

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



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Application of Pacific Gas and Electric  
Company for Authority, Among Other  
Things, to Increase Rates and Charges for  
Electric and Gas Service Effective on  
January 1, 2017.

Application 15-09-001  
(Filed September 1, 2015)

**OPENING COMMENTS ON THE PROPOSED DECISION OF  
ADMINISTRATIVE LAW JUDGE ROSCOW OF THE OFFICE OF  
RATEPAYER ADVOCATES AND PACIFIC GAS AND ELECTRIC COMPANY  
CONCERNING THE CONTESTED ISSUE OF A FOUR YEAR RATE CASE  
CYCLE**

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March 20, 2017

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## **SUMMARY OF RECOMMENDATIONS**

The Proposed Decision (PD) should be revised to state that, if the Commission adopts a four-year cycle prior to PG&E filing its next GRC application, then (i) the amount for the third post-test year recommended by ORA and PG&E in this matter should be adopted and (ii) PG&E would be required to file its next GRC for a 2021 test year.

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LAW JUDGE ROSCOW OF THE OFFICE OF RATEPAYER ADVOCATES AND  
PACIFIC GAS AND ELECTRIC COMPANY CONCERNING THE CONTESTED  
ISSUE OF A FOUR YEAR RATE CASE CYCLE**

**I. INTRODUCTION**

The Office of Ratepayer Advocates (ORA) and Pacific Gas and Electric Company (PG&E) hereby submit these Opening Comments on the Proposed Decision (PD) issued by the Administrative Law Judge (ALJ) on February 27, 2017, in the above-captioned manner.

In these Opening Comments, ORA and PG&E recommend a change to the PD's discussion of the contested issue of a four-year rate case cycle.

**II. ADMINISTRATIVE EFFICIENCY CALLS FOR A MINOR  
CHANGE TO THE RULING ON THE FOUR-YEAR RATE CASE  
CYCLE.**

The PD denies without prejudice ORA's and PG&E's request for a third post-test year, in 2020, which would make this a four-year rate case cycle.<sup>1</sup> The PD notes that the Commission is considering a longer general rate case (GRC) cycle in a separate docket, from which an Energy Division workshop report is to issue.<sup>2</sup>

In the interest of administrative efficiency, ORA and PG&E recommend that the PD be adjusted to state that, if the Commission adopts a four-year cycle prior to PG&E filing its next GRC application, then: (i) the amount of the revenue requirement increase for the third post-test

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<sup>1</sup> PD, pp. 195-196.

<sup>2</sup> PD, pp. 195-196.

year recommended by ORA and PG&E in this matter should be adopted; and (ii) PG&E would be required to file its next GRC on September 1, 2019, for a 2021 test year. Without this clarification, the Commission's transition to a four-year rate case cycle would be delayed for PG&E until at least the next GRC cycle, thereby adding unnecessary delay to such a transition.

### **III. CONCLUSION**

For the reasons set forth above, ORA and PG&E respectfully request that the Commission modify the discussion of the contested issue on the four-year rate case cycle such that -- in the event that the Commission does adopt a four-year GRC cycle prior to the filing of PG&E's next GRC application -- then the recommended attrition amount for 2020 would be adopted and PG&E's next GRC would be for a 2021 test year.

Pursuant to Commission Rule 1.8(d), counsel or representatives for PG&E have authorized ORA to submit these comments on PG&E's behalf.

Respectfully submitted,

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## APPENDIX A

### ORA'S AND PG&E'S PROPOSED ORDERING PARAGRAPH COMPARED AGAINST THAT FOUND IN THE PROPOSED DECISION

#### ORDER

**IT IS ORDERED** that:

16. Pacific Gas and Electric Company shall submit its next General Rate Case application according to the schedule adopted by the Commission in Decision 14-12-025, unless the Commission separately determines that a four year cycle for PG&E is appropriate prior to the filing of PG&E's next GRC application, in which case the third post-test year revenue requirement recommended by ORA and PG&E is hereby granted and PG&E's next GRC shall be for the test year 2021.