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

Petition of the City and County of San Francisco
for a Valuation of Certain Pacific Gas & Electric
Company Property Pursuant to Public Utilities
Code Sections 1401-1421.

P. 21-07-_____

**PETITION OF THE CITY AND COUNTY OF SAN FRANCISCO FOR A
VALUATION OF CERTAIN PACIFIC GAS & ELECTRIC COMPANY PROPERTY
PURSUANT TO PUBLIC UTILITIES CODE SECTION 1401-1421**

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Petitioner, the City and County of San Francisco (“San Francisco” or “City”), pursuant to Public Utilities Code sections 1401-1421, petitions the California Public Utilities Commission (“Commission”) for a determination of just compensation for acquisition of certain public utility property of Pacific Gas & Electric Company (“PG&E”) within and adjoining the boundaries of San Francisco.

I. INTRODUCTION

1. The City seeks an order from the Commission valuing certain public utility property of PG&E to provide electric service within San Francisco.
2. The City has the right to petition the Commission to value the PG&E assets the City intends to acquire and to fix the just compensation to be paid for those assets.
3. The Mayor of San Francisco (“Mayor”) and its Board of Supervisors (“Board”) have expressed the City’s intent to acquire certain PG&E property. The Mayor and Board intend to acquire such property in a manner that will benefit the City and all electric customers within San Francisco, not harm remaining PG&E ratepayers, and not detract from the City’s ability to fund other municipal obligations including protecting the health, safety, and welfare of its citizens.
4. San Francisco’s intent to acquire PG&E assets arises from several circumstances discussed below, including the City’s long-standing goal of providing electric service to all customers in San Francisco, as authorized by federal law in 1913; PG&E’s failure to provide adequate service to the City’s municipal electric utility under relevant Federal Energy Regulatory Commission (“FERC”) tariffs; PG&E’s general failure to provide reasonable, safe, and cost-effective service to its ratepayers, including those in San Francisco; and the City’s commitment to making changes that address climate change, including changes that require the City to own its electric grid.
5. In short, based on its experience in the electric business and working with PG&E for over a century, along with the intensive work it performed over the last two years, the City is confident it can acquire PG&E’s facilities and provide safe, reliable, and cost-effective electric distribution service to all San Francisco electric customers.

6. Acquisition of PG&E's property serving San Francisco will provide numerous benefits, including enabling the City to: (i) provide affordable, safe, and reliable service, and take meaningful environmental and climate action; and (ii) improve its programs to ensure workforce development and equity.
7. Electric service provided by the City would also be more transparent and accountable to customers. Bi-weekly meetings of the San Francisco Public Utilities Commission ("SFPUC") are open to the public. Ratesetting decisions are governed by the City's Charter, which requires independent review, and are subject to rejection by the Board. SFPUC Commissioners are appointed by the Mayor, subject to approval by the Board. Ultimately, the Mayor and Board are directly accountable to the voters.
8. Recently, the City made two formal offers to PG&E to purchase the assets the City would need to serve San Francisco customers. The City developed those offers with the advice of experts using standard methods of asset valuation. In its responses, PG&E claimed that the City's offer price was far below the value of the assets.
9. The City seeks to fix the value of the targeted assets using the Commission's unique expertise under authority granted to the Commission by state law. The City hopes that establishing a definitive value will facilitate negotiation of an acquisition transaction with PG&E.

II. COMMISSION JURISDICTION, AUTHORITY, AND PROCEDURES

10. As a "political subdivision" of the State of California, the City has the right to petition the Commission to value the PG&E assets the City intends to acquire and to fix the just compensation to be paid for those assets.¹
11. Pursuant to Public Utilities Code section 1404, and as set forth in greater detail below, this Petition contains: (a) the name of the political subdivision appearing as petitioner; (b) a description of the lands, property, and rights that the political subdivision intends to acquire (Section V, below); and (c) the names and addresses of all owners and claimants thereof, including each trustee and mortgagee under each deed of trust and mortgage, if known, or a statement that they are unknown (Section III, below).

¹ Pub. Util. Code §§ 1401-1403.

12. Subsequent to the filing of this Petition, the Commission must issue an order to show cause to PG&E that: (a) specifies the nature of the proceeding; (b) contains a general description of the lands, property, and rights San Francisco seeks to acquire; and (c) directs PG&E to appear and show cause why the Commission should not proceed to hear this Petition and to fix the just compensation to be paid for certain of PG&E's lands, property, and rights.²
13. The Commission's service of the order to show cause grants the Commission "full and complete jurisdiction" over PG&E and its property for purposes of fixing just compensation pursuant to Public Utilities Code section 1401 et seq.³
14. California courts have repeatedly affirmed the Commission's jurisdiction under and the constitutionality of Public Utilities Code section 1401 et seq. and its predecessor statutes.⁴
15. The Commission has exercised its jurisdiction under Public Utilities Code section 1401 et seq. in numerous cases.⁵
16. Public Utilities Code section 1401 et seq. contemplates acquisition of public utility property by a political subdivision "under eminent domain proceedings, or otherwise."⁶
17. The filing of this Petition does not initiate an eminent domain proceeding by the City and is separate and independent from an eminent domain proceeding.⁷
18. The Commission's proceeding in this case is "alternative and cumulative and not exclusive"⁸ to any other legal process available to political subdivisions to acquire utility assets, and is "not

² Pub. Util. Code §§ 1405, 1408.

³ Pub. Util. Code § 1408.

⁴ *East Bay Mun. Util. Dist. v. Railroad Comm'n of Cal.*, 194 Cal. 603 (1924); *Marin Mun. Water Dist. v. Marin Water & Power Co.* ("Marin Mun. Water Dist."), 178 Cal. 308 (1918); *Jackson Water Works, Inc. v. Pub. Util. Comm'n of State of Cal.*, 793 F.2d 1090 (1986).

⁵ See, e.g., *Vandenberg Village Cmty. Servs. Dist.*, D.87-07-080, 25 CPUC 2d 20, 1987 WL 1498409; *City of Fresno* ("City of Fresno"), D.86-02-040, 20 CPUC 2d 502, 1986 WL 1300703, as modified by order after rehearing, D.87-09-085, 25 CPUC 2d 436, 1987 WL 1497652; *N. Marin Cnty. Water Dist.* ("N. Marin Cty."), D.84718, 78 CPUC 534, 1975 WL 36284; *City of Riverside* ("City of Riverside"), D.80480, 74 CPUC 193, 1972 WL 30110, as modified by D.80913, 74 CPUC 563, 1973 WL 31671; *Monterey Peninsula Mun. Water Dist.*, D.68136, 1964 WL 146509. More recently, the Commission has conducted proceedings requiring some similar valuation considerations under a parallel law, Government Code § 56131, that applies to acquisitions under the jurisdiction of a Local Agency Formation Commission.

⁶ Pub. Util. Code § 1403.

⁷ *Re City of Fontana* ("City of Fontana"), D.87-07-082, 25 CPUC 2d 67, 1987 WL 1497518, as modified by D.88-03-081, 27 CPUC 2d 591, 1988 WL 1663791.

⁸ Pub. Util. Code § 1421.

subordinate to or conditioned upon” other legal processes, including an eminent domain proceeding.⁹

III. PARTIES TO THIS PROCEEDING

19. Petitioner City and County of San Francisco is a municipal corporation, organized and existing under and by virtue of the laws of the State of California and the City’s Charter, and is a “political subdivision” of the State of California.¹⁰
20. The governance, management and control of Petitioner are now, and at all times relevant were, vested in its Mayor and Board. All actions by San Francisco referred to in this Petition were authorized by, and done under the direction of, the Mayor and Board.
21. Pacific Gas and Electric Company is a corporation organized and existing under the laws of the State of California, and is a public utility under Public Utilities Code section 216(a). PG&E provides electric service in San Francisco and other parts of the State. PG&E’s mailing address is 77 Beale Street, San Francisco, CA 94105.
22. Does 1 through 100 are fictitious names for entities or persons that claim, or may claim, certain rights and interests in the whole or in some part of the properties or rights San Francisco will seek to acquire from PG&E. The character and extent of such alleged claims, rights or interests are unknown to Petitioner at this time.

IV. FACTUAL BACKGROUND

A. San Francisco Has Been Providing Electric Service for Over 100 Years

23. The City owns and operates Hetch Hetchy Water and Power, an electric utility that is managed by the SFPUC. The SFPUC is responsible for the construction, management, operation, and use of all City properties, assets, and facilities used to provide utility services, including water, wastewater, and power.¹¹
24. The foundation for the City to provide its own electric service was laid in 1913 when Congress enacted the Raker Act.¹² The Raker Act granted San Francisco the right to develop a water and

⁹ *City of Fontana, supra*, D. 87-07-082, 25 CPUC2d 67.

¹⁰ Pub. Util. Code § 1402.

¹¹ S.F. Charter, Art. IV, § 4.112, Art. VIII B, § 8B.121.

¹² 63 Pub. L. No. 41, 38 Stat. 242 (1913).

power supply system on certain federal lands in the Hetch Hetchy Valley in Yosemite National Park and Stanislaus National Forest. In the Raker Act, Congress intended “to provide the people of San Francisco with the advantages of cheap power and City competition with private power companies such as Pacific Gas and Electric.”¹³

25. San Francisco has been generating electricity since 1918, when it began powering the construction of Hetch Hetchy water and power facilities in and around Yosemite. The City started using PG&E’s transmission and distribution lines to serve its customers in San Francisco in 1945, pursuant to various agreements with PG&E.
26. San Francisco owns and operates 396 megawatts of hydroelectric and renewable generation facilities¹⁴ and through Hetch Hetchy Power, the City’s municipal utility, supplies more than 1,000 gigawatt hours (“GWh”) of GHG-free energy annually to more than 4,600 retail accounts in and around San Francisco.¹⁵
27. Today, the City purchases transmission service from PG&E under the CAISO tariff and distribution service under PG&E’s Wholesale Distribution Tariff (“Tariff”) on file with the FERC.
28. Although the City owns and operates transmission and distribution facilities within and outside of San Francisco, it lacks a comprehensive distribution system to serve its customers. The City uses the Tariff to serve almost all of its customers in San Francisco—largely City agencies and related public entities, City properties and tenants on those properties, and entities providing services on behalf of or in coordination with the City.
29. In addition, San Francisco uses the Tariff to serve other types of customers including the Transbay Transit Center and the new developments at Hunter’s Point. The City also serves or will soon serve other customers, including the developments at Treasure Island/Yerba Buena Island, Pier 70, and Mission Rock without using the Tariff.

¹³ *City & Cty. of S.F. v. United Airlines*, 616 F.2d 1063, 1068 (9th Cir. 1979).

¹⁴ The Hetch Hetchy Power System, available at: <<https://sfpuc.org/about-us/our-systems/hetch-hetchy-power-system>>.

¹⁵ San Francisco Public Utilities Commission Comprehensive Annual Financial Report for the Fiscal Years Ended June 30, 2020 and 2019, at 234, 243, available at: <<https://www.sfpuc.org/sites/default/files/about-us/policies-reports/Comprehensive%20Annual%20Financial%20Report%20FY2020%20SFPUC.pdf>>.

30. The City also operates a community choice aggregation program, CleanPowerSF, which provides approximately 3,100 GWh of electricity annually¹⁶ to over 380,000 accounts in San Francisco.¹⁷ CleanPowerSF supplies are at least 50% California Renewables Portfolio Standard (“RPS”) eligible renewables for its “Green” product and 100% California RPS-eligible renewables for its “SuperGreen” product.
31. Combined, the City’s Hetch Hetchy Power and CleanPowerSF provide power supply to meet approximately 75% of the electricity consumed in San Francisco and have an established track record of providing safe, reliable, affordable and sustainable electric service.
32. Generally, electric service provided by publicly-owned utilities is more affordable than service from investor-owned utilities. This is due to factors such as the absence of large executive bonuses, shareholders, and taxes.¹⁸
- B. PG&E’s Long-Standing Failure to Provide Reasonable Service to the City Can Only Be Remedied by San Francisco Acquiring PG&E’s Assets**
33. PG&E’s ongoing problems with providing safe and reliable gas and electric service throughout its service territory are well-known.
34. The Commission has acknowledged that PG&E’s recent history of safety performance “has ranged from dismal to abysmal.”¹⁹
35. While San Francisco has not experienced the devastation associated with catastrophic wildfires and other disasters caused by PG&E, over the years PG&E’s difficulty in maintaining a safe and reliable system has caused multiple incidents resulting in injuries and property damage within the City.²⁰

¹⁶ R.20-05-003, CleanPowerSF 2020 Integrated Resource Plan Compliance Filing (Public Version), at 7 (September 1, 2020), available at: <<https://sfpuc.sharefile.com/share/view/s61300b4056124fcda409799fd243d245>>.

¹⁷ San Francisco Public Utilities Commission Comprehensive Annual Financial Report for the Fiscal Years Ended June 30, 2020 and 2019, *supra*, at 234.

¹⁸ American Public Power Association, Public Power for Your Community (2016), at 20-21, available at: <<https://www.publicpower.org/municipalization>>.

¹⁹ D.20-05-053, 2020 WL 6060324, Decision Approving Reorganization Plan, at 16 (June 1, 2020).

²⁰ For a summary of such incidents see I.15-08-019, Opening Comments of City and County of San Francisco on Assigned Commissioner’s Scoping Memo and Ruling, at 4-6 (February 13, 2019).

36. PG&E customers in San Francisco, like PG&E's other customers, have also paid substantial costs resulting from PG&E's physical and financial disasters, including two bankruptcies in as many decades.
37. Since 1925, PG&E has imposed restrictions on the City's ability to meet the expectations of the Raker Act that it would serve electricity to all San Francisco customers.²¹ From 1945 to 2015, PG&E delivered City power under various bilateral agreements, but only to certain City customers.
38. Since 2015, the City has received service under PG&E's open access Tariff, subject to PG&E's continuing restrictions.²² San Francisco continues to be harmed by PG&E's failure to provide reasonable wholesale service to the City under the Tariff, which has delayed and disrupted important City services and imposed unnecessary costs.²³ In some cases, the City has had to turn over City projects entitled to Hetch Hetchy service to PG&E retail service, either temporarily or permanently, due to the extra requirements PG&E would impose on a project served by the City. This means these projects and customers pay higher rates and do not receive greenhouse-gas-free energy from Hetch Hetchy and other clean City resources.
39. PG&E's actions routinely delay and even prevent the SFPUC from providing electric service to City facilities by requiring the City to comply with ever-changing requirements and to install large, expensive equipment that does not advance safety or reliability. These delays unnecessarily drive up costs to City departments, non-profit service providers, and San Francisco taxpayers and hinder the City's efforts to reduce greenhouse gas emissions.²⁴

²¹ Complaint Requesting Fast Track Processing of the City and County of San Francisco Against the Pacific Gas and Electric Company, FERC Docket EL15-03-000, Complaint at 6 and Declaration of James Hoecker, (October 9, 2014), available at: <https://elibrary.ferc.gov/eLibrary/filelist?accession_num=20141010-5047&optimized=false: https://elibrary.ferc.gov/eLibrary/filelist?accession_num=20141010-5047&optimized=14>.

²² Complaint of City and County of San Francisco Challenging Interconnection Practices of PG&E under Wholesale Distribution Tariff, FERC Docket EL19-38-000 at 2-5 (January 28, 2019), available at: <https://elibrary.ferc.gov/eLibrary/filelist?document_id=14739962&optimized=false>.

²³ SFPUC, Preliminary Report on Electric Service Options, at 13-19 (May 2019). A copy of the Preliminary Report is attached as Exhibit F. See also, San Francisco Public Utilities Commission's Quarterly Report to the Board of Supervisors on the Status of Applications to PG&E for Electric Service (April 23, 2021). (A copy is attached as Exhibit A.)

²⁴ Exhibit F, Preliminary Report on Electric Service Options, at 10.

40. San Francisco and PG&E have litigated these issues at FERC for years and attempted to resolve these issues through negotiation, all unsuccessfully. All of these efforts are ongoing, but it has become clear to the City that acquiring and assuming responsibility for the distribution system is the only way for it to operate its electric utility to meet its objectives.

C. Controlling the Distribution Grid Will Allow San Francisco to More Efficiently Meet Important State and Local Objectives Related to Environmental and Climate Goals, Workforce Protection and Development Efforts, and Equity Policies

1. Environmental and climate goals

41. The City has set increasingly ambitious climate action goals for itself and has taken steps towards the electrification of its building and transportation sectors.

42. In 2008, the City established a goal of using 100% GHG-free electricity supplies by 2030 without using nuclear sources.²⁵ This goal is more ambitious than the State target (which PG&E must meet) of powering all retail electricity sold in California with renewable and zero-carbon resources by 2045.²⁶

43. Hetch Hetchy Power and CleanPowerSF combined serve approximately 75% of San Francisco's electricity supply needs. In 2019, nearly all of that electricity was 100% GHG-free, positioning the City to meet its 2030 electricity goal years ahead of schedule.²⁷

44. On April 19, 2018, Mayor Mark Farrell committed the City to achieving net-zero greenhouse gas emissions by 2050,²⁸ in alignment with the goals of the Paris Climate Accord.

45. Building on the City's success, Mayor Breed introduced legislation to increase the City's ambitious greenhouse gas emission reduction targets. The legislation specified climate action

²⁵ Board Ordinance 81-08 available at: <<https://sfbos.org/ftp/uploadedfiles/bdsupvrs/ordinances08/o0081-08.pdf>>. Also see, Board Resolution 349-11, available at: <<https://sfbos.org/ftp/uploadedfiles/bdsupvrs/resolutions11/r0349-11.pdf>>.

²⁶ S.B. 100, § 1 (2018).

²⁷ See, 2019 Power Content Labels as reported to the CEC by HHP and CPSF, available at: <https://sfpuc.org/sites/default/files/about-us/HetchyPowerProductContentLabel_2019.pdf>, and <<https://static1.squarespace.com/static/5a79fded4c326db242490272/t/5fd141e25a35a86a4754ab06/1607549420113/CleanPowerSF+2019+Green+PCL.pdf>>. Supplies provided to Direct Access customers are excluded; the power content of these supplies delivered to San Francisco is not reported.

²⁸ Mayor Mark Farrell Announces Historic Commitment to Net-Zero Emissions by 2050 (April 19, 2018), available at: <<https://sfmayor.org/article/mayor-mark-farrell-announces-historic-commitment-net-zero-emissions-2050>>.

goals in several key areas, including transportation, energy, and construction of housing and new buildings. The Board unanimously approved the legislation on July 20, 2021.²⁹

46. The City has adopted ordinances banning the use of natural gas and requiring all-electric energy sources for new and significantly renovated municipal buildings³⁰ and new construction of residential and commercial buildings beginning in June 1, 2021.³¹
47. The City has also committed to a zero-emission municipal bus fleet by 2035.³²
48. Without PG&E's delays and costly and unnecessary equipment requirements, the City can more effectively and efficiently meet its environmental and climate goals. The City's ownership of the distribution grid serving the City will allow grid modernization to support further development of solar and storage resources, as well as other distribution grid-connected assets and initiatives, such as electric vehicle charging stations.³³

2. Workforce protection and development

49. The City has a long-standing commitment to and history of providing workforce protections and development opportunities, as demonstrated by the more than 30 agreements with employee unions that represent City employees.³⁴ This commitment is also reflected by the project labor agreements³⁵ and local hire policies that apply to contracted construction.³⁶

²⁹ San Francisco Adopts New Climate Action Goals (July 20, 2021), available at: <<https://sfmayor.org/article/san-francisco-adopts-new-climate-action-goals>>.

³⁰ Board Ordinance 8-20, available at: <<https://sfbos.org/sites/default/files/o0008-20.pdf>>

³¹ Board Ordinance 237-20, available at: <<https://sfbos.org/sites/default/files/o0237-20.pdf>>.

³² At the March 16, 2021 SFMTA Board of Directors meeting, SFMTA staff presented its Zero-Emission Bus Rollout Plan, available at: <<https://www.sfmta.com/reports/3-16-21-mtab-item-12-approval-zero-emission-bus-rollout-plan>>. The SFMTA must comply with CARB's Innovative Clean Transit Regulation which set a goal for public transit agencies to fully transition their bus fleets to zero-emission buses by 2040.

³³ Exhibit F, Preliminary Report on Electric Service Options, at 29.

³⁴ See, City and County of San Francisco, Department of Human Resources, Memoranda of Understandings and Labor Agreements, available at: <<https://sfdhr.org/memoranda-understanding>>.

³⁵ Board Ordinance 001-19 (Citywide Project Labor Agreement), available at: <<https://sfgov.legistar.com/View.ashx?M=F&ID=7003434&GUID=0B3620E6-2854-4631-84AE-4EDF79BC3549>>; also see, <<https://sfpuc.org/construction-contracts/contractor-assistance/project-labor-agreement>>, for a description of the history of and links to SFPUC PLAs.

³⁶ Board Ordinance 84-17, available at: <<https://sfbos.org/sites/default/files/o0084-17.pdf>> (originally adopted in Board Ordinance 311-10, available at: <<https://oewd.org/sites/default/files/FileCenter/Documents/125-Local%20Hire%20Ordinance.pdf>>); also see, San Francisco Local Hiring Policy for Construction 2021 Annual Report, available at: <<https://oewd.org/sites/default/files/Workforce/Workforce-Docs/2021%20SF%20Local%20Hire%20Annual%20Report.pdf>>.

50. The goals of the City’s workforce programs are to ensure that its operations and infrastructure projects provide equitable career pathways and opportunities for its residents, including those traditionally marginalized. With the acquisition of PG&E’s assets, those policies can be applied to a larger workforce of dedicated public employees.

3. Equity policies

51. The City is committed to racial and social equity, and this commitment to equity is not new.³⁷ The City has frequently used its purchasing power³⁸ and legal authority³⁹ to advance equitable treatment and opportunities for marginalized groups as well as others. But the City needs and wants to do more.

52. The City worked with community members for more than a decade to close the old power plants in southeast San Francisco, addressing longheld concerns of citizens about the air and water impacts of those facilities.⁴⁰ City leaders worked with state agencies, paid for expert analyses and load flow studies, and developed action plans that made it possible to close the Hunters Point Power Plant in 2006 and the Potrero Power Plant in 2011.⁴¹ Ownership and operation of the electric grid would provide the City further opportunities to promote equity and environmental justice within the electric sector.

³⁷ For example, in 1964, the Board established the San Francisco Human Rights Commission. See, Human Rights Commission, Agency Overview, available at: <<https://sf-hrc.org/agency-overview>>. The Human Rights Commission implements and enforces City anti-discrimination measures and conducts other equity-focused activities. San Francisco Charter, Sec. 4.107.

³⁸ See, for example, San Francisco Administrative Code, Chapter 12B: Nondiscrimination in Contracts.

³⁹ See, for example, Ron Kroichik, Women couldn’t join Olympic Club 30 years ago. Now it’s hosting the U.S. Women’s Open, San Francisco Chronicle (May 29, 2021), available at: <<https://www.sfchronicle.com/sports/golf/article/Women-couldn-t-join-Olympic-Club-30-years-ago-16211511.php>>.

⁴⁰ See, for example, Board Resolution 362-99 creating a Citizens’ Advisory Task Force, available at: <<https://sfgov.legistar.com/View.ashx?M=F&ID=2608446&GUID=D742C4C7-1CC0-4B68-B860-346C5FA832A1>> and Board Resolution 119-04, available at: <<https://sfbos.org/ftp/uploadedfiles/bdsupvrs/resolutions04/r0119-04.pdf>> regarding the creation of the City’s Power Plant Task Force. The City adopted numerous ordinances and resolutions addressing the need to close the plants. See, for example, Board Ordinance 94-09, available at: <<https://sfbos.org/ftp/uploadedfiles/bdsupvrs/ordinances09/o0094-09.pdf>>. See also, Board Ordinance 8-02, available at: <<https://sfbos.org/ftp/uploadedfiles/bdsupvrs/ordinances02/o0008-02.pdf>> and Board Ordinance 220-09, available at: <<https://sfbos.org/ftp/uploadedfiles/bdsupvrs/ordinances09/o0220-09.pdf>>.

⁴¹ See Commission Resolutions EGPB-11 (February 24, 2011) approving closure of the Potrero Power Plant; and E-3989 (March 21, 2006) and E-3984 (March 15, 2006) approving closure of the Hunters Point Power Plant.

53. In 2009 the SFPUC established Environmental Justice and Community Benefits policies that guide its operations.⁴² These policies document the City’s commitment to fair treatment of people of all races, cultures, and incomes and to ensuring that no one group of people bear a disproportionate share of negative environmental or economic consequences resulting from utility operations, programs, or policies.⁴³
54. In 2019, the City created the Office of Racial Equity, which has been tasked with creating a citywide Racial Equity Framework and assisting City departments with developing and implementing their own Racial Equity Action Plans.⁴⁴
55. In 2020, the SFPUC reaffirmed its commitment to racial equity by adopting Commission Resolution 20-0149 condemning systemic racism and instituting actions to help address systemic racism.⁴⁵
56. The SFPUC issued its Racial Equity Action Plan Phase 1 in December 2020. This plan will guide SFPUC’s efforts to advance racial equity in all aspects of its work, including hiring and recruitment, creating an organizational culture of inclusion and belonging, and developing diverse and equitable leadership and management.⁴⁶
57. With these robust policies in place and close ties with the community, the City is well-positioned to leverage the acquisition of PG&E assets to serve its residents and further advance its environmental justice and equity goals.

⁴² SFPUC Environmental Justice policy, available at: <https://www.sfpuc.org/sites/default/files/about-us/policies-reports/Environmental-Justice-Policy_OCT2009.pdf>; and SFPUC Community Benefits policy, available at: <https://www.sfpuc.org/sites/default/files/about-us/policies-reports/CommunityBenefits%20Policy_JAN2011.pdf>.

⁴³ SFPUC Community Benefits Approach, available at: <<https://sfpuc.org/about-us/who-we-are/community-benefits-approach>>.

⁴⁴ Board Ordinance 188-19, available at: <<https://static1.squarespace.com/static/5ed18d943016244d3e57260c/t/5ef40b859c952511978f7b6b/1593052041009/ORE+Legislation+Final.pdf>>; also see, <<https://www.racialequitysf.org/mandate>>.

⁴⁵ San Francisco Public Utilities Commission Resolution 20-0149 (July 14, 2020), available at: <<https://sfpuc.sharefile.com/share/view/s9eeb6fd36f14639b>>.

⁴⁶ San Francisco Public Utilities Commission Racial Equity Action Plan (December 31, 2020), available at: <https://sfpuc.org/sites/default/files/documents/SFPUC_RacialEquityPlan_v1-11JAN21.pdf>.

D. San Francisco's Acquisition of PG&E Assets Would Not Burden PG&E's Remaining Ratepayers

58. While San Francisco's acquisition of PG&E assets in San Francisco would benefit the City and its residents, such an acquisition would not materially burden PG&E's remaining ratepayers and could potentially benefit them as well.⁴⁷
59. San Francisco is a small part of PG&E's large service territory.⁴⁸ And PG&E's revenues per San Francisco customer are smaller than its revenues per PG&E customer outside the City.⁴⁹
60. The size of PG&E's remaining service territory would be reduced along with its service obligations. This alone could benefit remaining ratepayers as PG&E would no longer have any expenses or service obligations related to the upkeep — and future capital needs — of the assets purchased by San Francisco.
61. PG&E's assets in San Francisco will require significant spending for replacement and upgrading to provide reliable service over the long term. Relieving PG&E of this obligation can help it focus on critical needs elsewhere.
62. Finally, the Commission has the responsibility and authority to ensure that ratepayers are not materially harmed by an asset purchase of this sort, in a separate proceeding after a sale has been negotiated.

⁴⁷ The City has analyzed this issue using data available to it. Additional data from PG&E would be required to fully understand the impacts.

⁴⁸ As an example, in 2019 San Francisco represented less than six percent of PG&E's total electric retail sales. See CPUC President Batjer's August 7, 2020 response to Senator Scott Wiener's request for information on the potential impact to non-San Francisco ratepayers from the potential acquisition of PG&E distribution assets by the City. (A copy of the response is attached as Exhibit B.) Based on the City's estimates, its proposed acquisition would represent a very small portion of PG&E's total system, including its natural gas assets and operations, and the total rate base value of that system (See Exhibit K).

⁴⁹ PG&E's customers in San Francisco are likely less valuable (lower revenues per account, and/or more costly to serve per account) to PG&E, because PG&E's customers in San Francisco are relatively small. Commission data shows that PG&E retail accounts in San Francisco are, on average, significantly smaller (in terms of electricity usage and revenues) than the average retail account across PG&E's system. See Exhibit B. This is due to many factors, such as San Francisco customers, who, on average, may live in smaller residences in denser neighborhoods with more multi-tenant buildings, and San Francisco's climate, which is more temperate than the rest of PG&E's territory, requiring less use of air conditioning in the summer and electric heating in the winter.

E. The City Has Established Its Intent to Acquire PG&E’s Assets in San Francisco

63. Public Utilities Code section 1403 provides that “[a]ny political subdivision may, at any time, file with the commission . . . a petition of the first class, setting forth the intention of the political subdivision to acquire under eminent domain proceedings, or otherwise, the lands, property, and rights of any character whatsoever of any public utility.”
64. Past Commission cases have considered resolutions and other documentation issued by a political subdivision in determining the intent of a political subdivision to acquire public utility property.⁵⁰
65. Initiation of an eminent domain proceeding is not necessary for showing sufficient intent as the procedures set forth in Public Utilities Code section 1401 et seq. “are not limited to intentions to acquire under eminent domain.”⁵¹
66. The San Francisco Charter provides:
- It is the declared purpose and intention of the people of the City and County, when public interest and necessity demand, that public utilities shall be gradually acquired and ultimately owned by the City and County. Whenever the Board of Supervisors . . . shall determine that the public interest or necessity demands the acquisition, construction or completion of any public utility or utilities by the City and County, or whenever the electors shall petition the Board of Supervisors . . . for the acquisition of any public utility or utilities, the Supervisors must procure a report from the [San Francisco] Public Utilities Commission thereon.⁵²
67. Consistent with the Charter, San Francisco has commenced an effort to acquire the PG&E assets necessary for the City to provide electric service to San Francisco’s residents and businesses, as was intended by the Raker Act in 1913.
68. On January 14, 2019, Mayor London N. Breed sent a letter to Harlan L. Kelly, then General Manager of the SFPUC, requesting that the SFPUC perform a detailed analysis of the current health of the electrical network and a robust feasibility study of all potential options to address PG&E’s operational and financial instability, including the possibility of acquiring or building electrical infrastructure assets. (A copy of the January 14, 2019 letter is attached as Exhibit C.)

⁵⁰ See *City of Fresno*, D.83-07-019, 12 CPUC 2d 39, 1983 WL 908472.

⁵¹ *City of Fontana, supra*, D. 87-07-082, 25 CPUC2d 67; *Truckee-Donner Pub. Util. Dist.*, D. 87-05-024, 24 CPUC 2d 197, 1987 WL 1514097.

⁵² S.F. Charter, Art. XVI, § 16.101.

69. On March 14, 2019, Mayor Breed and City Attorney Dennis J. Herrera sent a letter to PG&E stating that the City “has initiated work to evaluate the cost and feasibility of acquiring PG&E’s electric distribution facilities that serve San Francisco.” (A copy of the March 14, 2019 letter is attached as Exhibit D.) The March 14 letter also stated that if the City determined an acquisition was feasible the City intends to “make a formal offer to PG&E within the coming months as part of the [then ongoing PG&E] bankruptcy process.”⁵³
70. In Resolution 174-19 approved on May 18, 2019, the Board determined that the “public interest and necessity require changing the electric service provided in San Francisco, and these changes may include the acquisition of PG&E’s electrical system serving San Francisco, construction of new facilities by the City, or completion of the City’s own electric system.” (A copy of Resolution 174-19 is attached as Exhibit E.) The Board asked the SFPUC to provide a report “to help City policymakers and the public understand and evaluate the City’s options.”
71. In May 2019, the SFPUC issued a Preliminary Report of Electric Service Options (“Preliminary Report”). (A copy of the Preliminary Report is attached as Exhibit F.) One of the options discussed in the Preliminary Report is called “Full Independence.” Under this Full Independence option:
- [T]he City would purchase PG&E’s physical assets in and near San Francisco that are necessary for the City to expand its existing publicly-owned utility service to all of San Francisco, while enabling the City to provide clean, safe, reliable, affordable and sustainable service for all customers. Such assets would likely include PG&E’s maintenance inventories, yards, and related equipment as well as PG&E’s interconnections from the distribution grid to PG&E-owned transmission lines.
72. On September 6, 2019, Mayor Breed and City Attorney Herrera sent a letter to PG&E containing a “non-binding indication of interest (‘IOI’) to purchase substantially all of PG&E’s electric distribution and transmission assets needed to provide retail electric service to all electricity customers in San Francisco.” (A copy of the September 6, 2019 letter is attached as Exhibit G.) The IOI contained “an indicative purchase price” of \$2.5 billion.

⁵³ PG&E and its parent holding company PG&E Corporation filed for bankruptcy protection on January 29, 2019 (U.S. Bankruptcy Court, District of Northern California, Case 19-30088).

73. On September 19, 2019, Mayor Breed and City Attorney Herrera sent a letter to PG&E supplementing the City’s IOI in light of information from PG&E’s bankruptcy case. (A copy of the September 19 letter is attached as Exhibit H.)
74. In Resolution 403-19 approved on September 30, 2019, the Board unanimously supported the IOI. (A copy of Resolution 403-19 is attached as Exhibit I.) The Board “urge[d] PG&E to work collaboratively with the City to complete due diligence and enter into a purchase agreement with the City that will benefit PG&E, its customers and other stakeholders.”
75. In a letter dated October 7, 2019, PG&E rejected the City’s IOI. (A copy of the October 7 letter is attached as Exhibit J.) PG&E stated that its “evaluation of [San Francisco’s] proposal determined that a sale of our facilities in San Francisco could negatively impact PG&E’s customers, both inside and outside of the city.” Among other things, PG&E claimed “San Francisco’s offer reflects an amount significantly below the fair-market value of the underlying PG&E assets.”
76. In a letter dated November 4, 2019, San Francisco responded to PG&E’s rejection of the City’s IOI and PG&E’s claims regarding the fair-market value of PG&E assets, ratepayer impacts, and separation costs. This letter outlined that the \$2.5 billion included in the IOI is attractive relative to standardized valuation metrics commonly used for similar transactions and in previous Commission valuation proceedings (e.g. relative to book value and earnings available to PG&E from the assets). (A copy of the November 4 letter is attached as Exhibit K.)
77. In a letter dated August 14, 2020, San Francisco renewed its offer to purchase PG&E’s assets following PG&E’s emergence from bankruptcy. (A copy of the August 14 letter is attached as Exhibit L.) San Francisco urged PG&E to “engage in a dialogue” with the City concerning the offer.
78. In a letter dated August 19, 2020, PG&E informed San Francisco that its position on San Francisco’s offer “has not changed.” (A copy of the August 19 letter is attached as Exhibit M.) PG&E again stated the amount of San Francisco’s offer was “substantially below the fair-market value of [PG&E’s] assets.”

79. The City's offers were developed on the advice of experts using standard methods of asset valuation. The results of this analysis call into question PG&E's contentions that the City's offer price is far below the value of the assets. The City seeks the Commission's assistance in fixing the value, based on the Commission's expertise and the authority granted to it by state law.

80. The City has continued to analyze the proposed acquisition, including legal, financial, operational, engineering, environmental, and human resources issues related to the transaction.

F. San Francisco Has the Ability to Finance the Purchase of PG&E's Assets

81. San Francisco is confident in its ability to execute financing to fund the purchase of PG&E's assets. The City expects to finance such an acquisition through long-term revenue bonds issued by the SFPUC upon approval by the SFPUC and the Board.⁵⁴ The SFPUC is a frequent participant in the municipal capital markets, and those markets regularly absorb transactions of this size.

82. On January 14, 2020, the SFPUC approved Resolution No. 20-0011, conditionally authorizing the SFPUC to issue revenue bonds to finance the cost of acquiring certain PG&E electric distribution and transmission assets to provide affordable, safe and reliable electric service in San Francisco. (A copy of Resolution 20-0011 is attached as Exhibit N.)

83. On January 24, 2020, in Resolution 30-20, the Board conditionally authorized the SFPUC to issue revenue bonds to finance the cost of acquiring certain PG&E electric distribution and transmission assets. (A copy of Resolution 30-20 is attached as Exhibit O.) Among the conditions imposed by the SFPUC and Board was that the City had either negotiated a "binding agreement or agreements" with PG&E for the acquisition of PG&E's assets or was "otherwise legally authorized to acquire" PG&E's assets.

84. The City would finance the purchase of PG&E assets using revenue bonds secured solely by revenues from providing electric utility service. This means that the purchase will not be dependent upon or impact funding for any other City services, including developing affordable

⁵⁴ The SFPUC Power Enterprise currently maintains "AA" and "AA-" credit ratings from S&P Global Ratings and Fitch Ratings, respectively.

housing, addressing homelessness, responding to COVID-19, and providing other essential services.

V. THE LANDS, PROPERTY, AND RIGHTS SAN FRANCISCO IS ASKING THE COMMISSION TO VALUE IN THIS PROCEEDING

85. Public Utilities Code section 1404 requires the Petition to include “a description of the lands, property, and rights which the political subdivision intends to acquire ...”

86. According to the Commission:

It is not unusual, in matters of this kind, for amendments to the petition, relating to description of the sought properties, to be presented and authorized from time to time during the course of the proceeding. The question for determination here [regarding the adequacy of the description of the properties] is not whether there are minor uncertainties or ambiguities, nor whether amendments may be permitted in certain other respects, but whether there is such a sufficiency of description that the Commission may order that the matter proceed.⁵⁵

87. The assets San Francisco seeks to have valued are comprised of PG&E’s electrical system situated within or adjacent to the boundaries of the City and its service and planning area.

88. In particular, the City seeks a valuation of those PG&E transmission and distribution assets that are necessary for the City to provide safe and reliable retail electric service to all electricity customers in the City.

89. San Francisco is informed and believes, and alleges thereon, that the following comprises all of PG&E’s electrical distribution system serving San Francisco that are subject to this Petition:

- a. All of PG&E’s distribution assets within the City, including distribution-level substations, metering, customer-level interconnections, and related facilities.
- b. Transmission assets within the City, including substations, transmission lines, busses, transformers, and related facilities needed for operational control, including:
 - i. 115 kV transmission assets; and
 - ii. 230 kV transmission assets
- c. A portion of the Martin Substation or interconnections to the Martin Substation to enable the City to control all power flows from the Martin Substation into the City.

⁵⁵ *City of Folsom*, D.67348, 1964 WL 147770; see *Sacramento Mun. Util. Dist v. Pac. Gas. and Elec. Co.*, 72 Cal.App.2d 638, 646-47 (1946).

- d. Related assets, materials, records, and other items, as required for safe and reliable service to customers and safe and reliable operation of the assets described above, including:
- i. Other systems and equipment such as meters and advance metering infrastructure systems, relays, SCADA, transformers, rolling stock, telecommunication and control center equipment, support systems, standards, distribution system model data, system maps and diagrams, records, and all similar items required to operate the assets described above.
 - ii. All of PG&E's reliability, safety, operating, maintenance, and capital improvement records for the assets.
 - iii. PG&E's operating and maintenance facilities (for communications, SCADA, security, control, and emergency response), service yards, warehouses, customer service and call centers, and other facilities located in the City as necessary for safe and reliable operation and maintenance of the assets described above.
 - iv. PG&E's customer service, metering and billing records, including program and service agreements, disputes notices, outstanding complaints, and similar customer-related information.
 - v. PG&E-owned land, easements, rights-of-way, lease agreements, and other land-related agreements (or appropriate new lease or other agreements between the City and PG&E) as needed for safe and reliable operation and maintenance of the assets described above.
 - vi. PG&E-owned street lights and similar unmetered facilities in the City.

90. San Francisco is informed and believes, and alleges thereon, that PG&E could have other interests in the land, property or rights used and/or owned by PG&E for the purposes described herein, that are not now known or identified by San Francisco, which should be subject to this Petition.

91. San Francisco reserves the right to amend this Petition to identify other interests in land, property or rights used and/or owned by PG&E that comprise PG&E’s electrical system in San Francisco as they become known.

92. The lands, property, and rights for which the City seeks valuation excludes all PG&E land and facilities related to its “General Office” operations, i.e., facilities related to PG&E’s San Francisco headquarters, and excludes all land and facilities related to PG&E’s natural gas operations and services.

VI. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

93. This Petition does not trigger CEQA review by the Commission. A valuation determination is not a “project”⁵⁶ that requires any discretionary approvals on the part of the Commission and would result in a physical change in the environment. A valuation proceeding makes no determinations regarding whether the subject property will or will not be acquired – it simply appraises the property.⁵⁷

VII. LEGAL GROUNDS FOR RELIEF

94. As described above (Section II), the Commission has broad authority under the California Constitution and the Public Utilities Code to fix the just compensation amount to be paid to acquire public utility assets in a proceeding filed by a political subdivision.⁵⁸

VIII. ISSUES TO BE CONSIDERED

95. The issue to be considered is the just compensation to be paid by the City for certain public utility property of PG&E within and adjoining the boundaries of the City and County of San Francisco, as described above (Section V).

⁵⁶ CEQA defines a “project” as an activity that (1) is undertaken or funded by, or subject to the discretionary approval of a public agency and (2) may cause either a direct or reasonably foreseeable indirect physical change on the environment. (*see* Pub. Res. Code § 21065).

⁵⁷ *City of Fontana, supra*, D. 87-07-082, 25 CPUC2d 67. (The Commission’s “Rules of Practice and Procedure...expressly excludes from the purview of actions requiring Commission participation in the CEQA process those projects for which Commission approval is not required by law. The determination of just compensation...requires no approvals from this Commission. As stated before, our role may be likened to that of a referee appointed under authority of law to take evidence and submit a finding on the value.”)

⁵⁸ Cal. Const., art. XII, § 5; Pub. Util. Code §§ 1401-1421; *see Marin Mun. Water Dist., supra*, 178 Cal. 308.

IX. NEED FOR HEARING

96. In order to make the valuation determination required herein, the Commission should conduct a hearing to consider evidence on the value of PG&E’s property that San Francisco seeks to acquire.⁵⁹

X. PROPOSED CATEGORIZATION

97. San Francisco proposes that this Petition be categorized as a ratesetting proceeding pursuant to the Commission Rules of Practice and Procedure 7.1(e)(2).

XI. PROPOSED SCHEDULE

98. San Francisco proposes that the Commission issue the order to show cause forthwith and proceed with this matter pursuant to the schedule below.

Commission issues order to show cause	30 days after filing of the Petition
PG&E answers order to show cause	60 days after filing of the Petition
Commission issues interim opinion to proceed to hear the petition and to fix the just compensation as requested in the Petition	90 days after filing of the Petition
Pre-hearing conference ⁶⁰	110 days after filing of the Petition
City opening testimony	170 days after filing of the Petition
PG&E opening testimony	230 days after filing of the Petition
City rebuttal testimony	290 days after filing of the Petition
Hearing	310 days after filing of the Petition
Concurrent post-hearing opening briefs	360 days after filing of the Petition
Concurrent post-hearing reply briefs	390 days after filing of the Petition
Commission decision	480 days after filing of the Petition

⁵⁹ See *City of Riverside*, *supra*, D.80480, 74 CPUC 193; *N. Marin Cnty.*, *supra*, D.84718, 78 CPUC 534; *City of Fresno*, *supra*, D.86-02-040, 20 CPUC 2d 502.

⁶⁰ Among other things, the purposes of the pre-hearing conference are to identify the issues in the proceeding, the witnesses who will testify during the hearing, and establish discovery procedures. See *City of Fresno*, D.82-07-016, 9 CPUC 2d 436, 1982 WL 197571.

XII. CORRESPONDENCE AND COMMUNICATION

Communications with the City regarding this Petition should be addressed to:

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Grace Kay
Legislative & Regulatory Compliance
San Francisco Public Utilities Commission
525 Golden Gate Avenue, 7th Floor
San Francisco, CA 94102
Telephone: (415) 554-3129
E-mail: gkay@sflower.org

XIII. CONCLUSION

WHEREFORE, Petitioner prays:

1. That the Commission, within 30 days of the filing of this Petition, order PG&E to show cause why the Commission should not proceed to hear this Petition and to fix the just compensation to be paid for PG&E's property as described in this Petition.
2. That the Commission fix the just compensation to be paid by the City for PG&E's property as described in this Petition.
3. That the Commission take such other action herein as Petitioner may be entitled to under the law and as the Commission deems just and proper.

Dated: July 27, 2021

Respectfully submitted,

DENNIS J. HERRERA
City Attorney
THERESA L. MUELLER
Chief Energy and Telecommunications Deputy
THERESA CHO
WILLIAM K. SANDERS
SUZY HONG
Deputy City Attorneys

By: /s/Suzy Hong

Attorneys for Petitioner
CITY AND COUNTY OF SAN FRANCISCO

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**VERIFICATION OF THE MAYOR OF
THE CITY AND COUNTY OF SAN FRANCISCO**

I, LONDON N. BREED, declare:

I am an Officer of the Petitioner the City and County of San Francisco, and am authorized to make this verification on its behalf. I have read the foregoing Petition of the City and County of San Francisco for a Valuation of Certain Pacific Gas & Electric Company Property Pursuant to Public Utilities Code Sections 1401-1421 ("Petition") and know the contents thereof. The statements in the Petition are true of my own knowledge except as to matters which are therein stated upon information and belief and, as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on July 26, 2021, at San Francisco, California.



London N. Breed

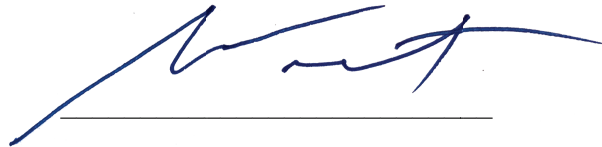
Mayor, City and County of San Francisco

**VERIFICATION OF THE PRESIDENT OF THE BOARD OF SUPERVISORS
OF THE CITY AND COUNTY OF SAN FRANCISCO**

I, Shamann Walton, declare:

I am an Officer of the Petitioner the City and County of San Francisco, and am authorized to make this verification on its behalf. I have read the foregoing Petition of the City and County of San Francisco for a Valuation of Certain Pacific Gas & Electric Company Property Pursuant to Public Utilities Code Sections 1401-1421 (“Petition”) and know the contents thereof. The statements in the Petition are true of my own knowledge except as to matters which are therein stated upon information and belief and, as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on July 26, 2021, at San Francisco, California.



Shamann Walton,

President, Board of Supervisors

City and County of San Francisco

**VERIFICATION OF THE PRESIDENT OF THE
SAN FRANCISCO PUBLIC UTILITIES COMMISSION**

I, Sopenia Maxwell, declare:

I am an Officer of the Petitioner the City and County of San Francisco, and am authorized to make this verification on its behalf. I have read the foregoing Petition of the City and County of San Francisco for a Valuation of Certain Pacific Gas & Electric Company Property Pursuant to Public Utilities Code Sections 1401-1421 (“Petition”) and know the contents thereof. The statements in the Petition are true of my own knowledge except as to matters which are therein stated upon information and belief and, as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on July 26, 2021, at San Francisco, California.

Sopenia Maxwell

Sopenia Maxwell,

President,

San Francisco Public Utilities Commission

City and County of San Francisco

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

Petition of the City and County of San Francisco
for a Valuation of Certain Pacific Gas & Electric
Company Property Pursuant to Public Utilities
Code Sections 1401-1421.

P. 21-07-_____

CERTIFICATE OF SERVICE

I, Paula Fernandez, declare that I am an employee of the City and County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is City and County of San Francisco, Office of the City Attorney, 1 Dr. Carlton B. Goodlett Place, Room 234, San Francisco, CA 94102.

On **July 27, 2021**, I served **PETITION OF THE CITY AND COUNTY OF SAN FRANCISCO FOR A VALUATION OF CERTAIN PACIFIC GAS & ELECTRIC COMPANY PROPERTY PURSUANT TO PUBLIC UTILITIES CODE SECTION 1401-1421** via electronic mail, in PDF format, on the attached Service List in Proceeding No. P.21-07_____.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on **July 27, 2021** in San Francisco, California.

/s/ Paula Fernandez

Paula Fernandez

SERVICE LIST

CPUC Commissioners and Advisors

Marybel Batjer, President

Shannon O'Rourke, Chief of Staff

Nora Hawkins, Energy Advisor

Clifford Rechtschaffen, Commissioner

Sean Simon, Chief of Staff

Martha Guzman Aceves, Commissioner

Jonathan Koltz, Chief of Staff

Kerry Fleisher, Energy Advisor

Maria Sotero, Energy Advisor

Genevieve Shiroma, Commissioner

Leuwam Tesfai, Chief of Staff and Energy Advisor

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Darcie Houck, Commissioner

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Suzanne Casazza, Legal and Energy Policy Advisor

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