

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

Order Instituting Rulemaking Regarding Policies,  
Procedures and Incentives for Distributed  
Generation and Distributed Energy Resources.

Rulemaking 04-03-017  
(Filed March 16, 2004)

**ASSIGNED COMMISSIONER AND ADMINISTRATIVE  
LAW JUDGE'S RULING AND SCOPING MEMO**

This Scoping Memo sets forth the scope, process, and schedule for this proceeding. This Scoping Memo and Ruling follows a prehearing conference before Administrative Law Judge (ALJ) Malcolm held on June 28, 2004, at which the parties discussed the schedule in this proceeding and the potential need for hearings.

**I. Proceeding Issues**

The assigned ALJ described several general issue areas for the Commission's consideration in this proceeding:

**A. Self-Generation Incentive Program (SGIP)**

The SGIP, originally authorized by Assembly Bill (AB) 970, provides incentives for the installation of certain types of distributed generation (DG) that meets all or a portion of a customer's energy needs. AB 1685 extends the incentive program through the end of 2007 and adopts air emissions and efficiency standards for projects to be eligible for rebates. The eligibility standards take effect January 1, 2005. Since the prehearing conference on June 28, the assigned ALJ issued a ruling seeking comments on an attached

report drafted by the Commission's Energy Division.<sup>1</sup> The report recommends several changes to the SGIP, consistent with AB 1685 and in response to a previous evaluation of the program in Rulemaking (R.) 98-07-037. The report also addresses the issues raised in a motion filed in this proceeding on March 26, 2004 by the California Solar Energy Industries Association. The Commission intends to issue an order resolving the issues raised by the Energy Division's report before the end of 2004.

**B. Rule 21 Interconnection Standards.**

As described in the order opening this investigation, the California Energy Commission (CEC) and the Rule 21 Working Group plan to provide policy guidance in the area of interconnection issues. On April 21, 2004, the CEC opened its own investigation which will inform our collaborative effort to explore revisions to the current interconnection rules and develop policy guidance to address outstanding technical issues. Consistent with CEC staff recommendations, this rulemaking will consider interconnection costs, meter ownership, the dispute resolution process, net metering for hybrid system, and recommendations for addressing interconnection rules for network systems. The CEC staff advises that the CEC expects to issue a scoping memo in the CEC's investigation (04-DISTGEN-1 and 03-IEP-1) by the second week of August 2004.

To ensure that parties in this proceeding are fully informed of issues relevant to the CEC's proceeding, the CEC will use the same service list for public communication. Similarly, parties should serve the parties in this proceeding and the CEC's related docket.

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<sup>1</sup> Comments were filed by 17 parties on July 23, 2004.

**C. Cost-Benefit Methodologies.**

A critical issue in this proceeding, and one required for the Commission's consideration by Public Utilities Code Section 353.9, is that of developing a cost-benefit methodology. The purposes of this analytical tool are to compare resource options as part of utility resource planning, to determine how to choose among candidate DG technologies and projects for incentives and other funding, to assess project alternatives as part of utility power procurement, and to assist in measuring and evaluating the effectiveness of DG incentive programs. There may be other uses for a rigorous cost-benefit test in the future.

**1. Relationship to R.04-04-025**

The Commission is considering the matter of avoided costs, typically used to calculate the benefits in cost-benefit tests, in a more general sense in a separate docket, R.04-04-025. In that rulemaking, the Commission intends to adopt avoided costs that are consistent, to the extent appropriate, across technologies, programs, and policies. For example, they may be applied to energy efficiency programs, demand response programs, utility resource planning and procurement, energy supply contracts with qualifying facilities, and DG. R.04-03-017 stated the Commission would not await the outcome of a final order in R.04-04-025 before examining the more specific cost-benefit issues in this proceeding. Indeed, that more general effort underway in R.04-04-025 may require a more precise identification of avoided cost specifications by issue area. For that reason, work in this proceeding may resolve cost-benefit issues that

relate specifically to DG, and utilize the more generic avoided costs adopted in R.04-04-025.<sup>2</sup>

The likely manner in which work can proceed in both proceedings in parallel is as follows. In R.04-04-025 the Commission is considering how to determine input values for various avoided cost components. In this proceeding, we will consider the methodology for evaluating DG cost effectiveness, as well as the factors that will be used in such a methodology. R.04-04-025 should help provide us with the values to plug into equations developed in this proceeding. There may be some overlap and interplay between these activities, and we will coordinate closely to minimize duplication of effort or relitigation of issues in each proceeding.

## **2. Proposed DG Costs and Benefits.**

Staff from the Energy Division and the CEC conducted a workshop on May 5, 2004 which focused on identifying costs, benefits, and potential methodologies to quantify them. The workshop looked at several CEC-funded research projects aimed at developing ways to quantify these values from the perspective of various interests. Parties filed comments in response to the workshop and to the DG Order Instituting Rulemaking (OIR) recommending a number of DG cost and benefit factors for possible inclusion in a cost-benefit methodology. Although the parties do not agree on the appropriate cost and benefits elements for DG, the following lists those the parties have identified.

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<sup>2</sup> A July 19, 2003 ALJ Ruling in R.04-04-025 seeks comment from parties on any changes needed to apply the E3 avoided cost methodology to DG, among other resource categories. Comments and reply comments are due July 30th and August 13th, respectively.

**Costs:**

1. Costs to mitigate distribution system impacts (e.g., interconnection study costs, upgrade costs)
2. Utility revenue loss due to displaced usage of transmission and distribution facilities.
3. Utility/DWR revenue loss due to avoided commodity purchase – energy, capacity, bonds
4. Costs for enhanced reliability
5. Improved stability and power quality
6. Ancillary services/VAR support
7. Utility loss of revenue due to displaced thermal load, cost of ratepayer incentives for CHP generators
8. Increased responsiveness to load growth
9. Environmental controls
  - a. NOx emissions
  - b. CO2 emissions
  - c. Water pollution
  - d. Soil pollution
  - e. Power plant siting
  - f. Environmental equity
  - g. Noise abatement
10. Lower market prices for power, payments for installed capacity.
11. Increased employment and taxes
12. Costs for increased national security
13. Conservation of natural gas
14. Building code or local permitting requirements
15. Loss of utility plant investment revenue
16. Administrative, maintenance, installation costs
17. Emissions offsets
18. Special metering
19. Cost of tax and other incentives

**Benefits:**

1. Reduction or deferral in distribution and transmission capital investment
2. Reduced T&D line losses
3. Avoided commodity costs – energy & capacity
4. Enhanced reliability
5. Improved stability and power quality
6. Provision of Ancillary Services/VAR support
7. Environmental Impacts
  - a. Avoided NOx emissions
  - b. Avoided CO2 emissions
  - c. Avoided water pollution
  - d. Avoided soil pollution
  - e. Reduced power plant siting impacts compared to large central station power plants
  - f. Promotion of environmental equity compared to large central station power plants
8. Thermal load provided in Combined Heat & Power applications
9. Increased responsiveness to load growth – due to its modularity and scale, DG is well suited to increase capacity in a manner that closely matches load growth.
10. Lower market prices for power – “[DG] may convey positive externalities or benefits to all end users that go beyond what the customer- and distributed-generators realize in reduced bills or power sales. The Commission should evaluate the monetary value of these benefits and potentially devise a program of payments for installed capacity.”<sup>3</sup>
11. Increased employment in California and tax revenue
12. National security benefits/reduced security risk to grid
13. Conservation of natural gas
14. Avoided utility cost of capital/finance costs

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<sup>3</sup> Comments by City and County of San Francisco, May 17, 2004, p.9.

15. Avoided utility administrative, maintenance, insurance, and installation costs
16. Tax and other incentives

Some costs and benefits will be easier to quantify than others. Parties comment that DG costs and benefits vary based on technology, fuel input, application, size, location, and frequency and duration of the facility's use. Additionally, the value of DG depends on the perspective of the viewer, i.e., a customer who is deciding whether to install DG, a utility deciding from among energy resource options, a utility ratepayer, or the DG merchant. There is also a societal perspective, one the Commission has historically considered in weighing the benefits of energy efficiency programs. In Decision (D.) 03-02-068, the Commission found that DG can serve different purposes, such as onsite generation or as a distribution system alternative. The value of a DG project may depend on how the power is used, technology, fuel and application. For this reason, it may be appropriate to develop different methodologies that reflect various perspectives and types of DG.

Many parties described methodological perspectives that are used in the *California Standard Practice Manual: Economic Analysis of Demand-Side Programs and Projects*. As some parties suggest, this manual is a useful starting point for developing cost-benefit methodologies for DG. Similarly, the framework described for avoided cost calculations in the E3 Report could be applied to cost-benefit methodologies for DG.

Parties should use these reference documents when preparing specific cost-benefit methodology proposals for testimony.<sup>4</sup> In developing testimony, the parties should identify the relevant perspectives for purposes of cost-benefit testing and identify the appropriate costs and benefits applicable to each perspective. Additionally, parties should propose methods to quantify the applicable cost and benefit factors, identify specific sources of data that can be used as inputs, and propose equations/calculations defining the test. Parties are encouraged to present illustrative examples showing the steps involved in their proposed cost-benefit test methodology(ies).

In D.03-02-068, the Commission adopted a set of criteria DG must meet to provide distribution system benefits and allow the utility to defer upgrades or additions to distribution facilities. The DG unit must be installed and operational in the right place, at the right time, and must provide the capacity size required to meet the utility's needs. Finally, the unit must provide physical assurance to ensure a real load reduction. This proceeding will not consider modifications to these criteria at this time, but parties should include DG used for this purpose when developing a cost methodology(ies).

### **3. Data Needed to Quantify Costs and Benefits.**

In order to assess and monitor the viability or cost-effectiveness of a project or program element (ie, financial or rate incentives), parties will need utility and DG project data to calculate costs and benefits. The utilities control data and analysis related to system planning, line losses, interconnection, and net

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<sup>4</sup> Attachment B provides additional resources in the form of a list of policy, research, and decision documents that may assist parties in developing a cost-benefit test.

metering. Public access to this information may compromise confidentiality. On the other hand, without the information, the development of quantitative methodologies is impossible.

This ruling directs San Diego Gas and Electric, Southern California Edison, and Pacific Gas and Electric Company to prepare specific proposals to make all relevant information and data available to those parties in order to assess the costs and benefits of a particular DG project or program element. If the utilities consider certain data or information confidential, they should propose ways to mitigate these concerns. The utilities should address these issues in testimony.

Although some parties indicate that provision of DG operational data should not be a condition of participating in a cost-benefit test or DG program, parties should address how to accommodate a probable need for some level of data disclosure, which may be necessary to evaluate program or project success.

#### **4. Program Monitoring, Measurement and Evaluation.**

As some parties observe, the cost-benefit methodologies the Commission initially adopts may require fine-tuning as the market evolves and parties gain a better understanding of project costs and benefits. Similarly, some parties suggest the Commission order routine evaluations of the effectiveness of the DG program and the cost-benefit methods adopted, which could serve as a foundation to consider ways to modify program goals or program elements. This may be a logical component of the evolving DG program and one with which the Commission has considerable experience in its implementation of energy efficiency. The Commission will need to determine in this proceeding how to assess DG benefits after the fact and whether a project complements utility procurement and provides a basis for participation in DG incentives and

other funding. Parties' testimony should include proposals for achieving these objectives.

**D. DG Reporting Requirements.**

In comments to the OIR and at the prehearing conference, parties questioned whether this proceeding might streamline or consolidate the multiple utility reports filed with the Commission each year, such as those providing data on interconnections, net metering installations, cost responsibility surcharge exemptions, and the SGIP. To minimize the number of reports and assure their usefulness, Commission staff will conduct a short workshop on this issue in September.

**E. Other Resource-Related Issues.**

The OIR issued in this proceeding identifies several issues related to resource planning, such as how DG might be incorporated into utility procurement portfolios, net metering, resource reliability, and distribution system planning. The Commission will consider how to address these broader issues after the hearings on cost-benefit methods and may modify this scoping memo accordingly.

**II. Procedural Schedule**

The procedural schedule in this proceeding at this time is as follows:

Issuance of Energy Division report on SGIP Issues.	July 9, 2004
Filing of responses on proposed SGIP report.	July 23, 2004
Proposed decision on SGIP report for 30 day comment and publication period.	August 2004
Workshop on Reports	September 2004
Opening Testimony on Cost-benefit models	October 4, 2004
Reply Testimony on Cost-benefit models	October 20, 2004
Hearings	November 17-19
CEC recommendations to CPUC regarding interconnection and Rule 21 issues.	January 2005
Briefing Schedule (Projected Submission Date at Conclusion of Briefing Schedule)	Dates to be Determined
Proposed Decision on Cost Benefit models, interconnection issues and reports	February 2005

### III. Category of Proceeding

The Commission preliminarily determined that this is a quasi-legislative proceeding for which hearings may be required. No party has expressed any objection to this determination. This ruling confirms that the proceeding is quasi-legislative for which hearings are likely to be conducted.

### IV. Presiding Officer

President Michael Peevey is the assigned Commissioner responsible for preparing the proposed decision in this quasi-legislative proceeding at the conclusion of hearings. President Peevey plans to attend some of these evidentiary hearings; however, it is anticipated that testimony will focus on technical cost-benefit issues rather than questions of law, policy and discretion,

and that assigned ALJ Kim Malcolm will preside over the evidentiary hearings and thereafter assist the assigned commissioner in the preparation of the proposed decision. (Pub. Util. Code § 1701.4; Rule 8(e)(2)).

#### **V. Service List**

The service list for this proceeding is located at the Commission's Website ([www.cpuc.ca.gov](http://www.cpuc.ca.gov)). Those who are not already parties, but who wish to participate in this proceeding should send an electronic message to ALJ Malcolm at ([kim@cpuc.ca.gov](mailto:kim@cpuc.ca.gov)). More information about the service list is included in R.04-03-017.

The Commission will follow the electronic service protocols attached to this ruling.

#### **VI. Procedure for Requesting Final Oral Argument**

Rule 8(d) provides that in a quasi-legislative proceeding such as this one, any party is entitled to present a final oral argument before a quorum of the Commission. A party who wishes to present a final oral argument on any issues relating to the SGIP program should so request no later than August 15, 2004 by sending an electronic message to all parties, a signed hard copy of which shall be sent to the assigned ALJ. A party who wishes to present a final oral argument on issues relating to reports, cost-benefit methodologies or interconnection standards should do so no later than December 1, 2004 by sending an electronic message to all parties, a signed hard copy of which shall be sent to the assigned ALJ.

#### **VII. Rules Governing Ex Parte Communications**

This proceeding is subject to Pub. Util. Code § 1701.3, which provides that parties are not restricted from engaging in ex parte communications with decision-makers in quasi-legislative proceedings.

**IT IS RULED** that:

1. The scope of this proceeding is set forth in this ruling.
2. The schedule for this proceeding is set forth in this ruling. The assigned Administrative Law Judge may revise this schedule as necessary for the fair and efficient management of the proceeding.
3. This proceeding is categorized as quasi-legislative and evidentiary hearings may be necessary.

Dated August 6, 2004, at San Francisco, California.

/s/ MICHAEL PEEVEY

Michael Peevey  
Assigned Commissioner

/S/ KIM MALCOLM by LTC

Kim Malcolm  
Administrative Law Judge

## **ATTACHMENT A**

### **SERVICE LIST AND ELECTRONIC SERVICE PROTOCOLS**

The service list for this proceeding is located at the Commission's website ([www.cpuc.ca.gov](http://www.cpuc.ca.gov)). Those who are not already parties, but who wish to participate in this proceeding as full parties may make a written motion to intervene or submit an appearance form at a hearing. Those who wish to be included as parties on the service list may alternatively send their requests in an e-mail note to ALJ Malcolm ([kim@cpuc.ca.gov](mailto:kim@cpuc.ca.gov)).

To reduce the burden of service in this proceeding, the Commission will use electronic service, to the extent possible using the electronic service protocols provided in this ruling.

All individuals on the service list should provide electronic mail addresses. The Commission and other parties will assume a party consents to electronic service unless the party indicates otherwise.

#### **Notice of Availability**

If a document, including attachments, exceeds 75 pages, parties may serve a Notice of Availability in lieu of all or part of the document, in accordance with Rule 2.3(c) of the Commission's Rules of Practice and Procedure.

#### **Filing of Documents**

These electronic service protocols govern service of documents only, and do not change the rules regarding the tendering of documents for filing. Documents for filing must be tendered in paper form, as described in Rule 2, et seq., of the Commission's Rules of Practice and Procedure.

## **Electronic Service Standards**

As an aid to review of documents served electronically, appearances should follow these procedures:

1. Merge into a single electronic file the entire document to be served (e.g., title page, table of contents, text, attachments, service list).
2. Attach the document file to an electronic note.
3. In the subject line of the note, identify the proceeding number; the party sending the document; and the abbreviated title of the document.
4. Within the body of the note, identify the word processing program used to create the document if anything other than Microsoft Word. (Commission experience is that most recipients can readily open documents sent in Microsoft Word 6.0/95.)

If the electronic mail is returned to the sender, or the recipient informs the sender of an inability to open the document, the sender shall immediately arrange for alternative service (regular U.S. mail shall be the default, unless another means—such as overnight delivery—is mutually agreed upon).

Parties should exercise good judgment regarding electronic mail service, and moderate the burden of paper management for recipients. For example, if a particularly complex matrix or cost-effectiveness study with complex tables is an attachment within a document mailed electronically, and it can be reasonably foreseen that most parties will have difficulty printing the matrix or tables, the sender should also serve paper copies by U.S. mail, and indicate that in the electronic note.

## **Obtaining Up-to-Date Electronic Mail Addresses**

The current service lists for active proceedings are available on the Commission's web page, [www.cpuc.ca.gov](http://www.cpuc.ca.gov). To obtain an up-to-date service list of electronic mail addresses:

- On the “Legal Documents” bar choose “Service Lists.”
- Scroll through the “Index of Service Lists” to the number for this proceeding (or click “edit,” “find,” type in R0010002, and click “find next”).
- To view and copy the electronic addresses for a service list, download the comma-delimited file, and copy the column containing the electronic addresses.

The Commission’s Process Office periodically updates service lists to correct errors or to make changes at the request of parties and non-parties on the list. Parties should copy the current service list from the web page (or obtain paper copy from the Process Office) before serving a document.

### **Pagination Discrepancies in Documents Served Electronically**

Differences among word-processing software can cause pagination differences between documents served electronically and print outs of the original. (If documents are served electronically in PDF format, these differences do not occur, although PDF files can be especially difficult to print out.) For the purposes of reference and/or citation (e.g., at the Final Oral Argument, if held), parties should use the pagination found in the original document.

**(END OF ATTACHMENT A)**

## **ATTACHMENT B**

### **RESOURCES**

The following is a list of policy, research and decision documents that may assist parties with developing a cost-benefit test. The inventory includes Commission and CEC policy decisions and reports, Public Interest Energy Research reports, and other related documents.

These documents are available on the agencies' respective websites:

CEC	<a href="http://www.energy.ca.gov">www.energy.ca.gov</a>
CPUC	<a href="http://www.cpuc.ca.gov">www.cpuc.ca.gov</a>

### **Joint Agency Report**

Energy Action Plan - May 2003

### **California Public Utilities Commission**

- R.04-04-026      Implement California's Renewable Portfolio Standard
- R.04-04-025      Promote Consistency for Application of Avoided Costs
- R.04-04-003      Promote Coordination and Integration in IOU Resource Planning (Resource Adequacy)
- R.04-03-017      Examine Policies, Procedures, and Incentives for DG and DER
- R.02-01-011      Implement Suspension of Direct Access
  - D.03-04-030 Cost Responsibility Surcharge Mechanisms for Departing Load
- R. 01-10-024      Establish Policies and Cost Recovery Mechanisms for Generation Procurement
  - D.04-01-050 Interim Opinion
  - D.02-10-062 Interim Opinion

- D.03-02-068 Opinion: OIR into Distributed Generation, March 2003
- D.03-04-060 Final Opinion: OIR into Distributed Generation, April 2003
- D.03-04-030 Opinion on Cost Responsibility Surcharge Mechanisms for Customer Generation Departing Load, April 2003
- D. 01-10-062 Interim Opinion: OIR to Establish Policies and Cost Recovery Mechanisms for Generation Procurement and Renewable Resource Development, October 2002
- D. 01-03-073 Interim Opinion: Implementation of Public Utilities Code Section 399.15(b), Paragraphs 4-7; Load Control and Distributed Generation Initiatives, March 2001
- D. 00-12-037 Decision Adopting Interconnection Standards, December 2000

### **California Energy Commission**

- CEC-1 Distributed Generation Strategic Plan - June 2002
- CEC-2 Electricity and Natural Gas Assessment Report - December 2003
- CEC-3 Energy Action Plan - May 2003
- CEC-4 Integrated Energy Policy Report - December 2003
- CEC-5 Integrated Energy Policy Report Subsidiary Volume: Electricity and Natural Gas Assessment Report - December 2003
- CEC-6 Integrated Energy Policy Report Subsidiary Volume: Public Interest Energy Strategies Report - December 2003
- CEC-7 DG Working Group: DG Definition and Cost-Benefit Analysis – Policy Inventory, July 9, 2004, publication number 500-04- 049

### **Public Interest Energy Research**

- R&D -1 SOW: Energy and Environmental Economics Inc, Electrotek Concepts Inc, San Francisco Co-op DER
- R&D -2 SOW: New Power Technologies
- R&D -3 Installation, Operation and Maintenance Costs for DG; EPRI, February 2003
- R&D -4 Innovative Ratemaking Treatment for DG – Statement of Work (Synapse Energy Economics), March 2004
- R&D -5 SOW: Commonwealth Program under PIER Renewables

- R&D -6 San Francisco as a Distributed Energy Resource 'Test Bed' Site, M-Cubed, Electrotek Concepts, Energy & Env. Economics, PowerPoint Presentation.
- R&D -7 Final DG Scenario Development Report for Air Quality Impacts of DG, by University of California, Irvine; September 24, 2003.
- R&D -8 Distributed Utility Integration Test, PIER, 2 page note
- R&D -9 Advanced Control Systems for the Grid' and DER, CADER International Symposium, January 2004.
- R&D -10 A framework for developing collaborative DER Programs: Working Tools for Stakeholders; Draft Report, E21 DER Partnership, December 2003.
- R&D -11 Air Pollution Emissions Impact Associated with Economic Market Potential of DG in California, DUA, June 2000
- R&D -12 Commonwealth Energy Biogas/PV Mini-Grid Renewable Resource Program, Project Prioritization, CH2M Hill and Itron, August 2003.
- R&D -13 Commonwealth Energy Biogas/PV Minigrid Renewables Resources Program, by Itron Inc., July 2003.
- R&D -14 Commonwealth Energy Biogas/PV Mini-Grid Renewables Resources Program, by Itron, Draft Report, August 2003
- R&D -15 DER Research Assessment Report, Addendum: 2003 Update, NCI
- R&D -16 Distributed Energy Resources with Combined Heat and Power Applications, LBNL, June 2003
- R&D -17 Distributed Power Integration Needs Assessment and Testing, DUIT White Paper, April 2001, Distributed Utility Associates
- R&D -18 Optimal Portfolio Methodology for Assessing DER Benefits for the Energynet, CADER International Symposium, January 2004.
- R&D -19 Pre-demonstration Summary Report, task 3.2.5: Micro Scale Technology Demonstration- Project Development and Engineering, Nov 7, 2003
- R&D -20 San Francisco PUC/Hetch Hetchy Baseline Data Report for DG Assessment Project, Draft Document, August 2003.
- R&D -21 SOW: Distributed Utility Integration Testing
- R&D -22 SOW: San Francisco PUC/Hetch Hetchy, April 5, 2004

R.04-03-017 MP1/KLM/hl2

R&D -23 Relative Merits of Distributed vs. Central PV Generation, Navigant Consulting and Kema-Xenergy, March 2004

(END OF APPENDIX B)

**CERTIFICATE OF SERVICE**

I certify that I have by mail this day served a true copy of the original attached Assigned Commissioner and Administrative Law Judge's Ruling and Scoping Memo on all parties of record in this proceeding or their attorneys of record.

Dated August 6, 2004, at San Francisco, California.

/s/ ELIZABETH LEWIS  
Elizabeth Lewis

**N O T I C E**

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

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The Commission's policy is to schedule hearings (meetings, workshops, etc.) in locations that are accessible to people with disabilities. To verify that a particular location is accessible, call: Calendar Clerk (415) 703-1203.

If specialized accommodations for the disabled are needed, e.g., sign language interpreters, those making the arrangements must call the Public Advisor at (415) 703-2074, TTY 1-866-836-7825 or (415) 703-5282 at least three working days in advance of the event.