



FILED

01/25/19
04:59 PM

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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.
(U 39 M)

Application No. 18-12-009
(Filed Dec. 13, 2018)

**MOTION OF SMALL BUSINESS UTILITY ADVOCATES
REQUESTING PARTY STATUS**

Ivan R. Jimenez
Regulatory Attorney

Small Business Utility Advocates
548 Market St., Suite 11200
San Francisco, CA 94104
Telephone: (650) 395-7025
Email: ivan@utilityadvocates.org



January 25, 2019

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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.
(U 39 M)

Application No. 18-12-009
(Filed Dec. 13, 2018)

**MOTION OF SMALL BUSINESS UTILITY ADVOCATES
REQUESTING PARTY STATUS**

I. INTRODUCTION

Pursuant to Rule 1.4(b) of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Small Business Utility Advocates (“SBUA”) submits the following Motion for Party Status in the above-referenced proceeding. Pacific Gas and Electric Company’s (“PG&E”) filed its Test Year 2020 General Rate Case Application (“Application”) on December 13, 2018. PG&E requests revenue requirement increases of \$1,058 million in 2020 and incremental increases of \$454 million and \$486 million in 2021 and 2022, respectively.¹ SBUA’s constituency includes an important customer class, small commercial customers, and SBUA requests party status to participate on behalf of these customers.

SBUA already is proactively involved in this General Rate Case. In the last rate case (PG&E’s 2017 GRC application), SBUA entered into a comprehensive settlement agreement with all parties and separately negotiated an agreement between PG&E and SBUA as a memorandum of understanding that was approved by the Commission in its Decision 17-15-013.² Pursuant to that settlement agreement, SBUA and PG&E have met semi-annually to

¹ PG&E Application (A.18-12-009), at 1, 19.

² D.17.15-013, at 161-167 (discussing benefits of settlement agreement for small businesses and approving SBUA-PG&E memorandum of understanding).

discuss the concerns of small commercial customers. As an outgrowth of these discussions, SBUA and PG&E interfaced and negotiated on small business matters related to PG&E's 2020 GRC, and the parties reached agreement on a Memorandum of Understanding (MOU), as discussed in Chapter 6 of PG&E's Application.

This MOU advances numerous issues of importance to SBUA's constituency, such as spending, customer service and outreach, adopting new energy technologies, economic development incentives, and promoting contracting opportunities for small businesses.

II. SBUA'S BACKGROUND

SBUA's mission is to represent the utility concerns of the small business community. Maintaining equitable and fair revenue requirements for utilities, including with appropriately approved expenditures to facilitate the success of small commercial customers, is a high priority for SBUA.³ Small businesses are not only vital to California's economic health and welfare but also constitute an important class of ratepayers for utility companies. The ratepayer interests of this class often diverge from residential ratepayers and larger commercial customers on a variety of utility matters. The needs of small businesses are critical to consider not only because they have a substantial impact on California's economy but also because engagement from small businesses and their employees is critical to the future of California's grid. There are approximately 3,941,201 small businesses in the state that comprise of 99.8% of all employer firms, provide 48.8% of private sector employment, account for over 280,000 net new jobs, and comprise approximately 43.2% of California's \$152.1 billion in exports.⁴ For these reasons,

³ See SBUA website at www.utilityadvocates.org.

⁴ California Small Business Profile, U.S. Small Business Administration Office of Advocacy. See www.sba.gov/sites/default/files/advocacy/2018-Small-Business-Profiles-CA.pdf.

PG&E's revenue application should give significant consideration to the needs of small commercial customers in PG&E's service territory.

III. SBUA'S INTERESTS IN THIS PROCEEDING

SBUA seeks to participate in this proceeding to advance the interests of small businesses and urge the Commission to adopt the MOU between SBUA and PG&E. As indicated in the Application, SBUA and PG&E entered into a Memorandum of Understanding ("MOU") focused on ways PG&E can improve services for small businesses.⁵ The MOU will provide needed services to small businesses and help this customer base gain access to utility-administered programs. This MOU would represent a continued collaborative approach between PG&E and SBUA, as the Commission previously approved an MOU in PG&E's 2017 GRC proceeding.⁶

Building upon the lessons learned from the 2017 MOU, the currently proposed MOU includes various strategies to better meet the needs of small businesses and remedy their low participation rates in utility-administered programs. For example, PG&E will reserve \$6.5 million annually for outreach and support activities with the purpose of increasing participation of small businesses.⁷ As such, SBUA will submit testimony and otherwise support the MOU as a reasonable and justified approach that is in the public interest and will assist the small business community. SBUA therefore requests that the Commission grant SBUA party status to address these concerns. In addition, SBUA reserves the right to address other issues that arise as the proceeding progresses that may impact small commercial customers. To the extent that SBUA's interests overlap with other parties, it will actively seek to collaborate. Its participation will not prejudice any party or cause any delay to the proceeding.

⁵ Ex. No. PG&E-6, at 2-3 – 2-4.

⁶ *Id.*, Ch. 2, Attachment A, at 2-AtchA-1.

⁷ *Id.* at 2-24.

SBUA supports the proposed schedule with a suggestion to align the deadlines for testimony in this proceeding with the Wildfire Mitigation Proceeding (R.18-10-007). The Scoping Memo for Rulemaking 18-10-007 indicates that parties have to submit reply briefs on March 27th but does not specify the date by which the Commission will adopt a final decision.⁸ The Scoping Memo for Rulemaking 18-10-007 indicates that the Commission will close the proceeding within 18 months of opening it. The proceeding opened on October 25, 2018 so it is possible that the final decision will be adopted in the third or fourth quarter of 2019. The final decision will likely impact this proceeding because it will decide which wildfire mitigation activities to approve and the scope, both of which will impact costs for wildfire mitigation and the determination of whether the proposed revenue increases in this Application are justified. This will likely impact parties' testimony in this proceeding. Therefore, SBUA suggests that the Commission adjust deadlines in the proposed schedule as it deems fit to coordinate with Rulemaking 18-10-007.

IV. SERVICE

Service of notices, orders, and other communications and correspondence in this proceeding should be directed to:

Ivan R. Jimenez
Small Business Utility Advocates
548 Market St., Suite 11200
San Francisco, CA 94104
(650) 395-7025
ijimenez@utilityadvocates.org

James M. Birkelund
Small Business Utility Advocates
548 Market St., Suite 11200
San Francisco, CA 94104
(415) 602-6223
james@utilityadvocates.org

⁸ See R.18-10-007, Scoping Memo.

As well as service on SBUA's expert:


Michael Brown
1712 19th Street, Suite 215
Bakersfield, CA 93301
(415) 699-0261
michael@mbrownlaw.net

V. CONCLUSION

In light of the above, SBUA respectfully requests the Commission grant its motion and allow SBUA to participate as a party in this proceeding.

Dated: January 25, 2019

Respectfully Submitted,

By: 
Ivan R. Jimenez

Small Business Utility Advocates
548 Market St., Suite 11200
San Francisco, CA 94104
T: (650) 395-7025
Email: ivan@utilityadvocates.org