



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Joint Application of San Diego Gas and Electric Company (U 902), Southern California Gas Company (U 904) and Pacific Gas and Electric Company (U 39 G) to Reallocate the Costs of Natural Gas Public Purpose Programs and Other Mandated Social Programs Among Customer Classes

Application. 07-12-006  
(Filed December 11, 2007)

**JOINT OPENING COMMENTS OF  
THE DIVISION OF RATEPAYER ADVOCATES, THE UTILITY  
REFORM NETWORK, DISABILITY RIGHTS ADVOCATES,  
CONSUMER FEDERATION OF CALIFORNIA,  
AND THE LATINO ISSUES FORUM**

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December 8, 2008

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Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Division of Ratepayer Advocates (“DRA”), The Utility Reform Network (“TURN”), Disability Rights Advocates (“DisabRA”), Consumer Federation of California (“CFC”), and the Latino Issues Forum (“LIF”) (collectively referred to as “Joint Consumers”) hereby submit their joint opening comments in support of the Proposed Decision (“PD”) of Administrative Law Judge (“ALJ”) Galvin which rejects Application (“A.”) 07-12-006.

The PD correctly concludes that Pacific Gas and Electric Company (“PG&E”), Southern California Gas Company (“SoCalGas”) and San Diego Gas & Electric Company (“SDG&E”) (collectively referred to as “Joint Applicants”), have not substantiated that the Equal Percent of Base Revenue (“EPBR”) method is more reasonable than the current cost allocation methods used to recover the Public Purpose Program (“PPP”) costs.<sup>1</sup> The PD correctly concludes that Equal Cents Per Therm

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<sup>1</sup> Conclusion of Law (“COL”) # 4.

(“ECPT”) for the California Alternate Rates for Energy (“CARE”) program is currently the cost allocation methodology most consistent with California legislation, as set forth for California natural gas utilities in Sections 739.1, 739.2 and 890-899 of the California Public Utilities Code,<sup>2</sup> and 20 years of Commission precedent.<sup>3</sup>

The Consumer Groups agree that there is no evidence that the costs of the PPP adversely impact the California economy. Moreover, the record contains significant evidence that the proposed cost shift of at least \$90 million would be detrimental to residential customers, especially those customers that are “lower income.”<sup>4</sup> Additionally, the PD properly concludes that the Applicants have not proven that EPBR or a “one size fits all” methodology is the most reasonable cost allocation methodology for the various PPPs.<sup>5</sup>

For all the foregoing reasons, the Commission should adopt the PD.

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<sup>2</sup> All statutory references herein are to the California Public Utilities Code unless otherwise indicated.

<sup>3</sup> PD, Appendix A, p. 1.

<sup>4</sup> PD, p. 17 and COL # 1.

<sup>5</sup> PD, p. 18.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of “**JOINT OPENING COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES, THE UTILITY REFORM NETWORK, DISABILITY RIGHTS ADVOCATES, CONSUMER FEDERATION OF CALIFORNIA, AND THE LATINO ISSUES FORUM**” in **A.07-12-006** by using the following service:

E-Mail Service: sending the entire document as an attachment to all known parties of record who provided electronic mail addresses.

U.S. Mail Service: mailing by first-class mail with postage prepaid to all known parties of record who did not provide electronic mail addresses.

Executed at **December 8, 2008** at San Francisco, California.

/s/            REBECCA ROJO

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Rebecca Rojo

**N O T I C E**

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address and/or e-mail address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

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