BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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In the Matter of the Application of Pacific Gas and Electric Company for Approval of its Senate Bill 350 Transportation Electrification Program.	Application 17-01-022 (Filed January 20, 2017)

PROTEST OF THE OFFICE OF RATEPAYER ADVOCATES TO THE APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY (U39E) FOR AUTHORITY TO IMPLEMENT AN ELECTRIC VEHICLE INFRASTRUCTURE AND EDUCATION SENATE BILL 350 TRANSPORTATION ELECTRIFICATION PROGRAM

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March 6, 2017

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I. INTRODUCTION

Pursuant to Rule 2.6 of the California Public Utilities Commission's Rules of Practice and Procedure, the Office of Ratepayer Advocates (ORA) protests Pacific Gas and Electric Company's (PG&E) Application (A.) 17-01-022, which seeks Commission authorization to establish and implement five "priority review"[1] projects to accelerate transportation electrification (TE) and two standard review[2] TE programs to provide make-ready infrastructure in response to customer request. PG&E seeks a total of $253 million.

PG&E's application was filed on January 20, 2017 and it appeared on the Commission's Daily Calendar on January 27, 2017. The original protest deadline of February 27, 2017 was extended to March 6, 2017 pursuant to the February 7, 2017 Chief Administrative Law Judge's (ALJ) Ruling Regarding Preliminary Determination of Category and Assignment, Setting of Protest and Response Deadlines, and Noticing of a Prehearing Conference for All Three Applications. This protest is timely filed pursuant to that ruling.

[1] Per the September 14, 2016 Assigned Commissioner's Ruling (p. 31), priority review projects "should be non-controversial in nature, and limited to no more than $4 million in costs per project…"

[2] Per the September 14, 2016 Assigned Commissioner's Ruling (p. 31), standard review programs are programs that do not meet the criteria of a priority review project, and therefore, do not qualify for an expedited review process.

II. BACKGROUND

On September 14, 2016, the Assigned Commissioner's Ruling Regarding the Filing of the Transportation Electrification Applications Pursuant to Senate Bill 350 (ACR) required each of the three investor-owned utilities (IOUs) to submit their first TE applications by January 20, 2017. Each IOU timely submitted its TE application to the California Public Utilities Commission (CPUC or Commission).

The ACR outlined the minimum statutory requirements for the applications, including the TE provisions of Senate Bill (SB) 350[3] and sections of the California Public Utilities Code defining ratepayer interest.[4] The ACR also listed regulatory requirements such as addressing the multiple goals of widespread TE, seeking to leverage non-utility funding, and providing anonymous and aggregated data for evaluation, among others.[5] Additionally, the ACR provided guidelines for priority review projects.[6] ORA evaluated PG&E's Application within this framework and more broadly for the reasonableness of PG&E's requests.

III. SUMMARY OF ORA'S PROTEST

ORA has identified six preliminary issues regarding PG&E's proposed TE programs. This list is not exhaustive and ORA may identify additional issues that require further discovery and analysis as the proceeding develops. ORA has identified the following issues that should be addressed before PG&E's Application is approved:

- Whether PG&E's vehicle adoption forecast used for its Fleet-Ready Program is reasonable;
- Whether PG&E's selection of the reference case from the adoption forecast is reasonable;
- Whether PG&E's approach in determining its estimated share of adoption for its Fleet-Ready Program is reasonable;
- Whether PG&E's estimate of the Fleet-Ready variable infrastructure costs and their impact on market segments is reasonable;

[3] Senate Bill 350 (De León, 2015) Chapter 547, Statutes of 2015.

[4] Pub. Util. Code § 740.3 and § 740.8.

[5] ACR, pp. 15-16.

[6] ACR, pp. 31-33.

- Whether PG&E's estimated 35% and 25% cost contingencies for its Fleet-Ready and Fast-Charge Programs, respectively, is reasonable; and
- Whether PG&E's Open Request for Proposals (RFPs) Project comports with the Ruling's guidelines.

IV. DISCUSSION

A. PG&E'S NON-LIGHT-DUTY VEHICLE ADOPTION FORECASTS ARE TOO UNCERTAIN IN THIS MARKET.

PG&E evaluated both governmental and independent forecast studies to determine vehicle adoption in its service territory in order to size and scope its Fleet-Ready Program.[7] Based on these resources, PG&E estimated the following statewide vehicle adoption forecasts (presented as ranges of low- to high-adoption scenarios) for each of the non-light-duty sectors:

Table 1: PG&E's Incremental Vehicle Adoption Forecasts by Sectors and Years 2018-2022 (Based on statewide forecasts)[8]

	Years				
Sector	2018	2019	2020	2021	2022
Medium Duty Vehicles (MD)[9]	**9 – 2,376**	**23 – 3,911**	**57 – 6,439**	**141 – 7,893**	**350 – 11,691**
Heavy Duty Vehicles (HD)[10]	**5 – 69**	**16 – 162**	**25 – 375**	**37 – 572**	**125 – 980**
Off-Road Vehicles[11]	**1,719 – 6,120**	**1,193 – 6,038**	**1,031 – 6,336**	**905 – 6,661**	**735 – 6,945**

[7] PG&E evaluated, among others, the California Air Resources Board's 2016 Draft Scoping Plan Scenario & Alternatives Modeling Description.

[8] PG&E TE SB 350 Prepared Testimony Table 3-4 (p. 3-17) – California Incremental Vehicle Adoption Range and Reference Case.

[9] Medium-duty vehicles sector include light-heavy-duty and medium-duty trucks (EMFAC Category LHD1, LHD2, MDV) – PG&E TE SB 350 Prepared Testimony Table 3-2 (p. 3-9).

[10] Heavy-duty vehicles sector include medium-heavy-duty and heavy-heavy-duty trucks (EMFAC Category MHDT, HHDT, SBUS, UBUS, OBUS) – PG&E TE SB 350 Prepared Testimony Table 3-2 (p. 3-9).

[11] Off-road vehicles sector include airport ground support equipment, port cargo handling equipment, transport refrigeration units, truck stop electrification, forklifts, and other non-light-duty vehicles – PG&E TE SB 350 Prepared Testimony Table 3-2 (p. 3-9).

ORA questions the accuracy of the vehicle adoption forecasts that PG&E relied on to size and scope its Fleet-Ready Program. First, the high-adoption forecasts may be too aggressive given the infancy and uncertainty of the MD/HD market segment.[12] Unlike the relatively more mature light-duty (LD) sector, the non-light-duty sector is largely nascent and faces a much greater magnitude of common market barriers, the largest being vehicle availability and cost. As of early 2017, the LD sector has as many as 30 electric vehicle (EV) models available for sales in the United States from an increasing number of car manufacturers.[13] In comparison, the nonlight-duty side has a few manufacturers with limited vehicle availability. Some of these vehicles are retrofits of diesel-to-electric drivetrains rather than purpose-built EVs, while others are low production experimental vehicles. Also, upfront vehicle costs continue to be prohibitive and a key adoption barrier, especially in the non-light-duty side due to the small number of manufacturers, low production of vehicles, and the large battery size required.[14]

Second, the vehicle adoption forecasts reflect a wide range. For example, PG&E forecasts that by 2022 California will have approximately 350 to 11,691 MD EVs. This forecast reflects a difference of 11,341 vehicles between the low- and high-adoption scenarios. This wide disparity further illustrates the inherent high uncertainty of vehicle adoption in this market segment.

Since the accuracy of PG&E's vehicle adoption forecast seems too uncertain at this time, as reflected by the extremely broad forecast, ORA believes further evaluation of adoption rates for the MD/HD sector should be conducted.

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[12] *See* PG&E TE SB 350 Prepared Testimony p. 3-13 ("[G]iven the nascent level of TE demand in the non-light-duty vehicle sector and the variability in vehicle types and charging requirements, it is not feasible to accurately estimate demand for PG&E's Fleet-Ready program over the next five years.").

[13] As of January 2017, Inside EVs (an independent Internet site covering electric vehicle news) reports a total of 32 EV models available for sales in the United States: http://insideevs.com/monthly-plug-in-sales-scorecard/.

[14] "The most significant cost component for Battery Electric Vehicles…is the battery system." California Air Resources Board Technology Assessment: Medium- and Heavy-Duty Battery Electric Trucks and Buses (October 2015), p. V-1, https://www.arb.ca.gov/msprog/tech/techreport/bev_tech_report.pdf.

B. PG&E'S BASE CASE SELECTIONS SHOULD BE SUPPORTED WITH FURTHER EXPLANATION.

From its statewide vehicle adoption forecasts, PG&E selected base cases between the low- and high-adoption scenarios upon which it further relied to size and scope its Fleet-Ready Program. Table 2 again shows PG&E's adoption forecasts for years 2018 to 2022 as well as its corresponding selected base cases in parenthesis.

Table 2: PG&E's Incremental Vehicle Adoption Forecasts and Base Cases by Sectors and Years 2018 – 2022 (Based on statewide forecasts)[15]

	Years				
Sector	2018	2019	2020	2021	2022
Medium Duty Vehicles (MD) (Base Case Used)	9 – 2,376 **(928)**	23 – 3,911 **(1,332)**	57 – 6,439 **(1,913)**	141 – 7,893 **(2,527)**	350 – 11,691 **(3,541)**
Heavy Duty Vehicles (HD) (Base Case Used)	5 – 69 **(27)**	16 – 162 **(147)**	25 – 375 **(372)**	37 – 572 **(491)**	125 – 980 **(974)**
Off-Road Vehicles (Base Case Used)	1,719 – 6,120 **(2,985)**	1,193 – 6,038 **(2,488)**	1,031 – 6,336 **(2,361)**	905 – 6,661 **(2,267)**	735 – 6,945 **(2,133)**

PG&E does not clearly explain the rationale used to make the base case selections for determining the overall costs for its Fleet-Ready Program. While PG&E cited the forecast studies it relied on to determine the base cases, it did not explain how it arrived at those figures. For example, while most base cases are approximately 30% to 40% of the high-adoption scenarios, in some cases PG&E selected forecasts that are as much as 99% of the high scenario. In particular, PG&E selected a base case that is 99.2% of the high scenario for the HD sector in 2020, a mere two years into program implementation. Given the high uncertainty level and the wide range of adoption forecasts for this new market segment, as previously discussed above, selecting a reference case near the high

[15] PG&E TE SB 350 Prepared Testimony Table 3-4 (p. 3-17) – California Incremental Vehicle Adoption Range and Reference Case.

end of the spectrum may be overly-aggressive. PG&E should provide additional analysis to support its base cases selections.

C. PG&E'S ESTIMATED SHARE OF VEHICLE ADOPTION IS UNCLEAR AND PG&E SHOULD USE MORE DATA TO REFINE ITS ESTIMATE.

PG&E scaled the base cases to the size of its service territory in order to determine the number of non-light-duty vehicles that its Fleet-Ready Program needs to support. PG&E estimated its service area represents about 43% of California geographically, and therefore, generally estimated its share of non-light-duty vehicle adoption by scaling the base cases at 43%. Table 3 shows PG&E's adoption forecasts scaled by its service area size.

Table 3: PG&E Vehicle Adoption Forecasts Scaled by Service Area Size.[16]

	Years				
Sector	2018	2019	2020	2021	2022
Medium Duty Vehicles (MD)	**399**	**572**	**823**	**1,087**	**1,522**
Heavy Duty Vehicles (HD)	**11**	**63**	**161**	**211**	**417**
Off-Road Vehicles	**1,171**	**977**	**930**	**893**	**842**

ORA questions whether using the geographical size as a scaling factor is reflective of the potential vehicle adoption and may otherwise over-inflate the adoption rate in PG&E's service area. While PG&E's service area makes up approximately 70,000 square-miles and encompasses 49 counties,[17] a majority of those counties have less than

[16] PG&E TE SB 350 Prepared Testimony Table 3-6 (p. 3-20) – PG&E Incremental Vehicle Adoption Range and Reference Case.

[17] PG&E Company Profile: https://www.pge.com/en_US/about-pge/company-information/profile/profile.page.

half a million in population. Siskiyou County, for example, is the third largest county[18] geographically in PG&E's service territory, but has less than 50,000[19] in total population.

In addition, PG&E's proposed Fleet-Ready Program aims to electrify non-light-duty vehicles such as delivery trucks, school buses, transit buses, and forklifts, but PG&E did not assess the number of trucking companies, school districts, transit agencies, and commercial factories in individual counties within its service territory. Doing so may allow PG&E to more accurately estimate its adoption share rather than using a scale factor that is purely based on geography with little correlation to potential adoption.

ORA would like to further review and analyze PG&E's methodology to determine whether more granular data is available to more accurately estimate potential adoption rates in PG&E's service area.

D. PG&E DID NOT SHOW QUANTITATIVELY HOW COST VARIABLES CORRELATE WITH ITS FLEET-READY PROGRAM COSTS.

PG&E estimated the overall costs for its Fleet-Ready Program based on the number of non-light-duty vehicles in its program. PG&E estimates that it needs to deploy approximately 700 make-ready sites in its service territory over a 5-year program period at an estimated cost of $211 million.

ORA questions the accuracy of PG&E's Fleet-Ready Program cost estimate. In explaining the program costs, PG&E did not provide the quantitative analysis that justifies the estimated cost of $211 million. While PG&E discussed different variables that can affect costs, it did not correlate quantitatively how these variables may impact each market sector, and therefore, affect overall program costs. For example, PG&E identified the following key cost variables: (1) Ease of sitting, permitting, and construction; (2) Site characteristics such as soil geology that can affect trench work, and existing site conditions that may affect design and installation; and (3) Charger power requirement (in kilowatt) that can trigger transformer and network upgrades.

[18] California counties by square miles: http://www.indexmundi.com/facts/united-states/quick-facts/california/land-area#chart.

[19] California counties by total populations per 2012 census estimates: http://www.us-places.com/California/population-by-County.htm.

However, PG&E did not correlate quantitatively how these variables affect each individual sector, and thereby, impact overall program costs. To further illustrate this point, Table 4 again shows PG&E's scaled forecasts as well as its corresponding site deployment required in parenthesis.

Table 4: PG&E Scaled Forecasts and Site Deployment Required by Sectors and Years.[20]

	Years					
Sector	2018	2019	2020	2021	2022	Total
Medium Duty Vehicles (MD) (Number of Deployment Sites Required)	399 **(34)**	572 **(48)**	823 **(70)**	1,087 **(92)**	1,522 **(128)**	4,403 **(372)**
Heavy Duty Vehicles (HD) (Number of Deployment Sites Required)	11 (6)	63 (16)	161 (24)	211 (28)	417 (46)	863 (120)
Off-Road Vehicles (Number of Site Deployment Required)	1,171 (71)	977 (59)	930 (58)	893 (55)	842 (53)	4,813 (296)
Total	1,581 (111)	1,612 (123)	1,914 (152)	2,191 (175)	2,781 (227)	100,79 (788)

PG&E estimated that 372 sites (or nearly half of its total deployment) will target the MD sector. The effects of cost variables for this sector will likely be different than those for the HD and Off-Road sectors. Therefore, in estimating costs, PG&E should provide detailed quantitative analysis to explain how cost variables for each market sector attribute to and affect overall program costs.

[20] PG&E TE SB 350 Prepared Testimony Table 3-8 (p. 3-24) – PG&E Site Deployment, by Sector and year of Program Operation.

E. PG&E'S COST CONTINGENCY REQUEST APPEARS TO BE EXCESSIVE.

PG&E requests a 25% and 35% contingency in its revenue request for its Fleet-Ready and Charge-Ready Programs, respectively. These cost contingencies appear to be excessive.[21] PG&E justified this request on the basis that there are many cost variables and, therefore, cost contingencies are needed to address potential cost variations and overruns. PG&E should further explain why a 25-35% contingency should be used.

F. PG&E'S OPEN REQUEST FOR PROPOSALS FOR TE INITIATIVES IS NOT LIMITED TO $4 MILLION AND LACKS CONCRETE ELIGIBILITY CRITERIA.

The Assigned Commission's Ruling (ACR) sets forth guidelines for priority review projects, including that the projects be non-controversial in nature, limited to no more than $4 million, and be less than one year in duration.[22] PG&E proposed, as a priority review project, to issue Request for Proposals (RFPs) to third parties to solicit ideas to encourage widespread TE adoption. However, this proposal is not necessarily limited to $4 million since PG&E proposed to use the remainder of the $20 million authorized for, but not dedicated to, the other priority review projects. Similarly, PG&E requests authority to shift funds among all priority review projects as long as the total costs do not exceed $20 million. ORA will evaluate whether PG&E's proposal to have flexibility to shift funds between the two types of projects is appropriate and consistent with the ACR's guidance.

Additionally, ORA questions whether PG&E's Open RFP proposal is concrete enough to ensure accountable spending of ratepayer funds. First, the scope of the proposal is largely undefined beyond that it "could include such things as testing of novel approaches to vehicle-to-grid integration, demonstrating advanced technologies, and piloting strategies to increase uptake of EVs by ride-sharing services." Moreover, the details of those potential projects would remain obscure until PG&E awards a contract,

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[21] The CPUC generally adopts 10 to 15% cost contingencies for infrastructure projects. *See, e.g.,* D.16-12-065, Conclusion of Law #18; D.13-03-032, p. 69 ("As we have done in prior decisions, we adopt a 10 percent contingency amount for Transmission and Distribution aspects of the approved pilots in this decision.") (footnoting D.12-11-051, p. 247).

[22] ACR, pp. 31-32.

well after the Commission would have authorized its funding and the opportunities for stakeholders input.

Second, as described in ORA's critique of the Fleet-Ready Program, there is significant uncertainty about adoption rates in the non-light-duty sector; therefore, allowing additional non-light-duty projects to go forward simultaneously with another non-light-duty program could increase risks to ratepayers. Lastly, if approved by the Commission, this project would not be subject to any further Commission review before a proposal is selected.[23] Instead, an advisory committee would assist in the development of undefined RFP evaluation criteria and weighing.[24]

For the above reasons, ORA requests that the Open RFP proposal undergoes further stakeholder review.

G. THERE SHOULD BE A CONSISTENT COMMUNICATION STANDARD BETWEEN THE EVS AND THE CHARGING STATIONS.

As the ACR notes, there is currently no consensus on whether the Commission needs to adopt one or more vehicle-grid integration (VGI) standards.[25] To further develop the record on this issue, the ACR requires the IOUs to state in their applications "how their programs will comply with the [International Organization for Standardization and International Electrotechnical Commisssion's] 15118 Standard or must provide justification on why alternative approaches sufficiently meet code requirements and policy objectives" provided in the ACR.[26]

PG&E's Application stated that "[s]ubsequent applications filed by PG&E may address additional issues raised in the ACR such as … Vehicle-Grid Integration Communication Standards."[27] ORA believes VGI Communication Standards should be addressed concurrently with this proceeding and in conjunction with the other TE

[23] *See* PG&E TE SB 350 Prepared Testimony (p. 2-19) – PG&E Open RFP for Third-Party EV Innovators.

[24] PG&E TE SB 350 Prepared Testimony (p. 2-19) – PG&E Open RFP for Third-Party EV Innovators.

[25] ACR, p. 28.

[26] ACR, p. 29.

[27] PG&E Testimony, p. 1-19.

applications filed January 20, 2017; for example, the Commission could convene a working group or hold a workshop to further explore the appropriate standard.

V. PROCEDURAL ISSUES

A. CATEGORY

ORA agrees with PG&E that this proceeding should be categorized as ratesetting.

B. NEED FOR HEARINGS

ORA agrees with PG&E that the need for hearings will be in part based on parties' protests. ORA anticipates that hearings may be necessary to address the issues ORA has raised in this protest or to address PG&E's priority and standard review projects.

C. PROPOSED SCHEDULE

PG&E provided a proposed schedule in its Application, with significant dates including a Proposed Decision issued by September 2017. Because all three IOUs submitted TE applications, ORA recommends staggering the schedules to allow for effective and efficient review of each application. ORA therefore proposes an alternative schedule as set forth below. For the Commission's convenience, ORA has included its proposed schedule for each of the three IOUs to better demonstrate its staggered schedule.

Procedural Event	PG&E Proposed Date	SCE Proposed Date	SDG&E Proposed Date	ORA Proposed Date (PG&E)	ORA Proposed Date (SCE)	ORA Proposed Date (SDG&E)
Application Filed	1/20/2017	1/20/2017	1/20/2017	1/20/2017	1/20/2017	1/20/2017
Protests Due	2/20/2017	30 days from notice of filing	2/20/2017	3/6/2017	3/6/2017	3/6/2017
Reply to Protests	3/2/2017	10 days from filing of protest	3/2/2017	3/13/2017	3/13/2017	3/13/2017
Prehearing Conference	3/9/2017	3/10/2017	3/10/2017	3/16/2017	3/16/2017	3/16/2017
Public Participation Hearing	N/A*	N/A*	N/A*	(April 2017)	(April 2017)	(April 2017)
Scoping Memo	3/23/2017		3/24/2017	(April 2017)	(April 2017)	(April 2017)
Intervenor Testimony	5/5/2017	4/21/2017		see below	see below	see below
Rebuttal Testimony	6/5/2017	6/2/2017				
Evidentiary Hearings	June 19-22, 2017					
Concurrent Opening Briefs	6/29/2017					
Concurrent Reply Briefs	7/20/2017					
Proposed Decision	9/8/2017					
Final Decision	Oct. 2017					
Phase 1 - Intervenor Testimony				(June 1, 2017)	(May 3, 2017)	(June 13, 2017)
Phase 1 - Rebuttal Testimony				(June 15, 2017)	(May 18, 2017)	(June 27, 2017)
Phase 1 - Evidentiary Hearings				Beginning June 27, 2017	Beginning June 7,2017	Beginning July 13, 2017
Phase 1 - Concurrent Opening Briefs				(July 12, 2017)	(June 21, 2017)	(Aug. 2, 2017)
Phase 1 - Concurrent Reply Briefs				(July 28, 2017)	(July 7, 2017)	(Aug. 16, 2017)
Phase 1 - Proposed Decision		Q3 2017	Q3 2017	Q3 2017	Q3 2017	Q3 2017
Phase 1 - Comments on PD		20 days from PD		20 days from PD	20 days from PD	20 days from PD
Phase 1 - Reply Comments on Proposed Decision		5 days from filing of comments		5 days from filing of comments	5 days from filing of comments	5 days from filing of comments
Phase 1 - Final Decision		Aug. 2017		Q4 2017	Q4 2017	Q4 2017
Phase 2 - Intervenor Testimony			Q4 2017	(Sept. 27, 2017)	(Sept. 1, 2017)	(Oct. 6, 2017)
Phase 2 - Rebuttal Testimony			Q4 2017	(Oct. 18, 2017)	(Sept. 19, 2017)	(Oct. 24, 2017)
Phase 2 - Evidentiary Hearings		June 26-30, 2017	Q1 2018	Beginning Nov. 1, 2017	Beginning Oct. 10, 2017	Beginning Nov. 29, 2017
Phase 2 - Concurrent Opening Briefs		7/21/2017	Q1 2018	(Nov. 22, 2017)	(Nov. 3, 2017)	(Dec. 7, 2017)
Phase 2 - Concurrent Reply Briefs		8/11/2017	Q1 2018	(Dec. 13, 2017)	(Nov. 21, 2017)	(Dec. 21, 2017)
Phase 2 - Proposed Decision		Oct. 2017	Q2 2018	Q1 2018	Q1 2018	Q2 2018
Phase 2 - Comments on PD		20 days from PD		20 days from PD	20 days from PD	20 days from PD
Phase 2 - Reply Comments on PD		5 days from filing of comments		5 days from filing of comments	5 days from filing of comments	5 days from filing of comments
Phase 2 - Final Decision		Nov. 2017		Q1 2018	Q1 2018	Q2 2018

D. PUBLIC PARTICIPATION HEARINGS

PG&E's Application includes several proposed projects that target residential and commercial customers, and diverse transportation sectors, such as MD/HD vehicles, light-duty vehicles, and school buses. PG&E proposes to fund all projects with ratepayer

funds. The breadth of proposals included in PG&E's Application and its proposed use of ratepayer funds will have potential impacts on significant numbers of ratepayers.

Recently enacted SB 512, Ch. 808, Stats. 2016, adopted a new Section 1711 to the California Public Utilities Code, which states:

> Where feasible and appropriate, except for adjudication cases, before determining the scope of the proceeding, the commission shall seek the participation of those who are likely to be affected, including those who are likely to benefit from, and those who are potentially subject to, a decision in that proceeding. The commission shall demonstrate its efforts to comply with this section in the text of the initial scoping memo of the proceeding.[28]

Accordingly, affected ratepayers, "particularly those who might or might not participate in these programs," should be provided adequate opportunity to participate in this proceeding and to comment on PG&E's proposed projects that may impact them directly in terms of eligibility and/or in terms of their rates. ORA, therefore, requests that PPHs be held in PG&E's service territory prior to the issuance of the scoping memo. ORA suggests that the details of how to comply with §1711(a) be discussed at the PHC. Additional PPHs may also be useful after the scoping memo but prior to submission of intervenor testimony and any applicant rebuttal testimony. These PPHs, if held, should be scheduled sufficiently before testimony is due to allow parties adequate time to incorporate any public comment into their testimony.

VI. CONCLUSION

ORA recommends that:

1. The scope of this proceeding includes, but not be limited to, the issues identified in this protest;

2. The Commission establish a reasonable schedule for this proceeding that includes adequate time for discovery, testimony preparation, and evidentiary hearings on the reasonableness and cost of proposed projects; and

[28] SB 512 (Hill, 2016), Ch. 808, Stats. 2016; Pub. Util. Code § 1711(a).

3. This proceeding be categorized as ratesetting.

Respectfully submitted,

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