



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

**FILED**  
08/07/19  
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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)

Application 18-12-009  
(Filed December 13, 2018)

**RESPONSE OF L. JAN REID TO PACIFIC GAS AND ELECTRIC COMPANY'S  
MOTION TO STRIKE THE TESTIMONY OF THE ALLIANCE FOR NUCLEAR  
RESPONSIBILITY**

**I. Introduction**

Pursuant to Rule 11.1(e) of the Commission's Rules of Practice and Procedure, L. Jan Reid (Reid) files this response to the motion of Pacific Gas and Electric Company (PG&E) to strike the testimony of the Alliance for Nuclear Responsibility (A4NR) in Application (A.) 18-12-009.

Responses to PG&E's motion are due on August 13, 2019. I will send this motion to the Docket Office on or before the due date using the Commission's electronic filing system, intending that the pleading will be timely filed.

PG&E claims that A4NR's testimony is outside the scope of this proceeding. I urge the Commission to reject PG&E's motion and find that ANR's testimony is within the scope of the instant proceeding.

## **II. Discussion**

PG&E states that “A4NR suggests that the Commission should not include in the generation revenue requirement adopted in this proceeding any of the forecast capital and O&M costs for Diablo Canyon because facts and circumstances have changed since the Commission approved retirement of Diablo Canyon.” (PG&E Motion, p. 2)

The issue before the Commission is whether A4NR’s testimony is consistent with the scope of this proceeding, and not whether the Commission agrees with A4NR’s proposals. If the Commission strikes A4NR’s testimony, they will have effectively rejected A4NR’s proposals without the benefit of hearing cross-examination of A4NR witness John Geesman, or of reading rebuttal testimony, opening briefs, or reply briefs. Therefore, the Commission should not prejudge ANR’s proposals based solely on PG&E’s motion.

As explained below, ANR’s testimony is clearly within the scope of this proceeding.

On March 8, 2019 the Assigned Commissioner issued a scoping memo and ruling (Ruling) in this proceeding. The Ruling states that the scope includes “Whether the proposed Post-TY forecasts, adjustments, mechanisms, and regulatory filings for 2021 and 2022 are just and reasonable.” (Ruling, p. 4)

A4NR addresses whether these forecasts are just and reasonable in its testimony. Geesman states that “The purpose of my testimony is to provide evidence in support of A4NR’s challenge to the reasonableness of certain portions of PG&E’s proposed revenue requirements for the 2020-2022 rate cycle related to the Diablo Canyon Nuclear Power Plant (‘DCNPP’).” (A4NR Testimony, p. 3) Therefore, the Commission should reject PG&E’s motion to strike A4NR’s testimony.

### **III. Conclusion**

The Commission should adopt Reid's recommendations for the reasons given herein.

\* \* \*

Dated August 7, 2019 at Santa Cruz, California.

/s/

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## VERIFICATION

I, L. Jan Reid, make this verification on my behalf. The statements in the foregoing document are true to the best of my knowledge, except for those matters that are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Dated August 7, 2019, at Santa Cruz, California.

/s/

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