



**PG&E 2010 ERRA Compliance Proceeding  
- MRTU Issues -**

**DRA Position:** The Commission should consolidate review of IOUs' MRTU costs into a single proceeding. If not, the Commission should only approve \$932,012 for PG&E's MRTU for 2008 and 2009 booked costs and reject PG&E's request for \$18.3 million for 2008-2011.



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**Background**

- Authorizing resolutions only allow recovery of booked MRTU costs. [E – 4087/AL 2091 – E and E – 4088/AL 1867 (SCE) ]
- PG&E's \$18.3 million request for MRTU costs consists of:
  - Booked Costs for 2008 and 2009
  - Estimated Costs for 2010 and 2011
- Across all MRTU: PG&E requests \$18.3 million (A.10-02-012); SCE \$11.2 million (A.10-02-022; and SDG&E \$2.6 million (A.10-06-001)

**A Consolidated MRTU Proceeding will Facilitate Consistent Treatment of Expenditures**

- Promotes resource efficiencies and centralizes expertise in complex subject matter.
- MRTU implementation costs are driven by common CAISO directives: tariff, structure, timeline, and technical requirements.
- The CPUC has a precedent for a consolidated proceeding approach: Resource Adequacy, Demand Response, Energy Efficiency, and Low Income.
- DRA has proposed an OIR in its testimony to consolidate MRTU cost recovery requests.

**If Commission does not Consolidate MRTU Proceeding, PG&E's Cost Recovery Should be Limited to Booked Costs**

- PG&E's MRTU should only be allowed cost recovery for booked costs = \$932,012.
- DRA supports PG&E's plan "to seek reasonableness review of each subsequent CAISO MRTU release in the first PG&E ERRA compliance proceeding after the year in which the release is implemented and operational ..." to the extent the associated costs have been booked or closed.
- A one year discrete ex post cost review of MTRU costs is appropriate after the books for each year have been closed.