

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



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Application of San Diego Gas & Electric Company
(U 902-M), Southern California Edison Company
(U 338-E), Southern California Gas Company
(U 904-G) and Pacific Gas and Electric Company
(U 39-M) for Authority to Establish a Wildfire Expense
Balancing Account to Record for Future Recovery
Wildfire-Related Costs

A.09-08-020
(Filed August 31, 2009)

**RESPONSE OF SAN DIEGO GAS & ELECTRIC COMPANY, SOUTHERN
CALIFORNIA GAS COMPANY, SOUTHERN CALIFORNIA EDISON COMPANY
AND PACIFIC GAS AND ELECTRIC COMPANY TO NOTICE OF INTENT TO
CLAIM INTERVENOR COMPENSATION AND ALJ RULING ON SHOWING OF
SIGNIFICANT FINANCIAL HARDSHIP OF RUTH HENRICKS**

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Pursuant to Rule 17.4 of the Commission's Rules of Practice and Procedure, Public Utilities Code Section 1804(a)(2)(C),¹ and ALJ Marybeth Bushey's telephonic authorization to submit this response, San Diego Gas & Electric Company, Southern California Gas Company, Southern California Edison Company, and Pacific Gas and Electric Company (Joint Utilities) respond to the *Notice of Intent to Claim Intervenor Compensation and, if Requested, ALJ Ruling on Showing of Significant Financial Hardship* (NOI) submitted by Ruth Henricks on October 20, 2010.² For the reasons set forth below, the Joint Utilities urge ALJ Bushey to issue a ruling pursuant to Public Utilities Code Section 1804(B)(2): (1) advising Ms. Henricks that her NOI sets forth an unrealistic expectation for compensation, (2) directing Ms. Henricks and Mr. Aguirre to coordinate their participation with the numerous other customer representatives

¹ Pub. Util. Code § 1804(a)(2)(C) provides that within 15 days after service of a notice of intent to claim intervenor compensation (NOI), the administrative law judge (ALJ) may direct the staff, and may permit any other interested party, to file a statement responding to the notice.

² This NOI was originally submitted by Mr. Aguirre on behalf of Ms. Henricks on October 11, 2010. However, Mr. Aguirre re-submitted the same NOI on October 20, 2010.

working on this proceeding to avoid duplication of efforts and reduce intervenor compensation costs to Joint Utilities' customers, (3) informing Mr. Aguirre that his expectations regarding hourly rates are unreasonable in light of his lack of experience practicing before the Commission, and (4) determining that the NOI fails to satisfy the "significant financial hardship" standard of the Intervenor Compensation Statute.³

I. INTRODUCTION

The Intervenor Compensation Statute requires that a number of specific criteria be satisfied in order for an intervenor in a Commission proceeding to obtain a compensation award. One of these criteria is the filing, within a specified time period, of a NOI that includes:

A statement of the nature and extent of the customer's planned participation in the proceeding as far as it is possible to set it out when the notice of intent is filed.

. . . An itemized estimate of the compensation that the customer expects to request, given the likely duration of the proceeding as it appears at the time.

. . . The notice of intent may also include a showing by the customer that participation in the hearing or proceeding would pose a significant financial hardship. Alternatively, such a showing shall be included in the request submitted pursuant to subdivision (c).⁴

If the customer's showing of significant financial hardship is included in the NOI, the ALJ, in consultation with the assigned commissioner, shall issue within 30 days thereafter a preliminary ruling addressing whether the customer will be eligible for an award of

³ Pub. Util. Code §§ 1801-1812.

⁴ Pub. Util. Code § 1804(a)(2)(A)-(B).

compensation.⁵ The ruling shall address whether a showing of significant financial hardship has been made.⁶ In addition:

The administrative law judge may, in any event, issue a ruling addressing issues raised by the notice of intent to claim compensation. The ruling may point out similar positions, areas of potential duplication in showings, unrealistic expectation for compensation, and any other matter that may affect the customer's ultimate claim for compensation. Failure of the ruling to point out similar positions or potential duplication or any other potential impact on the ultimate claim for compensation shall not imply approval of any claim for compensation. A finding of significant financial hardship in no way ensures compensation. Similarly, the failure of the customer to identify a specific issue in the notice of intent or to precisely estimate potential compensation shall not preclude an award of reasonable compensation if a substantial contribution is made.⁷

Section 1801.3 of the Public Utilities Code explains the intent of the Legislature in enacting the Intervenor Compensation Program. Section 1801.3(f) provides the Commission with guidance on administering the statute:

This article shall be administered in a manner that avoids unproductive or unnecessary participation that duplicates the participation of similar interests otherwise adequately represented or participation that is not necessary for a fair determination of the proceeding.

In D.98-04-010, the Commission pointed out that: “[e]ach of the three standards for program administration (productive, necessary, and needed for a fair determination) has independent meaning that customers, and ALJs preliminarily ruling on customer eligibility, should consider carefully.”⁸ The Commission also explained the importance of the NOI and the

⁵ Pub. Util. Code § 1804(b)(1).

⁶ Id. A finding of significant financial hardship shall create a rebuttable presumption of eligibility for compensation in other commission proceedings commencing within one year of the date of that finding. Id.

⁷ Pub. Util. Code § 1804(b)(2).

⁸ D.98-04-059, mimeo., at 31.

preliminary determination by the ALJ regarding customer eligibility for intervenor compensation:

We must begin to more critically assess, at the outset of a proceeding, whether the participation of these "third-party" customers, separate and apart from their representation through ORA or CSD,⁹ is necessary, both in terms of nonduplication and in terms of a fair determination of the proceeding.

The information filed in the Notice of Intent, pursuant to § 1804(2)(i), should provide a basis for a more critical preliminary assessment of whether the participation of third-party customers is necessary. The nature and extent of the customer's planned participation, in combination with the scope of the proceeding as detailed in the scoping memo ruling, should enable the ALJ to make a preliminary assessment. Where, as the result of the Notice of Intent, the ALJ preliminarily determines that the participation of third-party customers is not necessary, the ALJ shall issue a ruling (otherwise discretionary under § 1804(b)(1)).¹⁰

II. MS. HENRICKS FAILS TO DEMONSTRATE THAT SHE IS A "CUSTOMER" UNDER THE INTERVENOR COMPENSATION STATUTE

Rule 17.1(d) of the Commission's Rules of Practice and Procedure requires that the NOI provide, in the case of individuals, "verification of the intervenor's customer status pursuant to Public Utilities Code Section 1802(b)(1)(A) or (B)," or in the case of organizations, "a copy of articles of incorporation or bylaws demonstrating the intervenor's customer status pursuant to Public Utilities Code Section 1802(b)(1)(C)." The NOI submitted by Ms. Henricks fails to satisfy this requirement. In her NOI, Ms. Henricks baldly asserts that she represents "consumers, customers, or subscribers" of a public utility.¹¹ However, it does not appear that Ms. Henricks represents anyone but herself. Certainly, the NOI does not provide any information about the

⁹ ORA or the "Office of Ratepayer Advocates" is the predecessor to the Division of Ratepayer Advocates (DRA). Similarly, CSD or "Consumer Services Division" is the predecessor to the Consumer Protection and Safety Division (CPSD). Both DRA and CPSD are parties to this proceeding and represent customer interests, as discussed further below in Section III.

other customers that Ms. Henricks purports to represent. The only information in the record regarding the interests Ms. Henricks purports to represent is contained in the motion for party status that Ms. Henricks submitted in April of 2010. In that motion, Ms. Henricks asserts that she “seeks party status in this proceeding in order to advance and protect the interests of small business owners whose interests are implicated in this proceeding.”¹² But Ms. Henricks fails to assert that any other small business owners have authorized her to represent them. Nor does she offer any evidence to demonstrate that she satisfies the definition of “small commercial customer” under Section 1802(b)(2)(h). Accordingly, Ms. Henricks does not satisfy Section 1802(b).

Mr. Aguirre, Ms. Henricks’ counsel, would appear to be able to satisfy Section 1802(b) since he is presumably “a representative who has been authorized by a ‘customer’” (Category #2 of the “Procedural Issues” section of the NOI form). But the NOI was submitted by Mr. Aguirre on behalf of Ms. Henricks, not himself or his law firm. This distinction is important since the financial hardship test needs to be satisfied by the “customer” submitting the NOI, and Ms. Henricks likely has a very different financial situation than Mr. Aguirre and his law firm. This issue is especially important because Mr. Aguirre, an experienced attorney in other areas of the law, but a relatively inexperienced practitioner before the Commission, seeks a very large amount of ratepayer-funded compensation for himself and his law firm for representing the interests of one small commercial customer in this proceeding. The real “representative” here is Mr. Aguirre and his law firm, and therefore, the NOI should have been submitted by Mr. Aguirre on his own behalf, not on behalf of the one customer he represents. The NOI is defective because it was submitted on behalf of Ms. Henricks, who represents no one but herself.

¹⁰ D.98-04-059, mimeo., at 32.

¹¹ NOI at 1.

III. MS. HENRICKS' PROPOSED PARTICIPATION IN THIS PROCEEDING IS DUPLICATIVE AND UNNECESSARY

As noted above, in response to a NOI, the assigned ALJ should make a preliminary determination whether the participation of “third party” customers, separate and apart from their representation through DRA and CPSD, is necessary, both in terms of nonduplication and in terms of a fair determination of the proceeding.¹³ The Joint Utilities believe that this preliminary determination with respect to the proposed participation in this proceeding by Ms. Henricks — or, more accurately, by her “representative,” Aguirre, Morris & Severson LLP — should be negative on both counts.

DRA and CPSD have been active participants in this proceeding since it began in August of 2009, as have Disability Rights Advocates (DiRA), and the Mussey Grade Road Alliance (MG). TURN has been actively engaged in this proceeding since it filed a Motion for Party Status on January 26, 2010. DRA has a statutory mission to represent customers such as Ms. Henricks; TURN is a well-established, effective, and efficient customer representative with decades of experience dealing with utility issues; CPSD provides a strong voice for public safety; and DiRA advocates on behalf of the interests of disabled customers.

Given that all of these customer representatives are already fully participating in this proceeding, the proposed participation of Ms. Henricks would be completely duplicative. Customers already have numerous advocates representing their interests in this matter, and certainly DRA, TURN, CPSD, and DiRA are much more experienced with respect to Commission proceedings than Ms. Henricks and Mr. Aguirre. Utility customers should not be saddled with the costs incurred by yet another “representative” who brings nothing additional to

¹² Henricks April 21, 2010 Motion for Party Status at 4.

¹³ D.98-04-059, mimeo., at 32.

the table. This is particularly true since Ms. Henricks first sought to become a party more than eight months after the Joint Utilities filed their initial application, and missed all but one of the mediation sessions involving all parties that took place from January through May of 2010.

Moreover, the participation of Ms. Henricks and Mr. Aguirre in this matter is not necessary to achieve a fair determination in the proceeding. All of the issues that the Commission needs to consider in order to reach an informed decision can and will be fully vetted by customer representatives other than Mr. Aguirre.

A. The NOI Fails to Satisfy the Requirements of Rule 17.1 of the Commission Rules of Practice and Procedure

Rule 17.1 of the Commission’s Rules of Practice and Procedure requires that the NOI “identify all issues on which the intervenor intends to participate and seek compensation, and shall separately state the expected budget for participating on such issue.” The NOI submitted by Ms. Henricks fails to meet this requirement. The NOI Mr. Aguirre submitted on behalf of Ms. Henricks merely mentions the procedural means that Mr. Aguirre and his law firm anticipate using to participate in this matter — depositions, data requests, engaging witnesses to testify, the filing of motions and “legal contentions,” and legal research.¹⁴ But the NOI is utterly devoid of any explanation of what, if anything, Mr. Aguirre thinks he will ultimately present to the Commission that is any different than what the well-established customer representatives will present, and certainly does not “separately state the expected budget for participating on each issue.” Rather, the NOI broadly asserts that “Intervenor expects to be involved in all material issues raised in the proceeding,” presumably, whether or not those same issues are all being addressed by one or more of the six other parties representing customer interests in this

¹⁴ NOI at 2.

proceeding.¹⁵ The NOI does state that Mr. Aguirre intends to “depose 16 witnesses,” which is something other customer representatives are very unlikely to do. As ALJ Kenney noted in a telecommunications rulemaking when addressing the issue of taking depositions in lieu of more standard methods of discovery at the Commission:

The Commission's usual practice is to allow parties to conduct discovery through data requests, as this method has proven over time to be relatively convenient, inexpensive, and less burdensome compared to alternative methods such as depositions.

...

... Because depositions are not a favored means of conducting discovery in Commission proceedings, the party seeking a deposition will have the burden of demonstrating the need for the deposition opposed by the potential deponent by filing a motion to compel deposition. Any such motion must identify with specificity the information to be obtained through deposition and explain why the information cannot be obtained through data requests or other less burdensome means.¹⁶

Therefore, while Ms. Henricks and Mr. Aguirre might be allowed to conduct numerous depositions in this proceeding, utility customers should not be required to foot the bill for this non-standard, expensive, and unnecessary form of discovery. Likewise, Commission rules and guidelines allow Ms. Henricks and Mr. Aguirre (or any customer, for that matter) to participate in Commission proceedings such as this one, even where their participation is duplicative of the efforts of other intervening parties. However, the Intervenor Compensation Statute provides that utilities' customers may not be forced to pick up the tab for such duplicative and unnecessary participation.

¹⁵ NOI at 2.

¹⁶ R.01-09-001, May 14, 2002 ALJ's Ruling Regarding Pacific Bell's Motion to Confirm its Right to Conduct Depositions, at 4-5.

IV. THE SCOPE OF MS. HENRICKS' ANTICIPATED PARTICIPATION IN THIS PROCEEDING IS UNREASONABLE

In the NOI presented on behalf of Ms. Henricks by Mr. Aguirre, Mr. Aguirre estimates that he personally will spend 540 hours working on this matter, his law partner, Ms. Severson, will spend 300 hours, and an investigator hired by their law firm will spend 350 hours – for an estimated total of 1,220 hours and an estimated cost of \$363,500.¹⁷ By contrast, TURN estimates that it will spend a total of 140 hours working on this proceeding (90 hours for attorneys, and 50 hours for an expert witness), for a total estimated cost of \$41,050.¹⁸

The anticipated scope of Ms. Henricks' participation in this matter is utterly unreasonable – 1,220 hours is the equivalent of having someone working on nothing but this proceeding day in and day out for more than seven months. This level of effort might be appropriate for a lead intervenor in a general rate case, but not for the sixth customer representative to appear in an application proceeding dominated by policy issues. Moreover, the contrast between the proposed participation of Ms. Henricks and TURN is startling. Although the Joint Utilities do not always agree with the positions taken by TURN, TURN is undeniably familiar with the important issues in this proceeding and competent to represent customer interests. Even if customers should pay for some of the work done by Mr. Aguirre and his firm in this proceeding (a proposition the Joint Utilities do not agree with), why should customers pay more than eightfold for the relatively inexperienced participation of Mr. Aguirre's firm than for the experienced participation of TURN?

There is no justification for customers paying Ms. Henricks and Mr. Aguirre anything close to what they will pay for TURN's participation in this proceeding. Yet, Ms. Henricks and

¹⁷ NOI at 3.

¹⁸ TURN NOI at 3.

Mr. Aguirre want customers to pay almost 900% more for their participation than for TURN's. The Joint Utilities urge the ALJ to let Mr. Aguirre know that if Ms. Henricks' NOI is accepted at all, Ms. Henricks and Mr. Aguirre need to coordinate their participation with the numerous other customer representatives working on this proceeding in order to minimize the intervenor compensation costs to the Joint Utilities' customers in this proceeding.

In addition, it is unreasonable for attorneys inexperienced in Commission proceedings to be awarded customer-funded hourly rates that are as much as or higher than the rates charged by an experienced practitioner, such as Ms. Suetake of TURN. Nevertheless, Mr. Aguirre seeks ratepayer-funded compensation at the rate of \$400/hour for his time, and \$330/hour for time spent by Ms. Severson,¹⁹ compared with the \$275/hour charged by Ms. Suetake.²⁰ The Joint Utilities urge the ALJ to inform Mr. Aguirre that his expectations regarding hourly rates are unreasonable.

Section 1801 of the Public Utilities Code requires that claimed intervenor's fees and costs must be reasonable. The fees and costs anticipated by Ms. Henricks and Mr. Aguirre clearly are not. Section 1804(b)(2) notes that in response to a NOI, an ALJ "may point out similar positions, areas of potential duplication in showings, unrealistic expectation for compensation, and any other matter that may affect the customer's ultimate claim for compensation." The Joint Utilities urge ALJ Bushey to point out all of these factors to Ms. Henricks and Mr. Aguirre.

V. THE NOI DOES NOT ESTABLISH SIGNIFICANT FINANCIAL HARDSHIP

The Joint Utilities urge the ALJ to determine that the NOI fails to satisfy the statutory "significant financial hardship" standard. As noted above in Section II, Mr. Aguirre, and not Ms. Henricks, appears to be the party who should have submitted the NOI (since he is "a

¹⁹ NOI at 3.

²⁰ TURN NOI at 3.

representative who has been authorized by a ‘customer’” (Category #2 of the “Procedural Issues” section of the NOI form)), and Mr. Aguirre has not submitted any financial information that would enable the Commission to make any sort of determination regarding the potential financial hardship to Mr. Aguirre (and/or his law firm) from participating in this proceeding without receiving compensation from customers.

Even if the Commission were to assume that Ms. Henricks is qualified under Category 1 to represent customers, when seeking costs and fees an intervenor must demonstrate that the customers it purports to represent “cannot afford, without undue hardship, to pay the costs of effective participation.”²¹ For “not-for-profit corporations, and other organizational customers’ who file as Category 1 customers,” the Commission “require[s] documentation, noting that they ‘have ready access to their annual income and expense statements and year-end balance sheets.’”²² Failure to include such documentation with her financial hardship showing fails to meet Ms. Henricks’ burden of proof.

In Decision 86-05-007, the Commission explained:

We will not rest decisions of financial hardship upon inference or supposition. Clear proof is the requisite. When intervenors are represented by counsel in seeking eligibility, we expect counsel to carefully scrutinize the financial data provided us to ensure it complies with this Commission’s standards for completeness and clarity.”²³

No such showing has been presented on behalf of Ms. Henricks, Mr. Aguirre, or Mr. Aguirre’s law firm.

²¹ D.08-07-021, p. 7.

²² *Id.*, p. 9.

²³ D.92-04-030, 1992 Cal. PUC LEXIS 337, p. *12; *see also* D.09-04-010, 2009 Cal. PUC LEXIS 188, pp. *39-40 (“It is the duty of an intervenor to establish eligibility, including customer status and significant financial hardship, rather than offer unsupported statements and inferences from which the Commission is to derive rather specific elements of qualification.”).

For each of these reasons, the NOI submitted by Ms. Henricks and Mr. Aguirre does not establish significant financial hardship, and the Joint Utilities urge the ALJ to make a preliminary determination that Ms. Henricks fails to satisfy the statutory “significant financial hardship” standard.

VI. CONCLUSION

For the reasons set forth above, the Joint Utilities urge ALJ Bushey: (1) to point out that the scope of Ms. Henricks’ anticipated participation in this proceeding is unreasonable, (2) to point out that Ms. Henricks and Mr. Aguirre need to coordinate their participation with the numerous other customer representatives working on this proceeding, (3) to inform Mr. Aguirre that his expectations regarding hourly rates are unrealistic for practitioners who do not have significant experience working before the Commission, and (4) to not make a preliminary determination that Ms. Henricks has satisfied the “significant financial hardship” standard.

Respectfully submitted on behalf of all Joint
Utilities pursuant to Rule 1.8(d).

By: /s/ Michael R. Thorp

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Dated: October 22, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **RESPONSE OF SAN DIEGO GAS & ELECTRIC COMPANY, SOUTHERN CALIFORNIA GAS COMPANY, SOUTHERN CALIFORNIA EDISON COMPANY AND PACIFIC GAS AND ELECTRIC COMPANY TO NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION AND ALJ RULING ON SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP OF RUTH HENRICKS** by electronic mail to each party of record, and via Federal Express to Commissioner Simon and Administrative Law Judge Bushey.

Dated at Los Angeles, California this 22nd day of October, 2010.

/s/ Rose Mary Nava

Rose Mary Nava

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service List Proceeding: A.09-08-020 - Last changed: October 21, 2010

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