



**FILED**  
3/24/16  
11:10 AM

**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. (U39M)

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

**ADMINISTRATIVE LAW JUDGE'S RULING REGARDING COMPILATION  
OF A DRAFT JOINT COMPARISON EXHIBIT AND THE ELECTRONIC  
SUBMISSION AND FORMAT OF SUPPORTING DOCUMENTS**

**Summary**

This ruling establishes two procedures that shall be followed by parties in this proceeding, according to the instructions provided in this ruling. First, parties are directed to contribute to a draft Joint Comparison Exhibit that shall be prepared and distributed by the applicant, Pacific Gas and Electric Company. Second, parties are directed to submit their testimony and workpapers in this proceeding through the "Supporting Documents" feature of the Commission's electronic filing system.

**Procedures for Compilation of a Draft Joint Comparison Exhibit**

In order to assist the Commission in reaching its decision in this proceeding in an efficient manner, a draft Joint Comparison Exhibit (JCE) shall be prepared by Pacific Gas and Electric Company (PG&E). Each party that serves testimony in this proceeding shall provide their own party-specific contributions to the draft JCE, which shall be compiled and distributed by PG&E prior to the first day of hearings in this proceeding. In accordance with the instructions and examples provided in Attachment 1 of this Ruling, the Office of Ratepayer Advocates and other intervenors shall either (1) include the required material

when they serve their written testimony in this proceeding, or (2) provide the required material no later than seven days following the date of service of their testimony. The instructions and sample JCE templates included in Attachment 1 were assembled by the Commission's Energy Division staff at my direction. It is my intention to use this draft JCE for organizational and scheduling purposes during the evidentiary hearings, which are scheduled to begin June 13, 2016. As has been the practice in prior PG&E GRC proceedings, the schedule for finalizing the JCE will be determined in consultation with parties after evidentiary hearings have begun.

### **Electronic Submittal of Supporting Documents**

The Commission's website now allows electronic submittal of supporting documents (such as testimony and workpapers).

Parties shall submit their testimony and workpapers in this proceeding through the "Supporting Documents" feature of the Commission's electronic filing system.<sup>1</sup> When making these submittals, parties shall adhere to the following Instructions and Naming Convention:

- The Instructions for Using the "Supporting Documents" Feature,  
(<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&DocID=158653546>) and
- The Naming Convention for Electronic Submission of Supporting Documents

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<sup>1</sup> These instructions are for submitting supporting documents such as testimony and work papers in formal proceedings through the Commission's electronic filing system. Parties must follow all other rules regarding serving testimony. Any document that needs to be formally filed such as motions, briefs, comments, etc., should be submitted using Tabs 1 through 4 in the electronic filing screen.

<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&DocID=100902765>).

- The Supporting Document feature does not change or replace the Commission's Rules of Practice and Procedure. Parties must continue to adhere to all rules and guidelines in the Commission's Rules of Practice and Procedure including but not limited to rules for participating in a formal proceeding, filing and serving formal documents and rules for written and oral communications with Commissioners and advisors (i.e. "*ex parte* communications") or other matters related to a proceeding.
- The Supporting Document feature is intended to be solely for the purpose of parties submitting electronic public copies of testimony, workpapers and workshop reports (unless instructed otherwise by the Administrative Law Judge), and does not replace the requirement to serve documents to other parties in a proceeding.
- Unauthorized or improper use of the Supporting Document feature will result in the removal of the submitted document by the Commission.
- Supporting Documents should not be construed as the formal files of the proceeding. The documents submitted through the Supporting Document feature are for information only and are not part of the formal file (i.e. "record") unless accepted into the record by the Administrative Law Judge.

All documents submitted through the Supporting Documents feature of the electronic filing system shall be in PDF/A format. The reasons for requiring PDF/A format are:

- Security – PDF/A prohibits the use of programming or links to external executable files. Therefore, it does not allow malicious codes in the document.
- Retention – The Commission is required by Resolution L-204, dated September 20, 1978, to retain documents in formal proceedings for 30 years. PDF/A is

an independent standard and the Commission staff anticipates that programs will remain available in 30 years to read PDF/A.

- Accessibility – PDF/A requires text behind the PDF graphics so the files can be read by devices designed for those with limited sight. PDF/A is also searchable.

Until further notice, the Supporting Documents will not appear on the Docket Card for this proceeding. In order to locate the supporting documents that have been submitted electronically, go to:

Online documents, choose: “[E-filed Documents](#)”

- Select “Supporting Document” as the document type, (do not choose “testimony”)
- Type in the proceeding number and click on “search”.

Please refer all technical questions regarding submitting Supporting Documents to:

- Kale Williams ([kale.williams@cpuc.ca.gov](mailto:kale.williams@cpuc.ca.gov)) (415) 703- 3251 and
- Ryan Cayabyab ([ryan.cayabyab@cpuc.ca.gov](mailto:ryan.cayabyab@cpuc.ca.gov)) (415) 703-5999

**IT IS RULED** that:

1. Each party that serves testimony in this proceeding shall provide their own party-specific contributions to a draft Joint Comparison Exhibit, in accordance with the instructions and templates provided in Attachment 1 of this Ruling.
2. The draft Joint Comparison Exhibit shall be compiled and distributed by Pacific Gas and Electric Company prior to the first day of hearings in this proceeding.
3. Parties shall submit their testimony and workpapers in this proceeding through the “Supporting Documents” feature that is part of the Commission’s

Electronic Filing System. Instructions for using the Supporting Documents feature are provided in

(<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&DocID=158653546>).

4. When making these submittals, parties shall use the “Naming Convention for Electronic Submission of Supporting Documents”

(<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&DocID=100902765>).

5. All documents submitted through the “Supporting Documents” feature shall be in PDF/A format.

Dated March 24, 2016, at San Francisco, California.

/s/ STEPHEN C. ROSCOW

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Stephen C. Roscow  
Administrative Law Judge

## **Attachment 1**

### **PG&E 2017 GRC Joint Comparison Exhibit Templates and Instructions for Parties**

Attached are PG&E's 2017 GRC Joint Comparison Exhibit (JCE) templates. You will find one template for expense and one template for capital expenditures. These templates are populated with sample data for illustrative purposes only.

There are four sections in the JCE templates.

Section 1: Heading Information - All parties will fill out this section.

Section 2: PG&E, ORA and TURN Position Summaries – PG&E, ORA and TURN will fill out their corresponding sections.

Section 3: PG&E, ORA and TURN Forecast Comparison Table(s) – PG&E, ORA and TURN will fill out their corresponding sections.

Section 4: Other Intervenor Position Summaries – All parties other than PG&E, ORA and TURN will provide their position summaries in this section. Each party will provide its position summary in the text box. Intervenor's position summary boxes will be displayed alphabetically in the final document.

#### **Additional Instructions:**

- All the fields requiring input have been highlighted yellow.
- Parties (Other than PG&E, ORA and TURN) only need to fill out JCE templates for areas they have recommendations.
- Use one template for each MWC (Exhibit – Chapter – MWC)
- Use the Capital template for capital forecasts.
- Use the Expense template for expense forecasts.
- Use the Expense template to capture any non-dollar forecast related issues
  - Provide a name for the issue (for example, Asset Service Life)
  - Describe the issue and your party's position in the box provided
  - You do not need to fill out the forecast table
- Use Expense template for non-MWC related forecasts – such as those for Administrative and General (A&G) costs. In these cases – please provide the FERC Account Number/Name associated with the forecast (and described in PG&E testimony) rather than the MWC Number/Name.
- Be sure to fill out all yellow colored items in the sections applicable to your party.
  - Do not fill out PG&E's position.
  - Provide a short, concise summary of your party's position. This is not intended to repeat the entire argument that is presented in testimony but rather a tool for the Judge to easily identify where there are differences in parties' positions.
  - Provide a reference to your party's testimony (page numbers, tables/figures) that supports the summary.
- Please complete your position summaries and provide them to PG&E (GRC2017@pge.com) by the following deadlines:
  - ORA: April 15, 2016

- Other intervenors: May 6, 2016
- Upon receiving the completed templates from parties, PG&E will compile a draft including all party positions for the ALJ before hearings by June 10, 2016. PG&E will also provide this draft to all parties for review and further refinement by June 10, 2016.

If you have questions on how to use these templates, please call PG&E/Minci Han at 415-973-1140 or [m2h9@pge.com](mailto:m2h9@pge.com).

**Section 1****PACIFIC GAS AND ELECTRIC COMPANY****2017 GENERAL RATE CASE APPLICATION 15-09-001****Summary of Differences by Issue by Major Work Category: Capital****PG&E Exhibit:** 4 Electric Distribution **Chapter:** 13 Electric Distribution Capacity**Major Work Category:** 06 **Witness:** Nagra (PG&E) / Roberts (ORA-7)**Issue:****Electric Distribution Line Capacity****Section 2****PG&E Position**

PG&E forecast \$102.4 million in 2015, \$87.1 million in 2016, and \$107.9 million in 2017 for MWC 06 which consists of work to correct specific capacity deficiencies or overload conditions on distribution lines and equipment.<sup>1</sup>

While this MWC includes multiple subprograms, there are only two for which ORA recommends reductions: (1) Overloaded Transformers and (2) Mainline Loops. Overloaded Transformers improves reliability by replacing capacity-deficient distribution line transformers, or adding additional transformer to make up the deficiency.<sup>2</sup> Mainline Loops is a project to complete unfinished mainline loops to comply with design standards and reduce outage time for customers on the uncompleted mainline loops.<sup>3</sup>

1. Exhibit (PG&E-4), Chapter 13, p. 13-13, line 11 to p. 13-19, line 4

2. Exhibit (PG&E-4), p. 13-15, lines 5-10

3. Exhibit (PG&E-4), p. 13-17, lines 17-24

**ORA Position**

ORA adopts PG&E's 2015 recorded expenditure of \$102.4 million. ORA recommends a forecast of \$86.2 million in 2016 and \$102.1 million in 2017.<sup>1</sup>

ORA recommends a lower 2016-2017 forecast for Overloaded Overhead Transformers<sup>2</sup> and a lower 2017 forecast for completing Mainline Loops<sup>3</sup> based on a smaller projected amount of work and states that PG&E has failed to justify its proposed increases in these years. ORA recommends funding for 300 transformer replacements in each of the years 2016 and 2017 (instead of 375 and 417, respectively) and 32 Mainline Loops projects in 2017 through 2019 (instead of 99).

1. Exhibit (ORA-7), p. 37, line 12 to p. 41, line 14

2. Exhibit (ORA-7), p. 39, line 19

3. Exhibit (ORA-7), p. 40, line 23

**TURN Position**

TURN did not offer testimony on Electric Distribution Line Capacity.



### Section 3

#### 2015 - 2017 GRC Capital Dollar Impact to MWC 06 (Nominal \$000s):

##### 2015 Forecast

Item #	Item Name	PG&E	ORA	ORA-PG&E	TURN <sup>1</sup>	TURN-PG&E
1	Overloaded Transformers	\$2,110	\$2,110	\$0	N/A	N/A
2	Mainline Loops	\$2,470	\$2,470	\$0	N/A	N/A
3	Undisputed	\$97,815	\$97,815	\$0	N/A	N/A
4	Escalation	\$0	\$0	\$0	N/A	N/A
	<b>Total</b>	<b>\$102,395</b>	<b>\$102,395</b>	<b>\$0</b>	<b>N/A</b>	<b>N/A</b>

##### 2016 Forecast

Item #	Item Name	PG&E	ORA	ORA-PG&E	TURN	TURN-PG&E
1	Overloaded Transformers	\$4,500	\$3,600	(\$900)	N/A	N/A
2	Mainline Loops	\$2,000	\$2,000	\$0	N/A	N/A
3	Undisputed	\$78,287	\$78,287	\$0	N/A	N/A
4	Escalation	\$2,361	\$2,298	(\$63)	N/A	N/A
	<b>Total</b>	<b>\$87,148</b>	<b>\$86,185</b>	<b>(\$963)</b>	<b>N/A</b>	<b>N/A</b>

##### 2017 Forecast

Item #	Item Name	PG&E	ORA	ORA-PG&E	TURN	TURN-PG&E
1	Overloaded Transformers	\$5,000	\$3,600	(\$1,400)	N/A	N/A
2	Mainline Loops	\$7,500	\$3,271	(\$4,229)	N/A	N/A
3	Undisputed	\$92,698	\$92,698	\$0	N/A	N/A
4	Escalation	\$2,715	\$2,525	(\$190)	N/A	N/A
	<b>Total</b>	<b>\$107,913</b>	<b>\$102,094</b>	<b>(\$5,819)</b>	<b>N/A</b>	<b>N/A</b>

## **Section 4**

### **Other Intervenor Positions**

**Intervenor  
Position:**

Provide a summary of your position regarding PG&E's forecast for this specific work.

1. *Exhibit (Intervenor-Volume), p. 15, lines 20 to 30*

SAMPLE

**Section 1****PACIFIC GAS AND ELECTRIC COMPANY****2017 GENERAL RATE CASE APPLICATION 15-09-001****Summary of Differences by Issue by Major Work Category: Expense****PG&E Exhibit:** 3 Gas Distribution**Chapter:** 7 Gas System Operations**Major Work Category:** FG **Witness:** Christopher (PG&E)/ Chia (ORA-9) / TURN-Marcus**Issue:**

Operate Gas Distribution System

**Section 2****PG&E Position**

PG&E forecasts \$13.0 million of expenses in 2017 for projects associated with operating Gas Distribution Systems. These projects include (1) manually operating valves and regulator stations, (2) placing portable pressure recorder charts (electronic and paper), (3) collecting paper charts (to the extent paper charts will remain in use until full electronic recorder deployment is achieved), and (4) other operational situations that require PG&E field personnel to travel to physical equipment sites along the 42,000 miles of distribution pipe.

PG&E proposes hiring 37 full-time equivalent (FTE) employees under MWC FG to operate the Gas Distribution Control Center (GDCC) on a 24-hour, 365-day-a-year basis and to support the projects listed above.<sup>1</sup>

*1. Exhibit (PG&E-3), Chapter 7, p. 7-30, line 9 to p. 7-34, line 30*

**ORA Position**

ORA recommends a 2017 forecast of \$8.3 million, a reduction of \$4.7 million to PG&E's forecast.

ORA states that PG&E's estimate of the number of personnel in the GDCC is excessive and that PG&E's 2015 hiring was substantially less than planned.<sup>1</sup>

*1. Exhibit (ORA-9), p. 9 line 5 to p. 19, line 15*

**TURN Position**

TURN recommends an overall reduction of 14% due to .....<sup>1</sup>

*1. Exhibit (TURN-Marcus), p. 15, lines 20 to 30*

### Section 3

2017 GRC O&M Dollar Impact to MWC **FG** (Nominal \$000s):

2017 Forecast

Item #	Item Name	PG&E <sup>1</sup>	ORA	ORA-PG&E	TURN <sup>2</sup>	TURN-PG&E
1	Operate Gas Distribution System	\$12,980	\$8,300	(\$4,680)	\$11,163	(\$1,817)
	<b>Total</b>	<b>\$12,980</b>	<b>\$8,300</b>	<b>(\$4,680)</b>	<b>\$11,163</b>	<b>(\$1,817)</b>

1. PG&E's forecast reflects the adjustment to labor escalation presented in Exhibit (PG&E-19)
2. TURN's forecast is extrapolated by applying 14% reduction recommended by TURN

### Section 4

Other Intervenor Positions

**Intervenor**  
Position:

Provide a summary of your position regarding PG&E's forecast for this specific work.

1. Exhibit (Intervenor-Volume), p. 15, lines 20 to 30

(END OF ATTACHMENT 1)