



FILED

05-14-12

04:59 PM

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

Application of PACIFIC GAS AND ELECTRIC
COMPANY for Approval of Modifications to its Smart
Meter Program and Increased Revenue Requirements to
Recover the Costs of the Modifications

Application 11-03-014

(Filed March 24, 2011)

And Related Matters.

Application 11-03-015

(Filed March 24, 2011)

Application 11-07-020

(Filed July 26, 2011)

PREHEARING CONFERENCE STATEMENT OF THE COUNTY OF LAKE

///

///

I. INTRODUCTION

Pursuant to Rule 7.2, subdivision (a) of the Commission's Rules of Practice and Procedure and the Administrative Law Judge Ruling in this matter dated April 24, 2012, the County of Lake (County) files this Prehearing Conference (PHC) Statement.

II. CONTENTS OF THE COUNTY'S PHC STATEMENT

In response to Rule 7.2, subdivision (a) of the Commission's Rules of Practice and Procedure, the County states the following:

A. Schedule.

Discovery	June 15, 2012 – July 16, 2012
Hearings held	September 18-20, 2012
Parties' Opening Briefs due	October 22, 2012
Parties' Reply Briefs due	November 12, 2012

B. Issues to be Considered.

- (i) Whether payment of all of costs associated with the opt-out option should be limited to ratepayers selecting the opt-out option.
- (ii) Whether all or some of the costs associated with the opt-out option should be paid by PG&E shareholders.
- (iii) Whether PG&E's inadequacy in resolving health, privacy, security, and environmental concerns in installing its Smart Meters and associated fee structures should be considered in allocating all or some of the costs of the opt-out option to PG&E shareholders.
- (iv) Whether local entities and communities should be allowed to exercise the opt-out option.

III. CONCLUSION

Based on the above, County requests that the Commission adopt and approve the County's above-referenced proposed schedule and issues. The health concerns over Smart Meters, along with the lack of environmental impact recognition by PG&E in any of its Smart Meter applications and the pending unresolved privacy and security issues all warrant consideration in this proceeding due to the inadequacy of PG&E's installation of Smart Meters and its associated fee structures. Also, the cost allocation should avoid the result of non opt-out ratepayers subsidizing the opt-out ratepayers for a portion of the opt-out costs.

Respectfully submitted,
ANITA L. GRANT
County Counsel

By: /s/ LLOYD C. GUINTIVANO
Lloyd C. Guintivano
Deputy County Counsel
Attorney for the County of Lake
255 North Forbes Street
Lakeport, CA 95453
Telephone: (707) 263-2321
Facsimile: (707) 263-0702

May 14, 2012