



**FILED**  
6-06-16  
04:59 PM

BEFORE THE  
PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric	)	
Company in its 2015 Nuclear	)	Application 16-03-006
Decommissioning Cost Triennial	)	(Filed March 1, 2016)
Proceeding	U 39 E )	
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**ALLIANCE FOR NUCLEAR RESPONSIBILITY'S  
PREHEARING CONFERENCE STATEMENT**

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Date: June 6, 2016

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ALLIANCE FOR NUCLEAR RESPONSIBILITY

## PREHEARING CONFERENCE STATEMENT

Pursuant to the May 10, 2016 Ruling of Administrative Law Judge Maribeth Bushey, the Alliance for Nuclear Responsibility (“A4NR”) files its Prehearing Conference Statement in A.16-03-006. In response to each of the enumerated items in the Ruling, A4NR offers the following:

1. A4NR supports the consolidation of each of the four proceedings, and defers to the Meet and Confer Report regarding the efficiencies expected from such consolidation.
2. A4NR supports the Meet and Confer Report’s proposed schedule and phasing. During the meet-and-confer process, A4NR registered two areas of disagreement with the utilities regarding the scope of the consolidated proceeding: (a) that Phase 1 scoping would be deficient if it did not address the effect on the funding requirement of the Diablo Canyon Nuclear Decommissioning Trust stemming from extensions of the plant’s existing operating licenses; and (b) that a pro-active review of the cost ramifications of major utility decisions on spent fuel management should be incorporated into either Phase 2 or Phase 3 rather than deferred to subsequent proceedings.
3. Apart from the two general concerns voiced in the preceding paragraph, A4NR defers to the Meet and Confer Report.
4. A4NR envisions submitting testimony in Phase 1 focused on the costs associated with amount of Diablo Canyon spent fuel remaining to be transferred to dry casks at the commencement of decommissioning, and the resultant impact on the funding requirement for the Diablo Canyon Nuclear Decommissioning Trust.

5. Subject to its comment in paragraph # 6, A4NR believes an evidentiary hearing is needed to address the issue it has raised in paragraph # 5. The specific material factual issue that needs to be heard is whether PG&E's assumption that 70 of 138 spent fuel canisters will remain to be loaded during decommissioning, and the length of time assumed by PG&E for doing so, are reasonable. A4NR plans to introduce evidence that PG&E's assumptions are unreasonable. A4NR has not had time to adequately digest data responses received from PG&E on June 3, 2016 and is unable to more precisely outline its testimony at this time.
6. A4NR believes the Commission's ADR process would be useful to establish the agreed-upon facts underlying the PG&E assumptions addressed in paragraph # 5, leaving for Commission resolution A4NR's and PG&E's differences concerning the Commission's legal authority.
7. A4NR defers to the Meet and Confer Report on each of these subjects.
8. A4NR has no other matters to add at this point in A.16-03-006.

Respectfully submitted,

By: /s/ John L. Geesman

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