

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



**FILED**  
10-23-15  
04:59 PM

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)

**PREHEARING CONFERENCE STATEMENT OF  
SONOMA CLEAN POWER AUTHORITY**

Tim Lindl  
Keyes Fox & Wiedman LLP  
436 14th Street, Suite 1305  
Oakland, CA 94612  
Phone: (510) 314-8385  
Email: [tlindl@kfwlaw.com](mailto:tlindl@kfwlaw.com)

Attorney for:  
SONOMA CLEAN POWER AUTHORITY

October 23, 2015

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

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

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

**PREHEARING CONFERENCE STATEMENT OF  
SONOMA CLEAN POWER AUTHORITY**

Pursuant to Rule 7.2 of the Commission’s Rules of Practice and Procedure, and Administrative Law Judge Roscow’s October 13, 2015 Ruling Setting Prehearing Conference (“PHC”) in the above-captioned docket, Sonoma Clean Power Authority (“SCPA”) hereby submits this PHC Statement regarding the Application of Pacific Gas and Electric Company (“PG&E”) for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2017 (“Application”).

**I. PROCEDURAL SCHEDULE**

At this time, SCPA does not take issue with the schedule proposed on page 23 of the Application. However, we reserve our right to comment on any issues parties raise regarding the schedule at the PHC.

**II. SCOPE OF ISSUES TO BE INCLUDED OR EXCLUDED**

The fact that PG&E’s proposed electric rates must be just and reasonable under Public Utilities Code Sections 451 prescribes a broad scope as it pertains to SCPA’s community choice aggregation (“CCA”) program. PG&E’s distribution and related charges will ultimately be reflected in PG&E’s rates for SCPA customers through several non-bypassable charges (“NBCs”), including but not limited to the Power Charge Indifference Adjustment (“PCIA”) and the Cost Allocation Mechanism (“CAM”). It is essential to SCPA’s customers that the various

rate-related mechanisms and programs that affect these NBCs, and any determinations of prudence that influence them, be included in scope of this proceeding.

Likewise, SCPA has an interest in ensuring that the components of PG&E's generation revenue requirement fairly reflect the utility's generation-related costs and are not anti-competitive. Therefore, the factors influencing the generation revenue requirement also should be included in scope.

### **III. CATEGORIZATION AND NEED FOR EVIDENTIARY HEARINGS**

While SCPA continues to review the Application, and does not yet know the extent to which it will be necessary to participate in evidentiary hearings, it is clear that PG&E has requested a substantial rate increase that will impact SCPA's customers and could impact the competitiveness of SCPA's programs. The Commission's resolution of that increase is certain to rely on numerous material issues of fact, including, but not limited to, the accuracy of the assumptions underlying the large proposed increases in electric distribution capital expenditures, the assumptions regarding load growth and load migration, and the assumptions regarding energy supply costs. For these reasons, SCPA agrees with the September 17, 2015 Resolution ALJ 176-3363, categorizing this proceeding as "ratesetting" and stating that hearings are necessary.

### **IV. DISCOVERY ISSUES AND OTHER MATTERS**

At this time, SCPA does not have any suggestions or proposals regarding the need to depart from the Commission's customary discovery procedures or other issues. However, we reserve our right to comment on any discovery or other issues parties raised at the PHC.

SCPA appreciates the opportunity to submit these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tim Lindl', with a stylized flourish at the end.

Tim Lindl  
KEYES FOX & WIEDMAN LLP  
436 14th Street, Suite 1305  
Oakland, CA 94612  
Phone: (510) 314-8385  
Email: [tlindl@kfwlaw.com](mailto:tlindl@kfwlaw.com)

Attorney for:  
SONOMA CLEAN POWER AUTHORITY

Dated: October 23, 2015