20 ALJ LIRAG: 196-C is also admitted.

21 (Exhibit No. 196-C was received
22 into evidence.)

23 ALJ LIRAG: As well as 197 through 200.

24 (Exhibit Nos. 197-200 were received
25 into evidence.)

26 ALJ LIRAG: Off the record.

27 (Off the record.)

28 ALJ LIRAG: Let's go back on the

1 record.

2 Let's identify several more
3 exhibits. Exhibit-201 is a cross-exhibit for
4 Ms. Dao Phan. And this is Cal PA's Response
5 to Data Request PG&E Pub Advocates-029.

6 (Exhibit No. 201 was marked for
7 identification.)

8 ALJ LIRAG: Next is Exhibit-202. This
9 is PG&E's Response to Data Request of Cal PA
10 No. 052, Question 2.

11 (Exhibit No. 202 was marked for
12 identification.)

13 ALJ LIRAG: Ms. Gandesbery, a move to
14 admit Exhibits 201 and 202 into the record?

15 MS. GANDESBERY: Yes, Your Honor.

16 ALJ LIRAG: Any objections?

17 MS. SHEK: No, your Honor:

18 ALJ LIRAG: Hearing none, Exhibits 201
19 and 202 are received into the record.

20 (Exhibit No. 201 was received into
21 evidence.)

22 (Exhibit No. 202 was received into
23 evidence.)

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

25 (Off the record.)

26 ALJ LIRAG: Let's go back on the record
27 and we'll identify more exhibits.

28 First we'll identify Exhibit-203.
This is PG&E's Response to TURN Data Request

1 94-1.

2 (Exhibit No. 203 was marked for
3 identification.)

4 ALJ LIRAG: Next is Exhibit-204. This
5 is The Prepared Testimony of William Marcus.

6 (Exhibit No. 204 was marked for
7 identification.)

8 ALJ LIRAG: And then, Ms. Goodson, can
9 you explain about the next document that
10 we'll identify as 204-C, the confidential
11 version of Mr. Marcus's testimony?

12 MS. GOODSON: Yes, your Honor.
13 Exhibit 204-C includes information related to
14 PG&E's energy supply testimony that PG&E
15 provided to TURN subject to our nondisclosure
16 agreement. And PG&E has marked certain
17 information as confidential. So pursuant to
18 our NDA, TURN is treating it as confidential.

19 ALJ LIRAG: I believe we have already
20 discussed that that information is
21 confidential. So I'll accept the
22 confidential nature of Exhibit 204-C.

23 (Exhibit No. 204-C was marked for
24 identification.)

25 ALJ LIRAG: Next is Exhibit-205. It's
26 the Attachments to the Testimony of
27 Mr. Marcus.

28 ///

1 (Exhibit No. 205 was marked for
2 identification.)

3 ALJ LIRAG: Next is Exhibit 206-C.

4 This is one confidential attachment of
5 Mr. Marcus's testimony.

6 Ms. Goodson, explanation regarding
7 the confidential nature of this document?

8 MS. GOODSON: Yes. This is a document
9 that was provided by PG&E to TURN relating to
10 PG&E's energy supply testimony. Once again
11 PG&E deemed certain information confidential.
12 And pursuant to our nondisclosure agreement,
13 TURN is treating it as such.

14 ALJ LIRAG: All right. The same nature
15 as Exhibit 204-C. We've already discussed
16 the information is confidential. And so we
17 accept the confidential nature of
18 Exhibit 206-C or the information contained in
19 Exhibit 206-C.

20 (Exhibit No. 206-C was marked for
21 identification.)

22 ALJ LIRAG: A move to admit
23 Exhibits 203, 204, 204-C, 205, and 206-C
24 into the record, Ms. Goodson?

25 MS. GOODSON: Yes, please, your Honor.

26 ALJ LIRAG: Any objections?

27 MS. GANDESBERRY: No objection.

28 ALJ LIRAG: Hearing none, Exhibit 203,

1 204, 204-C, 205, and 206-C are received into
2 the record.

3 (Exhibit No. 203 was received into
4 evidence.)

5 (Exhibit No. 204 was received into
6 evidence.)

7 (Exhibit No. 204-C was received into
8 evidence.)

9 (Exhibit No. 205 was received into
10 evidence.)

11 (Exhibit No. 206-C was received into
12 evidence.)

13

14 ALJ LIRAG: I believe that concludes
15 today's hearing. Let's tackle more exhibits
16 the following day or whenever there's a good
17 time to do so.

18 Tomorrow we'll continue with
19 Mr. Lowe, Mr. Sugar, and Mr. Lambert. So we
20 are adjourned until tomorrow at 9:30.

21 Thank you, everyone.

22 Off the record.

23 (Off the record.)

24 (Whereupon, at the hour of 11:21
25 a.m. this matter having been continued
26 to 9:30 October 15, 2019 at
27 San Francisco, California, the
28 Commission then adjourned.)

* * * * *

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, JASON STACEY, CERTIFIED SHORTHAND REPORTER
NO. 14092, IN AND FOR THE STATE OF CALIFORNIA DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON OCTOBER 14, 2019.

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

EXECUTED THIS OCTOBER 18, 2019.

A handwritten signature in black ink, appearing to read 'JAS STACEY', written over a horizontal line.

JASON A. STACEY
CSR NO. 14092

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