

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



**FILED**

11/24/20  
08:39 AM

Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Services Effective on January 1, 2020. (U39M)

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

**JOINT CCAS' NOTICE OF EX PARTE COMMUNICATION**

Julia Kantor  
KEYES & FOX LLP  
580 California Street, 12<sup>th</sup> Floor  
San Francisco, CA 94104  
Telephone: (617) 835-5113  
E-mail: [jkantor@keyesfox.com](mailto:jkantor@keyesfox.com)

November 24, 2020

*On behalf of the Joint CCAs*

**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 Services Effective on January 1, 2020. (U39M)

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

**JOINT CCAS' NOTICE OF EX PARTE COMMUNICATION**

Pursuant to Rule 8.4 of the Rules of Practice and Procedure of the California Public Utilities Commission, East Bay Community Energy ("EBCE"), Marin Clean Energy ("MCE"), Peninsula Clean Energy Authority ("PCE"), Pioneer Community Energy ("Pioneer"), San José Clean Energy ("SJCE"), and Sonoma Clean Power ("SCP") (collectively the "Joint CCAs") hereby provide notice of the following *ex parte* meetings.

On the Joint CCAs' request, David Peck, Interim Energy Advisor to President Batjer, met with the Joint CCAs on Thursday, November 19, 2020, from 1:00 p.m. to 1:30 p.m. by telephone conference. Jacob Schlesinger, Partner, Keyes & Fox LLP; Julia Kantor, Associate, Keyes & Fox LLP; and Andy Reger, Executive Consultant, NewGen Strategies & Solutions participated on behalf of the Joint CCAs.

On the Joint CCAs' request, Anand Durvasula, Legal Advisor to Commissioner Randolph, and Suzanne Casazza, Legal and Policy Advisor to Commissioner Randolph, met with the Joint CCAs on Friday, November 20, 2020, from 10:00 a.m. to 10:30 a.m. by telephone conference. Jacob Schlesinger, Partner, Keyes & Fox LLP; Julia Kantor, Associate, Keyes & Fox LLP; and Andy Reger, Executive Consultant, NewGen Strategies & Solutions participated on behalf of the Joint CCAs.

On the Joint CCAs' request, Maria Sotero, Energy Advisor to Commissioner Guzman Aceves, and Jonathan Koltz, Chief of Staff to Commissioner Guzman Aceves, met with the Joint CCAs on Friday, November 20, 2020, from 11:00 a.m. to 11:30 a.m. by video conference. Jacob Schlesinger, Partner, Keyes & Fox LLP; Julia Kantor, Associate, Keyes & Fox LLP; and Andy Reger, Executive Consultant, NewGen Strategies & Solutions participated on behalf of the Joint CCAs.

On the Joint CCAs' request, Leuwam Tesfai, Chief of Staff and Legal Advisor to Commissioner Shiroma, Mary Claire Brown, Energy Advisor to Commissioner Shiroma, and Cristina Rivera, Associate Governmental Program Analyst, met with the Joint CCAs on Friday, November 20, 2020, from 3:00 p.m. to 3:30 p.m. by telephone conference. Jacob Schlesinger, Partner, Keyes & Fox LLP; Julia Kantor, Associate, Keyes & Fox LLP; and Andy Reger, Executive Consultant, NewGen Strategies & Solutions participated on behalf of the Joint CCAs.

On the Joint CCAs' request, Yuliya Shmidt, Advisor to Commissioner Rechtschaffen, met with the Joint CCAs on Monday, November 23, 2020, from 3:00 p.m. to 3:30 p.m. by video conference. Jacob Schlesinger, Partner, Keyes & Fox LLP; Julia Kantor, Associate, Keyes & Fox LLP; and Andy Reger, Executive Consultant, NewGen Strategies & Solutions participated on behalf of the Joint CCAs.

During these meetings, the Joint CCAs discussed their recommended revisions to the Proposed Decision in A.18-12-009, as set forth in their comments on the Proposed Decision. Attachment A hereto includes the slides the Joint CCAs presented at these meetings, which provide additional details on the topics discussed.

Respectfully submitted,

/s/ Julia Kantor

Julia Kantor

KEYES & FOX LLP

580 California Street, 12<sup>th</sup> Floor

San Francisco, CA 94104

Telephone: (617) 835-5113

E-mail: [jkantor@keyesfox.com](mailto:jkantor@keyesfox.com)

*Counsel to the Joint CCAs*

Dated: November 24, 2020

## **ATTACHMENT A**

JCCAs: East Bay Community Energy, Marin Clean Energy, Peninsula Clean Energy Authority, Pioneer Community Energy, San José Clean Energy, and Sonoma Clean Power

---

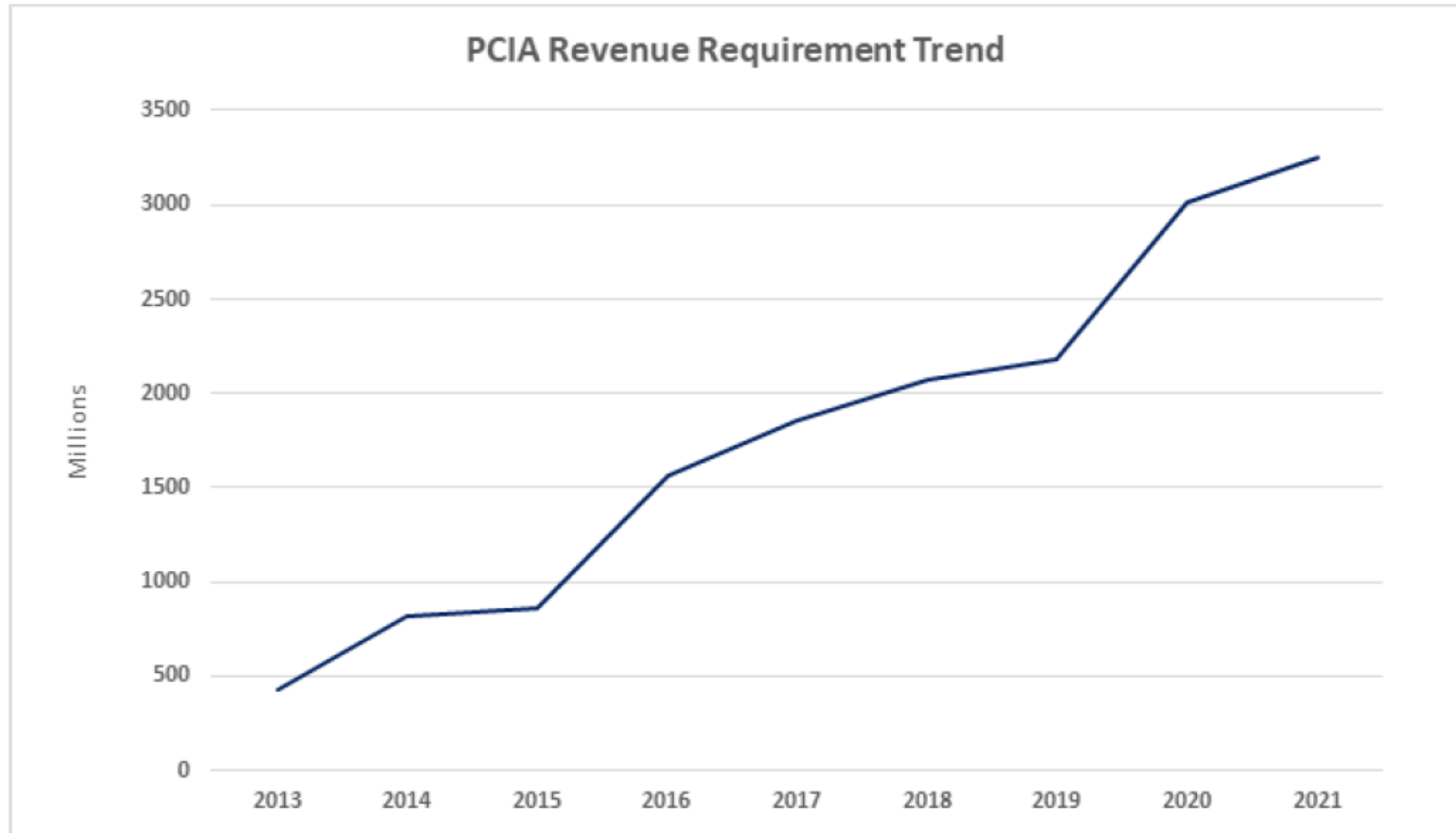
Two main issues that JCCAs ask the Commission to reconsider from the PD:

- 1. Are PG&E's newly proposed hydro and solar decommissioning costs just and reasonable?***
- 2. Who pays when shared customer costs (e.g.: call centers, customer service offices, escalated complaints, etc.) are utilized disproportionately between bundled and unbundled customers?***

## Issue #1 – Hydro and Solar Decommissioning Costs

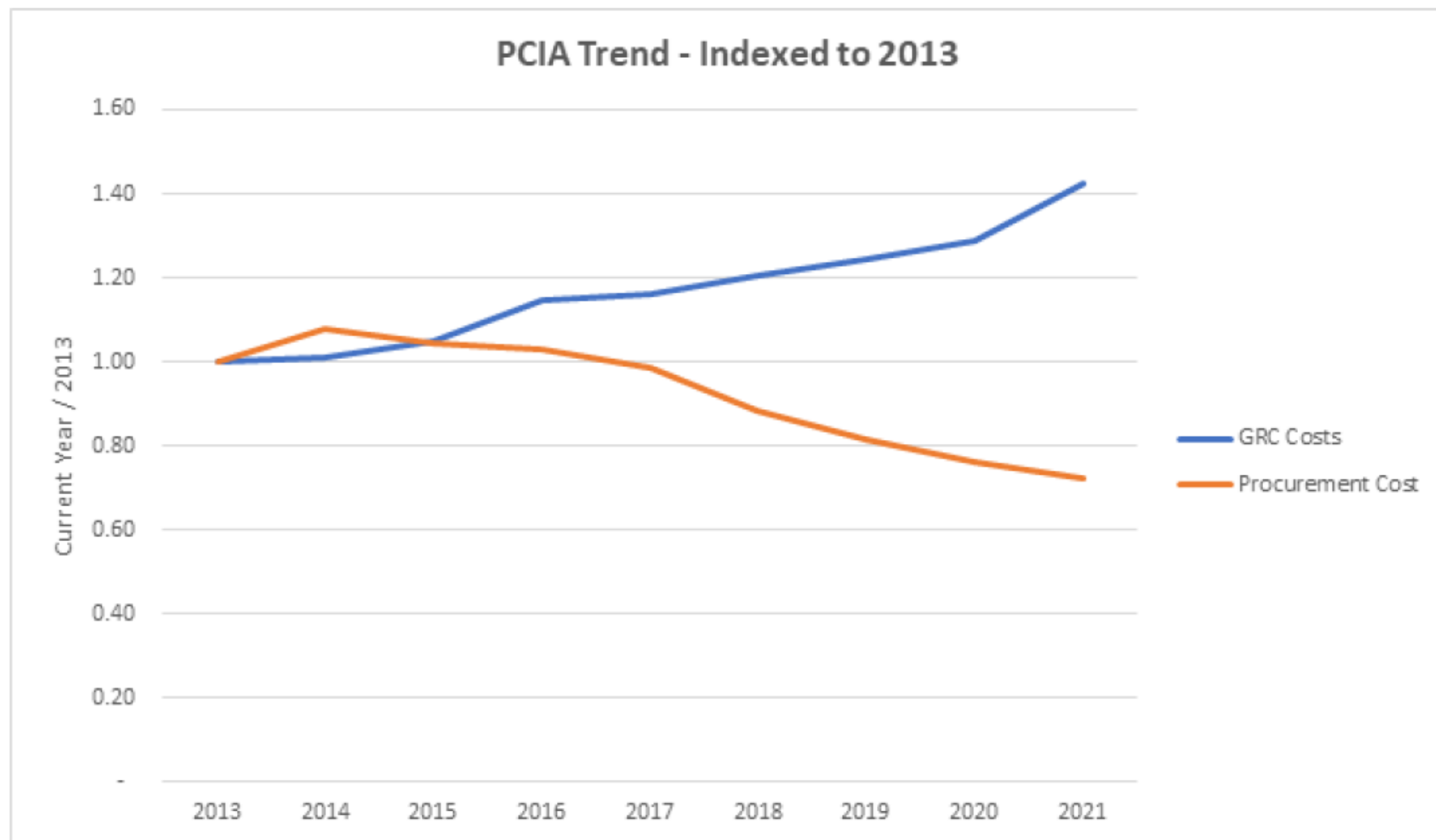
<b>Hydro Decommissioning Costs</b> (\$242.7 million)	<b>Solar Decommissioning Costs</b> (\$100.5 million)
<ul style="list-style-type: none"><li>- PG&amp;E's estimate includes assets that have been or are in the process of being sold</li><li>- None are set to decommission in the next 10 years: there is time to get this right and ensure PG&amp;E recovers its costs</li><li>- PG&amp;E's "intergenerational equity" arguments make little sense: assets have been providing power for decades</li></ul>	<ul style="list-style-type: none"><li>- Not consistent with PG&amp;E's own experience decommissioning a smaller solar facility</li><li>- Do not appropriately account for salvage value<ul style="list-style-type: none"><li>- Solar panels @ 90% power output after 20 years</li></ul></li><li>- Not in line with estimates from other relevant studies:<ul style="list-style-type: none"><li>- PG&amp;E: \$400/kW</li><li>- Others: \$10 - \$60/kW</li></ul></li></ul>

## Issue #1 – Hydro and Solar Decommissioning Costs





## Issue #1 – Hydro and Solar Decommissioning Costs



JCCAs: East Bay Community Energy, Marin Clean Energy, Peninsula Clean Energy Authority, Pioneer Community Energy, San José Clean Energy, and Sonoma Clean Power

---

Two main issues that JCCAs ask the Commission to reconsider from the PD:

- 1. Are PG&E's newly proposed hydro and solar decommissioning costs just and reasonable?*
- 2. Who pays when shared customer costs (e.g.: call centers, customer service offices, escalated complaints, etc.) are utilized disproportionately between bundled and unbundled customers?*

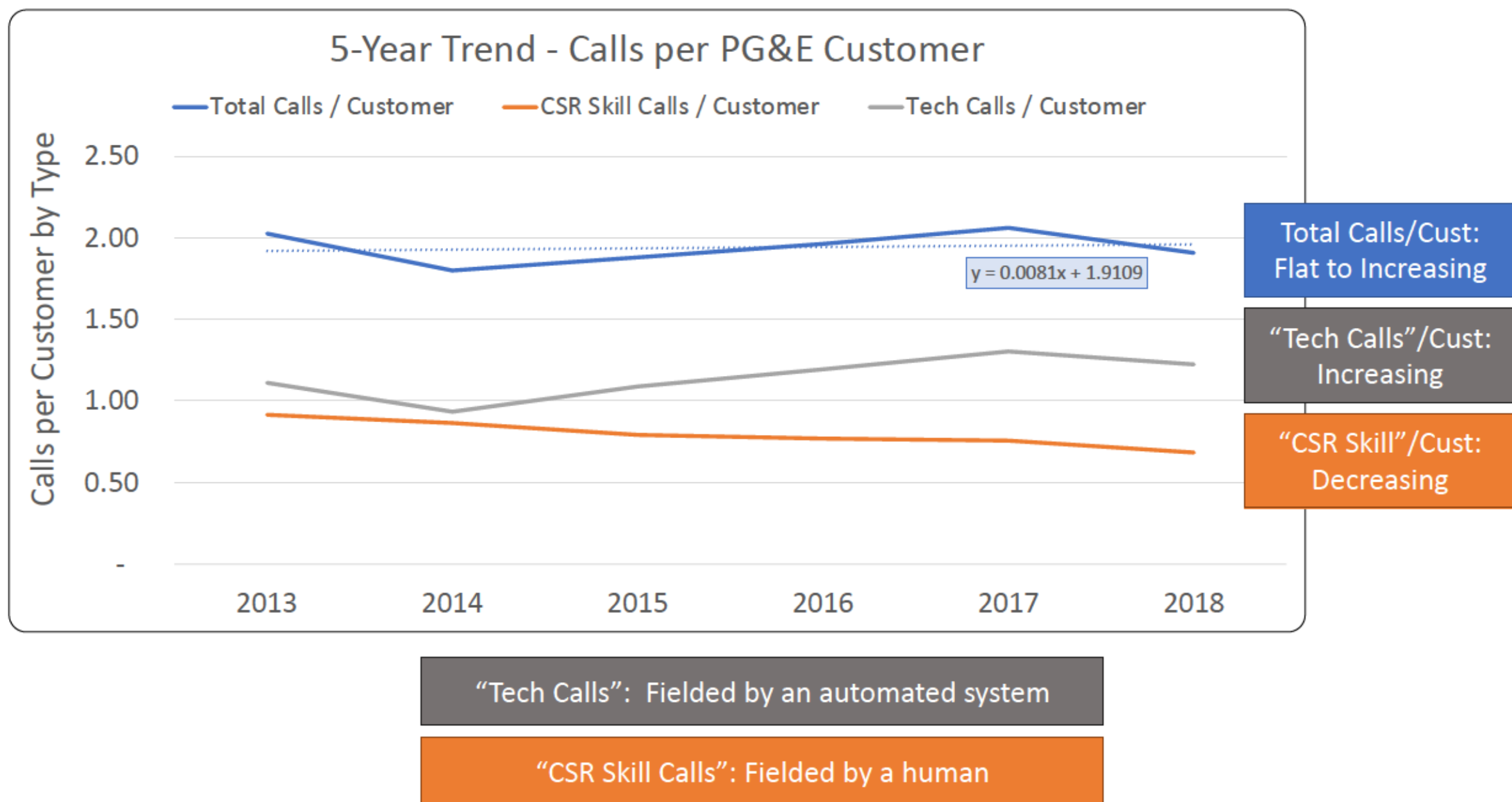
## Issue #2 – Common Customer Care Cost Functionalization

**Table 3: Customer Service-Related Programming by Customer Type**

PGE 6 WP	Chapter	MWC	Department	Specific Program/Service	Count of Customers Receiving Service (by Type)			Proportion of Customers Receiving Service (by Type)		
					Bundled Elec.	Unbundled Elec.	Gas	Bundled Elec.	Unbundled Elec.	Gas
Ch 2	Customer Engagement	IV: Provide Account Services	Business Energy Solutions	Large Commercial, Industrial and Agricultural Customer Reps <sup>1</sup>	1,827	1,524	2,751	29.9%	25.0%	45.1%
				Small and Medium Business Customer Reps <sup>1</sup>	169,509	154,496	147,923	35.9%	32.7%	31.3%
			Local Cust. Experience	Division Leadership Teams <sup>2</sup>	19	13	19	37.3%	25.5%	37.3%
				Customer Success <sup>1</sup>	894	876	1,203	30.1%	29.5%	40.5%
				Third Party Relations <sup>1</sup>	0	1,272,328	418,000	0.0%	75.3%	24.7%
			Manage Customer Inquiries	Escalated Complaints <sup>1</sup>	2,678	7	2,678	49.9%	0.1%	49.9%
		Customer Calls/Emails <sup>3</sup>		3,828,427	1,425,637	4,436,624	39.5%	14.7%	45.8%	
Ch 4	Contact Centers									
Ch 5	Customer Care	Customer Service Offices	Locations/Customers Served <sup>4</sup>	394,888	194,927	475,580	37.1%	18.3%	44.6%	

1. See PG&E Data Response to Joint CCAs DR 13, Q6 (included in **Attachment JAM-2**, pp. 47-49).
2. See PG&E Data Response to Joint CCAs DR 001, Q33 (included in **Attachment JAM-2**, pp. 54-55).
3. See PG&E Data Response to Joint CCAs DR 10, Q6 (included in **Attachment JAM-2**, pp. 37) and PG&E Data Response to Joint CCAs DR 10, Q7 supp 1 (included in **Attachment JAM-2**, pp. 38-40).
4. See PG&E Data Response to Joint CCAs DR 10, Q11 attachment 1 and attachment 2 (included in **Attachment JAM-2**, pp. 51-53).

## Issue #2 – Common Customer Care Cost Functionalization



## Issue #2 – Common Customer Care Cost Functionalization

### Customer Care Functionalization Should Better Reflect Cost Causation

1. **Functionalize *some* Customer Care costs to Electric Generation to reflect the higher utilization of these services by bundled customers**
  - a) Data of utilization came from PG&E – shows much higher utilization by bundled customers
  - b) PG&E's after the fact arguments regarding accuracy ignore the *inaccuracy* of current method to share costs “equally”
2. **Require PG&E to track *utilization* data going forward**
  - a) Not possible or practical to try to classify each call – many won't fit into generation, electric distribution or gas distribution
  - b) Better utilization data going forward will facilitate a more robust examination of who causes Customer Care costs to be incurred