

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  
)  
)  
)  
) Application  
) 18-12-009  
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REPORTER'S TRANSCRIPT  
San Francisco, California  
October 1, 2019  
Pages 1472 - 1650  
Volume - 15

Reported by: Karly Powers, CSR No. 13991  
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1 SAN FRANCISCO, CALIFORNIA

2 OCTOBER 1, 2019 9:30 a.m.

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4 ADMINISTRATIVE LAW JUDGES LIRAG and

5 LAU: Let's go on the record.

6 This is the continuation of the  
7 evidentiary hearings for A. 18-12-009, PG&E's  
8 2020 General Rate Case.

9 Today we have Mr. Jason Klemm  
10 followed by Mr. Jess Brown, Ms. Emily Barton,  
11 and Mr. Chris Zenner. So we have Mr. Jason  
12 Klemm on the witness stand.

13 Mr. Klemm, can you raise your right  
14 hand?

15 Jason Klemm, called as a witness by  
16 Pacific Gas & Electric Company, having  
been sworn, testified as follows:

17 THE WITNESS: I do.

18 ALJ LAU: You may lower your right hand  
19 now. Please state your name spelling your  
20 last name and give us your business address.

21 THE WITNESS: Jason Klemm, K-l-e-m-m.  
22 6121 Bolinger Canyon Road, San Ramon.

23 ALJ LAU: PG&E, you may proceed.

24 MR. OUBORG: Thank you, your Honor.

25 DIRECT EXAMINATION

26 BY MR. OUBORG:

27 Q Good morning, Mr. Klemm.

28 A Good morning.

1           Q    Mr. Klemm, I'd like to confirm the  
2    testimony that you're sponsoring in this  
3    proceeding. In what is being marked for  
4    identification as Exhibit-10, are you  
5    sponsoring all of Chapter 6, Gas Distribution  
6    Operations and Maintenance, and the  
7    workpapers for Chapter 6 presented in  
8    Exhibit-13?

9           A    Yes, I am.

10          Q    And what is being marked as  
11   Exhibit-15, are you sponsoring all of  
12   Chapter 6 and the Attachment A, Rebuttal  
13   Testimony on Gas Distribution Operations and  
14   Maintenance?

15          A    Yes, I am.

16          Q    And what has been marked as  
17   Exhibits 26 and 27, commonly referred to as  
18   PG&E's errata, are you sponsoring those pages  
19   in those exhibits that pertain to your  
20   testimony?

21          A    Yes, I am.

22          Q    And finally in Exhibit 52, are you  
23   sponsoring your statement of qualifications?

24          A    Yes, I am.

25          Q    Mr. Klemm, were these materials  
26   prepared by you or under your supervision?  
27   Or to the extent they were not, have you  
28   nevertheless read them, and are you prepared

1 to adopt them as your sworn testimony?

2 A Yes, they were. And, yes, I am.

3 Q Do you have any changes,  
4 corrections, or additions to make at this  
5 time?

6 A No.

7 Q Are the facts contained in these  
8 exhibits true and correct to the best of your  
9 knowledge?

10 A Yes.

11 Q And do the opinions expressed  
12 therein represent your best professional  
13 judgment?

14 A Yes.

15 Q Thank you.

16 MR. OUBORG: Your Honor, could we go  
17 off the record for a minute?

18 ALJ LAU: Off the record.

19 (Off the record.)

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

21 BY MR. OUBORG:

22 Q Mr. Klemm, a few minutes ago I  
23 asked you if you had any corrections to make  
24 to your testimony, and you said none at this  
25 time. Do you want to revise that answer?

26 A Yes. In Exhibit-10, on page 6-17,  
27 line 30, I would like to change  
28 "Approximately 2,500 such stations." To

1 "Approximately 2,400 such stations."

2 ALJ LAU: Mr. Klemm, can you say that  
3 again? I'm on page 6-17.

4 THE WITNESS: Line 30, change  
5 "Approximately 2,500 such stations." To  
6 "Approximately 2,400 such stations."

7 ALJ LAU: Okay. Thank you.

8 BY MR. OUBORG:

9 Q Do you have any further  
10 corrections, Mr. Klemm?

11 A No, I do not.

12 MR. OUBORG: Your Honor, Mr. Klemm is  
13 available for cross-examination.

14 ALJ LAU: Thank you.

15 Joint CCAs, you're ready to cross?

16 CROSS-EXAMINATION

17 BY MR. SCHLESINGER:

18 Q Thank you, your Honor.

19 Good morning, Mr. Klemm.

20 A Good morning.

21 Q My name is Jake Schlesinger. I'm  
22 with the law firm Keyes & Fox, and I'm  
23 representing the Joint CCA parties today. So  
24 I'm going to talk to you about your rebuttal  
25 testimony at Chapter 6 of PG&E's 17.

26 Do we have an exhibit number for  
27 that?

28 ALJ LAU: I believe it's Exhibit-15.

1 MR. SCHLESINGER: Thank you.

2 Exhibit-15.

3 Q And you can turn to your page 6-7.  
4 And first I just want to kind of be clear  
5 here what it is we're talking about in terms  
6 of the recommendation that the JCCAs made.  
7 This is in relation to locate and mark  
8 activities; correct?

9 A Correct.

10 Q So locate and mark activities are  
11 when somebody is digging or building or  
12 excavating in an area, and they call to see  
13 if there are any buried gas lines or electric  
14 lines; right?

15 A No, not entirely. So it's a  
16 government-required program for facility  
17 owners to go out and mark their facilities  
18 any time there is excavation activities. So  
19 it's not just gas and electric. But it's  
20 fiber, sewer, water, and other utilities as  
21 well.

22 Q Okay. But in the context of the  
23 costs that PG&E is requesting in this rate  
24 case, it's for gas assets and electric  
25 assets; right?

26 A Correct.

27 Q Okay. Great. And PG&E treats  
28 those as a cost that both the gas and the



1 electric system are responsible for to some  
2 extent; right? In terms of the cost  
3 responsibility?

4 A Can you say that again?

5 Q PG&E divides those costs and  
6 charges? Some of them to gas customers and  
7 some of them to electric customers?

8 A Correct.

9 Q Okay. And currently the way that  
10 you do that is you assign 57 percent of the  
11 costs to the electric customers, and  
12 43 percent of the cost to gas customers;  
13 correct?

14 A Specifically for locate and mark?

15 Q Yes.

16 A Yes.

17 Q Okay. And the Joint CCAs  
18 recommended that we revise that allocator to  
19 33 percent to electric customers and  
20 66 percent to gas customers; right?

21 A 33.3 and 66.7, yes.

22 Q Thank you. And you say on page 6-7  
23 that JCCA recommends this change for -- I am  
24 sorry. Really on 6-8, you say:

25 JCCA bases its  
26 recommendation on the  
27 assertion that the current  
28 FERC allocations contradict

1 Exhibit PG&E-03 Chapter 6  
2 testimony that explains  
3 that the majority of L&M  
4 activities are associated  
5 with gas distribution  
6 assets while the FERC  
7 allocation shows that the  
8 majority of costs go to  
9 electric distribution.

10 And do you agree with that  
11 assertion?

12 A Yes.

13 Q You do agree. Okay. Again,  
14 because the FERC has 57 percent of the cost  
15 going to gas even though PG&E says the  
16 majority of the underground assets are gas?

17 A Yes.

18 Q Okay. I'm sorry. To clarify the  
19 record, 57 percent of the costs currently go  
20 to electric. The majority of assets are gas?

21 A Correct.

22 Q I just wanted to make sure I said  
23 that right.

24 And you agree that the proposal  
25 that we're recommending makes sense because  
26 typically when PG&E goes out to locate  
27 assets, it's going to find more gas assets  
28 than electric assets; right?

1           A    We agree to it as a proxy until we  
2   can do a further analysis on the basis that  
3   the majority of PG&E-owned assets that are  
4   below ground are the only ones that require  
5   locate and mark activities are gas  
6   facilities.

7           Q    So you're agreeing to our  
8   approximation of 33.3 and 66.7 because we  
9   don't know exactly how many miles of each  
10   asset are in the ground; right?

11          A    No. So there is data associated to  
12   that. But the analysis hasn't been performed  
13   in a while, which is why we're going to use  
14   that as a proxy until a more thorough  
15   evaluation can be done in advance of the next  
16   rate case.

17          Q    In other words, we don't know  
18   precisely the relative proportion of gas  
19   assets to electric assets under the ground.  
20   We know that there's more gas, but we don't  
21   know exactly how much more?

22          A    Correct.

23          Q    Okay. And once PG&E does this  
24   survey, it will have a more precise allocator  
25   to propose in the next rate case; right?

26          A    Correct.

27          Q    And so just hypothetically if you  
28   were to do this survey and find that

1 90 percent of the assets underground are gas  
2 assets and 10 percent are electric assets,  
3 would a 90-10 allocator make sense in that  
4 situation?

5 A In that hypothetical case, I think  
6 there's good reason for that, but I don't  
7 want to speculate on the analysis because it  
8 could be done on a variety of different  
9 mechanisms, and we'll propose that in advance  
10 of the rate case.

11 Q Understood. Okay. But my point is  
12 that if 90 percent of the assets are gas,  
13 then that is at least a better indicator that  
14 90 percent of the need for locate and mark is  
15 related to gas; right?

16 A Hypothetically speaking, yes.

17 Q Hypothetically speaking. Thank  
18 you. But, again, in absence of the more  
19 precise data that you're talking about, you  
20 agree that the JCCA number is better  
21 reflective of the FERC allocator?

22 A Yes.

23 Q Because it better reflects how the  
24 locate and mark services are likely to be  
25 used?

26 A Yes.

27 Q Great. And you understand that the  
28 company has proposed a 55-45 allocator for

1 other types of costs that get divided between  
2 gas and electric customers?

3 A I'm not a FERC expert. Beyond  
4 Chapter 6, I can't speak to those other  
5 chapters.

6 Q Okay. No problem. I'll talk about  
7 that with other witnesses.

8 MR. SCHLESINGER: I have no further  
9 questions.

10 ALJ LAU: Mr. Ouborg?

11 MR. OUBORG: No, your Honor, I don't.

12 ALJ LAU: Okay. Then, Mr. Klemm, I  
13 think you are excused -- you are excused from  
14 the witness stand.

15 Let's go off the record.

16 (Off the record.)

17 ALJ LAU: Let's go on the record.

18 PG&E, do you have a motion to make?

19 MR. OUBORG: Yes, your Honor. PG&E  
20 would like to move into the record

21 Exhibits 10, 11, 12, 13, 14, and 15, which  
22 are the gas distribution witness materials.

23 And in addition we'd like to move  
24 into the record Exhibits 26 and 27, which are  
25 the eratta. And 26-A and 27-A.

26 ALJ LAU: Are there any objections to  
27 the motion?

28 (No response.)

1 ALJ LAU: Hearing none, these exhibits  
2 are moved into evidence.

3 ALJ LIRAG: They are exhibits 10 to 15.  
4 26, 26-A, 26-B and 27. To clarify for the  
5 record, 26, 26-A and B, and 27 are errata  
6 exhibits. And 10 to 15 are for the gas  
7 witnesses.

8 These are sponsored by various PG&E  
9 witnesses. But I think according to PG&E, we  
10 had the last gas witness today, and that  
11 completes these Exhibits 10 to 15; is that  
12 correct, Mr. Ouborg?

13 MR. OUBORG: Yes, your Honor.

14 ALJ LIRAG: All right. Thank you.

15 (Exhibit No. 10 was received into  
16 evidence.)

17 (Exhibit No. 11 was received into  
18 evidence.)

19 (Exhibit No. 12 was received into  
20 evidence.)

21 (Exhibit No. 13 was received into  
22 evidence.)

23 (Exhibit No. 14 was received into  
24 evidence.)

25 (Exhibit No. 15 was received into  
26 evidence.)

27 (Exhibit No. 26 was received into  
28 evidence.)

(Exhibit No. 26-A was received into  
evidence.)

(Exhibit No. 26-B was received into  
evidence.)

(Exhibit No. 27 was received into

1 evidence.)

2 ALJ LAU: Let's go off the record.

3 (Off the record.) ]

4 ALJ LAU: Let's go back on record.

5 While we were off the record, we have  
6 Mr. Jess Brown, who just got onto the witness  
7 stand, and before we swear Mr. Brown in, I'd  
8 like to identify several exhibits.

9 First is Exhibit 91. That is PG&E's  
10 prepared testimony customer care -- regarding  
11 customer care. It's formerly labeled as  
12 PG&E-6.

13 (Exhibit No. 91 was marked for  
14 identification.)

15 ALJ LAU: Hearing Exhibit 92 should be  
16 the -- PG&E's prepared -- no, PG&E's  
17 workpaper supportings -- supporting Chapters  
18 2 to 8 for customer care.

19 (Exhibit No. 92 was marked for  
20 identification.)

21 ALJ LAU: Hearing Exhibit 93 is PG&E's  
22 rebuttal testimony regarding customer care,  
23 Chapter 1 through Appendix A, page 387,  
24 Volume 1 of 2.

25 (Exhibit No. 93 was marked for  
26 identification.)

27 ALJ LAU: Hearing Exhibit 94 is PG&E's  
28 rebuttal testimony regarding customer care,

1 Appendix A, page 388, through Appendix A,  
2 page 900, Volume 1 of 2.

3 (Exhibit No. 94 was marked for  
4 identification.)

5 ALJ LAU: Hearing Exhibit 95 is PG&E's  
6 workpapers supporting rebuttal testimony,  
7 Chapters 4, 5 and 7, for customer care.

8 (Exhibit No. 95 was marked for  
9 identification.)

10 ALJ LAU: Exhibit 96 is PG&E's 2020  
11 General Rate Case Exhibit PG&E-30,  
12 supplemental and revised testimony.

13 (Exhibit No. 96 was marked for  
14 identification.)

15 ALJ LAU: Exhibit 97 is a stipulation  
16 between The Utility Reform Network and  
17 Pacific Gas & Electric Company regarding  
18 Assembly Bill 802, building and benchmarking.

19 (Exhibit No. 97 was marked for  
20 identification.)

21 ALJ LAU: Exhibit 98 is a joint  
22 stipulation between The Utility Reform  
23 Network and Pacific Gas & Electric Company  
24 regarding Salesforce 2 and 3 Project.

25 (Exhibit No. 98 was marked for  
26 identification.)

27 ALJ LAU: Exhibit 99 is a stipulation  
28 between The Utility Reform Network and



1 Pacific Gas & Electric Company regarding  
2 non-residential time-of-use customer outreach  
3 and natural gas appliance testing program.

4 (Exhibit No. 99 was marked for  
5 identification.)

6 ALJ LAU: And we have two errata  
7 exhibits.

8 First of the two is Exhibit 91-A.  
9 That is the errata to Exhibit 91, Chapter 2,  
10 the prepared testimony of Mr. Jess Brown.

11 (Exhibit No. 91-A was marked for  
12 identification.)

13 ALJ LAU: Exhibit 93-A -- dash "A" is  
14 the errata to Exhibit 93, Chapter 2, the  
15 rebuttal testimony of Jess Brown.

16 (Exhibit No. 93-A was marked for  
17 identification.)

18 ALJ LAU: We also have here three  
19 cross-examination exhibits from the joint  
20 CCAs.

21 The first is Exhibit 100, PG&E  
22 response to joint CCAs Data Request 15,  
23 Question 7.

24 (Exhibit No. 100 was marked for  
25 identification.)

26 ALJ LAU: Second exhibit is 101, PG&E's  
27 response to joint CCAs Data Request 15,  
28 Question 8.

1 (Exhibit No. 101 was marked for  
2 identification.)

3 ALJ LAU: Third exhibit is Exhibit 102,  
4 PG&E response to joint CCAs Data Request 15,  
5 Question 9.

6 (Exhibit No. 102 was marked for  
7 identification.)

8 ALJ LAU: Mr. Brown, can you raise your  
9 right hand?

10 JESS BROWN, called as a witness by  
11 PG&E, having been sworn, testified as  
follows:

12 THE WITNESS: Yes.

13 ALJ LAU: You may lower your right  
14 hand. Please state your name, spelling your  
15 last name, and also give us your business  
16 address.

17 THE WITNESS: Jess Brown, last name  
18 B-r-o-w-n, and address is 2180 -- 2180  
19 Harrison, San Francisco.

20 ALJ LAU: Ms. Zimney, are you  
21 representing PG&E?

22 MS. ZIMNEY: Yes.

23 ALJ LAU: You may begin your direct.

24 MS. ZIMNEY: Thank you, your Honor.

25 DIRECT EXAMINATION

26 BY MS. ZIMNEY:

27 Q Good morning, Mr. Brown.

28 A Morning.

1           Q    Mr. Brown, I'd like to confirm that  
2   you are -- the testimony that you are  
3   sponsoring in this proceeding.

4                   In what has been marked for  
5   identification as Exhibit 91, are you  
6   sponsoring all of Chapter 2 and Attachment A,  
7   customer engagement?

8           A    Yes, I am.

9           Q    And the workpapers for Chapter 2  
10  presented in Exhibit 92?

11          A    Yes.

12          Q    And 91?

13          A    Yes.

14          Q    In what has been marked as  
15  Exhibit 93, are you sponsoring all of  
16  Chapter 2, rebuttal testimony on customer  
17  engagement, and the documents in Exhibit 93,  
18  Volume 1 and 2, Appendix A, that relate to  
19  your sponsored Exhibit 93 rebuttal testimony?

20          A    Yes, I am.

21          Q    And Exhibit 26, PG&E's errata, are  
22  you sponsoring pages 14-244 to 14-246?

23          A    Yes, I am.

24          Q    And Exhibit 51, are you sponsoring  
25  your statement of qualifications?

26          A    Yes, I am.

27          Q    And then finally, in Exhibit 96,  
28  are you sponsoring Exhibit 6, Chapter 2, and

1 then the -- excuse me, Attachment A?

2 A Yes, I am.

3 Q Were these materials prepared by  
4 you or under your supervision?

5 A Yes, they were.

6 Q Do you have any changes,  
7 corrections or additions to make at this  
8 time?

9 A Yes. In Exhibit 91 and Exhibit 93,  
10 PG&E has revisions to revise the forecast for  
11 major work category FK, retain and grow  
12 customers, retain and grow customers in 2020,  
13 from 848,000 to 878,000.

14 ALJ LAU: Mr. Brown, can you point us  
15 to what pages you're talking about?

16 MS. ZIMNEY: Your Honor, this is  
17 captured in the redlines --

18 ALJ LAU: Okay. All right.

19 MS. ZIMNEY: -- that were marked.

20 ALJ LAU: Thank you.

21 MS. ZIMNEY: Yeah.

22 THE WITNESS: This change reflects  
23 PG&E's commitment in Exhibit 91, Attachment  
24 A, the memorandum of understanding between  
25 Small Business Utility Advocates and PG&E,  
26 Section 3.1. This change is shown in the  
27 redline version of Exhibit 91 and 93 that  
28 PG&E distributed this morning. It has been

1 marked for evidence as 91-A and 93-A.

2 BY MS. ZIMNEY:

3 Q Are the facts contained in these  
4 exhibits true and correct, to the best of  
5 your knowledge?

6 A Yes, they are.

7 Q And do the opinions expressed  
8 therein represent your best professional  
9 judgment?

10 A Yes, they do.

11 MS. ZIMNEY: Thank you. Your Honor,  
12 Mr. Brown is now available for  
13 cross-examination.

14 ALJ LAU: Mr. Schlesinger, you may  
15 begin your cross.

16 MR. SCHLESINGER: Thank you, your  
17 Honor.

18 CROSS-EXAMINATION

19 BY MR. SCHLESINGER:

20 Q Good morning, Mr. Brown.

21 A Good morning.

22 Q My name is Jake Schlesinger. I'm  
23 here on behalf of the joint CCAs today. It's  
24 nice to meet you.

25 A Nice to meet you.

26 Q So let's see. For our discussion  
27 today, I would like for you to have in front  
28 of you your rebuttal testimony previously

1 marked as PG&E-20, at page 2-5.

2 And I'm sorry, what's the hearing  
3 exhibit number?

4 MS. KANTOR: Exhibit 91.

5 BY MR. SCHLESINGER:

6 Q That's Hearing Exhibit 91.

7 A I'm on page 2-5.

8 Q Great. And then I'd also like for  
9 you to have in front of you the copies of  
10 Mr. Reger's and Mr. Mancinelli's tables which  
11 were also handed to you previously.

12 A Great. I have those.

13 Q Great. And we'll be going through  
14 those discovery responses to Exhibits 100  
15 through 102.

16 A I have those. Thank you.

17 Q Thank you. Okay. Before we dive  
18 in, let's just ground ourselves here, make  
19 sure we all know what we're talking about. I  
20 think maybe an easy way to do that is to look  
21 at Table 3 in Mr. Mancinelli and Mr. Reger's  
22 testimony.

23 So you are the witness here  
24 sponsoring the revenue requirements  
25 associated with customer engagement in  
26 Chapter 2. Right?

27 A I'm representing the costs in  
28 Chapter 2, customer engagement.

1           Q    Okay. Great. And in looking at  
2 Table 3 there, the Chapter 2 customer  
3 engagement costs encompass activities within  
4 the business energy solution department, the  
5 local customer experience department, and  
6 some of the managed customer inquiries area?

7           A    Can you -- can you say that again?

8           Q    Yeah. The costs that we're talking  
9 about local -- we'll just take it one at a  
10 time -- include the costs within business  
11 energy solutions, and then there's two  
12 specific programs under that?

13          A    Okay. In Chapter 2, not Table 3?

14          Q    Well, I believe Table 3 is a  
15 representation of what are the costs  
16 contained within Chapter 2, or at least a  
17 portion of those costs.

18          A    I'm looking at Table 3 on page 17.  
19 I don't believe those are costs on Table 3.

20          Q    Agreed that the table does not  
21 include costs. But, there are costs  
22 associated with each of these programs.  
23 Right?

24          A    Oh, yes, they are.

25          Q    Okay. And these are the programs  
26 that you cover in your testimony? That's all  
27 I'm trying to get at.

28          A    For Chapter 2, customer engagement

1 practice.

2 Q Okay. Great. Thank you. And you  
3 don't cover Chapter 4 and Chapter 5, which  
4 are -- discuss the costs related to operating  
5 customer service offices and call centers.  
6 Right? That's not your department?

7 A That's correct, those are not my  
8 departments.

9 Q Except maybe to the small extent  
10 that you get escalated complaints through the  
11 call centers. Then that is your department?

12 A That would be under Chapter 2,  
13 customer engagement, escalating complaints  
14 management, yes.

15 Q And we can see that clearly here in  
16 Table 3. If you look at kind of that  
17 Chapter 2 line, it kind of cuts through the  
18 managed customer inquiries, and the top part,  
19 the escalated complaints, that's part of  
20 Chapter 2. Right?

21 A Yes, the escalating complaints  
22 line --

23 Q Okay.

24 A -- is part of Chapter 2.

25 Q So everything in escalated  
26 complaints and above is your department,  
27 everything below is not your department?

28 A That's correct.



1 Q Great.

2 A My chapter, yes.

3 Q Yes. Okay. Sorry. I meant  
4 department in the colloquial sense. I  
5 apologize.

6 Okay. And so all of the costs here  
7 for -- that you're responsible for are costs  
8 that typically are shared between gas and  
9 electric customers. Right?

10 A That's my understanding.

11 Q Okay. So fair to call these common  
12 customer engagement costs, common in that  
13 they don't get assigned to one line of  
14 business or the other, that they're -- they  
15 get spread out?

16 A That's correct. They would be  
17 common costs services, if you will, that are  
18 intended to be available for all customers.

19 Q Okay. Great. And just to be  
20 clear, the dispute that we're having between  
21 JCCA and PG&E is exactly how to divide those  
22 costs up. Right? One of the disputes --

23 A I don't know if I'd --

24 Q -- perhaps.

25 A -- characterize it as a dispute. I  
26 think it's a -- perhaps a disagreement or  
27 understanding of -- of -- why don't you go  
28 ahead and ask the question?

1           Q    Okay.  So you would agree that we  
2   have a disagreement about how to allocate  
3   those costs.  Right?

4           A    I -- I'd say that's a fair  
5   statement, yes.

6           Q    Okay.  Great.  Thank you.  And are  
7   you -- have you been doing this for a long  
8   time?

9           A    Quite a while, yeah.  My statement  
10   of qualifications, I've been with PG&E --

11          Q    Yeah.

12          A    -- 35 years, specific departments  
13   in the organization which have to do -- have  
14   either been under my direct supervision or  
15   I've been deeply involved with it the last --  
16   over the last decade.

17          ALJ LAU:  Mr. Brown, you may want to  
18   slow down for our court reporter.

19          THE WITNESS:  Oh, I'm so sorry.  Yes.  
20   I've been told not to have coffee.

21                Yes.  I -- they've been under my  
22   direct supervision or I've been directly  
23   involved with them over the last decade.

24   BY MR. SCHLESINGER:

25          Q    And would you agree with me that  
26   typically in a -- in a PG&E Phase 1 rate case  
27   historically in the past there hasn't been a  
28   lot of dispute about how to -- how to

1 allocate these costs?

2 A Well, at least from my perspective,  
3 I'm an operations witness. I'm not a rate  
4 design or a cost allocation expert. So my  
5 understanding, this has not come up in terms  
6 of specifically in the angle, if you will,  
7 that joint CCA has thought about --

8 Q Uh-huh.

9 A -- distributing the cost  
10 differently or allocating them differently.

11 Q And would you agree with me that  
12 the reason that it's coming up now is because  
13 of the large amount of unbundling that's been  
14 happening in California over the last several  
15 years?

16 A I guess -- no. I -- I would say  
17 it's coming up --

18 MS. ZIMNEY: Objection --

19 THE WITNESS: Yeah. Sorry.

20 MS. ZIMNEY: -- calls for speculation.

21 MR. SCHLESINGER: That's fine. I can  
22 move on.

23 ALJ LAU: Okay.

24 MR. SCHLESINGER: Great.

25 Q All right. Let's see. Let's talk  
26 about how currently these costs are  
27 allocated, and you discuss this at page 2-5,  
28 which I believe you have in front of you, and

1     you say currently common customer costs --

2             A     Excuse me.  Sorry.  What line?

3             Q     Line 21.

4             A     Thank you.

5             Q     You state that currently, common  
6     customer costs are allocated between PG&E's  
7     electric distribution and gas distribution  
8     functions using factors of 55 percent  
9     electric and 45 percent gas, which is based  
10    on the total number of PG&E's electric and  
11    gas customers.  Yes?

12            A     Yes.

13            Q     Okay.  So currently, under your  
14    proposal, if one of these costs is considered  
15    to be common, and I think you said they all  
16    are, then those costs are shared between gas  
17    distribution and electric distribution under  
18    your proposal?

19            A     That's correct.

20            Q     And there is no allocation that  
21    goes specifically to generation, right, to  
22    the generation function?

23            A     That's correct.

24            Q     Okay.  And you understand that the  
25    JCCAs' argument is that some of these costs  
26    should be allocated -- sorry.  Let me  
27    rephrase.

28                   Do you agree with me that JCC's

1 (sic) argument is that we should allocate  
2 these costs based on the proportion to which  
3 they are utilized by different kinds of  
4 customers?

5 A Well, let me -- let me answer it  
6 this way, as I did in rebuttal on line 24.  
7 My understanding is that --

8 Q You -- I'm sorry. I'm just trying  
9 to make sure that we have a common  
10 understanding. I'm going to get to that  
11 section of your testimony.

12 A Okay.

13 Q So I promise you, you'll have a  
14 chance.

15 But, would you agree with me that  
16 our proposal here is to change the allocation  
17 based on what we've asserted is how the  
18 services are utilized?

19 A I would agree that that is your  
20 position.

21 Q Great. Thank you. And I  
22 understand that you disagree with the  
23 utilization numbers that the JCCAs have  
24 provided. Right?

25 A I do, based on my daily operational  
26 experience serving customers.

27 Q Okay.

28 A I do.

1           Q    Great.  But, you don't argue in  
2   your testimony, at least in the rebuttal  
3   testimony that you provided, that utilization  
4   of the services is -- is an improper or an  
5   inappropriate way to allocate costs, do you?

6           A    Can you ask the question again?

7           Q    Would you agree with me that it's  
8   not inappropriate to come up with an  
9   allocator based on utilization, assuming the  
10  utilization is correct?

11          A    I would say it's not inappropriate  
12  to look at allocation laws that can take in  
13  various factors that could or could not  
14  include utilization or customer counts; but,  
15  again, I'm not an allocation witness.

16          Q    Okay.  Understood.  But -- but, you  
17  agree that utilization of a service is at  
18  least one reasonable way to allocate costs?

19          A    Hypothetically, is a way.  I  
20  wouldn't go as far as saying whether it's  
21  reasonable or not reasonable.  Again, I think  
22  that would be something to -- to consider,  
23  but not necessarily.

24          Q    Okay.  Well, let's talk about the  
25  specific utilization numbers that we've  
26  asserted, and that is largely contained in  
27  the Table 3 in front of you.  Correct?

28          A    Yes.  And utilization would be your

1 term.

2 Q Okay.

3 A This would be numbers from our data  
4 response.

5 Q Okay. Fair enough. And we asked  
6 you in discovery whether you agreed with --  
7 with these numbers or not, and you responded  
8 in Q 15-7 marked as Exhibit 100, and you do  
9 disagree with these numbers, and you give a  
10 couple of reasons why.

11 A Well, I think, specifically, the  
12 area --

13 Q Sorry. I didn't ask a question.

14 A Sorry.

15 Q That's okay.

16 A I was trying to be responsive.

17 ALJ LAU: And Counsel, you may want to  
18 wait for -- for the court reporter. If  
19 there's too much overlapping, it's hard for  
20 her.

21 THE WITNESS: My apologies, as well.  
22 Sorry.

23 MR. SCHLESINGER: Thank you, your  
24 Honor.

25 ALJ LAU: Thank you.

26 BY MR. SCHLESINGER:

27 Q Okay. And so looking at this  
28 Table 3, let's talk about the numbers that

1     you dispute and don't dispute.

2                 First of all, just to ground us all  
3     again, you did not opine as to the numbers  
4     associated with Chapters 4 and 5 in the  
5     bottom two rows. Correct?

6                 A     That's correct.

7                 Q     You've only opined as to escalated  
8     complaints and up in this table. Right?

9                 A     That's correct.

10                Q     Okay. And in your discovery  
11     response, on the second page there -- well,  
12     the end of the first page, you do talk about  
13     the -- that PG&E can verify Table 3 reflects  
14     the customer counts for the following  
15     programs and services, and then you have a  
16     list there on the next page?

17                A     Yes.

18                Q     And that list, if we go down  
19     that -- sorry, one, two, three, four -- fifth  
20     column, the list affirms all of the costs  
21     down through third-party relations, so  
22     starting with large commercial, industrial  
23     and agricultural RAPs, and then all the way  
24     down through third-party relations, all of  
25     those numbers are confirmed. Right?

26                A     Are we looking at the data response  
27     in the Table 2 --

28                Q     No.



1           A    -- that I provide or are we looking  
2 back at Table 3?

3           Q    Still on -- still on Table 3.

4           A    Okay. Could you take me through  
5 that again? I was looking at the bullets.  
6 Sorry.

7           Q    Sure. So -- and I'm trying to  
8 match up the bullets with the table.

9           A    Gotcha.

10          Q    Yeah.

11          A    So could you take me down to  
12 Table 3, and I'll focus on Table 3?

13          Q    Yes. So we're under the fifth  
14 column labeled "Specific Programs/Service."

15          A    Yes.

16          Q    And for the first program here  
17 under that large commercial, industrial and  
18 agricultural customer RAPs, you have  
19 confirmed the numbers that follow in that  
20 row. Right?

21          A    Correct.

22          Q    Okay. And then the next one's  
23 small and medium business, confirmed. Right?

24          A    Yes.

25          Q    Division leadership, confirmed?

26          A    Confirmed.

27          Q    Customer success, confirmed?

28          A    Confirmed.

1 Q Third-party relations, confirmed?

2 A Confirmed.

3 Q Escalated complaints, not  
4 confirmed?

5 A Escalated complaints, those are the  
6 numbers -- the 260, 2678 and seven, are the  
7 data we provided in another data response.

8 Q Okay. So those are the correct  
9 numbers, then, that are associated with the  
10 customer engagement activities in Chapter 2.  
11 Right?

12 A In the context of the data response  
13 they came in, which I think we responded  
14 and -- or I responded to, I guess,  
15 Exhibit 100, Data Request 15-7, that it  
16 didn't have a lot of footnotes that would  
17 explain the context.

18 Q I'm getting -- getting to that  
19 next.

20 A Sure.

21 Q But, right now, we're just talking  
22 about the numbers, and now you're confirming  
23 all of the numbers in Chapter 2. Right?

24 MS. ZIMNEY: Your Honor, I would just  
25 like to confirm that we're clarifying the  
26 customers counts in Table 3, and not the  
27 proportion of customers receiving service.

28 ALJ LAU: Can -- yes. Right, Counsel?

1 Is that --

2 MR. SCHLESINGER: That's fair.

3 ALJ LAU: Yes.

4 THE WITNESS: Yeah.

5 BY MR. SCHLESINGER:

6 Q Okay.

7 A Okay.

8 Q So "Yes" to my last question,  
9 you're confirming all of the numbers in  
10 Chapter 2?

11 A In terms of the counts of customers  
12 receiving service.

13 Q Great. Thank you.

14 A I would say -- let's just leave it  
15 at that. Go ahead.

16 Q Okay. And -- and you do come up  
17 with a -- a few criticisms here, and let's  
18 talk about those.

19 And I think you just mentioned the  
20 first one is that some of the footnotes that  
21 you included in your original data response,  
22 and that's now Table 2 here --

23 A Yes.

24 Q -- included a bunch of footnotes  
25 that were not included in Table 3. Right?

26 A Correct.

27 Q Do you know whether the joint CCAs  
28 included this table as an attachment to their

1 exhibit, the one that you provided, Table 2?

2 A I don't recall.

3 Q Okay.

4 A You may have included the data  
5 response as part of your attachments, but I  
6 honestly don't recall.

7 Q You don't recall whether we also  
8 included this Table 2 from that same  
9 response, 13-6?

10 A No.

11 Q Okay. Could you agree with me  
12 that, assuming we did include it, it would  
13 have included all of the footnotes, too?

14 A Assuming you included it, it would  
15 include the footnotes.

16 Q Great. Okay. We can let the  
17 record speak for itself on that.

18 And then you also, at the end of  
19 this data response, note that some of the  
20 numbers here in Table 3 denote customer  
21 counts for 2018, while others reflect 2017 or  
22 2019 data. That's another -- another  
23 criticism that you have of the table?

24 A I think the question in your data  
25 request is please verify whether this table  
26 reflects actual customer counts for a portion  
27 of 2018. I was simply pointing out that some  
28 were '18, some were 2017, some were 2019 --

1 Q Okay.

2 A -- making sure I was clear as  
3 possible to your question.

4 Q Understood. And I -- and I  
5 appreciate the clarity.

6 You would agree me, though, looking  
7 back at your Table 2, that you, in fact,  
8 provided numbers from various vintages in  
9 that data response. Right?

10 A Which I think we responded in  
11 Question 7, yes.

12 Q Okay. So some of the numbers here  
13 in your Table 2 are from '17, some are from  
14 '19. Right?

15 A I -- yes, as -- as included in the  
16 response to Question 7, yes.

17 Q Okay. Great. Okay. Sorry. Just  
18 one second. Okay, moving on.

19 When a customer engages with the  
20 customer engagement functions here, do you  
21 know whether PG&E will ever refer a customer  
22 to a CCA for any reason?

23 A Say it again. Ask again. Sorry.

24 Q Does PG&E ever refer a customer to  
25 a CCA to resolve any issue that might come up  
26 in any of these activities we've been talking  
27 about in Chapter 2?

28 A Okay. Let me answer it this way:

1 I am aware when a customer asks a question  
2 where we refer them to a CCA because it's CCA  
3 specific.

4 Q Okay. Great. And do you know  
5 about how often that happens that PG&E will  
6 have to refer a customer to a CCA to answer a  
7 question or resolve another issue?

8 A Yes. As we -- I know there are  
9 exhibits now. So in our responses to  
10 Question 8 and 9 --

11 Q You know, let's just -- let's just  
12 look at those. That'll be easier.

13 A Yeah.

14 Q Why don't we start with eight?

15 ALJ LAU: Mr. Brown, can you point to  
16 what exhibit number you're looking at?

17 THE WITNESS: Question 8 would be  
18 Exhibit 101.

19 BY MR. SCHLESINGER:

20 Q And in response to our question, I  
21 think you already answered "A," whether  
22 customer engagement activities result in PG&E  
23 then referring an unbundled customer to the  
24 contact or CCA. You said, "Yes" in response  
25 to "A," and we just talked about that.  
26 Right? So that's consistent?

27 A Yeah, PG&E customer -- may result  
28 in referring unbundled customer to their

1 CCA --

2 Q Okay. And --

3 A -- for CCA specific questions.

4 Q And then in -- in "B," actually, we  
5 asked you to explain whether PG&E would ever  
6 refer one of its own bundled customers to  
7 contact a CCA, and in response to "B," you --  
8 you also said, yes, that that happens  
9 sometimes, too. Correct?

10 A It does. Now, I'll point out  
11 interesting aspect of this. Referring a  
12 bundled customer to their CCA is a little  
13 interesting.

14 Q Agree.

15 A It would be a bundled customer to  
16 a -- sometimes they'll have questions about,  
17 well, I have this -- for example, I'm a  
18 customer of East Bay Energy, I think it's  
19 called. My neighbors will say, "Well, what's  
20 that about?" Well, they're not -- they're  
21 not on it yet. And I say, "Well, you should  
22 actually call East Bay Energy, because they  
23 would be your CCA, if you were to choose to  
24 do that." So that -- that would be the  
25 example of that. So --

26 Q Okay. So would you agree with me  
27 that it's probably more likely that PG&E  
28 would refer an unbundled customer to a CCA

1 then it would refer a bundled customer to a  
2 CCA?

3 A That's correct.

4 Q There would be a lot more reasons  
5 why an unbundled customer would be referred  
6 to a CCA?

7 A It would happen more often --

8 Q Yeah.

9 A -- than for a bundled customer,  
10 referring them to a CCA.

11 Q Okay.

12 A But, it -- it does happen. It's  
13 a -- you know, customers will ask about, you  
14 know, I've got this in the mail. We have  
15 very rigid guidelines what we, as a utility,  
16 can and cannot say appropriately. So  
17 oftentimes, they'll say, "Well, I don't know.  
18 Maybe -- you know, I don't know about this.  
19 What do you think?" And we would say, "You  
20 know, your CCA in that area would be this, so  
21 you might want to see." So there -- there's  
22 reasons to have a bundled customer -- refer  
23 them to a CCA --

24 Q Sure.

25 A -- in their area. But, to your  
26 point, an unbundled customer, since they're  
27 already under a CCA, may have a bill where  
28 they don't understand, and they'll say --



1 we'll, say, refer them to the CCA. Now, I  
2 would say, if I could, it's not as  
3 straightforward as that. The call will come  
4 in, hey, I have a problem with my CCA  
5 generation rate. It'll come in as I have a  
6 problem with my bill. Right? And we'll have  
7 a conversation with the customer. We're  
8 asking about the bill. We're saying, "Is it  
9 your gas or electric bill?" They'll say, "I  
10 don't know. It's my bill. It's too high."  
11 We'll say, "Well, what time of year was it?"  
12 You know, it was in March or February. Did  
13 you have folks over at the house, the types  
14 of questions we would get, do you have a  
15 refrigerator in your garage, an extra one,  
16 and then we'll kind of whittle all the way  
17 down to, well, I don't know. I just don't  
18 understand what this PCIA charge is, which is  
19 related to CFA, and we'll explain that as the  
20 utility. Well, I don't understand what this  
21 generation piece is, and at that point we'll  
22 say, "Well, you know what? You really  
23 probably need to talk to your CCA about that.  
24 So that would be -- so it's not as  
25 straightforward as I have a CCA question or  
26 not.

27 Q Understood. Understood. And you  
28 would agree with me, though, that previously,

1 prior to the formation of a CCA, at the -- at  
2 the point that you realized you got down to a  
3 generation related question, PG&E would have  
4 handled that in the past?

5 A Before CCAs?

6 Q Right.

7 A Correct.

8 Q Okay. But, now you refer it?

9 A That would be one of the points  
10 that we refer them to their CCA.

11 Q Understood. Thanks. Okay. So  
12 let's move on here.

13 You don't know how many customers  
14 in a year customer engagement is referring to  
15 CCAs, do you?

16 A For customer engagement, I -- I  
17 think that would be a response where we have  
18 measured it.

19 Q I'm sorry. Let me direct you to  
20 your response to Question 8-B in Exhibit  
21 101 -- I'm sorry, A-I is the -- is the  
22 subpart I meant to refer you to, where we  
23 said, "If 'Yes' to the previous question,"  
24 whether you refer, "please provide the number  
25 of instances for each of the last three years  
26 broken out by a specific program service,"  
27 and then your response was "Customer  
28 engagement teams do not track customer

1 inquiries, nor does it track when it refers  
2 its unbundled customers to contact their  
3 CCA."

4 A Yeah. We generally don't track the  
5 inquiries. Where we do track it is under our  
6 escalated complaints management team --

7 Q Okay. And let's --  
8 (Crosstalk.)

9 THE REPORTER: Ah, ah, ah, ah.  
10 Escalated complaints management?

11 THE WITNESS: Where we do track it  
12 would be in our escalated complaints  
13 management team. In our response to Data  
14 Request 15, Question 9, Exhibit 102, we  
15 respond in Answer, I guess, 9-A that we do  
16 track what we call inquiries, not just other  
17 complaints, where these inquiries are referred  
18 to the appropriate CCA, and we do track those  
19 numbers. I think --

20 ALJ LAU: Mr. Schlesinger --

21 THE WITNESS: -- for 2016 was 192. For  
22 2017, it was 139. 2018, it was 114. ]

23 ALJ LAU: Mr. Schlesinger, please wait  
24 for Mr. Brown to finish.

25 Thank you.

26 MR. SCHLESINGER: Thank you.

27 ALJ LIRAG: Also, Mr. Schlesinger, if  
28 you don't want to hear the rest of the

1 explanation, sometimes the answers explain a  
2 little bit more than what you're asking. If  
3 you don't want to hear the rest of it, feel  
4 free to step in and say I only asked this  
5 question.

6 MR. SCHLESINGER: Thank you.

7 ALJ LIRAG: I think that would -- I  
8 don't know if that's your preference. If you  
9 want to hear the explanation, then you can  
10 let Mr. Brown continue.

11 MR. SCHLESINGER: Thank you, your  
12 Honor. In this situation, I was going to  
13 start asking these questions. So I decided  
14 to let it go.

15 ALJ LIRAG: Fair enough.

16 MR. SCHLESINGER: Thank you.

17 BY MR. SCHLESINGER:

18 Q Okay. So while -- well, you're  
19 skipping ahead of me a little bit. But let's  
20 do it anyhow, since that's what we were  
21 talking about.

22 So Question 9, Exhibit 1 and 2,  
23 asks specifically about the activities in  
24 MWDCK, which are the escalated complaints  
25 management team. And as you just pointed  
26 out, the escalated complaints management team  
27 does track certain complaints about CCA  
28 services as inquiries. And you've provided

1 those numbers here that you just read out;  
2 right?

3 A Yes.

4 Q Okay. So you would agree with me  
5 that it is pebble to track when customer  
6 engagement refers a customer to a CCA?

7 A It is possible. It is possible to  
8 track many things. So, yes, it's possible.

9 Q Okay. Thank you. All right.  
10 So let's turn back to your  
11 testimony here -- whoops. That's okay.  
12 Thank you.

13 A My rebuttal?

14 Q Your rebuttal testimony.

15 And at page 2-5, line 27, you were  
16 asked the question whether PG&E agrees with  
17 Joint CCA's recommendation, which is to  
18 reallocate these costs.

19 A Yes.

20 Q And you say:

21 No, because the Joint CCAs  
22 incorrectly assume that CCA  
23 customers require less  
24 customer engagement,  
25 support, unbundled  
26 customers.

27 Next sentence:

28 Customer support for all

1 customer engagement  
2 activities does not vary  
3 based on how a customer's  
4 energy is generated or  
5 whether a customer service  
6 is bundled or unbundled.

7 So that same that you made in your  
8 testimony arguing that the services under  
9 customer engagement are equally available to  
10 both CCA customers and bundled customers  
11 alike; correct?

12 A That is correct.

13 Q Okay. And that is the reason that  
14 you argue that the company's allocator is  
15 more appropriate?

16 A Yes. I mean -- and just to kind of  
17 go on in my rebuttal, I'm the director,  
18 currently, of the San Francisco division.

19 MR. SCHLESINGER: Your Honor, this is  
20 beyond the question that I asked.

21 THE WITNESS: Okay.

22 MR. SCHLESINGER: I'm happy to let him  
23 talk about this.

24 ALJ LAU: You can ask your next  
25 question.

26 BY MR. SCHLESINGER:

27 Q Thank you.

28 So, to be clear, you do not assert

1     that JCCAs -- let me rephrase.

2             You're not asserting that CCAs  
3     customers and bundled customers utilize  
4     customer engagement services on an equal  
5     basis, are you?

6             A     Can you ask that again?

7             Q     Do you assert in your testimony  
8     that CCA customers and bundled customers  
9     utilize customer engagement services equally?

10            A     What -- am I asserting that bundled  
11     and unbundled customers are using customer  
12     engagement services equally? That's the  
13     question?

14            Q     Did you make that argument anywhere  
15     here?

16            A     Well, I'll tell you now. My  
17     experience --

18            Q     Well, can -- we can get to that.  
19     But, right now, did you argue anywhere in  
20     your testimony that the utilization of  
21     customer engagement services is equal between  
22     CCAs and bundled customers?

23            A     I didn't specifically say it in  
24     that context.

25            Q     Okay.

26                 Do you know for sure? -- do you  
27     know one way or the other whether they used  
28     the services equally or not?

1           A    I am very confident that customers  
2   that I engage with and my teams engage  
3   with -- again, San Francisco is an example of  
4   97 percent CCA.

5           Q    Mm-hm.

6           A    Our daily engagement on customer  
7   engagement services pretty much feel the same  
8   as if we were in another division. I've had  
9   all the divisions under my purview. As we  
10  moved up with CCA and the customer engagement  
11  services that are covered in any testimony  
12  are pretty much equally utilized by  
13  customers, with a very small exception  
14  usually around the generation charge.

15               But all the other types of gas and  
16  electric services that customers are  
17  available to and do use and are asking about  
18  in our team's service, are fairly even across  
19  bundled and unbundled customers. We're kind  
20  of bundled, unbundled customer blind, if you  
21  will.

22          Q    Mm-hm.

23          A    When the phone rings and we're  
24  going out and showing up to a job site, I  
25  don't know if that answers your question.

26          Q    Well, I think what you're saying is  
27  that it feels about even to you; right?

28          A    Yes.



1           Q    But you don't track those numbers;  
2    right?

3           A    There's not a reason to track it, I  
4    feel.

5           Q    Okay. That's great.

6                I have no other questions.

7           ALJ LAU: Ms. Zimney, do you have any  
8    redirect?

9           MS. ZIMNEY: No, I don't have any  
10   redirect.

11          ALJ LAU: All right. Mr. Brown, you  
12   are excused from the witness stand.

13               (Crosstalk.)

14          ALJ LIRAG: Let's take care of the  
15   exhibits relating to Mr. Brown. So let's  
16   have you sit there for a little bit longer.

17          THE WITNESS: Okay. Fair enough.

18          ALJ LIRAG: Is there a move,  
19   Mr. Schlesinger, to admit Exhibits 100 to 102  
20   into the record?

21          MR. SCHLESINGER: Yes, your Honor.

22               Thank you.

23          ALJ LIRAG: Any objections?

24               (No response.)

25          ALJ LIRAG: Hearing none, Exhibits 100,  
26   101, and 102 are received into the record.

27               (Exhibit No. 100 was received into  
28   evidence.)

1 (Exhibit No. 101 was received into  
2 evidence.)

3 (Exhibit No. 102 was received into  
4 evidence.)

5 ALJ LIRAG: Let's take care of the  
6 joint stipulation exhibits between PG&E and  
7 TURN.

8 Have you explained what these are?

9 MS. ZIMNEY: These are joint  
10 stipulations or agreements that TURN and PG&E  
11 have come to relating to Exhibit 97 as  
12 related to customer engagement.

13 Exhibit 98 is related to contact  
14 centers.

15 And exhibit 99 is related to  
16 non-residential time of use and natural gas  
17 testing program.

18 (Court reporter clarification.)

19 ALJ LIRAG: Do you confirm that, Ms.  
20 Goodson?

21 MS. GOODSON: Yes, your Honor.

22 ALJ LIRAG: All right. Is there a move  
23 from either of you to admit Exhibit 97, 98,  
24 and 99 into the record.

25 MS. ZIMNEY: PG&E moves to have Exhibit  
26 97, 98, and 99 entered into the record.

27 ALJ LIRAG: All right. Any objections?

28 (No response.)

1 ALJ LIRAG: Hearing none, Exhibits 97,  
2 98, and 99 are received into the record as  
3 well.

4 (Exhibit No. 97 was received into  
5 evidence.)

6 (Exhibit No. 98 was received into  
7 evidence.)

8 (Exhibit No. 99 was received into  
9 evidence.)

10 ALJ LIRAG: All right. Thank you,  
11 Mr. Brown.

12 Ms. Gandesbery?

13 MS. GANDESBERY: One additional motion.

14 MS. ZIMNEY: Yes. Sorry.

15 We would also like to move  
16 Exhibits 91-A and 93-A into the record.

17 ALJ LIRAG: Let's hold off on that  
18 until we take a care of -- oh, that only  
19 pertains to Mr. Brown's corrections; right?

20 MS. ZIMNEY: Correct.

21 MS. GOODSON: May we go off the record  
22 for just a moment, please, your Honor?

23 ALJ LIRAG: Off the record.

24 (Off the record.)

25 ALJ LIRAG: Let's go back on the  
26 record. While we were off the record, there  
27 was some discussion regarding, I believe, the  
28 eratta exhibits. And we've come to the

1 decision that we will call a morning break  
2 until 11:00 a.m. on that clock while  
3 Ms. Goodson and PG&E discuss these eratta  
4 exhibits. And then we'll take up whether  
5 they can be admitted as soon as we come back  
6 from break. But we're still going to excuse  
7 Mr. Brown, I guess.

8 THE WITNESS: Thank you.

9 ALJ LIRAG: Thank you, Mr. Brown.

10 All right. Off the record.

11 (Recess taken.)

12 ALJ LIRAG: All right. Let's go on the  
13 record. We're back from our break.

14 I don't see Ms. Goodson around. But  
15 do you have an answer regarding the exhibits,  
16 Ms. Zimney?

17 MS. ZIMNEY: Yes. Ms. Goodson pointed  
18 out that there should be a parenthetical on  
19 one of the items. And we're having that  
20 revised to bring in as a substitute.

21 ALJ LIRAG: All right. So we'll hold  
22 off on admitting these eratta exhibits; is  
23 that correct?

24 MS. ZIMNEY: Yes. Correct.

25 ALJ LIRAG: All right. So we'll take  
26 care of Ms. Bartman. Please raise your right  
27 hand.

28 EMILY BARTMAN, called as a witness  
by Pacific Gas and Electric Company,

1           having been sworn, testified as  
2           follows:

3           THE WITNESS: Yes.

4           ALJ LIRAG: Please state your name,  
5           spell your last name, and provide a business  
6           address, please.

7           THE WITNESS: Emily Bartman.

8           ALJ LIRAG: You can put your hand down.

9           THE WITNESS: B-a-r-t-m-a-n. My  
10          business address is 245 Market Street, San  
11          Francisco.

12          ALJ LIRAG: All right. Thank you.

13                 And we already have Ms. Bartman's  
14          exhibits in question.

15          MS. ZIMNEY: Yes.

16          ALJ LIRAG: All right. Any cross  
17          exhibits from the Joint CCAs?

18          MR. SCHLESINGER: So, your Honor,  
19          similar to last time, we have a DR, which we  
20          included as an attachment to Mr. Mancinelli  
21          and Mr. Reger's testimony. So that will all  
22          go into the record when we admit that.

23          ALJ LIRAG: All right.

24          MR. SCHLESINGER: But we brought a copy  
25          since we're going to talk about it today.

26          ALJ LIRAG: Might as well distribute a  
27          copy to Ms. Bartman --

28          MR. SCHLESINGER: Okay.

1 ALJ LIRAG: -- and one to ALJ Lau.

2 MR. SCHLESINGER: Okay. And would your  
3 preference be to enter this as an exhibit or  
4 just wait until we --

5 ALJ LIRAG: Let's just wait until we  
6 have your exhibit. Let's use it as a  
7 reference exhibit.

8 MR. SCHLESINGER: Understood.

9 ALJ LIRAG: All right. All right.

10 Let's go into the direct testimony  
11 from Ms. Zimney. Or is it Ms. Gandsebery?

12 MS. GANDSEBERY: It's Ms. Gandsebery.

13 ALJ LIRAG: All right.

14 MS. GANDSEBERY: Okay. Thank you, your  
15 Honor.

16 DIRECT EXAMINATION

17 BY MS. GANDESBERY:

18 Q Good morning, Ms. Bartman.

19 A Good morning.

20 Q Ms. Bartman, I would like to  
21 confirm the testimony you're sponsoring in  
22 this proceeding in what's been marked for  
23 identification as Exhibit 91, which was  
24 previously Exhibit PG&E-06, are you  
25 sponsoring all of Chapter 3, Attachment A,  
26 all of Chapter 3 Supplement Testimony dated  
27 May 10th 2019, Pricing Products and Income  
28 Qualified Programs, and the Workpapers and

1 supplemental Workpapers for Chapter 3,  
2 presented in Exhibit 91, which was previously  
3 marked as PG&E-06, workpaper 0208?

4 A Yes, I am.

5 Q Thank you. And what has been  
6 marked as Exhibit 93, which was previously  
7 marked as PG&E-20, volumes 1 and 2, are you  
8 sponsoring all of Chapter 3 Rebuttal  
9 Testimony on pricing products and income  
10 qualified programs, and the documents in  
11 Exhibit 93, volumes 1 and 2, Appendix A that  
12 relate to your sponsored Exhibit 20 Rebuttal  
13 Testimony?

14 A Yes, I am.

15 Q And in what's been marked as  
16 Exhibits 26 and 27, PG&E's eratta, are you  
17 sponsoring pages 14-247 to 14-248 and 29-12  
18 to 29-126 -- or -116?

19 A Yes, I am.

20 Q Thank you.

21 Finally, in Exhibit 51, are you  
22 sponsoring your statement of qualifications?

23 A Yes, I am.

24 Q And were these materials prepared  
25 by you or under your supervision?

26 A Yes, they were.

27 Q Do you have any changes,  
28 corrections, or additions to make this

1 morning?

2 A No, I don't.

3 Q And are the facts contained in  
4 these exhibits true and correct to the best  
5 of your knowledge?

6 A Yes, they are.

7 Q And do the opinions expressed  
8 therein represent your best professional  
9 judgement?

10 A Yes, they do.

11 Q Thank you, your Honor.

12 Ms. Bartman is available for  
13 cross-examination.

14 ALJ LAU: Counsel for Joint CCAs, Mr.  
15 Schlesinger, you may begin.

16 CROSS-EXAMINATION

17 BY MR. SCHLESINGER:

18 Q Thank you, your Honor.

19 Good morning, Ms. Bartman.

20 A Good morning.

21 Q My name is Jake Schlesinger. I  
22 represent the JCCAs.

23 I would like to talk to you about  
24 your rebuttal testimony in what was marked as  
25 PG&E-20, Chapter 3, just page 3-2.

26 And I'm sorry. I do not have the  
27 hearing exhibit number.

28 MS. GANDESBERY: It's Exhibit 93.



1 MR. SCHLESINGER: Thank you.

2 MS. GANDESBERY: And you said page 3-2?

3 MR. SCHLESINGER: Correct. 3-2.

4 BY MR. SCHLESINGER:

5 Q And do you also have in front of  
6 you, Ms. Bartman, the -- PG&E's response to  
7 Data Request JCCA 9-11?

8 A Yes, I do.

9 Q Great. Okay.

10 So, Ms. Bartman, you state here at  
11 line 14 of page 3-2 that PG&E is:

12 Adjusting its forecast for  
13 non-residential rates  
14 implementation activities  
15 in MWCEZ --

16 Oops, I actually meant the read the  
17 next sentence which is that:

18 PG&E is also adjusting the  
19 allocation of common  
20 customer costs in MWCEZ to  
21 correct an error. And then  
22 you cite to Footnote 6 --  
23 (Court reporter admonition.)

24 BY MR. SCHLESINGER: Sorry.

25 Q And the data response we were just  
26 speaking about?

27 A Yes.

28 Q Great. And so let's take a look at

1     that data response.

2                   And before we jump in to ground  
3     ourselves, let's talk about what are MWCEZ  
4     costs? Do you want to just go ahead and  
5     describe that?

6           A     Yes. So, MWCEZ for pricing  
7     products and low-income programs. Primarily,  
8     we implement rate structure changes for all  
9     customers. So that would include the  
10    implementing the billing system changes, and  
11    outreach, et cetera.

12          Q     Okay. And prior to your eratta, or  
13    your acceptance of this eratta, the company's  
14    proposal was to split those costs using its  
15    55/45 allocator; right?

16          A     In this data request response?  
17    This is -- so this is an eratta? Yeah.

18                   You're referring to JCCA-009-Q11.

19          Q     I'm really just asking how those  
20    costs were allocated previously?

21          A     Can you repeat the question.

22          Q     Were those costs allocated  
23    previously using the 55/45 allocator?

24          A     There are four different buckets, I  
25    believe. One of them is a common-cost  
26    bucket. There's also an electric generation  
27    bucket, electric distribution bucket, and gas  
28    distribution bucket.

1 Q Okay.

2 A So that fourth bucket are for costs  
3 that get allocated to both electric and gas  
4 distribution.

5 Q Okay. So the common costs --

6 A Yes.

7 Q Were allocated 55/45?

8 A Yes.

9 Q Okay. But then after receiving our  
10 data response, you're suggesting a change to  
11 that; correct?

12 A Correct.

13 Q Okay. And am I correct that the  
14 reason that you're suggesting that change is  
15 that when you got to data response and  
16 thought about it, you released that none of  
17 these services were being offered to gas  
18 customers?

19 MS. GANDESBERY: Counsel, could you  
20 tell me which data response from JCCA we  
21 received that you're referring to?

22 MR. SCHLESINGER: Yeah. I'm referring  
23 to the same one that we've been referring to,  
24 that's 9-11.

25 MS. GANDESBERY: Okay. That's a data  
26 request -- just for clarification, that's a  
27 data request from JCCA to PG&E?

28 MR. SCHLESINGER: It's the company's

1 response to the JCCA data request.

2 MS. GANDESBERY: Thank you.

3 THE WITNESS: Can you repeat the  
4 question, please?

5 BY MR. SCHLESINGER:

6 Q Did you decide to change the  
7 allocator because you realized gas  
8 distribution customers were not utilizing the  
9 services?

10 A For some of these activities, not  
11 all of them. If you look at the table, there  
12 were some that were reclassified to a hundred  
13 percent electric and some that were left  
14 55/45.

15 Q Okay. But the ones that were  
16 changed to a hundred percent electric, were  
17 changed because you realized that gas  
18 customers weren't utilizing those services at  
19 all?

20 A That is correct.

21 Q Okay. And so you agree that when  
22 only one type of customer is utilizing a  
23 service, it makes sense for them to be  
24 responsible for those costs?

25 A Yes.

26 Q Because they caused the costs?

27 A Yes.

28 Q And this change in the allocation

1 moves some of the revenue requirement out of  
2 gas and more into electric distribution;  
3 correct?

4 A That is correct.

5 Q And so that is not to the benefit  
6 of CCA customers; correct?

7 A I don't know.

8 Q Okay. Let me ask it a different  
9 way.

10 Would you agree that electric  
11 distribution costs are going up because of  
12 your adjustment, all else being equal?

13 A Yes.

14 Q Okay. Great.

15 I have no further questions. And  
16 for the record, JCCAs do not oppose your  
17 adjustment.

18 A Thank you.

19 Q Thank you.

20 MS. GANDESBERY: I have redirect, your  
21 Honor.

22 ALJ LAU: You may proceed.

23 REDIRECT EXAMINATION

24 BY MS. GANDESBERY:

25 Q Good morning, Ms. Bartman.

26 Can you explain for the hundred  
27 percent the -- the cost categories that were  
28 assigned a hundred percent to electric, why

1 it is that gas customers are not using those  
2 services?

3 A Yes. These services are for  
4 implementing changes to electric rates and  
5 implementing new electric rates.

6 Q So the topic is only electric?

7 A Correct.

8 Q So it doesn't make any sense that  
9 gas customers would be participating in these  
10 services?

11 A Correct.

12 Q Thank you.

13 ALJ LAU: Do you have any recross?

14 MR. SCHLESINGER: No. Thank you, your  
15 Honor.

16 ALJ LAU: Are there any exhibits to  
17 move?

18 (No response.)

19 ALJ LAU: Okay. Ms. Bartman, you're  
20 excused.

21 Let's go off the record.

22 (Off the record.) ]

23 ALJ LIRAG: Let's go back on the  
24 record.

25 While we were off the record, we  
26 were distributing some exhibits. Let's take  
27 care of some of these right now.

28 First, let me identify a replacement

1 for what we had marked as 93-A. So this is  
2 still 93-A, but it's a replacement to the one  
3 that we have.

4 Is that correct, Ms. Zimney?

5 MS. ZIMNEY: Yes, that's correct.

6 ALJ LIRAG: And what's the nature of  
7 the replacement?

8 MS. ZIMNEY: The replacement was that  
9 the figures were not shown in a  
10 parenthetical. So it was unclear whether it  
11 was a reduction or a firm number.

12 ALJ LIRAG: All right. Let me just  
13 confirm with Ms. Goodson that that is the  
14 case.

15 MS. GOODSON: That is correct, your  
16 Honor.

17 ALJ LIRAG: All right. Nice loud voice.  
18 No need for a mic.

19 All right. Is there a move to admit  
20 exhibits I'll include 91-A since there seems  
21 to be no objection regarding that. No issue  
22 regarding that.

23 Is there a move to admit 91-A and  
24 93-A into the record?

25 MS. ZIMNEY: Yes. PG&E so moves.

26 ALJ LIRAG: Any objections?

27 (No response.)

28 ALJ LIRAG: Hearing none, Exhibits 91-A

1 and 93-A are received into the record.

2 (Exhibit No. 91-A was received into  
3 evidence.)

4 (Exhibit No. 93-A was received into  
5 evidence.)

6 ALJ LIRAG: Next we'll identify as  
7 Exhibit 93-C, the -- PG&E, is this a  
8 confidential version of Exhibit-93?

9 MS. ZIMNEY: I believe it's Exhibit-92.  
10 It's the confidential version of Exhibit-92.

11 ALJ LIRAG: All right. So we'll  
12 identify it as Exhibit 92-C then. So strike  
13 93-C. It's 92-C, and this is the  
14 confidential version of the workpapers  
15 supporting Chapter 5 for customer care.

16 MS. ZIMNEY: It's supporting chapters  
17 2-3. Or is it just --

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

19 (Off the record.)

20 ALJ LIRAG: Back on the record.

21 So, Ms. Zimney, it's workpapers  
22 supporting Chapter 5?

23 MS. ZIMNEY: Correct.

24 ALJ LIRAG: Why is this purported to be  
25 confidential?

26 MS. ZIMNEY: Can we go off the record?

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

28 (Off the record.)

ALJ LIRAG: Back on the record.



1                   Ms. Zimney, do you have an answer?

2                   MS. ZIMNEY: Yes. It pertains to  
3 confidential real estate market information  
4 that PG&E has regarding its own facilities.

5                   ALJ LIRAG: And why is this information  
6 confidential?

7                   MS. ZIMNEY: It's just market-sensitive  
8 information.

9                   ALJ LIRAG: Are there any objections to  
10 any of the parties here regarding the figures  
11 that are going to be -- that PG&E states are  
12 confidential?

13                   MR. SCHLESINGER: Can I just ask again  
14 exactly where those figures are in the  
15 testimony?

16                   ALJ LIRAG: Let's go off the record so  
17 you can confirm.

18                   (Off the record.)

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

21                   While we were off the record, there  
22 was -- parties were conferring regarding  
23 whether the figures were indeed confidential.  
24 And I believe there were no objections  
25 regarding the confidential nature of the  
26 figures that were represented.

27                   I evaluated Ms. Zimney's  
28 explanation, and we accept that these are

1 confidential. And so 92-C will be -- it's  
2 not being received yet. But we'll identify  
3 it as a confidential document. And we'll  
4 take up the admission once we take care of  
5 Exhibit-92.

6 (Exhibit No. 92-C was marked for  
7 identification.)

8 ALJ LIRAG: All right. So let's please  
9 raise your right hand Mr. Zenner.

10 Chris Zenner, called as a witness by  
11 Pacific Gas & Electric Company, having  
12 been sworn, testified as follows:

13 THE WITNESS: I do.

14 ALJ LIRAG: Please state your name,  
15 spell your last name, and provide a business  
16 address.

17 THE WITNESS: Chris Zenner. Last name  
18 spelled Z-e-n-n-e-r. Address is 2740 Gateway  
19 Oaks. Sacramento, California.

20 ALJ LIRAG: All right. Thank you.

21 Let's proceed with the direct  
22 examination, and then we'll ask for the rest  
23 of the exhibits.

24 DIRECT EXAMINATION

25 BY MS. ZIMNEY:

26 Q Good morning, Mr. Zenner.

27 A Good morning.

28 Q I'd like to confirm the testimony  
you are sponsoring in this proceeding in what

1 what has been marked for identification as  
2 Exhibit 91, formerly Exhibit PG&E-06, are you  
3 sponsoring all of the Chapter 4 contact  
4 centers?

5 A Yes, I am.

6 Q All of Chapter 5 and Attachments A  
7 through C customer service offices?

8 A Yes, I am.

9 Q The workpapers for Chapters 4 and 5  
10 presented in Exhibit-92, formerly PG&E-06,  
11 workpapers 2 through 8, and the confidential  
12 workpapers for Chapter 5 presented in  
13 Exhibit 92-C, formerly PG&E-06, workpapers  
14 five confidential?

15 A Yes, I am.

16 Q And what has been marked as  
17 Exhibit-93, formerly PG&E-20 Volume 1 and  
18 Volume 2, are you sponsoring all of  
19 Chapter 4, Rebuttal Testimony and Contact  
20 Centers; all of Chapter 5, rebuttal testimony  
21 on customer service offices documents; and  
22 Exhibit-93, formerly PG&E-20 Volume 1 and 2,  
23 Appendix A that relate to your sponsored  
24 Exhibit-93 Chapter 4 rebuttal testimony?

25 A Yes, I am.

26 Q And the workpapers for Chapters 4  
27 and 5 presented in Exhibit-95?

28 A Yes, I am.

1 Q And in what is marked as  
2 Exhibit-27, formerly PG&E-29, PG&E's errata.  
3 Are you sponsoring pages 29-117 to 29-130?

4 A Yes, I am.

5 Q And finally in Exhibit-51, formerly  
6 PG&E-13, are you sponsoring your statement of  
7 qualifications?

8 A Yes, I am.

9 Q And were those materials prepared  
10 by you or under your supervision?

11 A Yes, they were.

12 Q Do you have any changes,  
13 corrections, or additions to make at this  
14 time?

15 A Yes. In Exhibit 93, on page 4-6,  
16 lines 16, change "8.4 million," to  
17 "8.14 million."

18 ALJ LIRAG: Hold on 4-6, lines?

19 THE WITNESS: Sixteen.

20 ALJ LIRAG: Sixteen. All right  
21 8.4 million to?

22 THE WITNESS: 8.14 million.

23 ALJ LIRAG: All right. Please proceed,  
24 Ms. Zimney.

25 THE WITNESS: In Exhibit 93, on  
26 page 4-8, lines 11 to 12, change  
27 "20.3 million customer calls," to  
28 "7.5 million CSR skill calls handled."

1                   In Exhibit 93, on page 5-14, in  
2     Table 5-5, line number 2, under the column  
3     labeled "PG&E." The text should read, "At  
4     least two NPCs are available within three  
5     miles of the CS0." Change the "two," to a  
6     "three."

7                   ALJ LIRAG: All right.

8     BY MS. ZIMNEY:

9                   Q     Are the facts contained in these  
10    exhibits true and correct to the best of your  
11    knowledge?

12                  A     Yes, they are.

13                  Q     And do the opinions expressed  
14    therein represent your best professional  
15    judgment?

16                  A     Yes, they do.

17                  MS. ZIMNEY: Thank you, your Honor.  
18    Mr. Zenner is available for  
19    cross-examination.

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

21                               (Off the record.)

22                  ALJ LIRAG: Let's go back on the  
23    record.

24                   While we were off the record, more  
25    exhibits were distributed. These are cross  
26    exhibits from the Joint CCAs. Let's identify  
27    all these exhibits right now.

28                   So Exhibits 103 through 108 will

1     pertain to PG&E's response to the Joint CCAs  
2     data request No. 15. And the different  
3     exhibits will pertain to different questions  
4     off data request 15.

5             So first Exhibit-103 is Response to  
6     Data Request 15, Question 10.

7             (Exhibit No. 103 was marked for  
8             identification.)

9             ALJ LIRAG: Exhibit 104, Data Request  
10     15, Question 11.

11             (Exhibit No. 104 was marked for  
12             identification.)

13             ALJ LIRAG: Exhibit 105, Data Request  
14     15, Question 12.

15             (Exhibit No. 105 was marked for  
16             identification.)

17             ALJ LIRAG: Exhibit 106, Data Request  
18     15, Question 13.

19             (Exhibit No. 106 was marked for  
20             identification.)

21             ALJ LIRAG: Exhibit 107, Data Request  
22     15, Question 15.

23             (Exhibit No. 107 was marked for  
24             identification.)

25             ALJ LIRAG: Exhibit-108, Data Request  
26     15, Question 18.

26             (Exhibit No. 108 was marked for  
27             identification.)

28             MR. SCHLESINGER: Can you say the last

1 two again?

2 ALJ LIRAG: All right. The Exhibit-107  
3 is Question 15. Exhibit-108 is on Question  
4 18.

5 MS. ZIMNEY: Your Honor, yesterday PG&E  
6 just repeated a correction to request 15,  
7 question 12.

8 MS. KANTOR: It is the revised version.

9 MS. ZIMNEY: Great. Thank you. I just  
10 wanted to make sure we have that.

11 ALJ LIRAG: Exhibit-105 is already the  
12 revised version per discussion with PG&E and  
13 the Joint CCAs yesterday.

14 Yes, Mr. Schlesinger?

15 MR. SCHLESINGER: Yes, your Honor. I  
16 don't know. Maybe you just haven't gotten to  
17 it, but we have one additional exhibit as  
18 well, which is not a data response.

19 ALJ LIRAG: All right. Let's go off  
20 the record to receive it.

21 (Off the record.)

22 ALJ LIRAG: Let's go back on the  
23 record.

24 Let's receive and identify the  
25 exhibits. Exhibit-109 is PG&E's response to  
26 the Joint CCAs Data Request 16, Question  
27 five.

28 (Exhibit No. 109 was marked for  
identification.)

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ALJ LIRAG: Exhibit 110, is a document entitled PG&E Contact Center Calls and Customer Accounts Over Time Chart.

(Exhibit No. 110 was marked for identification.)

MS. ZIMNEY: And, your Honor, PG&E objects to the data that's provided. We have a disagreement that's provided in there. It can be marked, but we will be objecting.

ALJ LIRAG: We've identified it. You can object once we bring up its admission.

Exhibit-111 is PG&E's Response to the Joint CCAs Data Request 10, Question 11.

(Exhibit No. 111 was marked for identification.)

ALJ LIRAG: All right. So those are Exhibits 103 to 111.

And as we discussed, Mr. Schlesinger, we'll go into your planned cross-examination of Mr. Zenner, but we'll break for lunch sometime close to noon. All right?

MR. SCHLESINGER: Okay.

ALJ LIRAG: All right. Please proceed.

CROSS-EXAMINATION

BY MR. SCHLESINGER:

Q Good morning still, Mr. Zenner.



1           A     Good morning.

2           Q     My name is Jake Schlesinger. I'm  
3     representing the JCCAs.

4           ALJ LIRAG: Hold on, Mr. Schlesinger.  
5     Just to give you a fair amount -- just so you  
6     can plan. I plan on going for another  
7     15 minutes. Then let's break for lunch.  
8     Unless you're in the middle of, like, you  
9     know, some question.

10          MR. SCHLESINGER: Okay.

11          ALJ LIRAG: All right. Let's proceed  
12     then.

13          MR. SCHLESINGER: I do expect to take a  
14     full 60 minutes just so you know.

15          ALJ LIRAG: Yes. I'm just alerting you  
16     that I don't want to cut you off when you're  
17     in the middle of something. I don't want to  
18     break it up.

19          MR. SCHLESINGER: I'll try to be  
20     cognizant of that.

21          ALJ LIRAG: Please proceed.

22     BY MR. SCHLESINGER:

23           Q     Okay, Mr. Zenner, I'd like to make  
24     sure that you have in front of you your  
25     rebuttal testimony Chapter 4 in what's been  
26     marked as PG&E-20 and as Exhibit-93.

27                   I'd also to like to make sure that  
28     you have before you, the Mancinelli-Reger

1 Tables, which were previously distributed  
2 with Mr. Brown as a reference document. Do  
3 you have those in front of you?

4 A I do not.

5 ALJ LIRAG: Let's go off the record.  
6 (Off the record.)

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

9 Let's continue, Mr. Schlesinger.  
10 BY MR. SCHLESINGER:

11 Q Okay. So let's start here with  
12 Table 2 in Mr. Mancinelli and Mr. Reger's  
13 testimony. And Table 2 represents PG&E's  
14 proposed customer service program cost  
15 allocations; correct?

16 A Correct.

17 Q And so these are the customer  
18 service costs that PG&E considers to be  
19 common costs; right?

20 A Yes. I believe that is correct.

21 Q So for all of these common costs  
22 here in Table 2, PG&E is proposing a 55-45  
23 allocator?

24 A Yes, that's correct.

25 Q Okay. And just to be clear like I  
26 did with Mr. Brown just to make sure what  
27 you're responsible for here, you sponsor  
28 chapters 4 and 5. And so the costs that you

1     testify about are the bottom two rows of this  
2     table; correct?

3             A     That is correct.

4             Q     So essentially that includes the  
5     contact centers; correct?

6             A     Correct.

7             Q     And that's like a call center;  
8     right?

9             A     Correct.

10            Q     But they also will receive e-mails  
11     too?

12            A     Correct.

13            Q     And that also includes the customer  
14     service offices where somebody can go and  
15     talk to a live person?

16            A     That is correct.

17            Q     Okay. And just looking at the GRC  
18     costs there, would you agree with me that the  
19     vast majority of the costs in this table are  
20     for the contact centers and customer service  
21     offices?

22            A     Yes. I think in looking at this  
23     table, that would be a fair evaluation.

24            Q     Okay. So the Chapter 2 costs are  
25     fairly small in comparison to the Chapter 4  
26     and 5 costs; right?

27            A     From the data, yes. It appears  
28     that way.

1           Q    Okay.  Would you generally agree  
2   that it is more important when you're dealing  
3   with lots of costs to get allocators right  
4   than if you're dealing with fewer costs?

5           A    I'm not an expert on allocation,  
6   but I think that's probably a reasonable  
7   assumption.

8           Q    Okay.  Because it would have more  
9   of an impact; right?

10          A    Potentially.

11          Q    Okay.  Okay.  So some of the  
12   customer service program costs are not  
13   considered to be common costs; right?

14          A    Correct.

15          Q    And so there are some customer  
16   service-related costs where PG&E makes a  
17   direct allocation; right?

18          A    Yes.  I believe that's correct.

19          Q    And for example, you discuss in  
20   your testimony MWCEY, which is electric meter  
21   maintenance; right?

22          A    Correct.

23          Q    And you point out that electric  
24   meter maintenance is a distribution  
25   system-only cost; right?

26          A    That is correct.

27          Q    And so all of the those costs are  
28   allocated to the electric distribution

1 customers?

2 A Yes. Correct.

3 Q And the Joint CCAs have not  
4 recommended any change to that direct  
5 allocation; right?

6 A Not that I'm aware of.

7 Q You're just using it as an example  
8 in your testimony?

9 A Correct.

10 Q Okay. So you understand that the  
11 proposals that the Joint CCAs have made  
12 relate only to costs that are considered to  
13 be common?

14 MS. ZIMNEY: Objection. Speculative.

15 ALJ LIRAG: I'll allow it.

16 THE WITNESS: From what I have read, I  
17 can probably infer that appears to be the  
18 Joint CCAs' proposal.

19 BY MR. SCHLESINGER:

20 Q Okay. Would you agree with me that  
21 all of the costs associated here in Table 2  
22 are common costs? I think you already said  
23 yes.

24 A Yes. It appears that way.

25 Q Okay. Great. So the allocator  
26 that PG&E has always used and are proposing  
27 to use -- again, this is based on the total  
28 number of electric versus gas customers;

1 right?

2 A Could you repeat that?

3 Q The 55-45 allocator that PG&E is  
4 proposing to use here, that's based on the  
5 total number of electric and gas customers,  
6 55 electric, 45 gas?

7 A I believe it's customer service  
8 agreements is what it's based on. Not just  
9 necessarily customers. But it's 55 electric,  
10 45 gas; correct.

11 Q A customer service agreement is  
12 what exactly?

13 A So you could have multiple  
14 customers on one customer service agreement,  
15 but this is based -- I believe it's based  
16 upon customer service agreements.

17 Q Okay. But it's a rough  
18 approximation of the proportion of electric  
19 to gas customers?

20 A Correct.

21 Q Okay. It's not -- it's not at all  
22 based on how these services are utilized  
23 between electric and gas customers; right?

24 A I'm not an expert. I have a  
25 general understanding. I believe it was  
26 based upon the customer allocation service  
27 agreements.

28 Q Okay. Would you agree with me that

1 sometimes PG&E takes a common cost and  
2 attempts to allocate it based on the  
3 utilization by different customers of that  
4 service?

5 MS. ZIMNEY: Objection. Lacks  
6 foundation.

7 ALJ LIRAG: Sustained.

8 BY MR. SCHLESINGER:

9 Q Are you aware of how PG&E is  
10 proposing to allocate locate and mark costs  
11 in this proceeding?

12 A I'm not.

13 Q Are you aware of how PG&E is  
14 proposing to allocate helicopter costs in  
15 this proceeding?

16 A No, I'm not.

17 Q Are you at all familiar with the  
18 conversation I had with Ms. Bartman just  
19 about a half an hour ago regarding the  
20 allocation of customer engagement costs  
21 related to rates?

22 A I have to be honest. I was in the  
23 room when I walked in, but I wasn't really  
24 paying attention to that. It's not my area.

25 Q Okay. I'll move on. On page 4-7  
26 of your rebuttal testimony, at line 12 the  
27 question was posed to you whether PG&E agrees  
28 with JCCA's recommendation. Do you see that?

1 A Yes.

2 Q And JCCA's recommendation is to  
3 change the allocation from 55-45 to an  
4 allocator -- what we call the adjusted common  
5 customer care cost allocator; right?

6 A I believe that's maybe what you  
7 said before, yes.

8 Q Okay. Well, I'm just looking in  
9 your testimony a few lines above where you  
10 talk about JCCA recommends replacing -- sorry  
11 this at line 4:

12 JCCA recommends replacing  
13 PG&E's current 55 percent  
14 electric distribution,  
15 45 percent gas distribution  
16 cost allocation factor with  
17 a new adjusted common  
18 customer care cost  
19 allocator.

20 So that is our proposal; correct?

21 A Correct.

22 Q And that would change the allocator  
23 so that 13.21 percent of the common costs  
24 would be allocated to electric generation.  
25 42.84 percent would be allocated to electric  
26 distribution, and 43.95 percent would be  
27 allocated to gas distribution; right?

28 MS. ZIMNEY: Objection. Counsel's



1 asking the witness to speak to JCCA's  
2 proposal.

3 ALJ LIRAG: Overruled. I think  
4 Mr. Schlesinger is just clarifying whether  
5 Mr. Zenner understood the JCCA's position as  
6 what he had just described.

7 Please continue.

8 THE WITNESS: I believe that's accurate  
9 based upon that reading of what I'm reading,  
10 yes.

11 BY MR SCHLESINGER:

12 Q Okay. So then on line 12 where  
13 you're asked the question, "Does PG&E agree  
14 with JCCA's recommendation?"

15 That's the recommendation we're  
16 talking about; right?

17 A Yes.

18 Q Okay. And you say "No." That you  
19 don't agree because PG&E believes the current  
20 55-45 allocator is appropriate because the  
21 typical customer service-related activities  
22 and the level of service provided by PG&E's  
23 customer care organizations such as the  
24 contact centers does not vary based on  
25 whether a customer is bundled electric or  
26 unbundled electric; right?

27 A Yes.

28 Q So in other words you are arguing

1     that the services are equally available to  
2     both CCA and bundled customers; right?

3             A     From the context and the  
4     perspective, yes. We would treat the  
5     customers the same.

6             Q     Okay. You're not arguing here  
7     however, that you get about the same number  
8     of calls or e-mails from CCA and bundled  
9     customers are you?

10            A     What we're stating here is based  
11    upon what we have is we didn't see any reason  
12    to change based upon our understanding of how  
13    the costs are allocated. That being based  
14    upon service agreements by electric customers  
15    versus gas customers.

16            Q     Okay. But, again, just to confirm  
17    you are not arguing that CCA customers and  
18    bundled customers utilize these contact  
19    centers in equal proportions are you?

20            A     Actually, based upon some of the  
21    data we've provided, it appears actually that  
22    unbundled customer at times used our services  
23    more in the contact centers than a bundled  
24    customer.

25            Q     We'll get to that. I will get to  
26    that. I promise. Here in your rationale,  
27    you're stating that the service is equally  
28    available. You're not stating that the

1 service is equally utilized; right?

2 A We are stating here that it is  
3 equally available.

4 Q Okay. Thank you. Let's talk a  
5 little bit about what drives these costs,  
6 okay?

7 Would you agree with me that the  
8 total volume of calls received or e-mails  
9 received is a driver of costs?

10 A Yes. Generally.

11 Q And would you agree with me that  
12 the length of a call or the length of an  
13 e-mail is another driver of costs in the  
14 contact centers?

15 A Yes. That's another factor we look  
16 at.

17 Q Okay. So a longer call or longer  
18 e-mail will cost more to deal with than a  
19 shorter one?

20 A Yes. Generally.

21 Q And would you also agree that the  
22 complexity of a customer interaction could  
23 have an impact on how long it takes and  
24 therefore how much it costs?

25 A Yes. Generally, if it's a more  
26 complex issue, you would have a longer time.

27 Q Okay. So I think one type of  
28 common call or e-mail that you get is a bill

1 inquiry; right?

2 A We get many bill inquiries.

3 Q So if a customer has a question  
4 about their bill, they give you a call?

5 A Correct.

6 Q Okay. So if you had -- let's just  
7 look at bill inquiries and assume all else is  
8 equal. Let's say you had 500,000 bill  
9 inquiries in one year and then you had a  
10 million bill inquiries on the next year.  
11 Year one and year two.

12 Your costs in year two, all else  
13 being equal, would be higher than year one;  
14 right?

15 A I don't know if you can generally  
16 make that because it tends sometimes things  
17 go up and other things -- metrics go down.  
18 So other call types -- it fluctuates. You  
19 may have a year where different volume goes  
20 up and some go down.

21 Q Understood. That's why I'm asking  
22 all things being equal. Let's say everything  
23 stayed the same. The only variable that  
24 changed was the number of calls. Would you  
25 agree that the second year when there's a  
26 million, that would cost more than the first  
27 year when there's 500,000?

28 A Are we also saying the length of

1 the call?

2 Q Yes. All else being equal.

3 A Okay. So everything. The time the  
4 call arrived, everything else being equal,  
5 yes.

6 Q Great. And would -- okay. So  
7 let's go back to year one. You get 500,000  
8 bill inquiries. Okay. Would it -- would you  
9 agree with me that the work PG&E has to do to  
10 handle those 500,000 bill inquiries would be  
11 the same regardless if you got two calls from  
12 250,000 or one call from 500,000 customers  
13 each?

14 Do you want me to ask that  
15 differently?

16 A Yeah. I'm a little confused on the  
17 rationale there.

18 Q Okay.

19 ALJ LIRAG: I think let's head for  
20 lunch, Mr. Schlesinger.

21 MR. SCHLESINGER: Sure. Can I just  
22 finish this line of questioning?

23 ALJ LIRAG: All right. If you've  
24 reformulated the question. Is it a long  
25 line?

26 MR. SCHLESINGER: Well, it's probably  
27 got another 5 to 10 minutes. I'm happy to  
28 pick up later if you like.

1 ALJ LIRAG: Yeah. I prefer that we go  
2 on our lunch break.

3 So let's come back here at 1:15 on  
4 that thought.

5 Off the record. ]

6 (Whereupon, at the hour of 11:50  
7 a.m., a recess was taken until 1:15  
p.m.)

8 \* \* \* \* \*

9

10 (Off the record.)

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AFTERNOON SESSION - 1:15 P.M.

\* \* \* \* \*

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

Mr. Schlesinger, you may proceed.

MR. SCHLESINGER: Thank you.

CHRIS ZENNER,

resumed the stand and testified further as

follows:

CROSS-EXAMINATION RESUMED

BY MR. SCHLESINGER:

Q Good afternoon, Mr. Zenner. We made it to the afternoon.

Let's pickup where we left off, and I believe we were talking about the number of calls at the call center as being the driver of costs. Do you recall that conversation that we were just having?

A Yes.

Q And you agreed with me that all else being equal, the number of calls received or e-mails received is a driver of costs; right?

A Yes. I agreed that it is one of the drivers of cost, yes.

Q Okay. And does it matter how many customers are behind the total number of calls in terms of the cost causation?

A Could you say that again?

1           Q    Sure.  Let's say you get two calls  
2   in a day.  Does it matter whether you get two  
3   customers each making one call versus one  
4   customer making two calls in terms of the  
5   cost causation?

6           A    So, I guess, if you look at it from  
7   that standpoint, it would really depend on  
8   what the customer is calling about because in  
9   some cases, if it was a repeat call of the  
10  same issue, you could look at it one way.  If  
11  it's a totally different issue, probably not.

12          Q    Okay.  So, again, this is a  
13  hypothetical, and we're in a world where all  
14  else is equal.  So - let's say - we have two  
15  separate calls, okay, about two different  
16  things.

17                   From a cost-causation perspective,  
18  it doesn't matter whether it's two customers  
19  making a call each or one customer making two  
20  calls; right?

21          A    Again, everything being equal,  
22  handle time, complexity of the call, arrival,  
23  all of those things, yes.  I would agree with  
24  that.

25          Q    Okay.  In other words, the number  
26  of customers making calls is irrelevant to  
27  the total volume of calls that you receive;  
28  right?



1 MS. ZIMNEY: Objection; misstates the  
2 testimony.

3 ALJ LAU: Sustained.

4 MR. SCHLESINGER: Okay. I think I can  
5 move on.

6 Q And so the converse of everything  
7 we've just been talking about is also true;  
8 right?

9 If all else being equal, the number  
10 of calls or e-mails that you received, if  
11 that went down, that would serve to drive  
12 costs down; correct?

13 A Again, all those factors that go  
14 into call handling, whether it's arrival  
15 patterns, complexity, handle time, if all  
16 those things, if you received less live agent  
17 calls, costs would go down.

18 Q Great. Okay.

19 And, again, just to ground us here,  
20 you agree that what the Joint CCAs are  
21 attempting to do or recommending that the  
22 Commission do is come up with an allocator  
23 that better reflects the utilization of the  
24 customer service costs; right?

25 A From the testimony, your testimony,  
26 that is what I read.

27 Q Okay. I'd like to direct your  
28 attention to Table 3 in the Mancinelli-Reger

1 testimony; do you have that in front of you?

2 A Yes.

3 Q And we also asked you in Discovery  
4 Request 15-10 whether PG&E disputed the  
5 actual customer care/customer counts and  
6 proportions contained in Table 3, and you  
7 answered that request; right?

8 A Yes. We did answer that request.

9 Q And that has been marked as Hearing  
10 Exhibit 103. Do you have that in front of  
11 you?

12 A I do.

13 Q Okay. And in your answer there  
14 under A-I, you state that PG&E disputes the  
15 quoted customer/care customer counts for two  
16 reasons. And then you go ahead and list the  
17 two reasons. And I'm going to talk about  
18 those.

19 All right. The first reason you  
20 provided is that JCC asked, How many calls,  
21 e-mails, elevated disputes are received by  
22 PG&E's contact centers for each customer  
23 type. That was our question.

24 Therefore, the answers PG&E  
25 provided were for the number of calls,  
26 e-mails, and escalated complaints broken out  
27 by customer type, not by the number of  
28 customers. And so am I correct that what

1 you're stating here is, essentially, that our  
2 question and testimony was confusing because  
3 we asked about customer counts, and what you  
4 actually provided were numbers of calls and  
5 e-mails.

6 A When we interpreted this, based  
7 upon the question, we provided answers for  
8 the number of calls, e-mails, and escalated  
9 complaints that were broken out by the  
10 customer type; for example, bundled,  
11 unbundled, CCA, DA, gas. We did not base it  
12 upon the number of customers; correct.

13 Q Okay. And I appreciate and  
14 understand that the question we asked was  
15 confusing because it asked about the number  
16 of customers, but you do agree with me  
17 already that the number of calls and e-mails  
18 is more of a driver of costs than the number  
19 of customers; right? We just talked about  
20 that.

21 A Can you rephrase that?

22 Q You agree that the total number of  
23 calls and e-mails is more of a driver of  
24 costs, more of a driver of work, than the  
25 total number of customers?

26 MS. ZIMNEY: Objection; misstates the  
27 testimony.

28 ALJ LAU: I think Mr. Zenner already

1 answered counsel's question earlier regarding  
2 the driver, and if that's not the case, then  
3 Mr. Zenner can clarify.

4 THE WITNESS: I believe I answered.

5 ALJ LAU: So your answer is "yes" or  
6 "no"?

7 MR. SCHLESINGER: I'm sorry --

8 MS. ZIMNEY: He hadn't previously  
9 testified as to whether it was more or less  
10 of a driver. He just testified as to whether  
11 it was a driver.

12 ALJ LAU: Counsel, can you ask your  
13 question again then.

14 BY MR. SCHLESINGER:

15 Q Mr. Zenner, do you agree that  
16 number of calls and e-mails is more of a  
17 driver of costs for the call centers than the  
18 total number of customers on the system?

19 A Contact centers specifically?

20 Q Sure. Let's just talk about  
21 contact centers.

22 A So if I heard that correctly,  
23 you're saying in the contact centers, the  
24 total number of calls we receive or e-mails  
25 we receive is more of a driver in how we  
26 determine our costs than the number of  
27 customers that PG&E has.

28 Q Not exactly.

1           A    I'm sorry. I'm just wanting to  
2   make sure I understand it correctly.

3           Q    The number of calls or e-mails that  
4   the contact center receives is more of a  
5   driver of cost causation than the total  
6   number of customers out there; correct?

7           A    From a contact center perspective,  
8   the drivers for us, in terms of cost, would  
9   be the number of calls, the number of  
10  e-mails, and the service requests that we do  
11  need to service the customers with. Yes.

12          Q    Okay. Great.

13                No. 2, in your response to the  
14  discovery as to why you dispute our numbers  
15  in Table 3, is that the number of calls,  
16  e-mails, and escalated complaints for Chapter  
17  4, Contact Centers, quoted in the Direct  
18  Testimony of Joe Mancinelli and Andy Reger on  
19  behalf of the Joint CCAs do not match the  
20  answers that PG&E provided in its Response to  
21  Question 13-6 -- I'm sorry -- Set 13,  
22  Question 6, Table 2; correct?

23          A    Correct.

24          Q    And the numbers that don't match  
25  are the numbers that you provide here now in  
26  your table Table 1 in that discovery  
27  response; correct?

28          A    Yes. Under "2017 Customer Calls

1 and E-mails," yes.

2 Q Okay. On Friday the Joint CCAs  
3 filed an errata to Mr. Mancinelli and  
4 Mr. Reger's testimony, and I'm curious if you  
5 had a chance to review that?

6 A I don't believe I received that.

7 MS. GANDESBERY: I didn't send it to  
8 the witness.

9 ALJ LAU: Let's go off the record.

10 (Off the record.)

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

12 BY MR. SCHLESINGER:

13 Q So you said you have previously not  
14 seen these new citations; have you?

15 A I have not.

16 Q That's fine.

17 Well, let's look at your Table 1  
18 then, and you basically have two kinds of  
19 figures here that you say don't match up:  
20 One is 2017 escalated complaints, and the  
21 other is the 2017 customer calls and e-mails;  
22 correct?

23 A Correct.

24 Q Okay. So let's start with the  
25 escalated complaints. PG&E's response to  
26 Question 13-6, Table 2, in terms of the total  
27 escalated complaints, had 522 coming from  
28 electric-bundled customers; correct?

1           A    Are you on Table 1 of PG&E or are  
2   you on Table 2 of the -- this document?

3           Q    I'm on Table 1 of your Data  
4   Response to 13-6.

5           A    My apologies. I thought you said  
6   Table --

7           Q    I'm sorry. 15-10. Response to  
8   15-10.

9           A    Yes. So under "Electric Bundled,"  
10   PG&E's response was 522.

11          Q    Okay. And then Mr. Mancinelli and  
12   Mr. Reger included 2,678 for that; right?

13          A    Correct.

14          Q    Now, I would like to direct your  
15   attention to what was marked with Mr. Brown,  
16   Hearing Exhibit 100, which was the Response  
17   to Joint CCA 15-7, and we'll provide you a  
18   copy.

19          A    I don't have that.

20          ALJ LAU: Let's go off the record.

21                (Off the record.)

22          ALJ LAU: Back on the record.

23   BY MR. SCHLESINGER:

24          Q    And I'd like to specifically direct  
25   your attention to the second page of that  
26   exhibit, which is marked Table 2, PG&E-06,  
27   "Customer Service by Customer Type."

28                Do you have that in front of you?

1 A Yes.

2 Q Great. And this Table 2 is the  
3 table that PG&E provided in its response to  
4 JCCA-13-6; right?

5 MS. GANDESBERY: Can we go off the  
6 record for a second?

7 ALJ LAU: Off the record.

8 (Off the record.)

9 ALJ LAU: On the record.

10 THE WITNESS: Could you ask that again?

11 BY MR. SCHLESINGER:

12 Q Yes. This is the table that PG&E  
13 provided in response to JCCA-13-6 - right -  
14 one of tables that you provided?

15 THE WITNESS: Yes.

16 MS. ZIMNEY: Objection, your Honor.  
17 This witness did not provide this. So I  
18 don't know that he can attest to whether or  
19 not he provided it.

20 ALJ LAU: What kind of questions,  
21 Counsel, were you going to ask?

22 MR. SCHLESINGER: Well, I'm just trying  
23 to match up his number where he says what  
24 they provided versus what we used. This is  
25 what we provided.

26 ALJ LAU: How about -- let's proceed  
27 with the questioning, and if there's numbers  
28 that you cannot attest to, then you can just



1 say, these numbers were not provided by you.

2 THE WITNESS: So the contact center  
3 provided the numbers for the contact center  
4 portion. The rest of the numbers, I can't  
5 speak to.

6 BY MR. SCHLESINGER:

7 Q Okay. Great.

8 Then looking at this Table 2 here,  
9 you're saying that you provided the numbers  
10 here under Chapter 4, Contact Centers?

11 A Yes.

12 Q All right. So going back to, then,  
13 this Table 1, from your Response to 15-10,  
14 you say that you provided the number 522, and  
15 we used the number 2,678; right?

16 A Yes.

17 Q So, now, looking at the Table 2,  
18 what you said you provided, under Chapter 4,  
19 Contact Centers, there is escalated  
20 complaints of 522, just like you said; right?

21 A Yes.

22 Q Okay. But if you go up two cells  
23 in Chapter 2, which I understand are not your  
24 numbers - I'm not asking you to verify them -  
25 but in Chapter 2, there is also a number for  
26 escalated complaints management of 2,678;  
27 right?

28 A I see it there. That's not our

1 number, but I'm assuming that came from  
2 Chapter 2.

3 Q Okay. And that's the number that  
4 we used in our Table 3; right?

5 A 2,678, yes.

6 Q And so we failed to include the  
7 number of escalated complaints that came  
8 through contact centers - right - in our  
9 table?

10 A It appears the numbers we provided  
11 were not used in the table; correct.

12 Q Okay. So we probably should have  
13 included both sets of contact numbers in our  
14 table - right - both yours from Chapter 4 and  
15 Mr. Brown's from Chapter 2, then we would  
16 have been using all the numbers you provided?

17 A For reference -- I don't know if I  
18 can speak to what you should have provided  
19 for both, but, I think, for us the numbers  
20 that were provided were not the numbers we  
21 used.

22 Q Got it. Okay.

23 So within contact centers,  
24 sometimes people contact PG&E by calling,  
25 sometimes they e-mail, and then some of those  
26 are categorized as escalated complaints;  
27 right? Those were the three numbers you  
28 provided?

1 A Correct.

2 Q And would you agree with me that  
3 the contact centers received way more calls  
4 and e-mails than they do escalated  
5 complaints?

6 A Yes.

7 Q The calls and e-mails -- well,  
8 let's say, the calls total about 3.3 million  
9 in 2017; where the escalated complaints were  
10 only 522; right?

11 A Are you talking for electric  
12 bundled?

13 Q Correct. For electric bundled.  
14 Thank you.

15 A So calls and e-mails in that year  
16 appear to be 3,464,000 and escalated  
17 complaints would be 522.

18 Q And then for the CCA, DA customers  
19 in the next column, there were 965,000 calls,  
20 approximately, compared to 237 escalated  
21 complaints; right?

22 A That's correct.

23 Q So the numbers of calls is orders  
24 of magnitude higher than the number of  
25 escalated complaints; right?

26 MS. ZIMNEY: Objection; vague and  
27 ambiguous.

28 ALJ LAU: Overruled. Can you specify

1 what you mean by vastly.

2 MR. SCHLESINGER: I'll move on, your  
3 Honor.

4 ALJ LAU: Okay.

5 BY MR. SCHLESINGER:

6 Q Would you agree with me the number  
7 of calls and e-mails is a bigger driver of  
8 costs for contact centers than escalated  
9 complaints is?

10 A Would I agree for a contact center  
11 budget that calls and e-mails is a bigger  
12 driver than escalated complaints in our  
13 budget?

14 Q Yes. That's the question.

15 A Yes.

16 Q Okay. So let's go to the second  
17 piece of this table where you state that you  
18 provided a certain number for 2017 customer  
19 calls and e-mails, and we provided a  
20 different number.

21 MS. ZIMNEY: I'm sorry. Are we on  
22 Table 1 of the Data Response?

23 MR. SCHLESINGER: Correct. 15-10.

24 Q Hearing Exhibit 103. Are you  
25 there?

26 A Yes.

27 Q Great. Thank you.

28 So you provide here the numbers

1 contained in Table 2 of Hearing Exhibit 100,  
2 and you add those up to get a total of 3.4  
3 million - let's say - total calls and e-mails  
4 for 2017; right?

5 A That's correct for electric  
6 bundled.

7 Q However, the Mancinelli-Reger  
8 number is 3.8 million, approximately, for  
9 electric bundled; right?

10 A Yes.

11 Q Now, if you could look back at  
12 Table 3 in the JCCA testimony.

13 A Okay.

14 Q We've added a Footnote 4 there  
15 under "Location/Customers served." Oh, I'm  
16 sorry. I'm in the wrong row. Let me  
17 reorient us.

18 In Table 3 of Mr. Mancinelli and  
19 Mr. Reger's testimony, under Chapter 4,  
20 "Contact Centers," is what we're talking  
21 about, under "Customer Calls and E-mails."  
22 There you see that \$3.8 million that we were  
23 just talking about, the number you were  
24 criticizing?

25 A 3.8 million dollars or 3.8 million  
26 calls?

27 Q 3.8 million calls.

28 A Yes, I do see it there.

1 Q Okay. And there's a footnote  
2 there, Footnote 3, to the table, which refers  
3 to Data Response 10-6 and 10-7, sup. 1.

4 Sorry, your Honor. One moment.

5 ALJ LAU: Off the record.

6 (Off the record.)

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

8 MR. SCHLESINGER: Thank you.

9 Q Do you know, Mr. Zenner, whether in  
10 DR 10-6 and 10-7, whether the Joint CCAs  
11 asked for call and e-mail counts for 2018?

12 A Off the top of my head, no.

13 Q You don't know.

14 You would agree with me the numbers  
15 you provided in your Table 2 are for 2017;  
16 right?

17 A Yes, 2017.

18 Q 2017 numbers.

19 Okay. And so assuming that the  
20 responses for 10-6 and 10-7 provided  
21 call/e-mail counts for 2018, you would agree  
22 that that would demonstrate that the JCCAs  
23 were trying to come up with more recent  
24 numbers; right?

25 MS. ZIMNEY: Objection; calls for  
26 speculation.

27 ALJ LAU: I would have to sustain  
28 because I have no gauge.

1 MR. SCHLESINGER: Understood. We'll  
2 let the record speak for itself once we've  
3 got it completed.

4 ALJ LAU: Okay.

5 MR. SCHLESINGER: Okay. Great.

6 Q Let's move on to the next exhibit.  
7 Oh, I'm sorry. There's still a question we  
8 left unanswered.

9 So sticking, then, with Exhibit  
10 103, JCCA-10. Question B asked you to admit  
11 that while the customer-service-related  
12 activities performed and the level of service  
13 are equally available to bundled and  
14 unbundled customers, that bundled customers  
15 utilized them in greater numbers.

16 And your response was that you  
17 disagreed, you denied. You said: "Bundled  
18 customers do not utilize PG&E's customer  
19 service in greater numbers than unbundled  
20 because Table 2, below, shows the ratio of  
21 calls-per-customer is higher for unbundled  
22 customers, 0.094 calls versus 0.078 calls per  
23 customer."

24 That was your response, sir?

25 A That was our response.

26 Q Okay. So let's take a look at your  
27 Table 2, here.

28 MS. ZIMNEY: I'm sorry. Which Table 2?

1 Are we talking about the same Table 2 on that  
2 data response?

3 MR. SCHLESINGER: Table 2 on 15-10.

4 Q And, I assume, sir, that you are  
5 providing this calls-per-customer ratio  
6 because you believe that calls per customer  
7 is a better indicator of cost causation?

8 MS. ZIMNEY: Objection; argumentative.

9 ALJ LAU: Can you ask your question in  
10 another way.

11 MR. SCHLESINGER: Sure.

12 Q Do you agree that calls per  
13 customer is a better indicator of the  
14 utilization of the call center than just  
15 total calls?

16 A I think in terms of this, when we  
17 look at this, what we were trying to get at,  
18 because we don't actually track by customer  
19 coming in. We track by call type. It's  
20 never been asked of us to track differently  
21 since I've been around.

22 So we track by customer-call intent  
23 because we want to get the customer to the  
24 right person right away - right - so what  
25 they're calling about.

26 So we haven't looked at it in terms  
27 of bundled or unbundled because we treat  
28 those customers the same way when they come



1 in from a contact-center perspective; so --

2 Q Okay. But in Table --

3 A -- when we looked at this, what we  
4 did was, we pulled data, and we had to  
5 manually back into these numbers. This is  
6 not something we track.

7 So when we pulled it, we looked at  
8 the numbers, and we found for that period of  
9 time that unbundled customers actually called  
10 us more often than bundled customers.

11 Q Okay. For that period of time;  
12 correct?

13 A For the manual period of time that  
14 we pulled that data.

15 Q Well, let's look at where that data  
16 comes from, and you provide sources here in  
17 your table.

18 So - let's see - in the first row  
19 you provide the total number of bundled and  
20 unbundled customers in 2018; right?

21 A Yes.

22 Q And then we can track that because  
23 you've got Footnotes, here, A and B. So the  
24 total number of bundled customers, 4.2  
25 million, comes from the PG&E March 2018  
26 Response to CPUC Policy and Planning  
27 Division; right?

28 A Correct.

1           Q   And the 1.2 million for total CCA  
2 customers -- or total unbundled customers in  
3 2018 comes from your Exhibit PG&E-06,  
4 Workpaper, page 2-23; right?

5           A   Correct.

6           Q   So, now, let's look at the number  
7 of calls and where they came from. So the  
8 number of calls that you have listed here for  
9 2018 is 333,000-ish; right?

10          A   For that month.

11          Q   For that month; right.

12                So C, the footnote there, says that  
13 the number of CSR calls handled -- that was  
14 the number of CSR calls handled for bundled  
15 customers in January of 2018; right?

16          A   Correct.

17          Q   So it was only for one month, that  
18 was the number of calls?

19          A   Correct.

20          Q   So you've got total number of  
21 customers here in the first row, and then  
22 number of calls in one particular month in  
23 the second row?

24          A   Correct.                                ]

25          Q   Okay. And then for unbundled  
26 customers, you have 118,881. And if you  
27 track to that Footnote D, that's the number  
28 of CSR calls handled for unbundled customers

1 in April of 2018; right?

2 A Correct.

3 Q Okay. So you use January of 2018  
4 for the call numbers for bundled, and April  
5 of 2018 for the call numbers of unbundled?

6 A Correct.

7 Q Okay. Do you typically get a  
8 steady number of calls every month of the  
9 year?

10 A Those months are relatively close.  
11 And that was the date we had available to get  
12 those counts to turn that data request around  
13 in time.

14 Q Okay.

15 A So we figured because there was  
16 less volatility in those months, due to  
17 outages or anything else and the call counts  
18 were relatively the same, we made the  
19 assumption that, relatively, those customers  
20 counts for those months would match.

21 Q Okay. But, ultimately, this is a  
22 snapshot of a point in time; right?

23 A It is a snapshot of that month  
24 that we pulled the data from. As I said, we  
25 don't track this regularly. So we had to  
26 back -- manually back into these numbers.

27 Q Okay. And just to be really clear  
28 about what you're saying, it's actually the

1 data from two different months; right? -- one  
2 from January and one from April?

3 A So, the bundled customer data was  
4 from January. And the unbundled customer  
5 data was from April.

6 Q Okay. Great.

7 And you didn't attempt to get an  
8 annual average or anything like that? -- you  
9 just used the total calls from that month? --  
10 from each representative months?

11 A So in order to turn this around, we  
12 used data that was accessible to us. Based  
13 upon that point in time, and since it was a  
14 manual pull, we had to manually pull this and  
15 try to get that in to come up with something  
16 we don't normally track. That's the data we  
17 used.

18 Q Okay. Great. Thanks.

19 Okay. Now, let's move on to the  
20 next exhibit. So that's marked as 104.  
21 That's the company's response to JCCA 15-11.  
22 So you could just have that in front of you.

23 But my first question for you is,  
24 it is correct, and I believe you've actually  
25 just stated it, that PG&E does not track --  
26 I'm sorry. Let me back up for a second.

27 It is correct that sometimes the  
28 contact centers refer customers to a CCA;

1 right?

2 A Yes.

3 Q But you don't know exactly how many  
4 customers are referred to their CCA, do you?

5 A No. We don't have a means to track  
6 that.

7 Q You don't have a means to track  
8 that. Okay.

9 However, you do respond, in Part B,  
10 Section I, that:

11 Starting in 2018, PG&E  
12 started tracking when a  
13 customer is transferred to  
14 a CCA in the company's  
15 interactive voice response  
16 system.

17 Right?

18 A Yes, our IVR.

19 Q And so -- just so that we  
20 understand that, IVR is like a robotic  
21 calling system?

22 A Yeah. Basically, to be used in our  
23 automatic -- when you call the call center,  
24 it gives you menu options you can self-serve  
25 in.

26 Q Okay. So when somebody stays  
27 within that IVR system, never gets  
28 transferred to a customer-service

1 representative, you know that for 2018 you  
2 transferred 25,092 calls to CCAs?

3 A Yes. From that time point in 2018,  
4 through the IVR, what calls were transferred  
5 to CCAs, we did have that ability to --

6 Q Okay.

7 A -- check that. Yes.

8 Q Okay. But there are also  
9 additional calls that are handled by customer  
10 service representatives where a customer may  
11 be referred to a CCA that you don't track;  
12 right?

13 A Yes. We don't track CSR calls.  
14 They're -- CSR recommendations are to contact  
15 the CCA.

16 Q Okay. There were actually quite a  
17 few types of calls for which you may refer a  
18 customer to a CCA; right? -- and you provide  
19 some of those in Table 1?

20 A Yeah. There's several times -- I  
21 mean, when customers call in -- you know,  
22 we're on the bill, so customers call us  
23 first. They will call in and, you know, a  
24 lot of times it's about a high bill. And  
25 we'll start to talk about why their bill is  
26 high and we go through different things. And  
27 at times you can get into, for example,  
28 sometimes they don't even know they are part

1 of a CCA.

2 Q Sure.

3 A And no offense to the CCA, they do  
4 -- they send customers notices and all that  
5 stuff, customers don't always read that --

6 Q Okay.

7 A -- so first you got to explain  
8 that.

9 Q I'm going to ask that the witness  
10 refrain and just answer my questions.

11 ALJ LAU: Okay.

12 THE WITNESS: So could you repeat it?  
13 BY MR. SCHLESINGER:

14 Q You refer customers to their CCAs  
15 for all kinds of reasons; right?

16 A Yes, for many different reasons.

17 Q And you've listed some of them here  
18 in Table 1 in response to this data response?

19 A Yes.

20 Q Okay. Let's look at the first one.  
21 The subject of these types of calls  
22 are adjustment/billing inquiries -- I think  
23 that's kind of what you were just talking  
24 about, somebody has a question about their  
25 bill; correct?

26 A Correct.

27 Q And if somebody has a question  
28 about, looking here at the third column, the

1 CCA portion of their bill, the CCA rates, the  
2 CCA electric charges, or the CCA generation  
3 sources, those would all be reasons why you  
4 would refer that customer to a CCA; right?

5 A Correct.

6 Q Okay. If the customer doesn't have  
7 a CCA, because let's say they are a bundled  
8 customer, PG&E would handle questions -- all  
9 the questions about the customers's bill;  
10 right?

11 A Yes. And in that case, if you are  
12 just a bundled customer and you get to that  
13 point in the conversation, yes, that would be  
14 our conversation. But due to the neutrality  
15 we have with CCAs, we refer them to the CCA  
16 for their portion.

17 Q Okay. And if a bundled customer  
18 has a question about their electric charges  
19 or generation sources, those calls would be  
20 handled by PG&E; right? -- not referred?

21 A A bundled customer, yes.

22 Q Yes. Okay.

23 And in the next row, the subject of  
24 the calls are annual joint rate comparisons.  
25 I don't know exactly what that is, but I  
26 assume it's, like, a report that shows how  
27 their rate's changed over time; is that  
28 right?



1           A    It's a comparison to the PG&E rates  
2   to CCA rates.

3           Q    Oh, okay.

4                   And so they might call and have  
5   question, again, about the CCA portion of the  
6   rates or the CCA charges and -- again, that's  
7   where you refer them?

8           A    We can only speak to the PG&E  
9   rates.

10          Q    Right.

11                   And if it's a bundled customer,  
12   then you would handle those calls too, you  
13   wouldn't be referring them?

14          A    Well, they would -- a bundled  
15   customer wouldn't be calling in for the rate  
16   comparison. They would only be calling in if  
17   they had a question about rates.

18          Q    Uh -- Okay. We'll, let that one  
19   go.

20                   I'm not going to go through all  
21   this table in the interest of time; but would  
22   you generally agree that if a customer  
23   doesn't have a CCA to call, PG&E handles that  
24   inquiry?

25          A    Well, we handle all inquiries when  
26   they come in. But specific to that portion  
27   of the inquiry, if it gets into whether it's  
28   a CCA rate or generation, yes, we would refer

1 that portion of the inquiry. But we handle  
2 the inquiry as it comes in.

3 Q Okay. And if it was a bundled  
4 customer, you would not refer that portion of  
5 the inquiry? -- you would handle that  
6 yourself?

7 A Yes, we would handle that.

8 Q Great. Okay.

9 We can move on to the next  
10 Exhibit 105. Which is PG&E's response to  
11 JCCA 15-12 unbundled?

12 ALJ LAU: And just a time check, Mr.  
13 Schlesinger, can you -- is there -- how many  
14 more minutes of the questions do you think  
15 you have?

16 MR. SCHLESINGER: I think it probably  
17 is going to depend on how things go here.  
18 I'm hoping another 20 minutes.

19 ALJ LAU: Okay. So 20 minutes and then  
20 we break at 2:20. Okay?

21 MR. SCHLESINGER: All right.

22 ALJ LAU: All right. Back on the  
23 record.

24 BY MR. SCHLESINGER: Okay. Are you at  
25 Exhibit 105, sir?

26 A Yes. Question 12?

27 Q Correct.

28 And in this question, Joint CCAs --

1 or -- I'm sorry.

2 In this question, we're referring  
3 to your testimony in which you state that:

4 Contact centers do not  
5 track customer inquiries at  
6 a more-detailed level, such  
7 as electric-generation  
8 related versus  
9 electric-delivery related  
10 because it would be unduly  
11 burdensome.

12 Correct?

13 A Yes. Historically, we track by  
14 call intent, but not necessarily to that  
15 level of detail.

16 Q Okay. It is correct, however, that  
17 the company hasn't done any formal cost  
18 benefit studies or evaluations of the costs  
19 involved?

20 MS. ZIMNEY: Objection. Lack of  
21 foundation.

22 ALJ LAU: Can you set --

23 MS. ZIMNEY: I don't --

24 MR. SCHLESINGER: Do you --

25 (Court reporter admonition.)

26 ALJ LIRAG: One at a time, please.

27 BY MR. SCHLESINGER:

28 Q I can refer you to your response to

1 Part A of DR-15-12.

2 Do you agree that this states that:  
3 PG&E does not have any  
4 formal reports or studies  
5 on the level of difficulty  
6 required to track customer  
7 types by call?

8 A Yeah. The PG&E contact centers do  
9 not have any formal reports that we've done  
10 to track what it would take to get to that  
11 level --

12 Q Okay.

13 A -- of detail.

14 Q Nevertheless, though, you did  
15 provide sort of a back-of-the-envelope, rough  
16 estimate of what you thought it would cost to  
17 track those; right?

18 A Yeah. I think we were asked to --  
19 you know, what -- in response to this data  
20 response, to think about it. So while not  
21 having time to see what it would take from a  
22 time, cost, resource allocation, from a  
23 technology standpoint we kind of did  
24 back-of-the-envelope math.

25 Q Okay. Great. Let me ask you about  
26 that.

27 So, this is in your Table 1 here;  
28 correct?

1           A    Yes.

2           Q    All right.  And you -- this is the  
3   discovery response that I think you corrected  
4   last night at about 5:00 o'clock; is that  
5   right?

6           A    Yes.  We made a correction, yes.

7           Q    And that correction is reflected  
8   here in the redline where you struck 20  
9   million -- or 20.3 million CSR skill calls  
10  and replaced it with 7.4 million skills  
11  calls?

12          A    That is correct.

13          Q    Okay.  And you took that number  
14  then of 7.4 million, and you multiplied it by  
15  20.729 hours; is that right?

16          A    Yes.

17          Q    And then you multiplied the result  
18  of that by \$31.65?

19          A    We multiplied it by the average CSR  
20  wage.

21          Q    And so when you changed one of  
22  these multipliers to 20 million to 7 million,  
23  it didn't have any impact on the total result  
24  of this that calculation?

25          A    From my understanding is, the  
26  calculation was actually done with the  
27  correct number.  But the 20 million wasn't  
28  imposed on it.

1           Q    So 7.4 million, times 20,729, times  
2   \$31.65 comes to \$656,085?

3           A    I don't have a calculator on me  
4   right now.

5           Q    But you provided this response;  
6   right?

7           A    Yes. But my understanding, when we  
8   did it, is that's what it came out to.

9           Q    Okay. So that is your  
10   understanding, is that those three numbers  
11   multiplied together get you 656,000?

12          A    Correct.

13          Q    Okay. Well, let's for the sake of  
14   argument say that that's correct.

15                So you're saying it would cost  
16   about \$656,000 per a year to track whether a  
17   CSR skill call is generation-related or  
18   distribution-related?

19          A    Yes. And if you had -- well, to  
20   track if it was a bundled, unbundled, you  
21   know, gas-specific it would take about ten  
22   seconds to manually track that. The problem  
23   with manual tracking though is, it's not  
24   accurate.

25          Q    Okay. But, nevertheless, your  
26   estimate is about \$656,000; right?

27          A    Yes. That was our estimate, yes.

28          Q    Okay. And, do you know, what is

1 the total amount that the company is  
2 requesting for its contact centers in this  
3 rate case?

4 A I believe, off the top of my head,  
5 it's 63 million --

6 Q Okay. I think that's about right.  
7 So --

8 A Roughly.

9 Q So 63 -- so it would cost you about  
10 \$656,000 to track \$63 million of costs; is  
11 that right?

12 A In this particular case to track  
13 this?

14 Q Yes. In this particular case.

15 A In this particular case, it would  
16 cost us roughly that to track this particular  
17 type.

18 Q Okay. And PG&E does track other  
19 types of call metrics; right?

20 A Yes, we track other types of call  
21 intents.

22 Q Okay.

23 A Yes.

24 Q Can we turn to hearing Exhibit 106,  
25 which is PG&E's response to JCCA-15-13.

26 And in your response here to A, you  
27 provide a table that shows the breakdown of  
28 calls for each of the last three years

1 related to various topics; right?

2 A Yes. These are call categories.

3 Q And so the CSR skill calls -- and,  
4 again, CSR skill calls are those that are  
5 handled by a person; right?

6 A Correct.

7 Q Versus an automated system?

8 A Correct.

9 Q Okay. So for these CSR skill calls  
10 for 2016, -17, and -18, somebody categorized  
11 each call; right?

12 A It was categorized as it came  
13 through in the IVR. It was done  
14 automatically --

15 Q But --

16 A -- by customers selecting their  
17 reason for calling.

18 Q Oh, okay. Okay.

19 Is there a cost associated with  
20 tracking all of these various types of call  
21 costs or -- call topics?

22 A Is there a cost associated?  
23 There's a cost associated with maintaining  
24 our IVR system. Yes.

25 Q Okay. Great. Okay. Let's see.

26 I would like to ask you about your  
27 rebuttal testimony at page 4-8.

28 ALJ LAU: Counsel, that's hearing



1 Exhibit Number 93; right?

2 MR. SCHLESINGER: Thank you. Yes,  
3 Hearing Exhibit 93.

4 ALJ LAU: And it's page 4 dash?

5 MR. SCHLESINGER: 4-8.

6 ALJ LAU: Okay. Thank you.

7 MR. SCHLESINGER: Through 4-9.

8 BY MR. SCHLESINGER:

9 Q Well -- and, actually, let's look  
10 at the top of 4-9. Well, no, let's ground  
11 ourselves in 4-8.

12 So in Question 22, at line 21 on  
13 4-8, you were asked the question whether you  
14 agree with JCCA's assertion that since  
15 unbundled customers now outnumber bundled  
16 customers, this justifies the replacement of  
17 PG&E's 55/45 percent allocation factor,  
18 because CCA customers no longer require the  
19 same level of customer service.

20 That's the question that you're  
21 answering there below where you say, "No."  
22 Correct?

23 A I'm sorry. Could you repeat that?  
24 Where were you getting that from? SGLFRMTH.

25 ALJ LIRAG: Just identify the question  
26 number.

27 MR. SCHLESINGER: Sure.

28 Question Number 22 on page 4-8.

1 ALJ LIRAG: All right. Can you just  
2 read that silently, Mr. Zenner. And then,  
3 also, the answer to Question 22.

4 Let's go off the record.

5 (Off the record.)

6 ALJ LIRAG: All right. Let's go back  
7 on the record.

8 So, Mr. Schlesinger, you had a  
9 question. And the answer to -- you were just  
10 confirming that the answer to Question 22 was  
11 no.

12 BY MR. SCHLESINGER:

13 Q Is no; correct?

14 A Correct.

15 Q And the reason that you provide  
16 then on 4-9 is that if JCCA's assertion were  
17 true, the total calls handled by PG&E's  
18 contact centers in 2017 should have gone down  
19 instead of up from 2015; right?

20 A Yes. You would expect to see a  
21 logical decline with the number of CCA  
22 customers coming on board with call volume  
23 being reduced --

24 Q All right.

25 A -- if that were to be an true.

26 Q And so you provided some numbers  
27 here to demonstrate that while CCA -- that  
28 during the period of time when there was a

1 growth in CCAs, the number of calls went up;  
2 right? That's the purpose of --

3 A The purpose of Table 4-3  
4 demonstrates that the data supports that in  
5 2015 we handled 18.291 million calls. And  
6 then in '17, we handled 20,301,000 calls.  
7 And CCAs we are going during that time --

8 Q Which is what you show in  
9 Table 4-4; right?

10 A Yes.

11 Q Okay. So in Table 4-3, you show  
12 the total number of calls handled in 2015 and  
13 total number of calls handled in 2017; right?

14 A Yes.

15 Q And in table 4-4, you show the  
16 total number of customers in 2015 and the --  
17 I'm sorry -- of CCA customers in 2015 and the  
18 total number of CCA customers in 2018; right?

19 A Yes.

20 Q So you used '15 and '17 in 4-3 for  
21 calls handled. But then you used '15 and '18  
22 for total CCA customers in 4-4?

23 A Yes. That's what it appears.

24 Q Okay. And do you know whether new  
25 CCA customers came online between 2017 and  
26 2018?

27 A Yes. From my recollection, they  
28 did.

1 Q A significant number of them?

2 MS. ZIMNEY: Objection. Vague and  
3 ambiguous.

4 (Crosstalk.)

5 ALJ LAU: Can you specify?

6 MR. SCHLESINGER: I don't need to.

7 ALJ LAU: I --

8 MR. SCHLESINGER: I'm fine to let the  
9 question go.

10 ALJ LAU: Okay.

11 BY MR. SCHLESINGER: He agrees that there was  
12 more.

13 Q So if you had provided Table 4-4  
14 total CCA customers for 2017, that  
15 1.263 million number would have been less;  
16 correct?

17 A I think you could assume it would  
18 be less, to some degree. I don't know how  
19 much less.

20 Q Okay. And so this prompted us to  
21 ask a data response question which was 15-18  
22 Exhibit 108.

23 Do you have that in front of you?

24 A Yes.

25 Q And -- let's see.

26 In part A we asked you to provide  
27 the call volume data for all years 2013 to  
28 2018. And you provided that in a table in

1 response to A.

2 That's what you marked Table 1;  
3 correct?

4 A Correct.

5 Q All right. So Table 1 shows that  
6 the total number of calls handled in 2018 was  
7 18.9 million, approximately; right?

8 A Correct.

9 Q So if you go back to your Table 4-3  
10 and you match it up so that you're comparing  
11 15 to 18, just as you do in 4-4, you would --  
12 if you were comparing it to '18, line number  
13 2 would read:

14 Year 2018, calls handled  
15 18,936,645 under calls  
16 handled; right?

17 A That would be correct.

18 Q Okay. Now I would like you turn  
19 what's been marked as Exhibit 110.

20 Do you have that in front of you?

21 A I do.

22 Q Okay. This is a table that JCCAs  
23 served on PG&E and other parties a few days  
24 ago.

25 Did you have an opportunity to look  
26 at this before today?

27 A I received this yesterday, yes.

28 Q Okay. Well, let's go through

1 column by column. So the first column shows  
2 the years 2013 through 2018; correct?

3 A Wait. I apologize.

4 I may be on the wrong one. What  
5 was the -- it was what number again?

6 Q 110.

7 A 110. Oh, I'm sorry. This is the  
8 document we're referring to?

9 Q Yes, sir.

10 A Okay. I have it in front of me  
11 now.

12 Q Okay. Well, let me start over. We  
13 sent this ahead of time.

14 Did you have had a chance to take a  
15 look at it?

16 A Yes. I looked at it this morning.

17 Q Okay. Let's go through column by  
18 column. The first column is just years 2013  
19 through 2018; right?

20 A Yes.

21 ALJ LIRAG: Let's try to move it along,  
22 Mr. Schlesinger. Let's not do the column by  
23 column --

24 MR. SCHLESINGER: That's fine --

25 ALJ LIRAG: The document will speak for  
26 itself and he can verify whatever the number  
27 is.

28 MR. SCHLESINGER: Okay. Sure.

1 ALJ LIRAG: All right. Let's move  
2 along that way.

3 BY MR. SCHLESINGER: Okay.

4 Q Do you have any concerns about the  
5 accuracy of the data here on the left side of  
6 this chart?

7 A I have concerns about the data in  
8 the overall document.

9 Q Okay. Let's not talk about the  
10 calculated column on the right, but just the  
11 data to the left of that that was derived  
12 from '15 - '18, PG&E-06, Workpaper 4-11, and  
13 your tables in your rebuttal.

14 Do you have concerns about the  
15 accuracy of any of that data?

16 MS. ZIMNEY: Objection, your Honor.  
17 The witness did not create this document.

18 MR. SCHLESINGER: I believe the witness  
19 can --

20 (Crosstalk.)

21 ALJ LIRAG: Let's point specifically to  
22 which portion you're asking him to look. I  
23 believe the first column matches Table 4.3, I  
24 think. So, probably be more specific which  
25 data he should look at.

26 MR. SCHLESINGER: Okay. So back to  
27 column by column then?

28 ALJ LIRAG: All right --

1 MR. SCHLESINGER: That's -- I was  
2 trying to avoid this. But --

3 (Crosstalk.)

4 MS. ZIMNEY: I just don't know that  
5 it's appropriate to have this witness go  
6 through column by column and validate data on  
7 a document that was created by the Counsel or  
8 their witness. It doesn't seem like it  
9 should be appropriate for him to be  
10 validating that information that he did not  
11 create or testify to.

12 MR. LIRAG: Let's see where it goes.  
13 Let's give Mr. Schlesinger some latitude  
14 here. But be ready to point out any  
15 objectionable questions or how this will  
16 proceed.

17 MS. ZIMNEY: Thank you.

18 ALJ LIRAG: All right.

19 BY MR. SCHLESINGER:

20 Q All right. Let's look at the two  
21 columns under rebuttal PG&E-24-9 and 4-3 --  
22 I'm sorry -- page 4-9, Table 4-3.

23 Are you there?

24 A Yes.

25 Q Okay. Would you agree with me that  
26 those two columns reflect, really, Table 4-3  
27 and 4-4 in your rebuttal testimony?

28 A Some of the numbers, yes, do



1 reflect those. Yes.

2 Q Do any of numbers not -- are any of  
3 the numbers incorrect or not reflective of  
4 your Tables 4-3 and 4-4?

5 A No, those numbers appear accurate?

6 Q Okay. Thank you.

7 Moving on to the next -- so -- and  
8 just so we're clear, what we have here is, in  
9 '15 we have the total calls and total CCA  
10 numbers. For '17, we have the total calls.  
11 And for '18, we have the total CCA customers;  
12 right?

13 A Yes.

14 Q Okay. And then the rest of that  
15 data here, we've filled in based on PG&E-06,  
16 Workpaper 4-11.

17 Do you have any reason to dispute  
18 any of these numbers?

19 A Haven't had a chance to go through  
20 each line by line.

21 Q Subject to check, are you willing  
22 to accept them as correct today? -- for  
23 purposes of this cross-examination?

24 MS. ZIMNEY: Objection. Calls for  
25 speculation.

26 ALJ LIRAG: Sustained.

27 I think --

28 MR. SCHLESINGER: Okay. You can look

1 at it.

2 (Crosstalk.)

3 ALJ LIRAG: You can point at the  
4 numbers.

5 MR. SCHLESINGER: Sure.

6 ALJ LIRAG: But he didn't prepare these  
7 numbers. So he's not able to answer one way  
8 or the other.

9 BY MR. SCHLESINGER:

10 Q Well, Mr. Zenner, are you the  
11 witness sponsoring PG&E-06, Workpaper 4-11?

12 A Yes.

13 Q So can you very -- can we turn to  
14 that workpaper, please?

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

17 (Off the record.) ]

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

20 While we were off the record, we  
21 just tried to clarify these figures in the  
22 tables. Just trying to avoid having to check  
23 each figure one by one. So I believe we have  
24 some sort of equitable solution, and I'll let  
25 Mr. Schlesinger carry on.

26 MR. SCHLESINGER: Thank you, your  
27 Honor.

28 Q Okay. So moving now to the next

1 set of columns 6, 7, 8, 9, and 10, which are  
2 all under the heading "Joint CCAs 15-18."  
3 Again, subject to check, these are numbers  
4 that came from the company's response to JCCA  
5 15-18; correct?

6 A So I may be off on my columns. But  
7 the column titled "Total Calls and Technical  
8 Calls." The number listed below is not  
9 technical calls. That looks like it would be  
10 CSR live agent calls. So I believe that  
11 number is wrong.

12 Q Okay. It would be correct for CSR  
13 calls?

14 A I believe it is right around that  
15 roughly. That would be CSR calls but it's  
16 listed as technical calls, which that number  
17 would be much larger.

18 Q Understood. So if we were to  
19 strike the word "technical calls" and replace  
20 it with CSR calls, then it would be correct;  
21 right?

22 A Correct. But then I'm assuming  
23 that changes the rest of the data set going  
24 across. And without having access to the  
25 Excel formulas, I would assume that would  
26 change the rest of the data across in that  
27 row.

28 Q I don't believe so. Because it's

1 referred to as CSR calls in every other  
2 column. So you're just making it consistent  
3 now. I think we used those terms  
4 interchangeably by accident. We don't have  
5 to argue about the numbers right now. But  
6 with that change, you agree that these  
7 numbers are accurate?

8 A Again, I don't know the formulas  
9 behind them. And that's the one that jumps  
10 out to me that that number is not accurate.  
11 So I guess I have a hard time saying --

12 Q So we are not talking about  
13 calculated numbers. We are talking about  
14 only the columns here under Joint CCA 15-18.  
15 These are just numbers that have been  
16 reproduced, transposed; correct?

17 A From what you're stating, yes, that  
18 you transposed them. But as I pointed out,  
19 the technical calls is not technical calls.

20 Q Okay. So let's not talk about  
21 that. Let's talk about the total customers  
22 column. Do you see that column, totals  
23 customers? In 2013 there were 9.4 million  
24 total customers?

25 A Yes, I see that.

26 Q Great. And in 2015 there were  
27 9.446 million total customers -- total PG&E  
28 customers; right?

1           A    In which year?  I am sorry.

2           Q    2015.

3           A    Yes.

4           Q    And in 2018 there were  
5 9.944 million PG&E customers; right?

6           A    Yes.

7           Q    So from 2015 to 2018, the total  
8 number of PG&E customers grew by about half a  
9 million; right?

10          A    Roughly that would be correct.

11          Q    Would you expect the number of  
12 calls to increase as PG&E adds additional  
13 customers?

14          A    I think this is, again, one of  
15 those things if you're in a perfect world.  
16 Because there were things we did internally  
17 in PG&E.  For example in the fall of 2017, we  
18 changed our hours of operation in the contact  
19 centers, which drastically changed calls and  
20 call volume and pattern arrivals.  So it's a  
21 hard one for me to say that because  
22 technology is handling more and more calls.  
23 Which is then leaving agents with tougher  
24 calls, more complex calls, longer handle time  
25 calls.

26          Q    Let me re-ask the question.  All  
27 else being equal, again, nothing changes from  
28 year to year except PG&E adds a half million

1 customers. All else being equal, would you  
2 agree that you would tend to have more calls  
3 when you add more customers?

4 A So everything else being equal,  
5 there were no improvements in the contact  
6 center or anything like that, different  
7 handle times, call arrivals, that would be  
8 fair to say that if you added that amount of  
9 customers, you would probably receive more  
10 calls if all things were perfect.

11 Q Okay. But you did not reflect in  
12 your tables 4-3 and 4-4 in your rebuttal  
13 testimony anything extraneous except calls  
14 handled and total number of CCA customers;  
15 correct? You didn't factor in the increase  
16 in PG&E customers; right?

17 A It appears we used the data points  
18 of CCA customers on the contention that if  
19 CCA customers were growing, we would overall  
20 see reduction commensurate with the increase  
21 in CCA customers.

22 Q Okay. And you also didn't attempt  
23 in any way to correct or normalize for  
24 changes in technology or changes in call  
25 center hours that you were just talking  
26 about; right?

27 A Again, our world changes on a  
28 weekly, monthly basis in terms of how calls

1     come in. Weather events and different  
2     things. It's constantly evolving.

3             Q     Okay. Moving to the next part of  
4     the chart here the calculated columns, these  
5     are calculations that we provided in the  
6     spreadsheet; right? These are not  
7     calculations that you did?

8             A     These calculations were done by  
9     you, yes.

10            Q     Did you have a chance to check  
11    these calculations to see if they're correct?

12            A     I have not seen any documents that  
13    provide the calculations behind this. So an  
14    Excel table or anything like that, I've not  
15    been able to check formulas or anything.

16            Q     Okay. If we were able to provide  
17    an Excel spreadsheet with the formula intact,  
18    would you be able to check those now?

19            A     Yes. I don't think I could do it  
20    right now, but at some point I could -- we  
21    could check the math, yes.

22            Q     Great. Well, we will commit to  
23    doing so. And in the meantime, I will ask  
24    you these questions as a hypothetical  
25    assuming that the calculations are correct  
26    hypothetically and you can check. Is that  
27    okay?

28            A     To the extent that I feel

1 comfortable, I will do that with you, yes.

2 Q Okay.

3 ALJ LIRAG: Although, Mr. Schlesinger,  
4 what do you hope to achieve by him not being  
5 certain about the calculation? In fact he's  
6 not even certain of one column, which he  
7 testified might change the rest of the  
8 columns.

9 And so having to add a calculation  
10 that is not his own, I mean, he's going to  
11 check the formula. Like right now what do  
12 you hope to get out of it?

13 MR. SCHLESINGER: Do you want me to  
14 explain what I am --

15 ALJ LIRAG: Let's go off the record.  
16 (Off the record.)

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

19 While we were off the record, there  
20 was some discussion regarding calculations  
21 that were made by the Joint CCAs for which  
22 Mr. Zenner answered that he is not familiar  
23 with the formula granted that the formula  
24 could have been provided.

25 So let's try to sum up -- if you  
26 have a summation to the whole issue or this  
27 line of questioning, Mr. Schlesinger.

28 MR. SCHLESINGER: Well, your Honor, I



1 hesitate to testify myself. But we would be  
2 happy to have one of our witnesses sponsor  
3 this exhibit on a future day. And in the  
4 meantime, we'll address that.

5 ALJ LIRAG: Okay. We can discuss that  
6 at another time. But for the meantime, we  
7 discussed that at this point we don't see any  
8 value in Mr. Zenner answering these questions  
9 since he stated he's not familiar with these.  
10 And I don't think it's going to bolster your  
11 argument or your position.

12 MR. SCHLESINGER: Understood.

13 ALJ LIRAG: All right. Just so it's on  
14 the record. Let's move on to another line of  
15 questioning, or was that the last thing?

16 MR. SCHLESINGER: I have no further  
17 questions. Thank you.

18 ALJ LIRAG: All right. Did you use all  
19 the -- anyway, we'll get into that when we  
20 get into the exhibits.

21 Ms. Zimney, do you have redirect  
22 questions?

23 MS. ZIMNEY: Yeah. I know we discussed  
24 a break. Is it possible for me to  
25 potentially redirect when we return from  
26 break?

27 ALJ LIRAG: All right. Let's call a  
28 break right now. Let's come back at 2:45.

1 Is that fine?

2 MS. ZIMNEY: Yes.

3 ALJ LIRAG: All right. Off the record.

4 (Off the record.)

5 ALJ LIRAG: Back on the record.

6 PG&E, do you have any redirect?

7 MS. ZIMNEY: No. We do not.

8 ALJ LIRAG: Are there exhibits that the  
9 Joint CCAs want to move into the record?

10 MR. SCHLESINGER: Yes, your Honor. We  
11 would like to move Exhibit 103, 104, 105,  
12 106, 108, and -- I think we're -- I mean, I  
13 would like to move 110. I understand there  
14 will be an objection to that. But like I  
15 said before, I can also handle that  
16 through one of our witnesses down the road.

17 ALJ LIRAG: Let's have it if you're  
18 moving it into the record. What about 107,  
19 109, and 111? Are those being withdrawn  
20 then?

21 MR. SCHLESINGER: Yes.

22 MS. ZIMNEY: So sorry. We are moving  
23 to enter 110 into the record?

24 ALJ LIRAG: Yes. That's part of the  
25 lot that Mr. Schlesinger is moving to have  
26 admitted.

27 Let's first deal with 107, 109, 111.  
28 So these are withdrawn; right, Mr.

1 Schlesinger?

2 MR. SCHLESINGER: Correct.

3 ALJ LIRAG: All right. So for the  
4 record, Exhibit 107, 109, and 111 are all  
5 withdrawn.

6 Let's deal with Exhibits 103  
7 through 108. Any objections from PG&E or any  
8 other party?

9 MS. ZIMNEY: No objection.

10 ALJ LIRAG: Hearing none, Exhibits 103,  
11 104, 105, 106, 107, and 108 are all received  
12 into the record.

13 (Exhibit No. 103 was received into  
14 evidence.)

15 (Exhibit No. 104 was received into  
16 evidence.)

17 (Exhibit No. 105 was received into  
18 evidence.)

19 (Exhibit No. 106 was received into  
20 evidence.)

21 (Exhibit No. 107 was received into  
22 evidence.)

23 (Exhibit No. 108 was received into  
24 evidence.)

25 ALJ LIRAG: So now 110. I think Ms.  
26 Zimney has an objection.

27 MS. ZIMNEY: I object. The witness has  
28 not been able to lay a foundation for the  
contents of that document.

ALJ LIRAG: Any -- Mr. Schlesinger, any  
comments regarding the objection?

1           MR. SCHLESINGER: Yes, your Honor. The  
2 first half of the table other than those  
3 calculated numbers on the right-hand side of  
4 it are all directly transcribed from the  
5 sources that are identified within the table.

6           The calculations can be demonstrated  
7 by the submission of an Excel spreadsheet  
8 with a formula intact. I can commit to doing  
9 that within the next 24 hours so that  
10 everyone has an opportunity to verify the  
11 calculations on the right side.

12           ALJ LIRAG: Let's have you submit a  
13 correction. I believe one of the columns was  
14 not labeled correctly according to  
15 Mr. Zenner. And then probably have -- I  
16 don't know if you want to add a footnote or a  
17 general statement regarding where these  
18 numbers are found. Or you can confer with  
19 PG&E regarding that so they can check as  
20 well.

21           MR. SCHLESINGER: Your Honor, I believe  
22 it's already contained in here. If you look  
23 at the green line on the top of that exhibit,  
24 you see it says "Rebuttal PG&E-20, pages 4-9,  
25 Table 4-3." Everything underneath that comes  
26 from that source. I can add the footnotes,  
27 but I'm just pointing out the sources are  
28 already there.

1 ALJ LIRAG: I didn't see that. So it's  
2 here. What were you going to do with the  
3 calculation?

4 MR. SCHLESINGER: I can serve a copy of  
5 the Excel version of this table with all of  
6 the formula intact so that the calculations  
7 can be verified.

8 ALJ LIRAG: All right. Let's have that  
9 attached to this document. Are you fine with  
10 that? They're not confidential. You can  
11 attach it to this exhibit.

12 Okay. Let's have you resubmit the  
13 exhibit with that additional material. Then  
14 we'll bring it up again. And if Ms. Zimney  
15 objects again, we'll address it again. So  
16 let's set this aside for now. We're not  
17 going to rule on Exhibit 110. But there is a  
18 move to have it admitted, and our directive  
19 is for you to revise it.

20 MR. SCHLESINGER: Okay. Just to be  
21 clear, the way that I'm revising it is simply  
22 by attaching a CD with the Excel file version  
23 of it. This is just a PDF of an Excel  
24 spreadsheet.

25 MS. ZIMNEY: I believe we're seeking  
26 the formulas that were underlying all these  
27 calculations.

28 MR. SCHLESINGER: When I provide you

1 with an Excel version of it, you'll have  
2 those.

3 So you want me to modify this by  
4 attaching a CD with the electronic version?

5 ALJ LIRAG: I think they want to see  
6 that calculation. And so if that will solve  
7 it, then let's do it that way. It doesn't  
8 guarantee whether the document will be  
9 admitted or denied, but it's an attempt to  
10 satisfy both parties regarding this document.

11 MR. SCHLESINGER: Understood.

12 ALJ LIRAG: All right. So we won't  
13 rule on Exhibit-110. We'll set it aside and  
14 pick it up either tomorrow or a different  
15 day.

16 MR. SCHLESINGER: Understood. Thank  
17 you.

18 ALJ LIRAG: All right. Let's move on  
19 to the customer service operations part.

20 Mr. Zenner, I guess conveniently can  
21 remain there.

22 Let's go off the record to address  
23 the exhibits.

24 (Off the record.)

25 ALJ LAU: Back on the record.

26 Mr. Zenner, do you -- I just want to  
27 remind you that you're still under oath and  
28 tell the truth.

1 THE WITNESS: Yes, your Honor.

2 ALJ LAU: Ms. Zimney, can you begin --  
3 please begin your direct.

4 MS. GOODSON: Your Honor, if we may,  
5 could we mark for identification TURN's  
6 cross?

7 ALJ LAU: Sure. Let's mark for  
8 identification exhibit a couple -- one  
9 exhibit, which is TURN's Cross-Examination  
10 Exhibit-112. That is identified as PG&E  
11 response to TURN data request 84.

12 (Exhibit No. 112 was marked for  
13 identification.)

14 ALJ LAU: And, Ms. Zimney, do you --  
15 please begin your direct.

16 DIRECT EXAMINATION

17 BY MS. ZIMNEY:

18 Q Sure. Good afternoon, Mr. Zenner.  
19 I'd like to confirm that you are sponsoring  
20 the testimony that you affirm that you are  
21 testifying to earlier this morning?

22 A I am.

23 Q And were those materials prepared  
24 by you under your supervision?

25 A They were.

26 Q And do you have any other  
27 corrections to make at this time?

28 A No.

1 Q And the facts contained in these  
2 exhibits are true and correct to the best of  
3 your knowledge?

4 A They are.

5 Q And do the opinions expressed  
6 therein represent your best professional  
7 judgment?

8 A They do.

9 MS. ZIMNEY: Your Honor, Mr. Zenner is  
10 available for cross-examination.

11 ALJ LAU: Ms. Goodson, you may begin  
12 your cross.

13 CROSS-EXAMINATION

14 BY MS. GOODSON:

15 Q Good afternoon, Mr. Zenner. I'm  
16 Hayley Goodson. I'm one of the attorneys  
17 representing TURN in this proceeding, and I  
18 know you've had a long day. So I'll try to  
19 move quickly through this.

20 A Good afternoon.

21 Q Please turn to Hearing Exhibit-93,  
22 which is your rebuttal testimony and at  
23 page 5-9. At question and answer 12, and  
24 particularly -- excuse me. Question and  
25 answer 12 you address:

26 The cost saving benefits  
27 for ratepayers from closing  
28 17 customer service offices



1 or CSOs.

2 Is that correct?

3 A That is correct.

4 Q And at line 9 -- excuse me. Line 7  
5 you state that:

6 Closure would result in  
7 approximately \$7.7 million  
8 in savings from the sale of  
9 PG&E-owned CSO locations.

10 Do you see that?

11 A Yes, I see that.

12 Q But PG&E has proposed that some of  
13 those savings would go to shareholders  
14 instead of ratepayers; isn't that right?

15 A My understanding is there is a cost  
16 allocation when PG&E assets are sold that is  
17 typically applied to things such as real  
18 estate.

19 Q And by "cost allocation," you mean  
20 an allocation of proceeds between ratepayers  
21 and shareholders; is that right?

22 A I'm not an expert on that. But my  
23 understanding is there is some type of  
24 disbursement of how those payments are  
25 calculated.

26 Q Between shareholders and  
27 ratepayers. Why don't I point you to your  
28 workpaper 5-51 in Exhibit-93. No. Excuse

1 me. Exhibit-92, Hearing Exhibit-92. This  
2 would be the workpapers to your direct  
3 testimony. And again it's workpaper 5-51.

4 A Yes.

5 Q And in the third column, do you see  
6 the real estate savings subtotal of  
7 approximately \$7.7 million?

8 A Yes.

9 Q And that corresponds with the  
10 \$7.7 million in your rebuttal testimony that  
11 I just pointed you to; is that correct?

12 A That's correct.

13 Q Okay. And do you see that there  
14 are three asterisks at the top of the third  
15 column that correspond with an endnote on  
16 that page with three asterisks?

17 A Yes.

18 Q Yes. And do you see that the  
19 comment there is that that \$7.7 million in  
20 savings will be split between ratepayers and  
21 shareholders, do you see that?

22 A Yes, I do.

23 Q That was my question. Thank you.  
24 Let's go back to your rebuttal testimony,  
25 Hearing Exhibit-93. Pardon me. Hearing  
26 Exhibit-95, which are the workpapers  
27 supporting your rebuttal testimony. And  
28 please turn to workpaper 5-1.

1           A    I believe I am there.

2           Q    Okay. This workpaper provides  
3 information about 2017 CSO transactions for  
4 unique CARE accounts; is that right?

5           A    I don't believe I'm in the right  
6 spot. Sorry. That's not -- could you repeat  
7 where I was supposed to go?

8           Q    Certainly. The skinny little  
9 volume of workpapers supporting your rebuttal  
10 testimony, which has been identified as  
11 Hearing Exhibit-95.

12          ALJ LAU: Mr. Zenner, it's PG&E  
13 Exhibit-20.

14          MS. GOODSON: The workpapers.

15          MS. ZIMNEY: It's the workpapers  
16 supporting Exhibit-20.

17          MS. GOODSON: May we go off the record  
18 for just a moment, your Honor?

19          ALJ LAU: Off the record.

20                (Off the record.)

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

22          THE WITNESS: I'm at 5-1.

23 BY MS. GOODSON:

24          Q    Thank you. And so I had just asked  
25 you to confirm essentially the title of this  
26 workpaper which is "2017 CSO  
27 Transactions-Unique CARE Accounts." Do you  
28 see that?

1           A    Yes.  I see that.

2           Q    What does Unique CARE Account mean?

3           A    Unique CARE Account in this case is  
4 CARE customers who that pay exclusively at a  
5 CSO.

6           Q    I didn't mean to confuse you with  
7 that question.  But am I correct in  
8 understanding that this table provides  
9 exclusive CSO payments and non-exclusive CSO  
10 payments by Unique CARE Accounts?       ]

11          A    I think from this that it lists  
12 total care payment transactions, as well as  
13 unique care payment transactions.

14          Q    I'm afraid that that is  
15 inconsistent with the end notes at this  
16 table.  So maybe I should start over and step  
17 back from asking you to define unique care  
18 accounts.  That may be what set off this  
19 confusion.

20               Unless you want to try again?

21          A    No.  Can you restate?

22          Q    Yes, I would be happy to.  All  
23 right.

24               I'll withdraw the request for you  
25 to define unique care accounts.  And I think  
26 the rest of my questions will flow more  
27 easily without that detour.  But we can go  
28 back to it, if you prefer, at some point.

1                   So please look at Row 76 on this  
2                   workpaper. And under the column heading  
3                   "CARE exclusive CSO payments."

4                   Do you see 27 percent?

5                   A    By percentage, yes, I do see that.

6                   Q    And does that mean that 27 percent  
7                   of the CARE customers who pay at the 17 CSOs  
8                   proposed for closure pay exclusively at CSOs?

9                   A    So of the 38,246 that are included  
10                  in the 17 proposed closures, there are 10,320  
11                  of those customers who pay exclusively at a  
12                  CSO.

13                  Q    Okay. So I think we're saying the  
14                  same thing.

15                  So is it correct that there are  
16                  38,246 CARE customers who pay -- made a  
17                  payment in 2017 at least one of those 17  
18                  CSOs; is that correct?

19                  A    Yes.

20                  Q    Okay. And of those 38,246  
21                  customers, 27 percent made all of their  
22                  payments that year at a CSO; is that correct?

23                  A    That is correct.

24                  Q    Okay. And so at Line 77, 1 line  
25                  below, am I correct in understanding this row  
26                  to indicate that a smaller percentage, or  
27                  22 percent, of the CARE customers that paid  
28                  at all CSOs made payments exclusively at a

1 CSO in 2017?

2 A If you are to look at the total CSO  
3 population, 22 percent paid exclusively at a  
4 CSO.

5 Q Mm-hm. And so based on the data  
6 summarized in rows 76 and 77, would you agree  
7 that the CARE customers who paid at the 17  
8 CSOs proposed for closure in 1207 relied more  
9 heavily on the CSOs for payment than did CARE  
10 customers who paid at the full number of  
11 CSOs?

12 A I would say, based upon the data  
13 which is reflected, that these CARE customers  
14 that used exclusively the CSO to pay the bill  
15 is higher than the overall population of all  
16 75 CSOs.

17 Q Okay. So please turn to the next  
18 workpaper 5.2, same document, Hearing  
19 Exhibit 95. And this is the same information  
20 as in workpaper 5.1, except it pertains to  
21 customers receiving a medical baseline  
22 allowance instead of CARE customers; is that  
23 correct?

24 A That is correct.

25 Q And what is medical baseline?

26 A Medical baseline is an assistance  
27 for customers that have medical need, that  
28 have identified as such. They have to fill

1 out a form to receive assistance.

2 Q Mm-hm. And to your knowledge, does  
3 the Commission consider customers on medical  
4 baseline to be a vulnerable segment.

5 A I believe the Commission has stated  
6 in the past that this is a vulnerable  
7 customer segment.

8 Q Mm-hm. And are you aware of  
9 whether or not the Commission has adopted  
10 special protections for medical baseline  
11 customers related to service disconnections?

12 A I am generally aware. I'm not over  
13 at the credit department. But I am aware  
14 there are some provisions for medical  
15 baseline customers in terms of shutoffs.

16 Q Okay. So please look at Rows 76  
17 and 77 on this workpaper 5-2. And I am  
18 comparing the percentages in these two rows  
19 in the column called medical baseline  
20 exclusive CSO payments. Do you see those --  
21 do you see where I am?

22 I see 22 percent of medical  
23 baseline customers who paid at one of to 17  
24 CSOs proposed for closure paid exclusively at  
25 a CSO compared to 19 percent of medical  
26 baseline customers paying across all of the  
27 70 -- 75 CSOs.

28 Do you see that?

1           A    I do see that.

2           Q    Okay. And do you have before you  
3 the exhibit that's been identified as  
4 Exhibit 112? This is PG&E's response to TURN  
5 data request 84.

6           A    Yes.

7           Q    And did you prepare this data  
8 request response, Mr. Zenner? Or was it  
9 prepared under your direction?

10          A    It was prepared under my direction.

11          Q    And in response to Question 2,  
12 which is the first response in this exhibit,  
13 PG&E provided the same information as shown  
14 in workpapers 5-1 and 5-2 that we were just  
15 looking at. But for customers enrolled both  
16 in the CARE program and medical baseline; is  
17 that correct?

18          A    Yes. That's what it looks like  
19 it's titled. Correct.

20          Q    And so please look at the  
21 attachment to Question 2, which is on the  
22 back -- you have the version I printed. And  
23 it's really small font. And I'm sorry, but  
24 that is how you gave it to me.

25                Please look at Row 76 on this  
26 table. And, again, I'll point you to the  
27 same column we were looking at on your  
28 workpapers. And that column here is called



1 Med/CARE -- or medical baseline and CARE --  
2 exclusive CSO payments percentage.

3 And did you see on Row 76 that  
4 32 percent of customers on medical baseline  
5 and CARE who paid at one of the 17 CSOs  
6 proposed for closure paid exclusively at a  
7 CSO; is that right?

8 A I do see the percentage that is  
9 listed there. However, I would state when  
10 looking at the overall, in terms of data,  
11 that percentage can be a bit misleading.  
12 Because that number, 764, if you were to look  
13 at that across the 17 offices, works out to  
14 be about, roughly, 45 customers per office.

15 Q But I really just asked you to  
16 confirm that the data that PG&E provided  
17 shows that 32 percent of the medical  
18 baseline/CARE, dual-enrolled customers who  
19 paid at one of the 17 CSOs made all of their  
20 payments at a CSO in 2017; is that right?

21 A Yes. I would just state that on  
22 lower numbers, percentages can be a bit  
23 misleading in terms of overall.

24 Q Okay. And that 32 percent, would  
25 you agree, is larger -- I'll even say quite a  
26 bit larger at this point in the day -- than  
27 the 24 percent of dual enrolled medical  
28 baseline/CARE customers who paid at all of

1 the 57 CSOs do you see that?

2 A I would agree. Again, I think  
3 percentages can be misleading when we're  
4 talking about a low number of customers  
5 versus a larger data set, percentages can  
6 swing differently. I think in looking at  
7 this, the medical and CARE customers are  
8 probably PG&E's most vulnerable customers.  
9 And I think what you're getting at makes  
10 sense, but as I look at that 764 divided by  
11 17, as we get up to about 45 per office, the  
12 contention we make in our testimony is that  
13 these are the customers we need to care for  
14 in a closing proposal. These are the ones  
15 that we have to make sure they are taken care  
16 of.

17 Q Mr. Zenner, I'm glad we agree these  
18 are particularly vulnerable customers. And I  
19 am sure that PG&E and other interested  
20 parties can brief the significance that this  
21 data should be given by the Commission. But  
22 I'm going to ask you to answer the questions  
23 that I'm asking you to help this move along.

24 ALJ LAU: Can I and a clarifying  
25 question?

26 Mr. Zenner, why is it that the  
27 number on TURN's cross exhibit is  
28 significantly lower than the numbers on the W

1 -- your workpapers WP-51 and WP-52. If -- I  
2 thought this table should be a summation of  
3 numbers of these two tables in your  
4 workpapers. Is that not correct?

5 THE WITNESS: This is a combination of  
6 a customer who is a CARE customer --

7 ALJ LAU: Okay.

8 THE WITNESS: -- but also on medical  
9 baseline.

10 (Crosstalk.)

11 MS. GOODSON: It's the intersection,  
12 your Honor.

13 ALJ LAU: Okay.

14 BY MS. GOODSON: So it's a smaller group.

15 Q And just before we finish with this  
16 table, do you see row -- sorry -- line number  
17 10, Coalinga?

18 And is it right that 43 percent of  
19 the CARE and medical baseline customers paid  
20 exclusively at that CS0 who paid there in  
21 2017? Do you see that?

22 A Of the 114 does customers, 49 did  
23 pay exclusively at a CS0 to get to that 43  
24 percent.

25 Q All right. And that's one of the  
26 CS0s that PG&E is proposing to close; is that  
27 right?

28 A That is correct.

1           Q   All right. And so let me have you  
2 look a down at Kerman, Row 28.

3                   This is also a CSO on the proposed  
4 closure list; is that right?

5           A   That is correct.

6           Q   All right. And that percentage of  
7 medical baseline and CARE dual-enrolled  
8 customers is 49 percent.

9                   Do you see that?

10          A   Of the 176 customers, overall, 86  
11 are using it exclusively to get to the  
12 49 percent.

13          Q   All right. Thank you.

14                   And please turn back to your  
15 rebuttal testimony. That's Hearing  
16 Exhibit 93, page 519.

17          A   I'm there.

18          Q   Okay. At lines 9 to 10, you state:  
19                   Rather, PG&E's non-payment  
20 transaction data trends clearly show that CSO  
21 non-payment transactions have steadily  
22 declined over the past five years.

23                   Is that correct?

24          A   Yes. Overall, non-payment  
25 transactions and payment transactions have  
26 declined across the CSOs.

27          Q   And Figure 5.2 on that same page  
28 illustrates that trend that you describe at

1 lines 10 to 11; is that right?

2 A That is correct.

3 Q And turn back to hearing

4 Exhibit 112 for me, this is PG&E's response  
5 to TURN Data Request 84. And this time,  
6 let's look at Question 4.

7 And just to confirm, you prepared  
8 this response? Or it was prepared under your  
9 direction; is that correct?

10 A That is correct.

11 Q Okay. And in response to Question  
12 4-A, you provided line graphs, similar to  
13 what is shown in Figure 5-2, for each of the  
14 17 CSOs proposed for closure; is that right?

15 A That is correct.

16 Q And you also clarified that there  
17 were fewer non-payment transactions in 2018  
18 at each CSO than in 2014; right?

19 A Yes.

20 Q But PG&E is not suggesting that  
21 there was a steady decline in non-payment  
22 transactions at all of these 17 CSOs; is that  
23 right?

24 A There was a decline between the  
25 2014 numbers to the 2018 numbers at all of  
26 these CSOs.

27 Q But not necessarily a steady  
28 decline from 2014 to 2018; is that right?

1           A    I believe there's some variation,  
2 office to office, where there's some uptake,  
3 some downward trends --

4           Q    Okay.

5           A    -- overall.

6           Q    And we'll just look at a couple of  
7 those for example.

8                   Please turn to the page for  
9 Coalinga. And the names of the CSOs appear  
10 at the bottom right-hand corner.

11                   Do you see that?

12          A    I do.

13          Q    Okay. And at this office, would  
14 you agree that there was a slight decline  
15 each year from 2014 to 2016 followed by a  
16 significant drop in 2017, and then an  
17 increase in 2018 back to a level similar to  
18 the 2014-to-2016 period?

19          A    Yeah. And looking at Coalinga, I  
20 see, roughly, there's a little over 100  
21 non-payment transactions that transpire per a  
22 month. The number steadily declined, took a  
23 drop, and then came back again in 2018. But  
24 still below the 2014 number. So still  
25 averaging a little over 100 MPCs -- MPTs, I  
26 apologize, per month.

27          Q    Thank you. And flip to Colusa for  
28 me, next page.

1                   And would you agree that at this  
2 CSO there was an increase from 2014 to 2015,  
3 followed by a decrease in 2016, and fairly  
4 steady volume of non-payment transactions in  
5 2016, -17, and -18.

6                   Would you agree?

7                   A    Yes. And looking at it again,  
8 Colusa's number of a little over -- a little  
9 less than a hundred non-payment transactions  
10 per a month, it does spike up in '15. And  
11 then it looks in '16, '17, and '18 it has  
12 dropped below the numbers and has remained  
13 relatively steady over that three-year  
14 period.

15                  ALJ LAU: Let's go off the record for a  
16 second.

17                  (Off the record.)

18                  ALJ LAU: Back on the record.

19 BY MS. GOODSON:

20                  Q    All right. So, Mr. Zenner, turn to  
21 Roseville for me, please.

22                       And since you're providing lengthy  
23 responses to all my questions, why don't I  
24 just ask you to describe what you see in this  
25 graph. Because I feel that you will probably  
26 do that anyway.

27                  A    So I will try to be succinct.  
28 Again, 2014 number compared to the 2018

1 number is less. The 2018 number is less than  
2 the 2014 number.

3 Q All right. And so that wasn't was  
4 my question was going to be. So I'll go  
5 ahead and say it. And perhaps your response  
6 will be shorter.

7 But you would agree that the  
8 transaction volume declined from 2014 to 2015  
9 and again in 2016, but thereafter it  
10 increased in 2017, and increased slightly  
11 again in 2018; is that correct?

12 A Yes, I agree with that.

13 Q All right. So let's turn to Walnut  
14 Creek, and we'll wrap this up.

15 So in Walnut Creek, would you agree  
16 that the non-payment transaction volume  
17 increased from 2014 to 2015, decreased a  
18 little in 2016, and increased a little in  
19 2017, and then suddenly dropped dramatically  
20 in 2018.

21 Do you see that?

22 A Yes. I would say that, once again,  
23 this fits with all of them the number in '14  
24 is higher than in '18.

25 Q Yeah. Have you investigated why  
26 that very dramatic drop shows up in the data  
27 for 2018?

28 A I cannot be certain.



1           Q    Okay. Please turn to your rebuttal  
2 testimony, page 5-20. And at the top, I will  
3 direct you to question and answer 27. And  
4 I'm going to give you a second to look at  
5 those to try to speed this up.

6                   And here you suggest that unbanked  
7 customers can buy a Visa, Mastercard, or  
8 American Express gift cards, as well as  
9 reloadable debit cards from retailers, like  
10 CVS or Walgreens, and then they can pay their  
11 PG&E bill online or by phone; is that  
12 correct?

13           A    What we were stating is that was an  
14 option to them. The most preferable option  
15 for an unbanked customer would be to utilize  
16 an MPC. Because most customers that if  
17 you're paying in cash -- neighborhood payment  
18 centers accept cash. That would be the  
19 preferred option. But if they so choose to  
20 pay in a different way, such as online, that  
21 would be an option for them. Correct.

22           Q    Okay. And in mentioning this  
23 option in your rebuttal testimony, did you  
24 investigate the cost of purchasing a credit  
25 card gift card?

26           A    We don't keep records on or -- of  
27 what they charge for the gift cards or credit  
28 cards.

1           Q    Oh, I asked whether you  
2    investigated that, not whether PG&E has  
3    records.

4                    But did you look into that?

5           A    From -- I could tell you from  
6    personal experience, I've paid, I think,  
7    \$2.95 charge at a grocery store for a Visa  
8    gift card.

9           Q    Okay. And have you any personal or  
10   professional knowledge of the cost of  
11   purchasing a reloadable debit card?

12          A    I don't.

13          Q    Okay. And in this section, your  
14   response to Question and Answer 27, you also  
15   mentioned that unbanked customers could  
16   convert their cash into a money order; is  
17   that right?

18          A    Yes. Once again, if they did not  
19   want to pay in cash, which perhaps they are  
20   using to pay in cash now at a CSO -- again,  
21   cash neighborhood payment centers accept  
22   cash. That would be the preferable option.  
23   We were listing other options that if they so  
24   desire to pay in a different way than cash,  
25   that would be an option for them. Yes.

26          Q    And in your personal or, again,  
27   professional knowledge, do you know how much  
28   it costs to convert cash into a money order?

1                   Is there a charge for that service?

2           A    I'm not familiar with it. My hope  
3 would be that these customers would not  
4 choose to go that way, and go the same way  
5 they're paying now and pay in cash at a  
6 neighborhood payment center.

7           Q    So you have no knowledge about the  
8 cost of a money order? Was that a no?

9           A    I do not know the cost of a money  
10 order.

11          Q    Okay. And I have no further  
12 questions for Mr. Zenner.

13          ALJ LAU: Let's go off the record.  
14 (Off the record.)

15          ALJ LAU: Let's go back on the record.  
16 Ms. Goodson, you had some more  
17 questions?

18 BY MS. GOODSON: Thank you, your Honor.

19          Q    Mr. Zenner, I apologize for the --

20          A    It's quite all right.

21          Q    -- suggesting I was finished.

22                   How much does it cost to pay a PG&E  
23 bill online with a credit card?

24          A    I believe it's \$1.35.

25          Q    And how much does it cost to pay a  
26 PG&E bill by phone with a credit card?

27          A    I'm sorry; \$1.35.

28          Q    Both are \$1.35, by phone or online?

1           A    Yes, I believe online or on phone  
2   is \$1.35.

3           Q    Okay. Thank you.

4                Now I'm truly finished.

5           ALJ LAU: Thank you.

6                Ms. Stough, do you have questions  
7   for Mr. Zenner?

8           MS. STOUGH: Yes, I do. Thank you.

9                       CROSS-EXAMINATION

10   BY MS. STOUGH:

11           Q    Hi, Mr. Zenner.

12                I'm Camille Stough with CUE. I  
13   have some questions for you on your testimony  
14   and also related to your responses to a  
15   question submitted to PG&E by TURN.

16                So I will start with your rebuttal  
17   testimony, which has been marked as Hearing  
18   Exhibit 93. If you could go to page 5-19.

19                And lines 5 through 10 reads:

20                TURN goes on to suggest  
21                that the relevant question  
22                is not how many customer  
23                transact an MPT at a CS0,  
24                but rather how many may at  
25                some point in the future  
26                have a need to use the CS0s  
27                to transact an NPT. This  
28                appears to assume there

1                   might be some spike in CSO  
2                   NPTs in the future, a  
3                   presumption that TURN has  
4                   not provided any evidence  
5                   to support.

6                   Do you to see that?

7                 A    I do.

8                 Q    Okay. And so now please turn to  
9                   exhibit marked as Exhibit 112, which is  
10                  PG&E's response to Turn's Data Request 84,  
11                  Question 4.

12                   And just briefly wanted to confirm,  
13                  on page 2 of the response Part D of Question  
14                  4, PG&E defines a spike as:

15                   MPT volume dramatically  
16                   moving away from the  
17                   historical downtrend  
18                   without returning to their  
19                   normal pattern of decline.

20                   Is that still the definition you  
21                  agree with for a spike.

22                 A    Yeah. Based upon our data, again,  
23                  looking at it, the number in 2014 being  
24                  higher than the number of 2018, there may be  
25                  a variation within that; but overall trend  
26                  line is still going down.

27                 Q    Okay. But the term spike is not  
28                  limited to just the difference between 2014

1 and 2018? It's more of a general definition  
2 of how data can fluctuate over any period of  
3 time?

4 A Yes, data can fluctuate over a  
5 period of time.

6 Q Okay. So going to the -- to PG&E's  
7 response to Part A of the same question,  
8 Question 4, could you please go to line  
9 graphs? I know that you were already looking  
10 at these graphs with Ms. Goodson, but I just  
11 wanted to confirm a couple of graphs just so  
12 I understand the definition of a spike.

13 If you could go to the graph  
14 labeled for CSO Coalinga. Just let me know  
15 when you're there. ]

16 A I'm there.

17 Q Okay. Thank you. Would you --  
18 would the increase between 2017 at 888 NPTs  
19 to 1,291 NPTs in 2018 would that be  
20 considered a spike?

21 A I am sorry. Could you repeat that?

22 Q Sorry. The change in NPTs in 2017  
23 to 2018 there's an increase there. Would you  
24 categorize that as a spike?

25 A So I would categorize it based upon  
26 it's a small number. So when you present the  
27 data this way, I can see where that  
28 definitely looks like it has more relevance

1     than perhaps it does. But if you look at it  
2     in totality of numbers across, it is still  
3     kind of following a downward trend line if  
4     you were to draw that straight across.

5             Q     Okay. Would you consider that this  
6     number -- the number between 2017 and 2018  
7     reflect an upward trend of NPTs?

8             A     I would. I think our contention  
9     here though is that these offices have low  
10    NPT transactions, and there is not a  
11    transaction that is required in a local  
12    office to visit a local office. So  
13    nonpayment transactions, there's actually not  
14    a need for a customer to go to an office.  
15    That would be a choice.

16            Q     Okay. Thank you. Could you please  
17    go to -- I won't go to all the graphs. It's  
18    been said already. If you could please turn  
19    to -- keeping this Coalinga graph in front of  
20    you. If you could also turn to Exhibit-92,  
21    which is your direct testimony workpapers.  
22    And if you could turn to page 5, workpaper  
23    page 5-17.

24            A     Okay. I'm there.

25            Q     Okay. Thank you. This page  
26    reflects a total number of payments compared  
27    to nonpayment transactions by CS0 in the year  
28    2014; correct?

1           A     Correct.

2           Q     In the first column, there are the  
3 names of the CSOs. The second column has the  
4 total number of nonpayment transactions for  
5 2014 for each of those offices; correct?

6           A     Correct.

7           Q     If you were to refer to Coalinga,  
8 the Coalinga Office, it says that there were  
9 1,545 nonpayment transactions. Going back to  
10 the graph for 2014, it says 1,340.

11                     And in the interest of time, I'm  
12 not going to go through every office that was  
13 provided -- that you provided a graph for.  
14 But there have been some discrepancies in the  
15 numbers that you have here in the workpapers  
16 compared to the graphs and charts you  
17 provided in PG&E's response to TURN's data  
18 request question 4.

19                     So my question is: Do you know why  
20 there is a discrepancy with those numbers?

21           A     I don't. Not off the top of my  
22 head. I'd have to get back to you.

23           Q     Okay. Thank you. So let's move  
24 along. We'll go back to -- please go back to  
25 your rebuttal testimony, Exhibit-93, page 522  
26 -- 5-22. Are you on the page?

27           A     Yes. Sorry.

28           Q     Thank you. So on page 5-22, lines



1 10 through 12 in reference to the nine closed  
2 offices -- nine closed CSOs from 2007, your  
3 testimony states that:

4 After customers review the  
5 notice of the closure and  
6 those local offices closed,  
7 PG&E received minimal  
8 negative customer feedback.

9 Is that correct?

10 A That is correct.

11 Q And to support that statement, you  
12 then cite to footnote 71, which are  
13 workpapers pages 5-32 through 5-35 from an  
14 exhibit from PG&E's 2017 GRC proceeding A.  
15 15-09-001. I have provided a copy of that  
16 for your reference although it's not -- it  
17 wasn't included as an attachment to this  
18 testimony, and it's not marked in evidence.

19 So it appears that these workpapers  
20 show transaction volumes at neighboring  
21 payment centers in the vicinity of the nine  
22 closed CSOs from 2007; correct?

23 A Yes.

24 Q Can you please point to me where it  
25 shows minimal negative customer feedback  
26 flows received?

27 A I think two separate things. I  
28 think this was in conjunction -- this

1 statement that was made was not about  
2 customer feedback. The customer feedback was  
3 about escalating complaints to our Complaints  
4 Department. And then this was to show that  
5 customers migrated to other payment channels  
6 during that period of time.

7 So I think maybe the way it's  
8 written we're confusing two things. But one  
9 was we received minimal escalated complaints  
10 by customers when we closed those offices.  
11 And then the data showed that customers were  
12 able to migrate to either nonpayment centers,  
13 pay by mail, or different means.

14 Q Okay. Does it -- do you have data  
15 or workpapers to that point on customer  
16 feedback anywhere in your testimony?

17 A On the escalated complaints, I  
18 believe we referenced it.

19 Q I can check back with PG&E for a  
20 cite if you believe there's a reference in  
21 there somewhere.

22 A I believe it is cited. I'd have to  
23 go back and look.

24 Q Did PG&E formally elicit feedback  
25 from customers who previously visited one of  
26 the nine closed CSOs in 2007?

27 A I am sorry. Could you state that  
28 again?

1           Q    To your knowledge, did PG&E  
2   formally elicit feedback from customers who  
3   previously visited one of these nine closed  
4   CSOs in 2007?

5           A    After the closures?

6           Q    Yes.

7           A    No.

8           Q    Okay. Please now go to -- turn to  
9   Exhibit-91 in your direct testimony. On page  
10 5-10 through 5-11, starting on line 15.

11          A    I am sorry. Could you repeat that?  
12 I think I'm off.

13          Q    Okay. So we're -- make sure I have  
14 it right. Exhibit-91, which is your direct  
15 testimony, page 5-10 through 5-11.

16          A    Okay. I'm there.

17          Q    Thank you. Starting on line 15,  
18 you indicate that:

19               PG&E conducted in-person  
20               customers surveys at 18  
21               CSOs to better understand  
22               the demographics, needs,  
23               and preferences of  
24               customers who use those  
25               CSOs.

26               Correct?

27          A    That is correct.

28          Q    Are you familiar with the questions

1 that were included in the customer survey?

2 A Yes.

3 Q Did PG&E's customer survey include  
4 a question asking if the customer had a  
5 checking account?

6 ALJ LAU: Let's go off the record.

7 (Off the record.)

8 ALJ LAU: Back on the record.

9 THE WITNESS: I don't believe we asked  
10 them directly whether they had a checking  
11 account. We did ask them other ways they  
12 would pay their bill or other reasons why  
13 they would not find it convenient to pay  
14 their bill. And such things were listed as  
15 they don't have a bank account or things of  
16 that nature.

17 BY MS. STOUGH:

18 Q Okay. Thank you. Similar  
19 question. Did PG&E's customer survey include  
20 a question asking if the customer had an  
21 e-mail account?

22 A I believe, again, we asked if the  
23 customer had access to the internet or had a  
24 computer in the home or a mobile device with  
25 access to the internet. But I don't believe  
26 per se an e-mail.

27 Q Thank you. Did PG&E's customer  
28 survey include a question asking if the

1 customer had ever used a pay station or  
2 kiosk?

3 A Yes. We've asked if there was  
4 another form of payment they had paid in, and  
5 over 95 percent of our customers said they  
6 already pay one bill -- non-utility bill,  
7 non-PG&E utility bill, or could pay their  
8 PG&E bill by another method.

9 Q And the last question. Did PG&E's  
10 customer survey include a question asking the  
11 customer to rate the service they received of  
12 the particular CSO where they were surveyed?

13 A There was a question to the effect  
14 of why they visit the office. And I believe  
15 service or convenience was an option as a  
16 choice.

17 Q But not directly to a question of  
18 their opinion of the customer service they  
19 received at that location -- at the  
20 particular location? ]

21 ALJ LAU: Let's go off the record.

22 (Off the record.)

23 ALJ LAU: Back on the record.

24 THE WITNESS: Could you restate the  
25 question for me, please?

26 BY MS. STOUGH:

27 Q Sure. Did PG&E's customer survey  
28 include a question asking the customer to

1 rate the service that they received at the  
2 particular CSO where they were surveyed?

3 A No, we did not ask a specific  
4 question to that.

5 Q Okay. Thank you.

6 I'm the down with questions.

7 ALJ LAU: Ms. Zimney, do you have any  
8 redirect?

9 MS. ZIMNEY: I do not have any  
10 redirect.

11 ALJ LAU: Is there a motion to move  
12 Exhibit 112 into the record?

13 MS. GOODSON: Yes, your Honor.

14 ALJ LAU: Are there any objections?

15 (No response.)

16 ALJ LAU: Hearing none, Exhibit 112 is  
17 moved into to record.

18 (Exhibit No. 112 was received into  
19 evidence.)

20 ALJ LAU: Mr. Zenner, you are excused.

21 So we will have -- we are ending  
22 hearings for today. Tomorrow we will have a  
23 panel of -- integrated grid modernization  
24 panel. And that is with Mr. Nakayama, Mr.  
25 Petrakis, and Mr. Strasburger.

26 So we are in recess until tomorrow  
27 at 9:30.

28 Off the record.

1           (Whereupon, at the hour of 3:51  
2           p.m., this matter having been continued  
3           to 9:30 a.m., October 2, 2019, at  
          San Francisco, California, the  
          Commission then adjourned.)

4                   \*   \*   \*   \*   \*

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE  
STATE OF CALIFORNIA

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

JASON A. STACEY  
CSR NO. 14092




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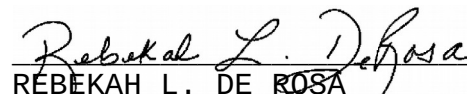
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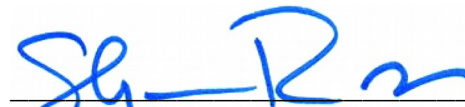
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