

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Application of San Diego Gas & Electric
Company (U902M) for Review of its
Safety Model Assessment Proceeding
Pursuant to Decision 14-12-025.

Application 15-05-002
(Filed May 1, 2015)

And Related Matters.

Application 15-05-003
Application 15-05-004
Application 15-05-005

**COMMENTS OF THE OFFICE OF RATEPAYER ADVOCATES
ON THE SAFETY AND ENFORCEMENT DIVISION'S STAFF REPORT
ON THE FEBRUARY 15, 2017 WORKSHOP 2**

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April 25, 2017

I. INTRODUCTION

On February 15, 2017, in accordance with the December 13, 2016 Scoping Ruling, Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company, and San Diego Gas & Electric Company (together, “the Joint Utilities”) presented an alternative safety risk methodology to the Joint Intervenor Approach (JIA) called the Joint Utility Approach (JUA). On April 3, 2017, the Risk Assessment and Advisory Section of the Commission’s Safety and Enforcement Division (SED), submitted a report entitled, “*Staff Report on Workshop 2 (February 15, 2017) in Phase 2 of S-MAP Proceeding A.15-05-002, et al.*” to summarize that workshop. The Office of Ratepayer Advocates (ORA) submits these Comments pursuant to the April 4, 2017 *Administrative Law Judge’s Ruling Providing Procedural Guidance, Entering Phase Two S-Map Workshop #2 Staff Summary Into the Record, and Seeking Comments*.

II. DISCUSSION

A. ORA Shares the View That the Best Methodology Should be Selected by the Commission

ORA commends the Joint Utilities’ efforts to incorporate the lessons learned from the workshops on the JIA methodology. ORA agrees with the statements of The Utility Reform Network (TURN) and the Energy Producers and Users Coalition/Indicated Shippers (EPUC/IS) that the methodology that is ultimately selected by the Commission and used by the utilities should be a methodology that is transparent, repeatable, and based on quantifiable data where applicable, whether that methodology is the current or future iterations of the JIA or JUA, or some hybrid methodology yet to be developed.¹ Additionally, that methodology must be applicable to other attributes (e.g. system reliability, cost, etc.) beyond safety.

¹ See April 3, 2017 SED Report, p 7.

B. ORA Agrees That the Weighting Assigned to the Attributes Used in Any Methodology Must Be Uniform Across All Utilities

ORA commends the Joint Utilities' efforts to use a uniform set of metrics in the JUA, specifically in providing uniform safety risk scores and risk spend efficiencies.² However, ORA shares the concerns of other parties that if the different utilities each have a different set of weights assigned to their respective attributes, then risk scores from one utility would be invalid for comparison with other utilities.³ ORA supports the view that all attributes and their associated weights should be common across all utilities.⁴

Additionally, ORA recommends that the Commission consider establishing attributes and their associated weights through a regulatory process. ORA suggests that attributes and weights be developed and approved through a regulatory process to ensure transparency and that the utilities' priorities reflect the Commission's in regulating system safety, reliability, and cost.

III. CONCLUSION

ORA appreciates the opportunity to provide these comments and looks forward to future participation in this proceeding.

Respectfully submitted,

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² See April 3, 2017 SED Report, p 6.

³ See April 3, 2017 SED Report, pp 6-7.

⁴ See April 3, 2017 SED Report, pp 6-7.