

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
SEPTEMBER 25, 2019 - 9:40 A.M.

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ADMINISTRATIVE LAW JUDGE LIRAG: Let's go on the record. Good morning, everyone. This is day three of our 20 days of hearing. Today we'll have two panels. This will probably be a short day. There won't be any lunch break. If we need to go a little bit past noon, then we'll do so.

We'll have the first panel, which is Mr. Kerans and Mr. Abranches, then followed by Mr. Abranches, I guess, who will remain there, and then we'll have Dan Menegus as part of our second panel, and then cross-examination by I think it's just Mr. Long, and then let's discuss after that. It looks like we might end a little earlier.

If there's still time, we can address some of PG&E's -- probably PG&E's exhibits where there are no cross, but that's assuming we have time. Then we'll discuss -- towards the end of today's hearing, we'll discuss the schedule for Thursday and for Friday.

But first let's have both of you

1 gentlemen raise your right hand.

2 ANDREW ABRANCHES, called as a
3 witness by Pacific Gas & Electric
4 Company, having been sworn, testified
as follows:

5 MICHAEL KERANS, called as a witness
6 by Pacific Gas & Electric Company,
7 having been sworn, testified as
follows:

8 WITNESS ABRANCHES: I do.

9 WITNESS KERANS: I do.

10 ALJ LIRAG: I assume you have the same
11 first names as was already recorded.

12 WITNESS ABRANCHES: Yes.

13 WITNESS KERANS: Yes.

14 Q So it's Andrew Abranches and
15 Michael Kerans. Same business addresses as
16 you provided before?

17 WITNESS ABRANCHES: Correct.

18 WITNESS KERANS: Correct.

19 ALJ LIRAG: Let's get to the exhibits.

20 These are cross exhibits. I will ask
21 Mr. Long who it's directed to, so I assume
22 this is directed towards the topic and
23 towards the panel. And then you may ask
24 specific questions to each one or you can
25 just direct it to both of them. If you want
26 a specific witness to answer, please direct
27 the question to that witness.

28 So first is Exhibit 43. This is

1 TURN's cross-examination exhibit concerning
2 the Cross Bore Comparisons of Imputed
3 Authorized Units and Cost with Recorded
4 Results for 2017 and 2018, so that's 43.

5 (Exhibit No. 43 was marked for
6 identification.)

7 ALJ LIRAG: Exhibit 44 is PG&E's
8 Response to TURN Data Request 87-1,
9 Revision 1, and it has a redacted attachment.
10 Exhibit 45 is PG&E's Response to TURN Data
11 Request 87-5. And then Exhibit 46 is a --

12 Is this an excerpt, Mr. Long?

13 MR. LONG: This Number 46 is a document
14 that I took off of the San Francisco Public
15 Utilities Commission website. It's an agenda
16 packet and includes the agreements that are
17 identified in the title on the cover page.

18 ALJ LIRAG: It's an agenda from the
19 Commission's website dated for the 6-28-2019
20 meeting.

21 MR. LONG: And that would be the San
22 Francisco Public Utilities Commission
23 Website.

24 ALJ LIRAG: Thank you for the
25 clarification. That is Exhibit 46.

26 (Exhibit No. 44 was marked for
27 identification.)

28 (Exhibit No. 45 was marked for
identification.)

1 (Exhibit No. 46 was marked for
2 identification.)

3 ALJ LIRAG: Let's proceed with the
4 Direct Examination. I think Mr. Ouborg is
5 ready.

6 MR. OUBORG: Thank you, your Honor.
7 Before we do that, can we take up the
8 suitability of even using Exhibit 43 at all
9 for cross-examination? Our position is that
10 it shouldn't even be used as a cross exhibit
11 because it's a workpaper created by TURN.
12 It's not in their workpapers, our witness
13 didn't prepare it, there's no foundation for
14 the document.

15 MR. LONG: Your Honor, if I could speak
16 to that. The numbers on this workpaper are
17 taken directly from PG&E's testimony and the
18 footnotes are provided so that the numbers in
19 the second column, third column, and the
20 fourth column --

21 ALJ LIRAG: All right.

22 MR. LONG: -- are all from PG&E's
23 numbers or they are calculated from them
24 using normal arithmetic calculations.

25 ALJ LIRAG: Do you object to the
26 calculation? Is that the objection?

27 MR. OUBORG: We don't object to the
28 calculations. But, again, it's presentation

1 of facts in a certain way for a certain
2 purpose that we've had no opportunity -- I
3 don't know who's even sponsoring these
4 calculations.

5 In particular, the last column, your
6 Honor, while those are arithmetically correct
7 numbers, we have no idea what they mean and I
8 just think that without the chance for us to
9 have seen this before, perhaps asked about
10 it, perhaps rebutted it in our rebuttal, this
11 doesn't come from their witness' testimony.
12 It seems inappropriate to enter this in the
13 record without a sponsor of any kind.

14 ALJ LIRAG: All right. Let's do a
15 couple of more exchanges. Would it help if
16 the heading was changed to say this is an
17 excerpt from testimony except for the last
18 column, which will be explained how it was
19 derived, so maybe the document --

20 MR. OUBORG: And, your Honor, who would
21 explain -- who -- is Mr. Long the witness on
22 the last column to explain what it's about?

23 ALJ LIRAG: All right.

24 Mr. Long?

25 MR. LONG: Your Honor, if I could speak
26 to the objection. As I was preparing my
27 cross, I realized that there are a lot of
28 numbers that relate to the issue we're going

1 to talk about.

2 ALJ LIRAG: Okay.

3 MR. LONG: And I thought, well, I could
4 ask a question, I could ask the question for
5 the row that's units and the first number,
6 and I could ask him that question and that
7 could be a number on the record.

8 ALJ LIRAG: Right.

9 MR. LONG: And then I could ask him the
10 number below that and that could be a number
11 on the record.

12 ALJ LIRAG: Okay.

13 MR. LONG: And I could ask him to do
14 the division.

15 ALJ LIRAG: Correct.

16 MR. LONG: And that would be the third
17 number there or we could have it in my handy
18 reference place so that everybody could
19 follow along better.

20 So the purpose of this is to make
21 the cross-examination a little bit easier to
22 understand for everybody involved and to put
23 the numbers that I was going to ask about in
24 one place so that we could all see them and
25 have them as a reference.

26 And then the last column that
27 Mr. Ouborg is speaking to is arithmetic
28 operations. It's just a matter of

1 subtraction and division. And we can -- I
2 can ask the witness if he agrees that that's
3 what those numbers are, and --

4 ALJ LIRAG: So I understand that these
5 are questions that you can directly ask and
6 this table helps as a sort of guide, but
7 isn't it better to have it as sort of a
8 reference exhibit rather than a full exhibit,
9 if I may call it that, which is not sponsored
10 by any witness because there's -- I
11 understand Mr. Ouborg's point that most of it
12 is lifted from someone's testimony.

13 But then there's this last column
14 wherein it's not lifted from their testimony.
15 This is more TURN's testimony. But then
16 since no witness is sponsored -- is
17 sponsoring it, they can't be process to how
18 these numbers were derived. But I believe
19 you can ask based on these numbers and then
20 we'll get to the same thing.

21 So I would prefer using this as a
22 reference document. We, the Commission, will
23 keep it just so we have it and so we don't
24 have to -- I understand the ease of not
25 having to forge through the records to try
26 and find this exact number. This way it's --
27 I mean it's already identified. If it's
28 denied, it's easily available to us and we

1 can reference it once we get to that part,
2 perhaps in your briefs where you're arguing
3 about it.

4 MR. LONG: I'm fine with that
5 arrangement, your Honor, thank you.

6 ALJ LIRAG: All right.

7 Is that fair enough?

8 MR. OUBORG: So just so I understand
9 what a reference exhibit is, your Honor, that
10 would then not be in the record?

11 ALJ LIRAG: Not be in the record. So
12 it can't be cited as for factual purposes.
13 But if it's in the transcript, there's also a
14 way to cite to the transcript, this is what
15 was said, this was the question, and this was
16 how the witness answered.

17 So it's up to Mr. Long to find a way
18 to put this in briefs that that is the
19 purpose. So it will depend, I guess, on how
20 the question and answer progresses.

21 MR. OUBORG: Okay, your Honor, thank
22 you.

23 ALJ LIRAG: All right. So having dealt
24 with that, let's go off the record for a
25 little bit.

26 (Off the record.)

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

1 Mr. Ouborg.

2 MR. OUBORG: Thank you, your Honor.

3 DIRECT EXAMINATION

4 BY MR. OUBORG:

5 Q Good morning, Mr. Kerans.

6 WITNESS KERANS: Good morning.

7 Q Previously when you testified, I
8 believe it was yesterday, we identified all
9 the testimony and exhibits that you were
10 sponsoring. Does that body of testimony
11 include testimony on deferred work that would
12 be the subject of today's panel?

13 A Yes, it does.

14 Q And yesterday you answered that
15 there were no corrections, no further
16 corrections to that testimony.

17 Is that still true today?

18 A That's still true today.

19 Q Thank you.

20 Mr. Abranches, good morning.

21 WITNESS ABRANCHES: Good morning.

22 Q Yesterday, Monday, I believe we
23 identified all the exhibits and workpapers
24 that you've adopted in this proceeding. Does
25 that testimony include the testimony on
26 deferred work that in your understanding will
27 be the subject of today's cross?

28 A It does.

1 Q And on Monday you answered that you
2 had no additional corrections or changes to
3 that testimony. Is that still correct?

4 A That is still correct.

5 Q Thank you.

6 Your Honor, Mr. Kerans and
7 Mr. Abranches are available for
8 cross-examination.

9 ALJ LIRAG: All right. Just to
10 clarify, we already had testimony and cross
11 regarding the cross bore program. Is there a
12 specific topic in the cross bore program that
13 we're concentrating on for today?

14 MR. OUBORG: Yes, your Honor. Cross
15 bore has its own issues related to number of
16 units, PG&E's forecast, and the total ask.
17 In addition, TURN identified cross bore as a
18 program that had deferred work under the 2017
19 settlement.

20 With respect to SCADA, which is the
21 next panel, the same thing, the topic would
22 be the portion of the SCADA testimony that
23 TURN identified as deferred work.

24 ALJ LIRAG: So we're focusing on the
25 deferred work aspect of these topics,
26 Mr. Long?

27 MR. LONG: That's correct, your Honor.

28 ALJ LIRAG: All right. Just so we can

1 determine beforehand what we're going to
2 discuss. With that, let's proceed with the
3 cross exam by Mr. Long.

4 CROSS-EXAMINATION

5 BY MR. LONG:

6 Q Good morning, gentlemen.

7 WITNESS KERANS: Good morning.

8 WITNESS ABRANCHES: Good morning.

9 Q This panel is about cross bore. As
10 we just discussed, the focus of this panel is
11 about deferred work issues. So I want to
12 begin with the work that PG&E was authorized
13 to do under the cross bore program in the
14 last GRC.

15 To help us with that, I would like
16 you to look at what's been marked as
17 Exhibit 43. It's the reference document that
18 we were just talking about, the judge was
19 just talking about. The first three words in
20 the title page are "Cross Bore Comparison."

21 Do you have that in front of you?

22 WITNESS KERANS: Was it this one that
23 was...

24 Q No, actually. I'm sorry. I think
25 I -- it's a different document. It's
26 actually the one we were just talking about.

27 WITNESS KERANS: Oh, the table.

28 WITNESS ABRANCHES: Yeah, this one.

1 Q Yes.

2 ALJ LIRAG: So right now it's still
3 Exhibit 43. And to clarify, it's only been
4 identified. Whether or not it's admitted
5 based on discussions will be considered once
6 we get into whether these documents, these
7 exhibits, will be admitted.

8 Right now I think we can still refer
9 to this as Exhibit 43 for reference purposes,
10 unless we want to address the admissibility
11 of it now to settle the issue. I think when
12 you look at the record you can see already.
13 What is your preference?

14 I'll direct that to Mr. Ouborg since
15 he's objecting to this.

16 MR. OUBORG: My preference, your Honor,
17 is for the reasons I stated earlier, mainly
18 that it is a workpaper without a sponsor that
19 we have not seen before, that it simply be a
20 reference exhibit for purposes of the cross,
21 and that any points that Mr. Long would like
22 to make regarding this exhibit be made
23 through his cross-examination.

24 The record would then reflect the
25 witness' testimony in response to his
26 questions, but the exhibit itself would not
27 be included.

28 ALJ LIRAG: All right. So there's only

1 one page and there's no need to get into the
2 full cross to determine what is included in
3 the document, plus we had a fairly lengthy
4 discussion about it and so I won't ask
5 Mr. Long whether he wants to move this into
6 the record. I'll simply deny admission of
7 this exhibit, 43. So Exhibit 43 is denied.
8 Instead, we'll use it as a reference exhibit.

9 MR. LONG: I will proceed to ask some
10 questions based on Exhibit 43 with that
11 understanding.

12 ALJ LIRAG: All right.

13 BY MR. LONG:

14 Q So the first number I want to make
15 sure we're clear on in the record is the
16 number of units of cross bore inspections
17 that were authorized to be done in 2017
18 through 2019. The number on this reference
19 is 123,307.

20 Is that the correct number?

21 WITNESS KERANS: Yes, that's the
22 correct number.

23 Q I do have a question about that.
24 To ask this question, I first want to ask you
25 to turn to another reference document.
26 Again, this one has not been marked for
27 identification but it is an excerpt from
28 PG&E's testimony in the 2017 GRC, page 4-28.

1 Do you have that in front of you?

2 WITNESS KERANS: Yes, I have it in
3 front of me.

4 Q Okay. And since this will not go
5 into the record, I'm going to just read lines
6 10 through 15. There's a heading Cross Bore
7 Program. And then after that it reads:

8 The cross bore program will
9 increase the annual number of
10 inspections to identify and
11 resolve cross bores from 33,570
12 inspections in 2014 to 45,000
13 inspections in 2017. The increase
14 in the number of inspections is in
15 recognition of the high risk
16 associated with cross bores and
17 PG&E's desire to inspect for and
18 eliminate them as quickly as
19 possible.

20 My first question is can you
21 confirm that this is a statement that PG&E
22 made in its 2017 GRC testimony?

23 A I believe that's correct. It's an
24 excerpt from that.

25 Q Okay. And the number that's
26 referenced for PG&E's forecast inspections
27 for 2017 is 45,000 in that passage.

28 Do you see that?

1 A Yes. In the original testimony
2 from there, I see that.

3 Q Okay. Was that the amount that was
4 adopted for 2017, 45,000?

5 A I don't believe that that was what
6 was adopted at the end of the rate case
7 hearings.

8 Q And how did that number get
9 changed, do you know?

10 A I don't have the exact details on
11 how the number was changed. I can provide a
12 high level of my understanding.

13 Q Sure, go ahead.

14 A I believe that after the hearings
15 were settled, there was an adjustment in
16 funding that was agreed to and the units were
17 scaled proportionally to match that.

18 Q Thank you.

19 MR. OUBORG: Your Honor.

20 ALJ LIRAG: Yes.

21 MR. OUBORG: And I believe that we can
22 provide references to the part of PG&E's
23 testimony which explains fully where the
24 imputed units were calculated. That's a
25 different exhibit. Mr. Kerans is not an
26 expert on that.

27 MR. LONG: That's fine. For my
28 purposes, that's what I needed, but thank you

1 for that.

2 ALJ LIRAG: All right. That's fine.
3 We can talk about the reference at the end of
4 this hearing day. Just remind me.

5 MR. OUBORG: Okay.

6 ALJ LIRAG: Please proceed.

7 BY MR. LONG:

8 Q Okay. Now, back to, again, what's
9 been marked as Exhibit 43. So we were
10 looking at the column that's headed "Imputed
11 Adopted 2017 through 2019." We went over the
12 units number. And then the cost number shown
13 there is \$59.243 million.

14 Is that the imputed authorized cost
15 for the work that PG&E was authorized to do
16 for 2017 through 2019?

17 WITNESS ABRANCHES: That is correct.

18 Q And then the bottom row is unit
19 cost and the unit cost that was calculated
20 here was determined by dividing the cost in
21 the row above divided by the number of units,
22 and that yields a number of \$480; is that
23 correct?

24 A That is correct.

25 Q And then going to the next column,
26 that's 2017 recorded, these are numbers that
27 were drawn from PG&E's workpapers. The
28 number of units recorded for 2017 was 35,154;

1 is that correct?

2 WITNESS KERANS: Yes, and the reference
3 at the bottom that takes you there is correct
4 as well.

5 Q Okay. And then the recorded cost
6 for 2017 was \$22.458 million; is that
7 correct?

8 A That's correct as well as the
9 reference at the bottom of the page.

10 Q And then deriving unit cost the
11 same way we derived unit costs from the prior
12 column, the number would be 639; is that
13 right?

14 A Yes, that's correct.

15 Q And then we'll do the same thing
16 for 2018 recorded column. And this I got
17 from the spending accountability report. It
18 may be elsewhere, but, anyway, that's where I
19 got it from. The units are 46,050 units for
20 2018 recorded; is that right?

21 WITNESS ABRANCHES: That is correct.

22 Q And then the cost, recorded costs,
23 for 2018 was \$28,579 million; is that
24 correct?

25 A That's correct.

26 Q And then the unit cost, again
27 derived the same way, is \$620 for 2018; is
28 that right?

1 A That's correct.

2 Q The next column -- what I want to
3 ask you is if you were to take -- focusing on
4 units now. If you were to see how many units
5 PG&E would need to do in 2019 in order to
6 arrive at the number -- the 123,307 units
7 shown in the second column, that number --
8 taking into account the recorded units for
9 2017 and 2018, that number would be 42,103;
10 is that right?

11 A That's correct.

12 Q And then I'm going to leave the
13 other two items. This is not going to get
14 admitted into evidence and I think it's just
15 going to provoke controversy so we'll just
16 leave those. These are the numbers that I
17 think are helpful for the record and to have
18 them in one place, so thank you.

19 So we're going to put that document
20 aside. Then I'm going to ask you to turn to
21 PG&E's workpapers for this program. And I
22 believe maybe, Mr. Kerans, we looked at this
23 a little bit yesterday. This what's been
24 marked as Exhibit 12, formerly PG&E
25 Workpapers, page 4-25. So when you find
26 that, could you let me know.

27 WITNESS KERANS: I'm at that page.

28 Q Great. If you look at the bottom

1 of that page -- and I think maybe we did do
2 this yesterday with Mr. Kerans, but just to
3 focus us on the issue for today, the last
4 paragraph on that page reads:

5 PG&E plans to perform
6 approximately 10,000 UTA
7 inspections in San Francisco and
8 approximately 14,000 routine
9 inspections outside of San
10 Francisco in 2020 for a total of
11 24,000 inspections. This plan is
12 selected as it allows PG&E to
13 finish performing remaining
14 inspections in San Francisco, an
15 area identified as having the
16 highest risk for cross bores,
17 while continuing to perform
18 inspections in other areas in
19 2020.

20 So now, this was the plan in the
21 forecast that PG&E presented in its direct
22 testimony; is that correct?

23 A Yes. That was the original plan in
24 the original testimony, that's correct.

25 Q And as the passage showed, it was
26 to do 10,000 UTA inspections in San Francisco
27 in 2020 and approximately 14,000 non-UTA
28 inspections in 2020; is that correct?

1 A Yes, that's correct.

2 Q And it assumed that PG&E would also
3 do 10,000 UTA inspections in 2019; is that
4 correct?

5 A Yeah, the original plan was 10,000
6 UTA inspections in 2019 as well as 10,000
7 inspections in 2020 followed by approximately
8 1,000 inspections in 2021.

9 Q Okay. And for 2019, you were going
10 to do a similar number of -- this was the
11 plan in the direct testimony -- you were
12 going to do a similar number of non-UTA
13 inspections, approximately 14,000; is that
14 right?

15 A Yes, that's correct.

16 Q And that plan for 2019 for the
17 2017-through-2019 period was going to leave a
18 shortfall of 21,766 units; is that correct?

19 A Yeah, that's approximately correct.

20 Q So now let's go to your rebuttal
21 testimony. That's been marked as Exhibit 6,
22 formerly PG&E-16.

23 MR. OUBORG: Is this Chapter 4 rebuttal
24 or the --

25 MR. LONG: This was PG&E-16.

26 MR. OUBORG: Okay. Thank you.

27 BY MR. LONG:

28 Q In particular if you could turn to

1 page 2-9 when you get there.

2 WITNESS KERANS: I'm on 2-9.

3 Q So at the top of that page right
4 there at line one, it says that PG&E will
5 reevaluate its 2019 work plan.

6 Do you see that?

7 A Yes, I see that.

8 Q And PG&E decided to change the plan
9 somewhere between the submission of your
10 direct testimony and the submission of this
11 testimony; is that correct?

12 A Yes, that's correct. It was
13 approximately February is when that decision
14 was made.

15 Q That's what I was going to ask. It
16 was a February decision?

17 A Yeah. I'm sorry. I misspoke. It
18 was 2019.

19 Q February 2019, thank you. Let's
20 turn to another document that we have had
21 marked. This one has been marked as
22 Exhibit 44 and this is PG&E's Response to
23 TURN Data Request 87-1, Revision 1, and
24 including the attachment to that data request
25 response which has some redactions in this.

26 Do you have that in front of you?

27 A Yes, I have it in front of me.

28 Q So to make sure we're all clear, in

1 1-C if you look on page one, we asked you to
2 provide any and all documents that discuss
3 changing the work plan for 2019 cross bore
4 inspections. And then the answer on page two
5 is to see the attachment that we have in this
6 exhibit for a copy of the work plan approved
7 as of February 2019.

8 So this was the document that shows
9 the approved new plan; is that right?

10 A Yes, that's correct.

11 Q Now we're going to take a little
12 time looking at this document. First, let's
13 look at the top left. There's a heading that
14 says "Decision" in parentheses and then it
15 says "work plan changed."

16 Do you see that?

17 A Yes.

18 WITNESS ABRANCHES: Yes.

19 WITNESS KERANS: Yes, we see that.

20 Q Okay. Who is the right person to
21 answer questions about this? Is it both of
22 you?

23 WITNESS ABRANCHES: I'll take the
24 questions primarily and then I might refer to
25 Mike, Mr. Kerans.

26 Q Okay. All right. So there are two
27 bullets in that section of the document. The
28 first bullet I believe is describing:

1 The purpose of this document is to
2 seek committee approval of the
3 2019 work plan which achieves the
4 GRC 123,307 imputed unit target
5 based on current negotiations with
6 SF.

7 And then there's a redaction. Am I
8 right that that first bullet is stating the
9 purpose of this document?

10 WITNESS ABRANCHES: Yes, the first
11 bullet is saying the purpose of the document
12 because we're changing the work plan and we
13 are doing more units that was currently in
14 the work plan.

15 Q Okay. And then the second bullet
16 says:

17 Approval of the updated work plan
18 eliminates the \$80 million cross
19 bore SF UTA risk in 2019 and will
20 impact 2020 GRC testimony.

21 I'm going to ask you some questions
22 about this -- first, this bullet is -- let me
23 start again.

24 The -- I want to ask about
25 eliminating the \$80 million cross bore SF UTA
26 risk in 2019. In that regard, that's also
27 discussed in the heading below it that says
28 "Justification/background."

1 Do you see that?]

2 A Correct. I see that.

3 Q And that first bullet reads: Team
4 has focused on the five levers, see slide
5 two.

6 By the way, slide two is the -- is
7 the next page.

8 A That is correct.

9 Q Is that -- all right.

10 A Yeah.

11 Q Yeah. Focused on the five levers
12 to mitigate the known cross bore UTA risk in
13 SF. \$80 million for 2019 equals \$8,000 per
14 unit for 10K UTAs plus additional risk in
15 future years.

16 So, I take it, then, that one of
17 the benefits of the updated work plan that
18 was being proposed here was to eliminate
19 this -- what's been identified as a
20 80 million-dollar risk. Is that right?

21 A No, that is not correct. Can I
22 explain?

23 Q That's not a benefit? Is that your
24 point?

25 A No. My -- my point is the -- the
26 point outlined here is being taken out of
27 context. Can I explain?

28 Q Okay. I guess so. I'm not -- all

1 I've done is read -- I haven't taken anything
2 out of context, other than to read the
3 bullets.

4 A Sure. Let me -- let me explain.
5 As I articulated in my testimony on Monday,
6 UTAs can range in cost from \$1000 all the way
7 up to \$10,000. As we put in our testimony
8 over here, we said four -- a UTA cost --
9 we're going to put a target unit cost of
10 \$2,000. We've shown in our testimony.
11 You've asked me about it. Specifically, the
12 budget we allocated to -- and this was my
13 department and myself. We allocated to the
14 cross bore program for UTAs a cost of \$2,000.
15 The risk that existed out there was if they
16 were to do open trench, the cross bores would
17 cost \$10,000. The delta between the -- the
18 10,000 and the 2,000 is \$8,000, which is what
19 is referenced in this document, and if you
20 multiply that by 10,000 UTAs, you get an 80
21 million potential risk. And what they were
22 alluding to over here --

23 EXAMINATION

24 BY ALJ LIRAG:

25 Q I'm sorry. What conditions would
26 present like a 2,000-dollar cost?

27 WITNESS ABRANCHES: This -- we would --
28 we had no idea exactly what the cost was

1 going to be.

2 Q All right.

3 A So we looked at similar methods to
4 identify and thereby clear the cross bore --
5 presence of a cross bore, and that was the
6 range of one -- 1,000 with a proximity
7 clearance, one was 3,500, where you clear
8 debris, and the other one, if you have no
9 other option, you open trench and you clear,
10 which costs about \$10,000.

11 Q Just to make everything clear, what
12 conditions would present a -- let's go to the
13 extreme, 1,000. What conditions would result
14 in a 1,000-dollar cost?

15 WITNESS KERANS: Yeah. So the -- it's
16 not necessarily the -- the conditions. It
17 would be the type of inspection that's being
18 performed which -- that would --

19 Q All right.

20 A -- result in that.

21 Q And what --

22 A That type of inspection --

23 Q Okay.

24 A -- or -- that type of inspection we
25 would call a proximity clearance, and a
26 proximity clearance is utilizing locate and
27 mark tools to, number one, locate the gas
28 facilities, and then simultaneously utilizing

1 locate and mark for the sewer facilities.
2 You would need to gain access to the sewer
3 facilities to locate them. You have to put
4 energized tape in there or a camera with a
5 son (phonetic). But, assuming both of those
6 were successful, you'd be able to perform an
7 above-ground evaluation, and then see if they
8 were within a certain proximity to be able to
9 clear it from the risk.

10 Q So I -- I gather most of the costs
11 would be labor costs.

12 A Yeah, definitely.

13 Q Is that a fair assessment?

14 A That's fair.

15 Q And then the 10,000 is,
16 Mr. Abranches said, an open trench?

17 WITNESS ABRANCHES: Right. You dig --

18 Q Dig the hole. Fair?

19 WITNESS KERANS: Yeah. That would be
20 generally the excavation, restoration, labor
21 costs.

22 Q All right.

23 Please proceed, Mr. Long.

24 Thank you for the answer.

25 WITNESS ABRANCHES: Your Honor, can --
26 you asked me a question about what's the
27 \$2,000.

28 Q All right. Let's --

1 A The \$2,000 was a target unit cost
2 would be put with the execution arm,
3 realizing that it could range from a thousand
4 to 10,000. The basis was we wanted to ask
5 the execution arm to find whatever mechanisms
6 possible to do these cross bores most
7 cost-effectively, which is why it references
8 in the second document the -- what ideas are
9 they trying to get to doing these cross bores
10 most cost-effectively.

11 Q All right. I got a fair idea once
12 I heard the description of what would result
13 in a 1,000-dollar cost, and it's using locate
14 and mark tools. And then I can just
15 extrapolate, you know, in between the --
16 there's a whole lot of --

17 A There's a whole range.

18 Q There's a whole range between
19 10,000 and 1,000, but seeing the two
20 extremes, there's -- I get a fair idea.

21 WITNESS KERANS: One other note, just
22 to -- more education than it is. You could
23 pursue a proximity clearance at that
24 1,000-dollar cost; however, if that failed,
25 you would then be required to go into another
26 mode, which would then take you into --
27 depending how far you needed to go, you might
28 end up in the \$10,000. So --

1 Q Right. Once you --

2 A You'd then be --

3 Q Once you start --

4 A -- continuing to add that cost --

5 Q Once you start the --

6 (Crosstalk.)

7 THE REPORTER: I'm sorry. Can --

8 ALJ LIRAG: I'm sorry. I'll start
9 again.

10 THE REPORTER: Okay.

11 BY ALJ LIRAG:

12 Q So once you start the inspection,
13 it may end up to -- it may entail further
14 inspection methods to be -- that will be
15 applied?

16 WITNESS ABRANCHES: Correct.

17 ALJ LIRAG: All right. All right,
18 Mr. Long.

19 CROSS-EXAMINATION (RESUMED)

20 BY MR. LONG:

21 Q So back to this document, the
22 document is saying that if PG&E went ahead
23 with the plan that was put forth in the
24 direct testimony in this case, that is to do
25 10,000 UTA inspections in San Francisco for
26 2019, that PG&E was at risk for \$80 million
27 of cost. Is that right?

28 WITNESS ABRANCHES: No, that's not what

1 it's saying. It's saying that if PG&E --
2 PG&E had -- had put in its original plan to
3 do 10,000 UTAs in San Francisco. That plan,
4 as indicated in this document, at least
5 alluded to in the document, is that to do
6 those UTAs, you have to work in conjunction
7 with San Francisco to clear those UTAs. It's
8 not something you can do by yourself. When
9 progress was not being made on that plan, we
10 asked them to come back -- the execution
11 arm -- we asked them to come back, and said
12 is -- "If you're not making progress on this
13 plan of clearing UTAs, what alternative plan
14 do you propose?" And they brought to this --
15 to the committee the -- the governance
16 committee that oversees changes to the work
17 plan -- they brought this proposal for
18 approval, which is when we changed the work
19 plan in February, because we did not see
20 progress on the UTAs --

21 Q Okay. So --

22 (Crosstalk.)

23 THE REPORTER: I'm sorry. I didn't get
24 the last half of your answer.

25 WITNESS ABRANCHES: That was originally
26 set up.

27 THE REPORTER: Thank you.

28 ///

1 BY MR. LONG:

2 Q And again, I'm -- I'm just reading
3 the document, and it sounds like you're not
4 agreeing with what the document says. The
5 document says, in the second bullet on the
6 decision work plan change heading,
7 "Eliminates the 80 million-dollar cross bore
8 asset UTA risk in 2019."

9 Isn't that what this plan was --
10 what -- what the decision-makers were being
11 told this plan would do?

12 WITNESS ABRANCHES: What the
13 decision-makers were being told was it's
14 seeking the approval to adjust the plan,
15 right, and it says approval of that decision
16 to adjust the plan would also have the effect
17 of eliminating an 80 million-dollar --
18 potentially 80 million-dollar financial risk
19 that exists because of the uncertainty of
20 what exactly the cross bores would cost.

21 Q Right. But --

22 A It also says in that statement, the
23 second half, is it impacts the 2020 GRC
24 testimony where we stated in the GRC
25 testimony that we would not meet the full
26 volume of imputed units, but by changing the
27 plan, we then meet the full volume of unit --
28 of imputed units.

1 Q And so PG&E was -- the concern was
2 that PG&E was at risk for \$80 million of
3 cost. Is that right?

4 A That was not the concern. The
5 concern was if we don't clear the UTAs, if
6 they're delayed in clearing that, we don't
7 eliminate the risk. So rather than not
8 eliminate the risk of a UTA, you redirect the
9 organization to say, "Where can you have
10 access to cross bore inspections and perform
11 them," because every cross bore inspection
12 that you perform eliminates risk. Attempting
13 and not completing does not eliminate any
14 risk.

15 ALJ LIRAG: So why does the bullet
16 point -- why do you think the heading says
17 eliminate the 80 million cross bore?

18 WITNESS ABRANCHES: It says eliminate
19 the 80 million in cross bore, because as part
20 of this -- this document, it changes the work
21 plan. But, we also asked them in this
22 document to provide what progress you have
23 made on various attempts to do -- to do UTAs
24 more cost effectively, because a targeted
25 price had been given to the execution team of
26 \$2,000. I'd indicated, you know, it can
27 range. So that's why the purpose of the
28 second. It was given to them as a challenge.

1 And so they said the --

2 THE REPORTER: I'm sorry, the lexy?

3 WITNESS ABRANCHES: Legacy.

4 THE REPORTER: Oh, legacy.

5 WITNESS ABRANCHES: Cross bore UTA
6 challenge update. And it says what are the
7 levels, what are the things they were trying
8 to look at to -- our intent was to eliminate
9 and complete all the UTAs. There's a further
10 complication that Mr. Kerans might get into
11 about performing UTA work in San Francisco
12 that maybe he should elaborate.

13 BY MR. LONG:

14 Q Wait a minute. Can I -- it seems
15 like we're getting far from my question here.

16 WITNESS ABRANCHES: Sorry.

17 Q So Mr. Abranches, are you denying
18 that financial considerations were not part
19 of this decision?

20 A Yes, I'm -- what I'm saying is the
21 considerations of this decision were the risk
22 considerations of this decision.

23 Q And not --

24 A I'm not denying that there are
25 financial considerations. They were in the
26 back of the mind, but they were not the
27 primary consideration. The awareness --
28 the -- this -- this committee is work,

1 resources and financials, and so we look at
2 changes to the work. When changes to the
3 work happen, it has an implication on the
4 resources that have to be deployed to do the
5 work. It also has an implication on the
6 financials. And as towards the business, we
7 want to understand all those dynamics.

8 Q So was -- were financial
9 considerations, and specifically financial
10 risk of \$80 million, at all at consideration
11 in making this decision?

12 A I -- I can't speculate for the
13 other decision-makers in the room. What I
14 can -- can say explicitly is when we
15 brought -- had them bring this topic to this
16 meeting, it was because the original work
17 plan, updates to that plan, had indicated
18 that they're not making progress on UTAs, and
19 if they're not making progress on UTAs,
20 they're not eliminating risk.

21 Q Let's look at -- at this document a
22 little bit more. The bottom left section of
23 the document has a heading "Original S2
24 Plan/2020 GRC."

25 A Right.

26 Q And the first column with numbers
27 in it for 2019 shows the -- the plan that was
28 in this -- this GRC, right, the direct

1 testimony?

2 A That is correct.

3 Q Okay. And then the plan that was
4 being proposed -- oh, I'm sorry. That --
5 that entire section is the plan that was in
6 the GRC. Is that right?

7 WITNESS KERANS: That's correct.

8 WITNESS ABRANCHES: Correct.

9 Q Okay. And then there's a footnote
10 at the bottom of that that applies to SF UTA
11 which says, "At the time of the GRC filing,
12 UTA unit cost was estimated at 10K, but
13 funded at 2K, carrying a significant risk --
14 risk to the portfolio."

15 And when it's referring to
16 significant risk to the portfolio, the risk
17 that's being referred to there is a financial
18 risk. Isn't that right?

19 WITNESS ABRANCHES: That is correct.

20 Q And let's go to the top right. The
21 heading there is "Financial Summary." Do you
22 see that?

23 A Yes.

24 WITNESS KERANS: Yes, we see it.

25 Q Okay. And then the first column
26 with numbers in it is headed "S2 Plan," and
27 then it says, "WFR 10-8-18." Can you tell me
28 what WFR stands for?

1 WITNESS ABRANCHES: Work, finance and
2 resources.

3 Q And what does that mean?

4 A That's the name of the committee
5 that meets, does the review, progress against
6 work, progress against financials, resource
7 deployment.

8 Q Okay. In the far right column, it
9 has the term "risk." What's being referred
10 to there is financial risk to the company,
11 not safety risk. Is that right?

12 A In this case, yes.

13 Q And for the -- so the first column
14 with numbers in it has the -- the S2 plan.
15 That's the plan that was in the direct
16 testimony. Correct?

17 WITNESS KERANS: That's correct.

18 Q And then the next column, revised
19 plan expected case, that's the expected case
20 for the plan that's being proposed here. Is
21 that right?

22 A That's, yes, essentially what we're
23 working through in 2019.

24 Q Okay. And comparing the numbers at
25 the bottom for total, the original plan had a
26 total cost of \$29 million, and the revised
27 plan expected case cost was \$28.6 million.
28 Do you see that?

1 WITNESS ABRANCHES: Yes, that's
2 correct.

3 Q Was it important that the revised
4 plan come in at \$29 million or less?

5 A Yes. The -- the funding for the
6 program was provided at \$29 million, so what
7 they were explaining is what they were doing
8 for that \$29 million.

9 Q All right. So let's -- let's go
10 over this revised plan expected case column.
11 First, the first number is 5200 for pending
12 2018 units. What is that?

13 WITNESS KERANS: Those are -- those are
14 units that would have been captured late in
15 2018, and then as they've basically done, you
16 know, revised, looking, reviewing, making
17 sure those inspections are complete, that
18 they'll be carried over in the next year.

19 Q So would they account for 2018 or
20 2019?

21 A Those are 2019.

22 Q And then the next number is SF
23 attempts, 16,000. Are those -- could you
24 explain what that -- that line means?

25 A Yeah. You have to look at that in
26 relation to the line below it. As my volume
27 paper had cited yesterday, there's a ratio of
28 attempts that we believe will be successful

1 in San Francisco versus ones that will fall
2 out either under unsuccessful or UTA. So the
3 line below it puts an assumption of 8000
4 below it. So that's how you read that
5 with -- in relation to the two of them.

6 Q Okay. And on those attempts and
7 completed, are those -- is the -- was -- was
8 the thinking that those would be -- any of
9 those would be UTAs?

10 A It doesn't explicitly say that, but
11 it -- it does note that if there was a UTA
12 completed that it would be counted, as is
13 expected for the completion of any unit.
14 It's in the parentheses, I believe, on the
15 left side, the first column.

16 Q Right. So -- so some of those
17 eight -- 8000 might be UTAs, but generally
18 not. Is that fair to say?

19 A Yeah, that's fair to say, that it
20 would generally be just standard routine
21 inspections, not the UTAs.

22 Q Okay. And then the next -- the
23 next row is SF UTAs dates, but there's -- it
24 just says, "pending negotiation," so we'll
25 skip that, and go to the non-UTA line.

26 And the number in the revised plan
27 expected case column is 29,000. Are those
28 non-UTAs -- first of all, what are those

1 non-UTA -- UTAs referring to?

2 A Those are just non-UTAs that would
3 be standard routine inspections.

4 Q Where -- where would they be
5 outlined?

6 A They would be outside of
7 San Francisco. The -- the columns above
8 specify the San Francisco attempts.

9 ALJ LIRAG: Well, let's go off the
10 record for a little bit.

11 (Off the record.)

12 ALJ LIRAG: Let's go back on the
13 record. Let's take our first morning break.
14 I plan on calling two breaks, because we
15 might go a little past noon. So let's take a
16 15-minute break, and be back at 10:45. Off
17 the record.

18 (Off the record.)

19 ALJ LIRAG: Let's go back on the
20 record. Let's continue the cross-examination
21 of Mr. Long -- or by Mr. Long.

22 MR. LONG: That was a close one.
23 Although, I guess there is an opportunity for
24 me to be crossed later in this hearing.
25 So --

26 Q So back to the same document,
27 follow-up question on the -- the row in
28 the -- in the financial summary section. It

1 says, "Pending 2018 units." Are those in
2 San Francisco or elsewhere?

3 WITNESS KERANS: I'm sorry. Say that
4 one more time. I was looking --

5 Q For the pending 2018 units row, are
6 those numbers for San Francisco or not
7 San Francisco?

8 A I -- I believe they're a mix. I
9 don't have exactly where they are, but I
10 think it's a -- in consideration of all the
11 inspections we've done.

12 Q Okay. So let's -- let's look at
13 the next column over, the revised plan worst
14 case. Does worst case mean from a financial
15 perspective?

16 WITNESS ABRANCHES: No. The worst --
17 worst case means what -- so I'll give you
18 the -- where it says, "Pending 2018 units,"
19 they said they will take a look at all the
20 work that was attempted in San Francisco that
21 hadn't yet been recorded, the 5,200. Worst
22 case they would say is only 2,800 -- or 2,600
23 of those would be completed cross bore
24 inspections.

25 WITNESS KERANS: And I'll just clarify
26 a little bit with that. The reason why there
27 would be one value versus the other is
28 there's a video QC that's performed on the

1 inspections to ensure they meet the criteria
2 for clarity, et cetera, and make sure we're
3 able to observe that the cross bore was
4 actually found in that inspection. If it
5 didn't meet the criteria, then it wouldn't
6 necessarily have counted into this, so that's
7 why you would have a worst case where less
8 are put into that.

9 Q And the worst case number at the
10 bottom, the total at the bottom, is 31.4
11 million. Do you see that?

12 WITNESS ABRANCHES: Yes, that is
13 correct.

14 Q And that's shown as \$2.4 million
15 more than the expected case. Is that right?

16 A Correct.

17 Q And that's in the risk column?

18 A Correct.

19 Q So when the word "worst" is being
20 used there, the word "worst" is referring to
21 worst from a financial perspective. Is that
22 right?

23 A Both.

24 Q Both what?

25 A So in the sections of volume, it
26 ties to volume. In the sections of
27 financials, it ties to financial. It says,
28 "worst case" where what's the worst case

1 scenario of volume of work that you're going
2 to have to do, and then the associated
3 financials with that.

4 Q Now, let's just -- we'll be
5 finished with this in a moment.

6 A Sure.

7 Q But, I do want to understand that
8 some -- one of the bullets below in that
9 financial summary section, the second bullet,
10 says, "BPR target." What is that?

11 A The BPR as referenced, I believe on
12 Monday, is the business plan review. And so
13 the target that was set in -- for 20 -- for
14 the 2019 period was set at approximately
15 37,000 units, realizing there's a lot of
16 uncertainty with what's the exact volume that
17 we did there.

18 Q And so is that target what's being
19 set by this revised plan or is it a previous
20 target?

21 A No. The target was higher than the
22 plan. So the plan had given -- the original
23 plan had allocated them fundamentally 10,000
24 UTAs and 14,000 non-UTAs. Right? We
25 would -- we wanted to incent the execution
26 arm to get more cross bores done, so we set
27 the BPR target at 37,000 under cross bore
28 inspections, as a whole.

1 Q And again, I'm asking for -- about
2 the timing.

3 A That target was set around the same
4 time the -- that the original plan was set.

5 Q Okay. So that -- that was a target
6 that was set, and that was what was -- the
7 original plan was trying to reach?

8 A Correct, because it said -- because
9 that 37,000 excludes and indicates later --
10 excludes the 2018 pending units. When you
11 had started the work, you had done the
12 majority of the work. You hadn't recorded
13 that work.

14 Q All right. Let's try to sum up
15 here what -- what this document is showing.

16 Is it -- is it fair to say that the
17 work plan that is being adopted here, the new
18 work plan, does not include completing any
19 UTA inspections?

20 A Correct.

21 Q And, in fact, that's confirmed by
22 the response to -- in the -- in the data
23 request that precedes this document we've
24 been looking at, 1-A. At the bottom, answer
25 at the bottom, it says, "PG&E's 2019 current
26 work plan does not include completing any UTA
27 inspections." So that's just confirming what
28 you've just said, Mr. Abranches. Is that

1 right?

2 A That is correct.

3 Q Okay. So the -- the new plan was
4 not to do the 10,000 UTA units in
5 San Francisco. Is that right?

6 A The plan was to move away from the
7 10,000 UTAs. It was not not to do the 10,000
8 UTAs, move away from the 10,000 UTAs. And
9 Mr. Kerans can give more clarification as to
10 why.

11 Q Okay. And my question wasn't
12 precise. I meant for 2019, you were not
13 going to do the 20 -- the 10,000 UTA units
14 that you were originally planning to do?

15 A We did see evidence that they were
16 going to do those 10,000 --

17 Q Is that a "Yes" or a "No," first,
18 that you were -- you were not -- the plan was
19 to not do the 10,000 UTAs that you were
20 planning to do in 2019?

21 WITNESS KERANS: I think, when you look
22 at this, there's the pending negotiations
23 line --

24 Q Well, can I get a "Yes" or a "No"
25 on --

26 ALJ LIRAG: Let's have the question
27 answered.

28 WITNESS ABRANCHES: The original plan

1 was to do the 10,000. The revised plan was
2 to not do the 10,000.

3 BY MR. LONG:

4 Q That was my question. Thank you.

5 WITNESS ABRANCHES: Okay.

6 Q All right. So let's look at
7 your -- back to your rebuttal testimony,
8 Exhibit 6.

9 ALJ LIRAG: It's PG&E-16.

10 BY MR. LONG:

11 Q I'm going to ask you to turn to
12 page 2-8.

13 WITNESS KERANS: And that was PG&E-16?

14 Q Yeah. In the -- in the record of
15 this case, it would be Exhibit 6. And I'd
16 like to direct your attention to Answer 17.
17 I'm just going to read the first two
18 sentences. "Performing the originally
19 planned 10,000 UTA cross bore inspections in
20 2019 has proved to be challenging. To
21 complete UTA cross bores necessitates PG&E's
22 engagement with and support from other
23 parties, which has been slower than
24 anticipated."

25 So are you saying there that PG&E
26 was being prevented by third parties from
27 doing the work that PG&E originally planned
28 to do for 2019?

1 A I don't know if "prevented" is
2 actually the word. I would say we were
3 engaging them to work on the process by which
4 we would -- could fix the UTAs.

5 Q Well, was there -- were -- were you
6 being barred from fixing the UTAs by any
7 third party?

8 A I'm not sure if -- I wouldn't say
9 we were barred. I would say that we require
10 their engagement to work on their sewer
11 facilities. But, I'm not sure that barred is
12 truly the right word for that.

13 Q Okay. So let's now look at what's
14 been marked as Exhibit 45. That's PG&E's
15 response to TURN data request 87-5. And this
16 is our effort to understand a little better
17 what was meant by the answer that I just
18 read.

19 So in response to subpart "C," you
20 talk about needing to engage with the City of
21 San Francisco and other third parties on many
22 levels, give examples, and then the next
23 paragraph says, "However, the main activity
24 that has taken longer than anticipated is
25 finalizing an amended agreement with the City
26 of San Francisco (San Francisco Public
27 Utilities Commission) on the resolution of
28 UTA locations."

1 Are you suggesting here that the
2 amended agreement you're referring to is
3 needed in order to get permission to do a UTA
4 inspection in San Francisco?

5 A Well, what we're saying is we -- we
6 require their engagement and participation in
7 instances to work through the UTAs. In
8 instances where there's customers involved,
9 where they're involved to repair sewers that
10 are their sewers or clear blockages which are
11 in their sewers, we -- we need this agreement
12 to support us in that.

13 Q So my question was: Do you need
14 this agreement in order to get permission to
15 do the UTA work in San Francisco?

16 A So I'm not quite sure what you mean
17 by permission, because there's a --

18 Q Absent the agreement -- the
19 question is: Absent the agreement, would you
20 be unable to do UTA inspections in
21 San Francisco?

22 A Yes, I think there are instances
23 where we would need and require their
24 participation, as an example, as I stated.

25 Q So you're saying if -- you needed
26 this amended agreement in order to do UTAs.
27 Without that, you would not be able to do UTA
28 inspections?

1 A Did you say, "a UTA"?

2 Q I said you -- you would not be able
3 to do UTA inspections, is what I said.

4 A Yeah, we would need this agreement
5 to get the support to complete them.

6 Q Okay. You couldn't do any UTA
7 inspections without getting this amended
8 agreement you referred to?

9 A I'm not sure if there would be --
10 it would be fair to say, "any." There's a
11 possibility that, as I've stated, there's a
12 range that could be attempted that could
13 range from proximity clearances to
14 excavation. However, when we looked at our
15 2019 plan, prior to February, we realized
16 there's execution risks associated with
17 making those attempts such that as you go
18 into making an attempt via proximity or
19 excavation, you may not be successful, you
20 may require this engagement, and that would
21 take resources away from conducting other
22 inspections that could be completed, which is
23 why this plan was shifted.

24 Q Well, what, in particular, did you
25 need to get resolved in order to be able to
26 do UTA inspections in San Francisco?

27 A So I think part "D" to the -- the
28 Question 5 we were just responding to answers

1 that question.

2 Q Yeah. That -- that doesn't help
3 me.

4 Could you answer in your own words
5 now what specific things did you need to get
6 an agreement -- an agreement from
7 San Francisco that you didn't have already
8 that you needed in order to be able to do UTA
9 inspections in San Francisco?

10 A So there's a variety of UTA
11 inspections, of types in San Francisco.
12 Those would involve access issues, and maybe
13 it's best to cite you to my direct testimony
14 to show those.

15 ALJ LIRAG: Let's go off the record
16 while you look.

17 (Off the record.)

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

20 WITNESS KERANS: So I'm on page 4-24
21 of -- this is actually the original
22 testimony.

23 ALJ LIRAG: Which -- which exhibit is
24 that, Mr. Ouborg?

25 MR. OUBORG: I believe --

26 UNIDENTIFIED SPEAKER: It's PG&E
27 Exhibit 3, but I'm not sure --

28 MR. OUBORG: I believe it's Exhibit 11.

1 ALJ LIRAG: 11? Okay.

2 MR. LONG: No. I think we better go
3 with 10.

4 MR. OUBORG: 10. Sorry.

5 ALJ LIRAG: Ten.

6 MR. LONG: You have your handy blue
7 sheet.

8 MR. OUBORG: Ten.

9 ALJ LIRAG: All right. Exhibit 10.

10 WITNESS KERANS: Okay. Are we back on
11 the record or --

12 ALJ LIRAG: I think we're on.

13 WITNESS KERANS: Okay. Great. So,
14 Tom, your question was what were pieces we
15 needed to help from the city on this
16 agreement?

17 BY MR. LONG:

18 Q No. I --

19 WITNESS KERANS: Clarify it. I'm
20 sorry.

21 Q Yeah. What specifically did you
22 need that you -- so that you would be able to
23 do UTA inspections in San Francisco, that you
24 needed to have in an -- in an agreement from
25 San Francisco?

26 A Yeah. So these photographs show
27 you some of those examples that we need as
28 part of that agreement. They involve sealed

1 manhole covers. They involve debris within
2 sewers to clear out. They involve high water
3 where we could use their help in this
4 agreement to clarify that. What's not in
5 here is also the engagement with customers.
6 So sewer customers have laterals, and that's
7 our primary unit of inspection. When those
8 have defects, those are the responsibility of
9 the customers, and also, we have to gain
10 access to sewer laterals via contact with the
11 customer. Part of that agreement works with
12 how we engage with the sewer customer, the
13 responsibilities of who can help us with
14 that, and that's what's part of the agreement
15 that's necessary to move forward with many of
16 the UTAs.

17 Q So you -- for example, you think
18 you don't have -- you think you need to have
19 an agreement, a contract, with the city to be
20 able to access a manhole cover, to be able to
21 get in a manhole? You needed that to have --
22 that to be in an agreement as opposed to
23 seeking a permit or some other -- going
24 through some other process?

25 A So -- so this isn't just a manhole
26 that's getting into. It's --

27 Q Well, that's one example. That's
28 just an example.

1 A Well, for a manhole, that's a
2 different -- these are sealed manholes
3 that -- for example, that have welded shut
4 that aren't ours to unweld. So we're working
5 through many of these obstacles in that
6 agreement.

7 Q And all right. Well, let's --
8 let's look at the -- the document that has
9 been marked as Exhibit 46, and this is what I
10 referred to earlier as -- these are a series
11 of agreements and one proposed agreement that
12 were on the San Francisco Public Utilities
13 Commission website. So when you get that,
14 let me know, and then we'll -- we'll talk
15 about what -- what I want you to look at.

16 A I think I'm there.

17 Q So there already is an agreement in
18 place with the City of San Francisco for
19 doing cross bore inspections. Is that
20 correct?

21 A There -- there was an agreement
22 from 2014 that has expired.

23 Q You're not a lawyer?

24 A No, but I -- I read it this
25 morning, and looked at it, and I saw the
26 dates on it.

27 Q And you haven't been involved in
28 these negotiations. Right?

1 A I have not been directly involved
2 with them.

3 Q So let's look at -- in this packet.
4 If you could turn to the agreement that's
5 probably -- the pages are not numbered, but
6 this one is -- it says, "Gas Pipeline Cross
7 Bore Agreement." It's probably 20 pages
8 into -- into the document. So the heading at
9 the top is "Gas Pipeline Cross Bore
10 Agreement," and it says, "This agreement is
11 entered into by and between PG&E and the City
12 and County of San Francisco," and it also
13 says at the top right "Execution Copy." So
14 are you there?

15 ALJ LIRAG: So that's page 1 of 9 at
16 the bottom.

17 WITNESS KERANS: I believe I'm there.

18 BY MR. LONG:

19 Q Okay.

20 WITNESS KERANS: You can correct me if
21 I'm -- if I'm on the wrong one.

22 Q So this is an agreement -- let's --
23 let's flip through it to the -- to the end.
24 It was -- the last signature was given on
25 October 14th, 2014. Do you see that on the
26 page 9 of 9?

27 A Yes, I see that.

28 Q Okay. So I'm going to call this

1 the October 14th, 2014 cross bore agreement.

2 A Okay.

3 Q Hang on just a second.

4 Okay. Now, back on page 1 of this
5 agreement, the sixth whereas clause, it says,
6 "Whereas, the parties wish to implement a
7 formal protocol for promptly identifying and
8 repairing existing and future gas pipeline
9 cross bores." Do you see that?

10 A Yes, I see that.

11 Q Okay. And then the next page has a
12 schedule, schedule for inspection, at the
13 bottom, page 2 of 9. Do you see that?

14 A I see that.

15 Q Okay. And then PG&E's agreeing to
16 provide the city with a schedule for records
17 review and overall video inspection planned
18 of all possible gas pipeline cross bores.
19 And then later in that paragraph, it says,
20 "PG&E shall complete such inspections no
21 later than 30 months after the effective date
22 of this agreement," and then it goes on to
23 say, "In no event shall the duration exceed
24 36 months, unless PG&E establishes that the
25 work cannot be completed within that time
26 period."

27 MR. OUBORG: Your Honor --

28 ///

1 BY MR. LONG:

2 Q "PG&E acknowledges that timely
3 performance of this agreement --"

4 ALJ LIRAG: Yes --

5 BY MR. LONG:

6 Q "-- supports public health and
7 safety --"

8 (Crosstalk.)

9 THE REPORTER: PG&E acknowledges?

10 BY MR. LONG:

11 Q "That timely performance of this
12 agreement supports public health and safety.

13 ALJ LIRAG: Mr. Ouborg?

14 MR. OUBORG: I object to the selective
15 skipping from one sentence -- skipping over
16 other sentences. I think this -- this
17 witness is not a lawyer. And I'm not sure
18 what Mr. Long's question will be, but he's
19 skipping important sentences in between
20 the -- the sentences he is reading, and I
21 just don't want that to confuse the witness,
22 especially given that he's not a lawyer.

23 I don't know what your question's
24 going to be, but --

25 ALJ LIRAG: Let's let Mr. Long
26 continue. I believe it is in response to
27 Mr. Kerans' expressing in his opinion, as a
28 non-lawyer, that the agreement was expired.

1 So I believe Mr. Long is testing that
2 response. So let's continue, but keep note
3 of -- let us alert us if there's any
4 significant items, lines that were skipped
5 that would change the meaning of the
6 question.

7 MR. OUBORG: Well, I -- I think by
8 skipping from "PG&E shall complete such
9 inspections no later than 30 months after
10 effective date," and then moving straight on
11 to a sentence that's two or three sentences
12 later, he is skipping important sentences
13 such as "PG&E acknowledges that it lacks
14 precision in work scope."

15 ALJ LIRAG: So there -- there's no
16 question yet, so there's nothing to object
17 to. So --

18 MR. LONG: And your Honor, I'm not
19 trying to play a trick here. I'm just trying
20 to move the -- and we're -- we're over time,
21 anyway. I'd like to move -- I was trying to
22 move things along. But, I don't have an
23 objection if Mr. Ouborg wants to stand and
24 tell the witness what he wants him to hear.
25 That's fine with me. I'm happy to take -- to
26 go off the record and let him talk all he
27 wants with -- with this witness.

28 ALJ LIRAG: All right. Let's -- let's

1 try and proceed using Mr. Long's approach,
2 and then if things need to be corrected,
3 let's do that. Let's see where this goes
4 first. All right.

5 Please continue, Mr. Long.

6 MR. LONG: And actually, I believe
7 the -- the point of this is not to test the
8 expiration thing. The point of this is --
9 is where my question is now going.

10 Q So then, the agreement is --
11 from -- at a high level is -- is -- the
12 purpose of it is to try to get these cross
13 bores inspected and addressed as quickly as
14 possible. Is that -- is that fair to say?]

15 WITNESS KERANS: I think that's a
16 portion of it. I also think it relates to
17 costs associated with the city's sewer work
18 that are attributed to PG&E's cross bore
19 program. Some of those costs, as I
20 understand it, are if the city were doing a
21 routine inspection that identified the cross
22 bore, they would be required to stand by and
23 perform work. This agreement, I believe,
24 goes into kind of discussing how those
25 processes work as well.

26 Q But as I read this agreement, it
27 looks to me like the City is pressing to get
28 the work done as quickly as possible. After

1 all, these are cross bores that pose a safety
2 risk as the last sentence I just read and
3 that PG&E agrees poses safety risk.

4 And so it's in the interest of the
5 City to get these addressed as quickly as
6 possible; isn't that right?

7 A I think it's in the interest of
8 both parties to get it done as quickly as
9 possible.

10 Q All right. So, now, what we just
11 read is that the October 14, 2014, agreement
12 said:

13 In no event shall the duration
14 exceed 36 months unless PG&E
15 establishes that the work cannot
16 be completed within this time.

17 So it was a deadline but then it
18 could be extended and based on a showing by
19 PG&E; is that right?

20 A That's my understanding, yes.

21 Q And that date is -- and that timing
22 is still governing; that is, that there's
23 nothing that's been agreed to between the
24 city and PG&E that changes that timing; isn't
25 that right?

26 A The 36 months? Is that the time
27 frame?

28 Q The 36 months unless PG&E makes the

1 showing.

2 A If there's nothing changed? I'm
3 not quite understanding your question.

4 Q That it's -- there's been no other
5 agreement between the city and PG&E that
6 changes that timing; isn't that right?

7 A Not that I'm aware of. I believe
8 later on in this package there's some
9 amendments that are probably discussed, but
10 I'm not sure they speak to the timing.

11 Q Right. I mean, you know, counsel
12 is free to disagree, but the Amendment 1
13 doesn't change the timing. Amendment 2 is in
14 this, but that was not executed by the City
15 so there's nothing -- there's no executed
16 agreement that changes that timing.

17 Is that fair to say?

18 MR. OUBORG: Your Honor -- sorry.

19 ALJ LIRAG: Are you going to object?

20 MR. OUBORG: I'm going to object to
21 that, yeah, because it doesn't say that the
22 36 months needs to be extended by an
23 agreement. It says "unless PG&E establishes
24 that the work cannot be completed within this
25 time period."

26 ALJ LIRAG: All right. I'll sustain.
27 I think it's fairly established that
28 Mr. Kerans is not able to accurately

1 interpret everything that's written in this
2 agreement so we can read off it, but he can
3 just, you know, agree or disagree.

4 MR. LONG: I'll move on.

5 ALJ LIRAG: All right.

6 MR. LONG: I would like now to go back
7 to Exhibit 44, which was the document that
8 included the Attachment 1 to Data Request
9 87-1.

10 ALJ LIRAG: All right.

11 BY MR. LONG:

12 Q Do you have that?

13 WITNESS KERANS: Yes, both Andy and I
14 have that.

15 Q So now I'm going to ask questions
16 about the second page. The top item is
17 referred to as Lever 1. It's about record
18 review status. And then it says in the
19 description "Overview: Used exponent to
20 complete a review of legacy cross bore data
21 with the goal of eliminating rework."

22 What's the issue about eliminating
23 rework that's being referred to there?

24 A Yes, so that alludes to the video
25 QC process that I spoke to earlier prior
26 to -- I don't remember the exact year, but in
27 previous we were doing more of a statistical
28 and we wanted to have exponent review more

1 than to ensure that we hadn't perhaps cleared
2 an inspection, but we felt necessary that we
3 didn't have the right visibility.

4 So that's what exponent was
5 performing for us was a video review and if
6 that cleared all of them because their QC
7 evaluated it. And if they would complete,
8 then we wouldn't have any additional work to
9 go out and do, or, if there were inspections
10 that we didn't have the full visibility, we'd
11 have to go out and, as this states, I'll call
12 it rework, but I would say reinspect is
13 probably the better term.

14 Q In fact the result -- after the
15 word "result" on the second line there, it
16 says "Sound data was not sufficient to
17 mitigate reinspecting locations."

18 Does that mean that -- the question
19 was whether PG&E would have to go back to
20 reinspect locations because the camera
21 quality, the quality of the camera recording,
22 was not sufficiently good to be able to give
23 PG&E confidence that it was an adequate
24 inspection; is that right?

25 A Yeah. That's my basic
26 understanding of that.

27 Q Can you give us an idea of the
28 scale of this issue? How many reinspections

1 were necessitated by this quality control
2 review?

3 A I don't know the scaling of that
4 exactly, no.

5 Q Do you have the unredacted version
6 of this document?

7 A Actually, no. For both of them, I
8 don't have either. I have the redacted
9 version from both pages.

10 Q Because there's a reference on the
11 first page to a number of -- a number of --

12 MR. OUBORG: Your Honor --

13 MR. LONG: -- a number of additional
14 inspections needed.

15 MR. OUBORG: Could we go off the record
16 for a second?

17 ALJ LIRAG: All right. Off the record.
18 (Off the record.)

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

21 BY MR. LONG:

22 Q So we were talking about that
23 Lever 1 on the top of the second page and
24 it's referring to the need to reinspect
25 locations. I asked you about the scale of
26 the number of locations needing
27 reinspections. You said you didn't know. I
28 take it it's not something you have personal

1 knowledge of, how much reinspection is needed
2 for this program?

3 WITNESS KERANS: It's a little bit of a
4 general question. I wouldn't say I have a
5 specific number of each time we go out how
6 many times we would have to go out and
7 reinspect based on various conditions of the
8 sewer or based on the quality of the videos
9 to come back.

10 But I would say there are instances
11 throughout the inspection where you return to
12 a site to reinspect it and it's normal and
13 expected.

14 Q But would it be fair to say that
15 the company has identified a number of
16 reinspections that's over 10,000 that were
17 necessary?

18 A Yes. I think, based on what I see
19 here, that that's about correct.

20 Q And that's meaning that's 10,000
21 units more work, more inspections, that have
22 to be redone because the quality of the
23 original inspection was not adequate; is that
24 right?

25 A Could you say that one more time.

26 Q That's 10,000 or so more
27 inspections that need to be done because the
28 quality of the original inspection was not

1 adequate?

2 A Yeah, those are 10,000 inspections
3 we would go out and reinspect to ensure that
4 there were no cross bores there.

5 Q Let's go down to the bottom of that
6 second page, Lever 5. It's talking about "A
7 better understanding of sewer camera
8 inspections and more experienced contractors
9 may result in fewer UTAs."

10 Can you explain what that item is
11 referring to.

12 A Yeah, so at a high level as sewer
13 inspectors -- these are contractors that
14 perform sewer inspections -- gain more
15 experience with inspecting sewers, they are
16 able to either break through some of the UTA
17 issues that they find on initial and complete
18 them that day or understand that they can
19 come back at a later point when conditions
20 have changed slightly and those wouldn't
21 result in a UTA.

22 An example might be high water
23 flow, for example, where you might have high
24 water during certain times of the year or
25 during certain periods of the day. A more
26 experienced operator with training would
27 understand that they could come back and
28 clear that. That's basically what that's

1 stating.

2 Q So it's stating that some
3 inspections that are presumed to be UTAs with
4 a more experienced operator might not turn
5 out to be UTAs; is that right?

6 A Yeah. So it's speaking to if you
7 were going out to do an initial inspection,
8 you don't know if that inspection would be a
9 UTA or would just be a routine inspection
10 that's cleared that day. But with additional
11 training, you might be able to have those
12 contractors clear them initially without them
13 resulting in a UTA.

14 Q Okay. That is all my questions.
15 Thank you very much.

16 ALJ LIRAG: All right. Judge Lau.

17 EXAMINATION

18 BY ALJ LAU:

19 Q Good morning.

20 WITNESS ABRANCHES: Good morning.

21 WITNESS KERANS: Good morning.

22 Q So I'm looking at the testimony and
23 the testimony seems to say that there are a
24 few units that would not be completed based
25 on the imputed numbers, yet in somewhere, I
26 think in Hearing Exhibit-06 which is the
27 Rebuttal Testimony for the Safety Risk and
28 Integrated Planning, there are mention that

1 there's a change in work plans such that
2 that -- the units that were not expected to
3 be completed would be completed; is that
4 correct?

5 WITNESS KERANS: Yes, that's correct.
6 We intend to complete all of the imputed
7 units, the 123,307.

8 Q Okay. And I remember Mr. Abranches
9 was responding to Mr. Long about the new work
10 plan. And one of the things you mentioned
11 the reason why this change was because of
12 safety-related risk; is that correct?

13 WITNESS ABRANCHES: That is correct.

14 Q Can you elaborate how -- why --
15 what is the safety-related risk that is being
16 addressed by changing the work plan?

17 WITNESS ABRANCHES: So I think what
18 Mr. Kerans is better able to --

19 Q I think you should turn on your
20 mic.

21 WITNESS ABRANCHES: I think Mr. Kerans
22 is better able to answer the question so let
23 me start and let him provide more context.
24 We put together the original work plan to do
25 10,000 UTAs and 14,000 -- 10,000 unable to
26 access and 14,000 regular inspections.

27 Q Okay.

28 A When progress was not getting made,

1 when we didn't see evidence of progress
2 getting made on the unable to access because
3 of the coordination required, no cross bore
4 inspections were getting cleared. If no
5 cross bore inspections get cleared, then the
6 risk doesn't come out of the system.

7 So we ask them to pivot and says
8 can you please do cross bore inspections.
9 And so we took the unable to access off the
10 plan until they could further the
11 coordination work and perform regular cross
12 bore inspections. Those regular cross bore
13 inspections, as they get done, every one that
14 gets completed takes risk out of the system.
15 So that was the reason for the pivot.

16 Q But there is a plan for PG&E to
17 address the remaining 10,000 UTAs in San
18 Francisco --

19 A Yes, I think that --

20 Q -- in the 2020 forecast?

21 A Yes. Our best estimate for the
22 remaining UTAs is 21,000.

23 Q Okay.

24 A 10,000 is what we wanted to do in
25 2019; 10,000 in 2020; and 1,000 in 2021. And
26 that was what we -- we filed our testimony
27 stating that would be our plan to remediate
28 those unable-to-access locations.

1 Q But with the revised work plan,
2 what are the numbers now for 2020, 2021, and
3 2022?

4 WITNESS KERANS: So I think that goes
5 to what we spoke about yesterday with the
6 equation that was in my rebuttal is that
7 range between the 23,000 and 45,000 just
8 depending on how many UTAs we can complete in
9 a given year and then doing a ratio between
10 the two.

11 Q So I'm looking at a reference and
12 these numbers are not sponsored by you so it
13 may not be correct, but I'm looking at the
14 unit costs, what the imputed 2017 GRC imputed
15 cost was, \$480.

16 But for 2017 and 2018, what
17 Mr. Long estimated was around \$639 for 2017
18 and \$620 for 2018. Is there -- are these
19 sort of estimated to be correct?

20 WITNESS ABRANCHES: These numbers are
21 correct.

22 Q So what is the reason for almost a
23 30 percent increase and is that expected for
24 the 2020 forecast to have around a \$600 unit
25 cost?

26 A The reason for the increase from
27 the imputed numbers was as we got deeper into
28 the program, the true costs of doing the

1 program emerged, the coordination that
2 requires, the fact that in some cases you've
3 got to go back to the same site as additional
4 costs. These are actual recorded costs, so
5 those are not incorrect.

6 For the forecast that we asked for,
7 I'd originally asked for a blended-unit cost
8 that put UTAs and non-UTAs. In the rebuttal
9 testimony, we conceded if they wanted to
10 separate unable-to-access costs at around
11 \$2,080 and non-UTA costs in the range of
12 around the \$600 range. We said that would be
13 fine as well.

14 Q So but these numbers include -- so
15 the 640 and 620 or 639 and 620, they
16 include -- they're unit costs for both
17 regular inspections and UTA inspections; is
18 that correct?

19 A No. These are just for regular
20 inspections.

21 Q Okay. Okay. Those are all my
22 questions. Thank you.

23 WITNESS ABRANCHES: Thank you.

24 ALJ LIRAG: Mr. Ouborg, any redirect?

25 MR. OUBORG: Yes, your Honor. Can I
26 have one minute?

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

1 (Off the record.)

2 ALJ LIRAG: I think we can go back on
3 the record.

4 Any redirect, Mr. Ouborg?

5 MR. OUBORG: Yes, your Honor.

6 REDIRECT EXAMINATION

7 BY MR. OUBORG:

8 Q This is directed to Mr. Abranches.
9 Mr. Abranches, can you refer back to the
10 slide which describes the decision for the
11 revised work plan in 2019 --

12 WITNESS ABRANCHES: Yes.

13 Q -- that Mr. Long was asking you
14 questions on. Let's first talk about there's
15 a second bullet in the decision work plan
16 change box which talks about eliminating the
17 \$80 million cross bore risk in 2019.

18 That 80 million, you explained in
19 your responses, was based on the difference
20 between the \$2,000-per-unit estimate PG&E had
21 for cross bores -- unable-to-access cross
22 bores compared to the potential that those
23 unable-to-access cross bores could cost as
24 much as 10,000, and that that 80 million is
25 kind of an estimate of what that risk of cost
26 overrun could be; is that right?

27 A Yes, the upper end of that.

28 Q Okay. In your view, has this plan

1 that's been adopted for 2019 in this slide,
2 in your view has that eliminated that risk to
3 PG&E going forward of that cost overrun?

4 A No, it has not eliminated that
5 risk. In the 2020 period, we've still put
6 forward a unit cost -- if I go with the unit
7 cost of unable to access of about \$2,000.
8 Every time we have to perform an inspection
9 that's on the higher end of the range, that
10 risk exists in the system. So that 80
11 million risk of 10,000 in 2020, that risk
12 still exists, the financial risk.

13 Q Thank you. And Mr. Long asked you
14 several times about what the driving reason
15 was for this decision to change the work
16 plan, whether it was financial or some other
17 reason.

18 In your opinion was the purpose of
19 moving from the 10,000 UTAs in 2019 to
20 performing non-UTAs driven by
21 execution-related difficulties or by
22 financial considerations?

23 A It was driven by progress on
24 getting unable to access for clear. That's
25 execution focused.

26 Q And was PG&E making progress? Can
27 you elaborate on the progress PG&E was or was
28 not making on UTAs?

1 A PG&E was not making any progress on
2 UTAs partly because of the discussion that
3 Mr. Kerans has elaborated on in terms of the
4 negotiation and the coordination required.
5 PG&E was making progress on the
6 non-unable-to-access locations, the regular
7 inspections. And so we pivoted to doing more
8 regular inspections and clearing those
9 situations.

10 Q Thank you. Just returning for one
11 minute to the \$80 million risk, was PG&E
12 aware of this \$80 million over cost -- the
13 risk of going over the cost of the
14 unable-to-access install?

15 Was PG&E aware of that at the time
16 it filed its GRC? And I refer you to the
17 footnote that was discussed during your cross
18 with Mr. --

19 A Yes.

20 Q -- Long, Footnote 1?

21 A Yes. To answer your question, when
22 we file the GRC, we filed and asked for, in
23 effect, a unit cost of approximately \$2,000
24 for unable to access. We knew about this
25 risk. We still know about this risk. It
26 still exists.

27 Q Thank you. And finally, in
28 response to some questioning from the ALJ,

1 you explained -- maybe it was Mr. Kerans --
2 that I believe your response for unit
3 costs --

4 A Right.

5 Q -- of UTAs.

6 A Correct.

7 Q So can you explain given the range
8 of costs that you discussed with the ALJ, the
9 1,000 to 10,000 potential costs that might be
10 associated with UTAs, how PG&E selected the
11 2,080 figure that's in PG&E's forecast for
12 UTA unit cost?

13 A The 2,000 figure that was selected
14 was a target unit cost that we asked the
15 execution on to find ways to address
16 unable-to-access cross bore locations. The
17 fact that we found a large number of unable
18 to access, we certainly don't expend \$10,000
19 to do that. Is there a more effective way of
20 doing it.

21 We're trying to find more effective
22 ways to incent the organization to do that.
23 We set a target cost at the lower end of that
24 range, which was \$2,000.

25 Q Thank you.

26 Your Honor, that's my redirect.

27 ALJ LIRAG: Any questions off the
28 redirect, Mr. Long?

1 MR. LONG: Yes, your Honor.

2 RECROSS-EXAMINATION

3 BY MR. LONG:

4 Q Mr. Abranches, the presentation
5 that was made to the decision makers is
6 embodied in this document, Attachment 1 to
7 Exhibit 44; is that right?

8 WITNESS ABRANCHES: That's correct.

9 Q Can you point me to anything in
10 that document that talks about the reason for
11 the change in the plan being execution
12 difficulties?

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

14 (Off the record.)

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

17 Do you have an answer,
18 Mr. Abranches?

19 WITNESS ABRANCHES: Mr. Long, it's in
20 the redacted portion with reference to those
21 execution difficulties. The only reference
22 would be in the financial summary at the
23 bottom of the third bullet where it says
24 "Revised work plan is contingent on finding
25 negotiations with SF."

26 BY MR. LONG:

27 Q Could you tell me where you were
28 referring to again. I missed that.

1 A Sorry. On the financial summary
2 section right at the bottom, there are three
3 bullets. The first one starts with "both
4 expected worst case." The second one starts
5 with "BPR target."

6 I'm referring to the third one
7 which says "Risk: Revised work plan is
8 contingent on final negotiations with SF."

9 Q Okay. I'm --

10 A That's where it references the
11 execution challenges because those
12 negotiations with SF were coordination that
13 we need to do that prevented execution from
14 proceeding as planned.

15 Q That's saying that carrying out the
16 revised plan is contingent on final
17 negotiations, but it doesn't say that the
18 change from the original plan to the new plan
19 is because of execution difficulties; isn't
20 that right?

21 A That's true, yeah, sorry.

22 Q And as for the risk going forward,
23 PG&E's proposal in the rebuttal testimony for
24 the work it will do in the 2020 to 2022 GRC
25 period does not commit to doing -- commit;
26 that is, PG&E is not proposing a certain
27 number of UTAs that it will do. PG&E is not
28 committing to a definitive number of UTAs;

1 isn't that right?

2 WITNESS KERANS: That's correct. We
3 expect it to range from zero to about 10,000
4 depending on how the negotiations work and if
5 we're able to get through this.

6 Q So it could be that PG&E decides to
7 do as few as zero UTAs in 2020; is that
8 right?

9 WITNESS KERANS: That's correct. And
10 using that equation then, it would substitute
11 that standard inspections for those.

12 Q Thank you. Those are all my
13 questions.

14 ALJ LIRAG: ALJ Lau?

15 ALJ LAU: I have none.

16 ALJ LIRAG: Let's go to the exhibits.
17 Exhibit 43 was denied.

18 Mr. Long moved to admit Exhibits 44
19 to 46 into the record?

20 MR. LONG: Yes, your Honor.

21 ALJ LIRAG: Any objections?

22 MR. OUBORG: Which one is that, your
23 Honor? I'm sorry.

24 ALJ LIRAG: So 44 is the agreement with
25 the redacted portions --

26 MR. OUBORG: No objections.

27 ALJ LIRAG: So 44, 45, and 46?

28 MR. OUBORG: No objection to 45. 46 is

1 the San Francisco?

2 ALJ LIRAG: Correct.

3 MR. OUBORG: No objection to that.

4 ALJ LIRAG: All right. Exhibits 44,
5 45, and 46 are received into the record.

6 (Exhibit No. 44 was received into
7 evidence.)

8 (Exhibit No. 45 was received into
9 evidence.)

10 (Exhibit No. 46 was received into
11 evidence.)

12 ALJ LIRAG: That excuses Mr. Kerans.

13 Thank you.

14 WITNESS KERANS: Thank you.

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

16 (Off the record.)]

17 ALJ LAU: Back on the record.

18 Now we have Mr. Andrew Abranches and
19 Dan -- Mr. Dan Menegus on the stand.

20 ANDREW ABRANCHES,
21 resumed the stand and testified further as
22 follows:

23 ALJ LAU: Mr. Abranches, you are aware
24 that you are still under oath to tell the
25 truth?

26 WITNESS ABRANCHES: I am.

27 ALJ LAU: Mr. Menegus, can you raise
28 your right hand?

1 DAN MENEGUS, called as a witness by
2 PG&E, having been sworn, testified as
follows:

3 WITNESS MENEGUS: I do.

4 ALJ LAU: Can you please state your
5 name, spelling your last name, and give us
6 your business address?

7 WITNESS MENEGUS: Dan Menegus,
8 M-e-n-e-g-u-s, 6121 Bollinger Canyon in
9 San Ramon.

10 ALJ LAU: So while we were off record,
11 there were a couple of exhibits that were
12 distributed. These are cross-examination
13 exhibits. We will now identify them.

14 First is Exhibit 47, PG&E's response
15 to TURN data request 89-2.

16 (Exhibit No. 47 was marked for
17 identification.)

18 ALJ LAU: Next is Exhibit 48, PG&E's
19 response to TURN data request 89-4.

20 (Exhibit No. 48 was marked for
21 identification.)

22 ALJ LAU: Next is Exhibit 49, PG&E's
23 response to TURN data request 87-7.

24 (Exhibit No. 49 was marked for
25 identification.)

26 ALJ LAU: And last is Exhibit 50,
27 PG&E's response to TURN data request 89-6
28 with attachment.

1 (Exhibit No. 50 was marked for
2 identification.)

3 ALJ LAU: Mr. Ouborg, would you like to
4 start with your direct examination of the
5 witnesses?

6 MR. OUBORG: Yes, your Honor. Thank
7 you.

8 DIRECT EXAMINATION

9 BY MR. OUBORG:

10 Q Good morning, Mr. Menegus. I think
11 it's still morning.

12 WITNESS MENEGUS: Good morning.

13 Q Mr. Menegus, I'd like to confirm
14 the testimony that you are sponsoring in this
15 proceeding.

16 In what has been marked for
17 identification as Exhibit 11 -- 10, sorry,
18 are you sponsoring a portion of Chapter 2,
19 gas distribution forecast summary and
20 investment planning, all of Chapter 9, gas
21 system operations, and the workpapers for
22 Chapter 9, which have been marked as
23 Exhibit 14?

24 A Yes, I am.

25 Q And in what has been marked as
26 Exhibits 6, 15 and 39 in connection with
27 PG&E's rebuttal testimony, are you
28 response -- are you sponsoring a portion of

1 Exhibit 6, Chapter 2, rebuttal testimony on
2 integrated planning and affordability, all of
3 Exhibit 15, Chapter 9, rebuttal testimony on
4 gas system operations, a portion of
5 Exhibit 39 containing confidential documents
6 related to the rebuttal testimony, and the
7 documents in Exhibit 6, Appendix A, and
8 Exhibit 15, Appendix A, that relate to a
9 sponsored rebuttal testimony?

10 ALJ LIRAG: Just a question,
11 Mr. Ouborg. I think that was 39-C. Right?

12 MR. OUBORG: Yes, your Honor. I
13 apologize.

14 ALJ LIRAG: All right. Thank you.

15 WITNESS MENEGUS: Yes, I am.

16 BY MR. OUBORG:

17 Q And in what has been marked as
18 Exhibit 26, PG&E's errata, are you sponsoring
19 the pages in that errata that pertain to your
20 previously identified testimony?

21 WITNESS MENEGUS: Yes, I am.

22 Q And finally, are you sponsoring
23 your statement of qualifications?

24 A Yes, I am.

25 Q And Mr. Menegus, were these
26 materials prepared by you or under your
27 supervision?

28 A Yes, they were.

AFTERNOON SESSION - 1:18 P.M.

* * * * *

ALJ LAU: Back on the record. We're proceeding with cross-examination by Mr. Long from TURN.

MR. LONG: Thank you.

CROSS-EXAMINATION

BY MR. LONG:

Q Good afternoon, gentlemen.

WITNESS MENEGUS: Good afternoon.

Q I'm going to start by asking you to look at your rebuttal testimony, Exhibit 6, please. And today's panel is about the SCADA visibility program. Is that correct?

WITNESS ABRANCHES: That's correct, yeah.

Q And so your testimony about that -- your rebuttal testimony on that issue begins on page 2-13. Is that right?

A That is correct.

WITNESS MENEGUS: Yes.

Q Okay. So just to -- to give us a little outline of what your rebuttal testimony addresses, as I read it, you're responding to two concerns raised by TURN in your rebuttal. Concern number one is that the SCADA program -- this is -- this is

1 TURN's view. The -- the SCADA program
2 experienced significant cost overruns that
3 PG&E has failed to justify. That's number
4 one. And TURN's second concern is that PG&E
5 deferred work that was authorized and funded
6 in the 2017 to 2019 period, and ratepayers
7 should not have to pay for that work a second
8 time.

9 Do you agree that those were the
10 two main issues raised by TURN that you're
11 addressing in this rebuttal?

12 A Could you repeat the first one?

13 Q Sure. The -- the SCADA program
14 experienced significant cost overruns that
15 PG&E has failed to justify.

16 ALJ LIRAG: Mr. Menegus, could we have
17 you speak into the mic? Same with
18 Mr. Abranches. It's shared, but please use
19 it, both. There may be other parties that
20 are further back in the room.

21 Sorry to interrupt, Mr. Long.

22 WITNESS MENEGUS: Yes, those are the
23 two.

24 WITNESS ABRANCHES: Yeah.

25 BY MR. LONG:

26 Q Okay. So I'm going to -- the way
27 I'm going to organize this cross-examination
28 is we'll start by talking about cost overrun

1 issues, and then after we're finished with
2 that, we'll move to the -- the deferred work
3 issues.

4 So on the issue of cost overruns,
5 am I correct that PG&E does not dispute that
6 there have been significant cost overruns in
7 the SCADA visibility program in the 2017 to
8 2019 period?

9 WITNESS MENEGUS: Yes, there -- the
10 costs were significantly higher than shown in
11 the GRC.

12 Q Okay. I'd like now to ask you to
13 look at page -- I'm sorry, Exhibit 47, which
14 is PG&E's response to TURN data request 89-2.
15 Let me know --

16 A Okay.

17 Q -- when you have that in front of
18 you.

19 A Okay. I have it.

20 Q Thank you. The top table on that
21 response is where PG&E is confirming numbers
22 from the 2017 GRC testimony in which PG&E
23 forecasts unit costs, including escalation
24 for SCADA units. Is that your understanding?

25 A Yes, those are the unit costs with
26 assumed efficiencies that were expected to be
27 realized.

28 Q Okay. So those were the

1 forecast -- the -- that top table, those are
2 the forecast costs that PG&E presented, and
3 those show declining unit costs over the
4 2017/2019 period for both types of RTU. Is
5 that right?

6 A Yes, because of the assumed
7 efficiencies.

8 Q All right. And then in the answer
9 below, you provide additional information
10 about unit costs, and I wanted to ask you to
11 help explain, for the record, a few of these
12 rows. So I'm counting as rows the ones that
13 are -- have numbers in them, dollar numbers.

14 So the third row down says, "Type 3
15 RTU," and then it says, "NCM." NCM stands
16 for new cost model. Is that correct?

17 A Correct.

18 Q And so you've converted the numbers
19 for -- that were shown in the table above
20 which are in the old cost model, and you've
21 converted those to the new cost model, is
22 that right, in that -- in that -- what I'm
23 calling Row 3?

24 A Correct.

25 Q Okay. And you've done that in --
26 in Row 4, as well, for the Type 4 RTU. Is
27 that correct?

28 A Correct.

1 Q Okay. And the conversion from the
2 new cost model -- I'm sorry, the old cost
3 model to the new cost model did not make
4 significant changes to the cost numbers, it
5 looks like. Is that fair to say?

6 A Yes.

7 Q Okay. And then what I'm calling
8 Rows 5 and 6 have the word "imputed" added,
9 and I wonder if you could just explain what
10 you mean by imputed there?

11 A My understanding is imputed is --
12 2017's the base year, so then those are just
13 escalation off the base year numbers in 2018
14 and '19.

15 Q Okay. So could you then explain
16 the difference between the forecast unit
17 costs and the -- that are shown in the rows
18 above and those imputed unit costs?

19 A Yes. As I said, the forecast
20 assume various technology efficiencies were
21 going to be realized throughout the GRC
22 period. So some of those efficiencies were
23 assumed to be realized going before 2017, and
24 that was the starting point, but then there
25 was other assumed efficiencies, mostly from
26 the wireless technology as it achieved
27 greater and greater penetration of the number
28 of units, so that efficiency was going to

1 continue to increase.

2 Q Interestingly, though, the imputed
3 numbers in Rows 5 and 6 actually go up over
4 the three-year period, which is different
5 from the forecast numbers above that.

6 A Yeah. My --

7 Q Does -- go ahead.

8 A My assumption is the imputed
9 numbers for '17 are the same, and then you're
10 just escalating off that '17 number.

11 Q So then those -- for 2018 and 2019,
12 those are not assuming efficiencies that
13 are -- you say are -- are built into the
14 forecast numbers for 2018 and 2019. Is that
15 right?

16 A Correct. I mean they have a
17 certain amount of efficiencies that were
18 based -- baked into the 2017 numbers, but
19 then you were just not having additional
20 efficiencies in those 2018/2019 years.

21 Q Okay. So now going back to your
22 testimony, Exhibit 6, the rebuttal, if you
23 could turn to page 2-18, Answer 36, you say
24 effectively that PG&E built efficiencies into
25 the unit costs that it presented in the 2017
26 GRC, and those -- those efficiencies did not
27 materialize. Is that -- is that your
28 testimony?

1 A Yes. At the time the testimony was
2 put together, there's a number of technology
3 efficiencies that PG&E thought it was going
4 to realize. So that was back first quarter
5 of 2015. SCADA, which stands for Supervisory
6 Control and Data Acquisition, is a complex
7 technology project, and there was a lot of
8 learnings, as with all technology projects,
9 in those initial years.

10 Q Okay. So then Answer 37 focuses on
11 expected efficiencies from a wireless
12 transmitter design called WiHART,
13 W-i-H-A-R-T. Is that right? Is that what
14 Answer 37's focused on?

15 A Yes.

16 Q Okay. Now, it -- it turns out that
17 WiHART was an unproven technology for the
18 uses that PG&E wanted to make of it. Is that
19 correct?

20 A Well, WiHART had been used in
21 certain applications such as, I think, power
22 plants at PG&E, but it hadn't been used for
23 distribution SCADA.

24 Q So in -- I'm sorry. Did I
25 interrupt?

26 A No. Go ahead.

27 Q So, in fact, it was unproven for
28 the uses that PG&E wanted to make of it in

1 the SCADA visibility program. Is that right?

2 A PG&E had started to evaluate it,
3 and those evaluations had looked promising.
4 We hadn't installed any WiHART installations
5 at the time that we wrote this testimony.

6 Q Okay. So I'm going to ask the
7 question again.

8 Was it -- was it an unproven
9 technology for the uses that PG&E wanted to
10 make of it in the SCADA visibility program?

11 A As I said, we were --

12 Q Could I get an answer, "Yes" or
13 "No," and then -- you've explained it, but
14 you haven't -- you haven't given me -- given
15 me a "Yes" or "No" answer.

16 A Well --

17 Q Was it unproven or not?

18 A It gets back to what's the
19 definition of unproven. Certain aspects of
20 it had been proven at that time. Other
21 aspects were unproven, because we were in the
22 evaluation phase of it.

23 Q Which is why I qualified my
24 question with the phrase "for the uses PG&E
25 wanted to make of it in the SCADA visibility
26 program." Was it unproven for those uses?

27 A It hadn't been installed for those
28 uses yet.

1 Q Okay. Now, is it also correct that
2 the 2017 testimony did not indicate that PG&E
3 was relying on that technology?

4 A The 2017 testimony talked about
5 assumed technology efficiencies. It didn't
6 mention WiHART by name.

7 Q Now, did PG&E, when it was making
8 the decision to rely on the WiHART
9 technology -- did it think through all the
10 issues with WiHART that it should have
11 thought through?

12 A Say that again, please.

13 Q When PG&E was making the decision
14 to rely on WiHART in its SCADA visibility
15 program, did it think through all of the
16 issues that it should have thought through?

17 A PG&E wasn't relying on WiHART as
18 part of its SCADA program.

19 (Conference line announcement.)

20 ALJ LIRAG: Off the record.

21 (Off the record.)

22 ALJ LAU: Back on the record.

23 WITNESS MENEGUS: PG&E wasn't relying
24 on WiHART for the SCADA program. It was the
25 most likely technology that was going to be
26 used in the 2017 GRC rate case period, so
27 that's what we based the unit costs on.

28 ///

1 BY MR. LONG:

2 Q So the unit costs were based on
3 significant adopt -- significant use of
4 WiHART. Is that right?

5 WITNESS MENEGUS: Correct.

6 Q But, you weren't relying on it. Is
7 that what you're saying?

8 A Well, there were technologies to
9 install SCADA monitoring that didn't involve
10 WiHART. So if WiHART didn't work out, we
11 were -- still had a technology that we could
12 install visibility using.

13 Q I see. Okay. It's not like it was
14 all or nothing, unless -- I -- I think I
15 understand what you're saying now.

16 But, I guess my -- my question
17 comes back to for purposes of the 2017 GRC
18 forecast, you were assuming significant use
19 of WiHART in your deployments of SCADA?

20 A Yes.

21 Q Okay. Sorry. Maybe we got
22 interrupted when I was asking this question,
23 but I did want to hear whether it's your
24 opinion, based on your experience with this
25 program, whether PG&E thought through all of
26 the issues it should have thought through
27 when it decided to base its 2017 forecast
28 on -- significantly on the use of Wi -- of

1 WiHART.

2 A I'd say at the stage we were at, we
3 thought through those -- those issues. We
4 had a whole set of issues we needed to fully
5 think through before we could deploy WiHART.
6 The GRC testimony is due at a certain point
7 in time, so for that point in time where we
8 were at, we hadn't fully vetted the WiHART
9 technology yet.

10 Q Okay. One of the issues, if I'm
11 recalling correctly from some of the data
12 request responses, is that the -- the
13 wireless transmitters are mounted high on a
14 pole, and could not be easily accessed for
15 maintenance. You needed to get a -- a bucket
16 truck out there to do that. Was that one of
17 the problems?

18 A Maybe a little bit to explain what
19 WiHART is. So WiHART is wireless technology.
20 So the transmitters that are monitoring
21 pressure in the -- the gas system, we -- we
22 connect those to an RTU, which is a remote
23 terminal unit, basically a commute -- a
24 computer that then communicates to our gas
25 control center. So the prior technology, you
26 had to hard-wire between the two. WiHART
27 uses wireless transmitters that can
28 wirelessly then communicate with that gateway

1 to our gas control center, and that was being
2 mounted on a pole. So it's not the
3 transmitters that are mounted on a pole.
4 It's that gateway unit.

5 Q And that was -- but, that's part of
6 the WiHART configuration. Is that right?

7 A Right.

8 Q Okay.

9 A Correct.

10 Q And so it was the gateway being
11 mounted on the pole that drew complaints from
12 internally that this was much more difficult
13 to maintain and required the use of a bucket
14 truck, which would be much more costly. Is
15 that right?

16 A Yes. A gateway has -- doesn't have
17 a lot of equipment in it, so the crews don't
18 have to access it anywhere near as much as
19 the RTU units. So there was lots of
20 different options being evaluated at the
21 time -- potentially mounting that unit up on
22 the pole, and then bringing those wires down
23 to maybe three feet so that the crew only
24 rarely would need a bucket truck -- that
25 hadn't been fully vetted at the time we wrote
26 the testimony. But, yes, that gateway unit
27 mounted up on the pole nine to 15 feet in the
28 air proved to be an issue.

1 Q Now, continuing on with your
2 rebuttal testimony, page 2-19, Answer 39,
3 there you're saying, in the first sentence,
4 that PG&E based its forecast for Type 4 units
5 on design assumptions that ultimately could
6 not be implemented. There in -- and that
7 leads me to ask you to look at Exhibit 48,
8 which is PG&E's response to TURN data request
9 89-4. Let me know when you have that in
10 front of you.

11 A Okay.

12 Q So 4-A asks: Are the design
13 assumptions on which PG&E based its forecast
14 discussed anywhere in PG&E's 2017 GRC
15 testimony or workpapers?

16 And the answer below for "A" is:
17 No, PG&E did not discuss the specific design
18 assumptions that could not be implemented in
19 the 2017 GRC testimony or workpapers. Is
20 that still an accurate answer?

21 A Yes.

22 Q Now, looking at "B" --

23 THE REPORTER: I'm sorry, looking at
24 "D," did you say?

25 MR. LONG: "B," as in boy.

26 THE REPORTER: Thank you.

27 BY MR. LONG:

28 Q It asked to provide any and all

1 documents in PG&E'S possession discussing
2 design assumptions that could not be
3 implemented for Type 4 units.

4 And the response below in the --
5 gosh, four or five lines down, it says
6 PG&E -- actually, four lines down, "PG&E uses
7 a design -- decision design matrix to
8 determine which design is appropriate for
9 each location, and as PG&E applied it, fewer
10 locations were determined to be suitable for
11 the WiHART design than previously assumed."

12 So looking at that answer, it seems
13 that again the issue -- the issue that you're
14 raising is the issue with the WiHART
15 technology. Is that right?

16 A Yes. At the time that the 2017 GRC
17 was filed, PG&E was looking at a whole host
18 of potential technologies to lower cost.
19 WiHART was the most promising and the one we
20 thought was likely to be implemented, so it
21 was the one that we based our unit costs on.
22 But, there were other technologies being
23 looked at, so we didn't specify all the list
24 of technologies as part of the 2017 GRC
25 filing.

26 Q Okay. All right. That's -- those
27 are the questions I wanted to ask about the
28 cost overrun issues. Now I want to move to

1 the defer -- deferred work issue. And to
2 start on that, I wanted to ask you to look at
3 Exhibit 10, which was formerly PG&E-3,
4 particularly page 2-44. Let me know when
5 you're there.

6 A Okay.

7 Q All right. At lines 16 through 19,
8 in summary, it's saying that PG&E was
9 authorized to install 1,244 units in 2017
10 through 2019, but only expects to install
11 536 units. Is that right?

12 A Yes.

13 Q Okay. And is it correct to say
14 that in the current 27 (sic) to 2019 GRC
15 period PG&E is receiving revenue requirement
16 for the cost of the authorized 1,244 units?

17 A Yes.

18 Q Okay. Now, looking at your
19 rebuttal testimony, that's Exhibit 6,
20 page 2-21, please, I think this gets to
21 your -- your part of the rebuttal,
22 Mr. Abranches.

23 WITNESS ABRANCHES: Yeah.

24 Q Yeah. Let's see. So Answer 42 --
25 Question and Answer 42, question states:
26 Does PG&E agree with TURN's contention that
27 PG&E deferred a safety program for budgetary
28 reasons? No.

1 The answer is: No. While TURN
2 contends that PG&E extended the program
3 solely for budgetary reasons, PG&E maintains
4 it was prudent to delay it.

5 Were budgetary reasons at least
6 part of the reason for deferring the program?

7 A Yes.

8 Q Okay. And that's -- let's look
9 then at 87 -- I'm sorry, Exhibit 49, which is
10 PG&E's response to TURN data request 87-7.

11 A I'm there with you.

12 Q Okay. And the answer to 7-A is --
13 talks about two times when PG&E has deferred
14 the SCADA program, first in 2016, and then
15 I'm going to skip over that, and then ask you
16 to look at the part that's the second time,
17 in 2017, and the sentence reads: Second, in
18 2017, as part of the 2018 budget-setting
19 process, it was decided to reduce the number
20 of SCADA units planned for 2018 to stay
21 within the budget allocated for 2018, as the
22 unit cost was around \$186,000 per unit as
23 opposed to the \$100,000 per unit originally
24 forecast.

25 So that indeed is a budgetary
26 reason, would -- would you agree?

27 A Yes, I would.

28 Q Okay. Okay. Now, those unit costs

1 that are mentioned there, the \$186,000 per
2 unit that was experienced versus the
3 100,000-dollar a unit originally forecast,
4 those are blended unit costs for different
5 types of SCADA units. Is that right?

6 And maybe -- Mr. Menegus, I don't
7 know if you know about this.

8 A Yes. I think --

9 WITNESS MENEGUS: Yes, that's a blended
10 unit cost for --

11 Q Which -- which types of units are
12 being blended? And maybe you can provide an
13 answer to that question by reference to your
14 Table 2-2 on page 2-15 of Exhibit 6.

15 A I'm not completely sure, but I'm
16 assuming it's Type 3 and Type 4.

17 Q Okay. And blended for those two
18 types. Okay.

19 Now, back to this data request
20 87-7, Exhibit 49, the decision that's being
21 described there in -- in 7-A, it was made at
22 a -- an FIT-gov committee meeting on June 4,
23 2017. Is that right?

24 WITNESS ABRANCHES: That is correct.

25 Q And FIT stands for?

26 A Finance and information technology.

27 Q Thank you. Now, back to the
28 rebuttal testimony, Exhibit 6, page 2-21,

1 lines 9 and 10. Actually, beginning at
2 line 8, the sentence reads: Rather than
3 continuing to incur the increased costs, PG&E
4 slowed down the program to evaluate options
5 for reducing program costs. Do you see that?

6 A I do.

7 Q Did you have an expectation at that
8 time that that decision was made -- when I
9 say, "you," I should say did PG&E have an
10 expectation at the time that that decision
11 was made in 2017 that you were going to be
12 able to reduce unit costs after 2017?

13 A Yes, at -- yes. At the time that
14 decision was made, we went back to the SCADA
15 team and asked them to -- to look at ways on
16 which they could more prudently reduce costs
17 and still achieve the same objective.

18 Q There's -- there's looking, and
19 then there's expectation. Did you expect
20 there would be a -- reduced costs achieved
21 after -- after the costs that you were
22 experiencing in 2017?

23 A No. The costs we experienced in
24 2017, as indicated here, was high, right,
25 than we initially --

26 Q \$186,000 --

27 A Right.

28 Q -- per unit?

1 A Yes. So when we saw that high unit
2 cost, the question we asked ourselves was if
3 we slow this program down that, first, does
4 it pose any type of safety risk. The second
5 piece of it is we asked the program team:
6 Can you find any technologies that you're
7 looking at that can refine? So with asking
8 them to refine, there is an expectation that
9 they would be able to find something; but,
10 there was no promise of it.

11 Q Okay. Now, I think this is back to
12 you, Mr. Menegus. I'm -- I'd like you to
13 look at Exhibit 14. That's your workpapers.
14 In particular, page 9-12.

15 WITNESS MENEGUS: Okay.

16 Q You're there?

17 A I'm there.

18 Q Okay. So basically, what I'm --
19 what I'm going to ask is whether it worked
20 out that PG&E was able to achieve lower unit
21 costs than what it was experiencing when it
22 made that decision to defer the program in
23 order to evaluate whether lower unit costs
24 could be achieved. And so looking at this
25 workpaper, and it is a little small, let's
26 look at first Row 37.

27 A Okay.

28 Q That's -- that's, I think, the

1 equivalent of the blended costs we were just
2 talking about, major activity code, or MAT,
3 4AM. The unit cost in 2017 that I see is
4 about \$181,000. Is that right?

5 A Yes.

6 Q Okay. That --

7 A That's not a blended unit cost.
8 That's the Type 3 unit cost.

9 Q I see.

10 A As we -- as warehouse -- wireless
11 didn't turn out to be effective technology,
12 we moved to just installing the Type 3 units.
13 So all of these numbers would be comparable
14 to a Type 3.

15 Q Okay. Good. Thank you for
16 clarifying that.

17 And then comparing that 2017
18 recorded cost of \$181,000 and looking to the
19 forecast cost for 2020, the forecast is
20 232,000, roughly. Was that right?]

21 A Yes.

22 Q So the unit costs, you were not
23 able to -- the reductions that you were, say
24 you were evaluating -- the evaluation that
25 you were doing to see if you could get low
26 unit costs did not pan out. In fact, the
27 unit costs that you're forecasting are
28 significantly higher than 2017; is that

1 right?

2 A Than '17. I think if you look back
3 to the -- Table 17 was 180, 2018 was 220, and
4 I believe 2016 was about 220, 230 also. I'm
5 just pointing out that every year, depending
6 on the location and the specific sites, that
7 unit cost varies between 16 to 18. Probably
8 the unit cost is in that 210, 215 range
9 overall.

10 Q Is that somewhere we can verify in
11 your workpapers?

12 A 2017 and 2018 have an average
13 that's in the SCADA deferred work. It shows
14 a \$202 unit cost versus a 204 unit cost
15 without efficiencies. That's Table 2-3.

16 MR. OUBORG: What page is that,
17 Mr. Menegus?

18 WITNESS MENEGUS: That's 2-17.

19 MR. OUBORG: And this is your rebuttal
20 testimony?

21 WITNESS MENEGUS: That's my -- well,
22 it's Chapter 2, Deferred Work Rebuttal,
23 Table 2-3, page 2-17. It shows the type 3
24 are 2017, '18 recorded average was 202. 2019
25 the forecast without efficiencies was 204.
26 2016 I don't think is in the testimony
27 anywhere.

28 ///

1 BY MR. LONG:

2 Q Okay. I'm trying to catch up to
3 you. I'm looking at Table 2-3. Were you
4 talking about type 3 units?

5 WITNESS MENEGUS: Right, so --

6 Q So --

7 A Yes.

8 Q So let's take it one step at a
9 time. Type 3 units for the recorded cost in
10 2017 was \$180,000, right, unit cost?

11 A Correct.

12 Q And then I was comparing that to
13 the 2020 GRC unit cost that you're
14 forecasting now and that's back at the
15 workpaper we were just looking at and that's
16 \$232,000; right?

17 A Right. What I was trying to point
18 out was depending upon the stage of
19 engineering of projects, where they're
20 located, to get a true understanding of what
21 our unit cost has been, you have to look at a
22 two-, three-year period. You can't just take
23 one year because that takes the unit cost out
24 of context.

25 Q Well, I'll tell you the reason I
26 was asking the question the way I did was
27 because I was looking at the decision that
28 was made. It was made on June 14, 2017. And

1 then the explanation in the testimony was
2 that we decided to defer because we wanted to
3 evaluate options to reduce costs.

4 So that's why I was looking at
5 2017. And so from that vantage point, the
6 comparison would be to look at the 2017 unit
7 cost and see how that compares to the unit
8 costs going forward; isn't that right?

9 A Well, I think when we were looking
10 at unit costs, we're looking at what was '15,
11 '16, '17. We weren't just taking one year
12 because depending upon what the units were,
13 that wouldn't be what we were projecting to
14 have as the unit cost.

15 Q I'm afraid I don't understand that,
16 but I'm going to move on to the next
17 question, which is about row 33 on your
18 workpaper, again, page 9-12. I'm just going
19 to ask you the same question for the other
20 type of SCADA device that's the ERX
21 pressuring monitoring device. And there the
22 recorded cost in 20 -- in 2017 was 28,000
23 roughly and the forecast cost in 2020 was
24 approximately \$30,000; is that right?

25 A You lost me.

26 Q Okay.

27 A What I see is the 2017 recorded
28 cost --

1 Q Yes.

2 A -- is 20,000.

3 Q 2017?

4 A Yes. Workpaper 9-10, row --

5 Q Oh, I'm on 9-12.

6 A Oh, 9-12.

7 Q Maybe you have a better workpaper
8 page. I don't know. I'm interested in what
9 was the recorded cost for the ERX device for
10 2017 as recorded unit cost?

11 A Okay. 27,000. Is that --

12 Q That's what I'm --

13 A Row 33?

14 Q Yes. Is that right?

15 A Yes.

16 Q Okay. And then it went up -- in
17 the 2020 forecast it went up to 30,000; is
18 that correct?

19 A Yes.

20 Q So, again, cost reductions were not
21 achieved; correct?

22 A For the ERXs we weren't really
23 looking at cost efficiency technology so,
24 yes, we're using the same design that we've
25 always used.

26 Q Okay. Back to the rebuttal
27 testimony, page 2-21, Answer 45, about the
28 question of whether this delay of the program

1 increased risk. Beginning on the third line
2 in that answer row, I'm sorry, line 29, it
3 says:

4 The critical risks have been
5 addressed through construction of
6 the GDCC and completing at least
7 one SCADA deployment in each HIS
8 of 500 or more customers.

9 So the critical risks had been
10 addressed. Does that mean then that the work
11 that was deferred is addressing non-critical
12 risks?

13 A So the first point of visibility in
14 any system reduces the risk by the largest
15 amount and gives us some visibility as to
16 what's going on in that system. So I liken
17 it to putting lights in a house.

18 The first light you put into each
19 room gives you illumination to that room.
20 Each additional piece of visibility -- you
21 put a light in over the kitchen to wash the
22 dishes gives you some value but it's not the
23 same as the value of that first point of
24 visibility which tells you if there's a
25 significant problem in that area.

26 So by having visibility of every
27 single system, that addresses the greatest
28 risk. All the other ones help us to become

1 more proactive in addressing risk, but that
2 first point is the one that gives you
3 information on what's going on in that
4 system.

5 Q Okay. So in defending the
6 deferred -- the decision to defer, you're
7 saying, well, that didn't increase risks,
8 that didn't increase risk because we already
9 addressed all the critical risks.

10 Is that a fair summary?

11 A It doesn't increase risk because
12 unlike replacing copper services or replacing
13 main where there's a risk to that pipe and
14 that risk as it ages gets worse; SCADA, every
15 point you put in decreases risk further. So
16 not putting those points in doesn't increase
17 risk.

18 Q My question is if you've already
19 addressed the critical risks, and I think
20 that's what you're saying here. You had
21 already addressed the critical risks. Does
22 that mean that the work that was deferred is
23 designed to address non-critical risks?
24 Doesn't that follow?

25 A Not really because I think we're
26 using a different definition of critical.
27 Every point you put in after that first point
28 helps you to be more proactive. It's working

1 on the same risk, but that first point is the
2 greatest risk reduction and tells you what's
3 going on in that system.

4 Q Okay. So then the deferred work
5 was important and was addressing a critical
6 risk then?

7 A I think somewhere else in testimony
8 we'd explained it a different way which is by
9 having that single point in every system, we
10 create a base foundation of visibility across
11 the system for risk reduction.

12 Q Well, it seems like you're trying
13 to have it both ways. When it comes time to
14 defer the risk, you're saying, well, we'd
15 already addressed all the critical risks.
16 But here when you're trying to ask the
17 Commission to give you money to address the
18 risks, you seem to be hesitant to say that
19 those aren't -- you still want to say those
20 are important risks that need to be
21 addressed.

22 Can you square those two for me?

23 A The SCADA program helps us to
24 reduce risk, identify risk earlier on. That
25 first point of visibility has the biggest
26 impact. The additional visibility still
27 helps us to reduce risk, it's not as much,
28 helps us to become more proactive.

1 But that there's an abnormal
2 situation going on in any system, the first
3 point of visibility tells us that. So, you
4 know, going along with this FIT-gov decision,
5 there was also executive project committee
6 meetings that same summer that closed out the
7 SCADA project and made it a program.

8 The reason we were able to close
9 out that project is because the most critical
10 risks identified when we created the project
11 were addressed by that first point of
12 visibility plus our new control center. So
13 that continues, you know, that's in this
14 TURN 33, Question 3 that talks about the
15 slow-down in work. And it talks -- and it --

16 Q Excuse me, Mr. Menegus. I think
17 you're way away from my question. Here's
18 what I want to try to understand: You seem
19 to be saying in Answer 45 that there was not
20 a risk issue created by deferring because the
21 critical risks had already been addressed.

22 Let me put the question this way:
23 Is it true that some of that work that was
24 deferred, you are requesting funding to do in
25 this rate-case period, this upcoming
26 rate-case period; is that correct?

27 A Yes.

28 Q Now, is that important work that's

1 necessary for safety? Yes or no, then you
2 can explain.

3 A Okay. Yes, it helps us to be -- to
4 address risk to a deeper level for -- to
5 create a core level of safety and
6 reliability. That first point of visibility
7 achieves that. Now we're going above and
8 beyond trying to be more proactive in how we
9 address risks, so that has continued safety
10 and reliability impacts.

11 That first point of visibility
12 allowed us to have a basic level of safety
13 and reliability from the program.

14 Q Okay. So the work that you're --
15 that you deferred and are asking to have
16 funded again in this rate-case period is
17 important work for safety.

18 That's your testimony?

19 A Yes.

20 Q So if it's important now, wasn't it
21 also important in the 2017 to 2019 rate-case
22 period?

23 A Yes.

24 Q Now I'd like to turn to page 2-23.

25 ALJ LIRAG: Hang on, Mr. Long. Let me
26 just ask a follow-up question while we're on
27 that topic.

28 Following your example about the

1 first point of visibility being sort of
2 more -- it addresses more issues than the
3 second, third, and fourth. I'm wondering if
4 that applies progressively, meaning does the
5 second point of -- I don't know what you call
6 it.

7 WITNESS MENEGUS: Visibility.

8 ALJ LIRAG: Visibility. Is that
9 more -- does that address more issues than
10 the third point or does it only apply to the
11 first point of visibility?

12 WITNESS MENEGUS: It primarily applies
13 to the first point because that first point
14 is giving you generally visibility of the
15 whole system. Every additional point is kind
16 of a specific point in the system that's
17 providing additional --

18 ALJ LIRAG: All right. So it does not
19 apply progressively, it's just that first
20 point. And then the second, third, fourth,
21 fifth points are, you know, address specific
22 issues and none are more important than the
23 other generally?

24 WITNESS MENEGUS: There may be a
25 priority because there may be one -- you
26 know, a system might be fed by five different
27 stations.

28 ALJ LIRAG: All right.

1 WITNESS MENEGUS: The biggest station
2 might have more value than the smallest
3 station, but they're all addressing a
4 specific --

5 ALJ LIRAG: All right. I think I got
6 it. Thank you.

7 BY MR. LONG:

8 Q Thank you. Now, looking at page
9 2-23, Answer 50.

10 WITNESS MENEGUS: Yes.

11 Q I think this is Mr. Abranches'
12 testimony. In the second paragraph in that
13 answer it says "PG&E did not restrict its
14 spending to the forecast adopted in the 2017
15 GRC." And there's a reference to exceeding
16 the authorized capital spending.

17 WITNESS ABRANCHES: Correct.

18 Q And then there's a footnote
19 referencing Table 203 in Exhibit PG&E-01. So
20 that leads us to a data request that's been
21 marked as Exhibit 50, which is PG&E's
22 Response to TURN Data Request 89-6.

23 Do you have that in front of you,
24 Mr. Abranches?

25 WITNESS ABRANCHES: I do have that,
26 yes.

27 Q So this data request asked you to
28 update that Table 2-3 that's referenced in

1 that footnote. The attachment is an update
2 and it's also broken out as TURN requested by
3 line of business; is that right?

4 A That is correct.

5 Q So now I want you to turn then to
6 the attachment. There are two sets of
7 tables. The first one is for comparing the
8 adopted -- imputed adopted costs to the
9 recorded and budgeted costs; is that right?

10 MR. OUBORG: Your Honor --

11 WITNESS ABRANCHES: It's right, but I
12 do want to say this response and this data
13 request was directed at Shilpa Ramaiya.

14 BY MR. LONG:

15 Q I'm sorry. Well, it was directed
16 at the testimony and PG&E responded with
17 saying that the person who provided the
18 response is Ms. Ramaiya, but it's directed to
19 this testimony. Anyway, I'm not going to get
20 into very complicated things. I think that
21 you're going to know what I'm going to ask
22 you about.

23 So the first page is -- gee, it
24 doesn't say but I think this is -- oh, it
25 does. Wait, that's capital and then second
26 page is expense, is that right, or is it the
27 other way around? Oh, the first page is --

28 WITNESS ABRANCHES: The first page is

1 expenses.

2 Q First page is expense, okay.

3 A As far as I can tell.

4 Q Okay. Yeah. That's what I figured
5 you knew these amounts. For gas distribution
6 line of business, that's what I'm focused on.
7 It turns out that PG&E's expectation now is
8 that it will not quite spend the full imputed
9 amount for 2017 to the 2019. That will be a
10 variance of \$12 million; is that right?

11 A I have not prepared these tables so
12 I can't directly speak to the table. What it
13 does say on the table, which I'm not
14 disputing, is that, yes, it shows a variance
15 of \$12 million.

16 Q Okay. That is less than what was
17 imputed and authorized; correct?

18 A Based on what it says on this
19 table, correct.

20 Q Okay. And then turning to the
21 capital table, the second page, it's showing
22 that PG&E would spend less for gas
23 distribution than its imputed authorized
24 capital for 2017 through 2019 on the amount
25 of \$56 million; is that right?

26 A Based on what it shows on this
27 table, correct.

28 Q Those are all my questions. Thank

1 you.

2 ALJ LAU: I do have a couple questions.

3 Judge Lirag, do you have questions?

4 Off the record.

5 (Off the record.)

6 ALJ LAU: Back on the record.

7 EXAMINATION

8 BY ALJ LAU:

9 Q So my first question is back to the
10 first point of visibility. How did you
11 define and how is that defined to have a
12 first point of visibility?

13 WITNESS MENEGUS: So our gas
14 distribution system is broken up into
15 independent hydraulic systems. They're
16 independent from one another. So the first
17 point of visibility, which we defined as
18 addressing the critical risk, is we have no
19 visibility of what the pressure is in that
20 system. So that first point gives us some
21 indication of what the pressure is in that
22 system.

23 Q And the work that the SCADA units
24 that were deferred, what other qualitative
25 visibility other than pressure does it give
26 PG&E if that makes sense?

27 A Yes. Most of the other RTU units
28 are then providing visibility of what the

1 pressure is at the inlet -- basically the
2 inlet points to that system are our regulator
3 stations so it gives us the pressure right at
4 that regulator station.

5 So if you have a pressure problem
6 in the system and it's a high pressure, it's
7 coming from one of the regulator stations so
8 you can evaluate more quickly what station is
9 causing the problem.

10 Q And why is it that that is not --
11 not having information to read those pressure
12 points at the inlet to the regulating --
13 regulator stations, why is that not a
14 critical risk?

15 A We defined it as that first point
16 of having no visibility. As soon as you have
17 some visibility, it's an important but it's
18 not as critical because that first point
19 tells us something is going on. We call out
20 people to identify what the problem is in
21 that system then.

22 Q So what is I guess -- let me
23 rephrase. What kind of consequence would
24 happen? Is it catastrophic if, let's say,
25 PG&E doesn't have that reading to the
26 inlet -- the pressure of the inlet to the
27 regulator station? What kind of a -- how big
28 of a consequence would that be?

1 A Consequence would typically be a
2 delayed response to the issue.

3 Q Okay. How many units were
4 deferred?

5 Off the record.

6 (Off the record.)

7 ALJ LAU: Back on the record.

8 WITNESS MENEGUS: So it went from 1,244
9 to 668 -- oh, no, wait, sorry, to 536.

10 BY ALJ LAU:

11 Q Is there anything in the
12 testimony -- can you point me to somewhere in
13 your testimony?

14 WITNESS ABRANCHES: Table 2-9.

15 Q And in which exhibit?

16 A Exhibit PG&E-03. What exhibit is
17 that?

18 MR. OUBORG: That's 10.

19 WITNESS ABRANCHES: Exhibit 10.

20 BY ALJ LAU:

21 Q What page is that?

22 A It's on page 2-36, Table 9 --
23 Table 2-9. There's a table right at the
24 bottom. It tells you how many -- let me go
25 through the table. The table indicates 1,244
26 SCADA units. That was the imputed ask at
27 \$103.5 million, and what was installed was
28 536 at a cost of \$80.3 million.

1 Q So does that mean that there were
2 about 700 units that were delayed?

3 A Approximately. It's 668.

4 Q Okay.

5 A Approximately 700, yes.

6 Q And how many of the -- so what is
7 the requested -- what is the amount of
8 requested units for the 2020 forecast?

9 WITNESS MENEGUS: Just one --

10 Q Off the record.

11 (Off the record.)

12 ALJ LAU: On the record.

13 WITNESS MENEGUS: Just one point first
14 is we didn't do 668 units but also the number
15 of units we needed to do decreased from the
16 2017 GRC to this filing as we learned more
17 about our systems.

18 BY ALJ LAU:

19 Q Okay. So I guess the question --
20 let me rephrase my question. How many of the
21 units that were -- that are requested in the
22 2020 GRC are deferred units from the previous
23 GRC and can you point me to somewhere in your
24 testimony that clarifies that?

25 WITNESS MENEGUS: So there's nothing in
26 the testimony that points to how many of
27 those were planned to have been done in the
28 2017 GRC. The total number of units planned

1 for 2020 through 2022 is 457. And then there
2 will be 350 remaining after that to complete
3 the program.

4 So our total program will require
5 2,262 units to be installed. Back at the
6 last 2017 GRC, we were planning on installing
7 3,275 units as part of this program. So as
8 we've learned more about our system, more
9 about risks, we've reduced the program size
10 by about a thousand units.]

11 Q I am a bit confused. We were
12 talking about 668 deferred units, and the
13 numbers do not correspond to the numbers that
14 you've just given me.

15 Is there anything that --

16 A I'm using workpaper 9-15, workpaper
17 Table 9-13.

18 WITNESS ABRANCHES: Which exhibit?

19 ALJ LAU: Exhibit 14?

20 WITNESS MENEGUS: PG&E-3, which --

21 MR. OUBORG: Exhibit 10.

22 WITNESS MENEGUS: Exhibit 10.

23 MR. OUBORG: There's workpapers in
24 Exhibit 10.

25 ALJ LAU: Off the record.

26 (Off the record.)

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

28 Q I want to clarify that my question

1 is asking of the 429 units that are
2 forecasted, which is on page 2-44 in Hearing
3 Exhibit 10, how many of those 429 units that
4 PG&E is requesting for the 2020 rate case --
5 how many of those units were from -- were
6 deferred work from the previous 2017 rate
7 case?

8 WITNESS MENEGUS: So I don't have that
9 information.

10 ALJ LIRAG: You can explain,
11 Mr. Menegus, how you determine how many --
12 your forecasting to do, and then --

13 WITNESS MENEGUS: Right.

14 ALJ LIRAG: -- if there's a connection
15 with the deferred work, then indicate that.
16 But, if that's not how -- the way you plan,
17 or if you -- that's not the way -- how you
18 forecast things, then kind of explain how it
19 is that you do determine the number of work
20 that has to be done in this GRC.

21 WITNESS MENEGUS: Right. So we have a
22 total number of sites that need SCADA, and as
23 we get more information on each of those
24 HISes and what's the specific makeup and
25 where would we need to install units, our
26 total number of units decreases. Or if we
27 have another project that installed SCADA,
28 like a reg (phonetic) rebuild, and that

1 installed SCADA -- that also decreases the
2 number of units we need to install. So for
3 the last GRC, pending the numbers that Andy
4 showed me, we installed 600 -- or are
5 planning on installing 668 units less than we
6 had in the forecast, but at the same time
7 between those two GRCs, we're installing 1013
8 less units that complete the program. Now,
9 we don't identify which of those units we're
10 going to get installed in which years because
11 of various issues. A lot of times, units
12 will get deferred -- delayed because of
13 permitting issues or other issues. So we
14 just seek to install a certain number of RTUs
15 and ERXs in a given year.

16 ALJ LAU: Okay. That's all the
17 questions I have.

18 Mr. Ouborg, do you have any
19 redirect?

20 MR. OUBORG: Could I have a minute,
21 your Honor?

22 ALJ LAU: Yes. Let's go off the
23 record.

24 (Off the record.)

25 ALJ LAU: Back on the record. We're
26 going to take a ten-minute recess. Off the
27 record.

28 (Off the record.)

1 ALJ LAU: On the record. We're
2 proceeding with the redirect from Mr. Ouborg.

3 MR. OUBORG: Your Honor, we have no
4 redirect.

5 ALJ LAU: Okay. Then you guys --
6 Mr. Abranches and Mr. Menegus are excused.

7 ALJ LIRAG: Not yet. They need to --
8 let's address the exhibits first.

9 ALJ LAU: Okay.

10 ALJ LIRAG: So let's keep them there
11 probably a couple minutes longer.
12 Mr. Abranches has been there all day.

13 WITNESS ABRANCHES: Well --

14 ALJ LAU: So Mr. Long, do you want to
15 move the Exhibits Number 46 to 50 and to
16 40 -- off the record for a second.

17 (Off the record.)

18 ALJ LAU: Back on the record.

19 Mr. Long, do you move to -- to move
20 Exhibit 47 through Exhibit 50 into the
21 record?

22 MR. LONG: Yes, I do, your Honor.

23 ALJ LAU: Are there any objections?

24 (No response.)

25 ALJ LAU: Hearing none, Exhibit 47, 48,
26 49 and 50 are moved into record.

27 (Exhibit No. 47 was received into
evidence.)

28 (Exhibit No. 48 was received into

1 evidence.)

2 (Exhibit No. 49 was received into
evidence.)

3 (Exhibit No. 50 was received into
4 evidence.)

5 ALJ LAU: Mr. Abranches and
6 Mr. Menegus, you are both excused.

7 Right now, we're going to talk about
8 scheduling. So there are no witnesses
9 scheduled for tomorrow. That is
10 September 26th. So we will not have hearings
11 tomorrow. But, we do have those witnesses
12 which is -- which are the witnesses for the
13 Community Wildfire Safety Program that is the
14 Community Wildfire Safety Panel that is
15 Sumeet Singh, Matthew Pender and Steve E.
16 Calvert. They will be testifying on Friday,
17 October 4th.

18 ALJ LIRAG: No, it's -- we're -- we're
19 looking at the 27th first.

20 ALJ LAU: Okay.

21 ALJ LIRAG: So I think we have Robert
22 Earle and Sandra Cullings.

23 ALJ LAU: Yes, we have Sandra Cullings
24 and Robert Earle for September 27th,
25 tomorrow.

26 ALJ LIRAG: No, on Friday.

27 ALJ LAU: Right, Friday.

28 ALJ LIRAG: Judge Lau is a week ahead.

1 ALJ LAU: Friday, September 27th.

2 Judge Lirag?

3 ALJ LIRAG: Yeah. So that's the
4 schedule for the rest of the week.

5 PG&E, specifically Mr. Arnold and
6 Ms. Gandesbery, please update us if there are
7 any changes.

8 And also, on Friday, we'll go into
9 the schedule for the following week.

10 So now let's spend the next --
11 probably the next 20 minutes to take care of
12 exhibits that have no cross scheduled.

13 Mr. Long, you can stick around for
14 that, but we're -- we're fine, I think, with
15 Ms. Shek speaking on behalf of the other
16 parties.

17 MR. LONG: Ms. Goodson asked me to hang
18 around, just in case.

19 ALJ LIRAG: All right. May as well
20 stay. Who knows? There may be an objection
21 there. All right.

22 So let's go off the record while
23 we -- while we take care of these exhibits.
24 So off the record.

25 (Off the record.)

26 ALJ LAU: Back on the record.

27 Ms. Gandesbery, do you have any
28 exhibits that you'd like to move into the

1 record?

2 MS. GANDESBERY: Yes, your Honor.

3 Thank you. I would like to mark as Hearing

4 Exhibit 51 PG&E --

5 ALJ LAU: Let --

6 ALJ LIRAG: Excuse me, Ms. Gandesbery.

7 Let's have Judge Lau --

8 ALJ LAU: Identify.

9 ALJ LIRAG: -- identify the exhibits.

10 MS. GANDESBERY: Okay.

11 ALJ LAU: We're still on the record.

12 Right?

13 So let me identify several records

14 that PG&E's circulated.

15 Exhibit 51 is the prepared testimony

16 statement of qualifications.

17 (Exhibit No. 51 was marked for
18 identification.)

19 ALJ LAU: Exhibit 52 is the rebuttal

20 testimony statement -- statement of

21 qualifications.

22 (Exhibit No. 52 was marked for
23 identification.)

24 ALJ LAU: Exhibit 53, prepared

25 testimony post test year ratemaking.

26 (Exhibit No. 53 was marked for
27 identification.)

28 ALJ LAU: Exhibit 54, post test year

1 ratemaking workpapers supporting Chapters 2
2 and 3.

3 (Exhibit No. 54 was marked for
4 identification.)

5 ALJ LIRAG: All right. Are these for
6 various witnesses? I just wanted to clarify.

7 MS. GANDESBERY: This is for witness
8 Teresa Hوجلund.

9 ALJ LIRAG: All right. So if it's a
10 singular witness, let's identify which
11 witness' testimony or rebuttal testimony or
12 workpapers that is. If it's various
13 witnesses, let's also indicate that, for
14 clarity. Thank you.

15 ALJ LAU: Okay. So Exhibit 55 are
16 rebuttal testimony post test year ratemaking.

17 (Exhibit No. 55 was marked for
18 identification.)

19 MS. GANDESBERY: Yeah.

20 ALJ LAU: And Exhibit 51 through 55 are
21 sponsored by various witnesses.

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

23 (Off the record.)

24 ALJ LAU: Back on the record.

25 Ms. Gandesbery, do you want to
26 clarify the witnesses for Exhibit 53?

27 MS. GANDESBERY: Yes.

28 ALJ LAU: Do you want to use the mic

1 for the reporter?

2 MS. GANDESBERY: Yes. Thank you, your
3 Honor. I'm clarifying that, for Exhibit 53,
4 the witnesses are -- for Chapters 1 and
5 Chapter 2 are -- is Teresa Hoglund.
6 Chapter 3 is Pei Sue Ong.

7 ALJ LAU: PG&E, do you move the
8 Exhibits 51 through 55 into the record?

9 MS. GANDESBERY: Yes, your Honor.
10 Thank you.

11 ALJ LAU: Are there any objections from
12 the other parties?

13 MS. SHEK: No, your Honor.

14 ALJ LAU: Hearing none, Exhibits 51
15 through 55 are moved into evidence.

16 (Exhibit No. 51 was received into
17 evidence.)

18 (Exhibit No. 52 was received into
19 evidence.)

20 (Exhibit No. 53 was received into
21 evidence.)

22 (Exhibit No. 54 was received into
23 evidence.)

24 (Exhibit No. 55 was received into
25 evidence.)

26 ALJ LIRAG: Let's just clarify for the
27 record that Exhibit 53 for those two
28 witnesses and then all the various witnesses
that are sponsoring these exhibits, these are
witnesses where cross had been waived. Is

1 that correct?

2 MS. GANDESBERY: Well, cross has been
3 waived for Teresa Hog- -- Hoglund. Pei Sue
4 Ong does have some cross still.

5 ALJ LIRAG: Right. But, this portion
6 has been waived?

7 MS. GANDESBERY: But, not on these
8 exhibits, correct.

9 ALJ LIRAG: All right. So all the
10 exhibits from various witnesses contain
11 sections wherein cross had been waived?

12 MS. GANDESBERY: Yes.

13 ALJ LIRAG: All right. So I just
14 wanted to clarify that. All right.

15 MS. GANDESBERY: Thank you.

16 ALJ LIRAG: Judge Lau?

17 ALJ LAU: All right. So that concludes
18 today's hearing. Thank you. Off the record.

19 (Whereupon, at the hour of 2:49
20 p.m., this matter having been
21 continued to 9:30 a.m., September
22 27, 2019 at San Francisco,
California, the Commission then
adjourned.)]

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, ANDREA L. ROSS, CERTIFIED SHORTHAND REPORTER
NO. 7896, IN AND FOR THE STATE OF CALIFORNIA, DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON SEPTEMBER 25, 2019.

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

EXECUTED THIS SEPTEMBER 28, 2019.

A handwritten signature in black ink, reading "Andrea L. Ross". The signature is written in a cursive style with a large, looped "R".

ANDREA L. ROSS
CSR NO. 7896

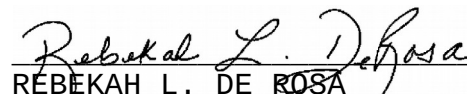
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, REBEKAH L. DE ROSA, CERTIFIED SHORTHAND
REPORTER NO. 8708, IN AND FOR THE STATE OF CALIFORNIA,
DO HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON SEPTEMBER 25, 2019.

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

EXECUTED THIS SEPTEMBER 28, 2019.


REBEKAH L. DE ROSA
CSR NO. 8708

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