

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

COMMISSIONER KAREN DOUGLAS, in attendance

ADMINISTRATIVE LAW JUDGE EHREN SEYBERT, presiding



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Implementing Senate Bill 846 Concerning) PREHEARING
Potential Extension of Diablo Canyon) CONFERENCE
Power Plant Operations.)
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) Rulemaking
) 23-01-007
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REPORTERS' TRANSCRIPT
Virtual Proceeding
March 17, 2023
Pages 1 - 75
Volume 1

Reported by: Andrea L. Ross, CSR No. 7896
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VIRTUAL PROCEEDING

MARCH 17, 2023 - 10:00 A.M.

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ADMINISTRATIVE LAW JUDGE SEYBERT: We will now be on the record. The Commission will come to order.

Good morning, everyone. This is the time and place for the prehearing conference in Rulemaking 23-01-007 concerning the potential extension of operations at the Diablo Canyon Nuclear Power Plant pursuant to SB 846.

Today's prehearing conference is being held remotely. My name is Ehren Seybert, and I am the assigned administrative law judge to this proceeding. I am joined today by Commissioner Karen Douglas, who is the assigned commissioner.

Commissioner Douglas, would you like to make any opening remarks?

COMMISSIONER DOUGLAS: Thank you, Judge Seybert. I'll just make some brief remarks. I'd like to join you in welcoming everybody to the prehearing conference today.

I'm looking forward to engaging in this proceeding, and I do want to thank Judge Seybert and the team who have been working hard behind the scenes to put together this prehearing conference and the preliminary

1 scope of issues and schedule for this proceeding. I'm
2 very happy -- or very interested in hearing the feedback
3 on it.

4 Having seen the preview of the 2023 schedule
5 for this proceeding, we all know that we're going to
6 have a lot of ground to cover and tight timelines for
7 meeting the legislative deadline of the December 2023
8 decision.

9 I'd like to encourage everybody to keep that in
10 mind as we scope out what we need to do to get to that
11 final decision with the thorough consideration of the
12 key issues that are before us.

13 Thank you to everybody who is participating on
14 this issue and will be throughout the course of the
15 year. I look forward to working on this proceeding and
16 on these issues, and I look forward to everybody's
17 participation. Thank you.

18 MR. HAGA: ALJ Seybert, you're on mute.

19 ALJ SEYBERT: Oh, thank you.

20 Thank you, Commissioner. The purpose of
21 today's prehearing conference is to discuss the issues
22 and the scope of the proceeding, the proceeding
23 schedule, the need for evidentiary hearings, and other
24 procedural matters. All the aforementioned issues will
25 be determined in the assigned commissioner's scoping

1 memo and ruling following today's prehearing conference.

2 For the benefit of our court reporters today, I
3 would like to remind everyone to speak slowly and
4 clearly, to please mute your phone unless called upon to
5 speak.

6 I will be providing several opportunities for
7 party comment. If you have a question or would like to
8 provide a comment, please use the Webex raise-hand
9 feature or physically raise your hand and wait for me to
10 call upon you.

11 The first order of business is to go over party
12 status and appearances. There are currently 17 parties
13 to this proceeding. On the service list, this includes
14 Pacific Gas and Electric Company, who is the named
15 respondent; almost everyone who filed written comments
16 in the response to the rulemaking itself; as well as
17 everyone who filed a written motion for party status.

18 In addition, I have three individuals who
19 indicated they intend to request party status today. I
20 will go through these requests now.

21 Ms. Ashford, are you on the line?

22 MS. ASHFORD: Yes. This is Sylvie Ashford on
23 behalf of Natural Resources Defense Council.

24 ALJ SEYBERT: Thank you, Ms. Ashford. Will you
25 please spell your first and last name for the record.

1 MS. ASHFORD: Sylvie, S-y-l-v-i-e, Ashford,
2 A-s-h-f-o-r-d.

3 ALJ SEYBERT: Thank you. And are you intending
4 to make an oral motion for party status today?

5 MS. ASHFORD: Yes. NRDC requests party status
6 today.

7 ALJ SEYBERT: And what is the interest of the
8 National Resources Defense Council in this proceeding?

9 MS. ASHFORD: NRDC is interested in engaging in
10 Phase 1, Track 2, the process for establishment of new
11 retirement dates for Diablo Canyon.

12 ALJ SEYBERT: Thank you. And do you intend to
13 actively participate?

14 MS. ASHFORD: Yes. Thank you.

15 ALJ SEYBERT: Does anyone object to this motion
16 for party status? If so, please raise your hand.

17 (No response.)

18 ALJ SEYBERT: Okay. I am not seeing any hands
19 raised.

20 Thank you, Ms. Ashford. Your request for party
21 status is granted.

22 MS. ASHFORD: Thank you, your Honor.

23 ALJ SEYBERT: Thank you.

24 (National Resources Defense Council, Inc.
25 was granted Party Status.)

1 ALJ SEYBERT: Ms. Karlstad, are you on the
2 line?

3 MS. KARLSTAD: Yes, your Honor.

4 ALJ SEYBERT: Please state and spell your full
5 name for the record and indicate the organization you're
6 representing.

7 MS. KARLSTAD: Cathy Karlstad. That's
8 C-a-t-h-y K-a-r-l-s-t-a-d. I'm representing Southern
9 California Edison.

10 ALJ SEYBERT: Thank you. And do you intend to
11 make an oral motion for party status?

12 MS. KARLSTAD: Yes, your Honor.

13 ALJ SEYBERT: What is the interest of Southern
14 California Edison Company in this proceeding?

15 MS. KARLSTAD: Yes, your Honor. As the OIR
16 recognizes in encouraging investor-owned utilities to
17 participate, this proceeding is considering cost and
18 cost responsibility issues that will have a financial
19 effect on SCE and its customers. So that's our
20 interest. Thank you.

21 ALJ SEYBERT: And do you plan to actively
22 participate?

23 MS. KARLSTAD: Yes.

24 ALJ SEYBERT: Thank you.

25 Does anyone object to this motion for party

1 status? If so, please raise your hand.

2 (No response.)

3 ALJ SEYBERT: Again, I am not seeing any hands
4 raised. Thank you, Ms. Karlstad. Your request for
5 party status is granted.

6 MS. KARLSTAD: Thank you.

7 (Southern California Edison Company was
8 granted Party Status.)

9 ALJ SEYBERT: Mr. Specht, are you on the line?

10 MR. SPECHT: Yes, I am.

11 ALJ SEYBERT: Good morning. Please state and
12 spell your full name for the record and indicate the
13 organization you are representing.

14 MR. SPECHT: Right. I'm Mark Specht.
15 That's spelled M-a-r-k S-p-e-c-h-t. I am representing
16 the Union of Concerned Scientists.

17 ALJ SEYBERT: Thank you. And do you intend to
18 make an oral motion for party status?

19 MR. SPECHT: Yes, I do, your Honor.

20 ALJ SEYBERT: What is the interest of the Union
21 of Concerned Scientists in this proceeding?

22 MR. SPECHT: Right. UCS would like to
23 participate in Phase 1, Track 2, the extension of Diablo
24 Canyon retirement dates as well.

25 ALJ SEYBERT: Thank you. And do you plan to

1 actively participate?

2 MR. SPECHT: Yes, your Honor.

3 ALJ SEYBERT: Does anyone object to this motion
4 for party status? If so, please raise your hand.

5 (No response.)

6 ALJ SEYBERT: I am not seeing any hands raised.

7 Thank you, Mr. Specht. Your request for party
8 status is granted.

9 MR. SPECHT: Thank you.

10 (Union of Concerned Scientists was granted
11 Party Status.)

12 ALJ SEYBERT: Thank you.

13 For those that have just been granted party
14 status, I ask each representative to please email your
15 full name, email address, and the name of the party
16 you're representing to the service list and the court
17 reporters at reporting@cpuc.ca.gov by the end of the day
18 today. This will help us keep track of the new parties
19 to the proceeding.

20 If anyone else wants to become a party to this
21 proceeding, you can do so by submitting a motion for
22 party status in accordance with Rule 1.4 of the
23 Commission's rules of practice and procedure. The
24 Commission's Public Advisor's Office is available at
25 public.advisor@cpuc.ca.gov to answer any questions on

1 how to file a motion for party status.

2 For those interested in just following along
3 with this proceeding, you may also reach out to the
4 Public Advisor's Office and ask to be added to the
5 information-only portion of the service list.

6 I'm now going to move on to appearances. The
7 following list reflects parties and representatives that
8 have indicated their intent to participate today and is
9 not an exhaustive list of all the formal parties to this
10 proceeding. Starting with the respondent, when I call
11 on a party, I ask the party representative to please
12 unmute, state your name and spell your first and last
13 name for the record.

14 First I have Pacific Gas and Electric Company.

15 MS. WILSON: Good morning. Thank you, your
16 Honor. My name is Maria Wilson, M-a-r-i-a, Wilson is
17 W-i-l-s-o-n. I'm representing Pacific Gas and Electric
18 Company today.

19 ALJ SEYBERT: Thank you.

20 Alliance for Nuclear Responsibility.

21 MR. GEESMAN: Thank you, your Honor, John
22 Geesman, J-o-h-n G-e-e-s-m-a-n, on behalf of the
23 Alliance for Nuclear Responsibility.

24 ALJ SEYBERT: Thank you. Alliance for Retail
25 Energy Markets.

1 MR. FULMER: Hello. This is Mark Fulmer for
2 ARM whose name is spelled M-a-r-k F-u-l-m-e-r. Thank
3 you.

4 ALJ SEYBERT: Thank you.
5 Direct Access Customer Coalition.

6 MR. DOUGLASS: Good morning, your Honor.
7 Daniel Douglass for the Direct Access Customer
8 Coalition, or DACC. That's D-a-n-i-e-l D-o-u-g-l-a-s-s.

9 ALJ SEYBERT: Thank you.
10 California Community Choice Association.

11 MR. LINDL: Thank you, your Honor. This is
12 Tim, T-i-m, Lindl, L-i-n-d-l, on behalf of the
13 California Community Choice Association, or CalCCA.

14 ALJ SEYBERT: Thank you.
15 Next we have the Coalition of California
16 Utility Employees.

17 MS. KOSS: Good morning. Rachael Koss,
18 R-a-c-h-a-e-l K-o-s-s, for the Coalition of California
19 Utility Employees, or CUE.

20 ALJ SEYBERT: Thank you.
21 County of San Luis Obispo.

22 MS. SOMOGYI: Good morning, your Honor. Megan
23 Somogyi, that's M-e-g-a-n S-o-m-o-g-y-i, for the County
24 of San Luis Obispo.

25 ALJ SEYBERT: Thank you.

1 Next we have Green Power Institute.

2 MR. MORRIS: (Line muted.)

3 THE REPORTER: Excuse me, Mr. Morris, you're on
4 mute.

5 MR. MORRIS: Sorry about that. Gregg Morris
6 for the -- thank you, your Honor. Gregg Morris for the
7 Green Power Institute, G-r-e-g-g M-o-r-r-i-s.

8 ALJ SEYBERT: Thank you. Next we have the
9 Northern Chumash Tribal Council.

10 MS. HAUG: Thank you. Good morning. Lynn
11 Haug, L-y-n-n H-a-u-g, appearing this morning for the
12 Northern Chumash Tribal Council. I'll note that I'm
13 appearing on behalf of my colleague Samantha Neumyer who
14 is ill. Thank you.

15 ALJ SEYBERT: Thank you.

16 Next we have the Public Advocates Office at the
17 Commission.

18 MS. PURCHIA: Good morning. Robyn Purchia,
19 R-o-b-y-n P-u-r-c-h-i-a, for the Public Advocates
20 Office, or Cal Advocates.

21 ALJ SEYBERT: Thank you.

22 Small Business Utility Advocates.

23 MR. RAYKHER: Yeah. Thank you, your Honor.
24 Good morning. Mikhail Raykher on behalf of the Small
25 Business Utility Advocates. First name is spelled

1 M-i-k-h-a-i-l. Last name is spelled R-a-y-k-h-e-r.

2 ALJ SEYBERT: Thank you.

3 Next we have The Utility Reform Network.

4 MR. FREEDMAN: Good morning. Matthew Freedman,
5 M-a-t-t-h-e-w F-r-e-e-d-m-a-n on behalf of The Utility
6 Reform Network.

7 ALJ SEYBERT: Thank you. Women's Energy
8 Matters.

9 MS. MERRIGAN: Good morning. Jean Merrigan,
10 J-e-a-n M-e-r-r-i-g-a-n, on behalf of Women's Energy
11 Matters.

12 ALJ SEYBERT: Thank you.

13 I will also go through the parties that were
14 just granted party status. And there's no need to spell
15 your name this time around.

16 The Natural Resources Defense Council.

17 MS. ASHFORD: Yes. Sylvie Ashford on behalf of
18 NRDC.

19 ALJ SEYBERT: Thank you.

20 Southern California Edison Company.

21 MS. KARLSTAD: Cathy Karlstad on behalf of
22 Southern California Edison.

23 ALJ SEYBERT: Thank you.

24 And the Union of Concerned Scientists.

25 MR. SPECHT: Yes. Mark Specht on behalf of the

1 Union of Concerned Scientists.

2 ALJ SEYBERT: Thank you.

3 That is everyone I have on my list. Let's move
4 on to the categorization of the proceeding.]

5 In the January 12th, 2023, Order Instituting
6 Rulemaking, the Commission preliminarily categorized
7 this proceeding as ratesetting. The ratesetting
8 categorization appears to be broadly agreed upon by all
9 parties in the written filings.

10 Is there anyone today that would like to
11 comment on the categorization of the proceeding? If so,
12 please raise your hand, and I will call on you.

13 (No response.)

14 ALJ SEYBERT: Okay. I am not seeing any hands
15 raised, so I will recommend the ratesetting
16 categorization to Commissioner Douglas.

17 A reminder --

18 MR. HAGA: ALJ Seybert, this is Joe Haga. Can
19 we go off the record for one moment?

20 ALJ SEYBERT: Let's go off the record.

21 (Off the record.)

22 ALJ SEYBERT: Let's go back on the record.

23 Mr. Boyd, are you on the line?

24 MR. BOYD: Yes, sir.

25 ALJ SEYBERT: Okay. Mr. Boyd just joined our

1 call. I'm going to go back to party appearances.

2 Mr. Boyd, will you please spell your first and
3 last name and indicate the party you are representing?

4 MR. BOYD: My first name is Michael,
5 M-i-c-h-a-e-l. And my last name is Boyd, B-o-y-d. And
6 I'm representing Californians for Renewable Energy, Inc.

7 ALJ SEYBERT: Thank you, Mr. Boyd.

8 MR. BOYD: You're welcome.

9 ALJ SEYBERT: Moving back to the proceeding
10 categorization, as I mentioned, the ratesetting
11 categorization appears to be broadly agreed upon by all
12 of the parties in the written comments.

13 Again, does anyone wish to comment on the
14 ratesetting categorization? If so, please raise your
15 hand.

16 (No response.)

17 ALJ SEYBERT: Thank you. I'm not seeing any
18 hands raised. So I will recommend the ratesetting
19 categorization to Commissioner Douglas.

20 A reminder to parties that the ex parte
21 requirements for ratesetting proceedings will continue
22 to apply. And if you are not familiar with the
23 Commission's ex parte rules, please consult Article 8 of
24 the Commission's Rules of Practice and Procedure.

25 Let's move on to issues in scope of the

1 proceeding. I'd like to start by asking a few questions
2 on issues that I think would benefit from further record
3 development. And then I'll provide parties with an
4 opportunity to comment on the broader list of potential
5 scoping issues.

6 My first question concerns funding for the
7 Diablo Canyon Independent Safety Committee or the
8 "DCISC."

9 My understanding is that the DCISC has a 2023
10 allowance of approximately \$1 million. But that due to
11 the additional duties and responsibilities set forth in
12 Senate Bill 846, the DCISC might experience a financial
13 shortfall beginning as early as the third quarter of
14 this year.

15 Ms. Wilson, starting with the first question
16 with you. In reply comments and in the joint prehearing
17 conference statement, PG&E indicates that it supports
18 recovery of the DCISC costs that are in excess of PG&E's
19 general rate case forecast for 2023 and 2024 through the
20 SB 846 loan amount that's currently being tracked in the
21 Diablo Canyon Transition and Relicensing Memorandum
22 Account. And for the purposes here, when I say
23 "memorandum account," I'm referring to the Diablo Canyon
24 Transition and Relicensing Memorandum Account.

25 To further clarify the statement, Ms. Wilson,

1 do you think it would be fair to characterize these
2 additional 2023 and 2024 DCISC operational costs as just
3 described as transition-related activities, which are
4 further described in the decision that established this
5 memorandum account, D. 22-12-005?

6 MS. WILSON: Correct. Some of -- it is PG&E's
7 understanding that the work that the DCISC is conducting
8 is directly related to SB 846 activities including
9 transition activities. And PG&E is supportive of an
10 expeditious process so that the Commission grants DCISC
11 any authority that it may require to raise these funds
12 for work incurred (indecipherable) if SB 846 outside of
13 the GRC process.

14 ALJ SEYBERT: Thank you, Ms. Wilson.

15 Based on written comments, there seems to be a
16 few options to address the potential funding shortfalls
17 in the -- particularly in 2023 and 2024. The first is
18 to use the memorandum account that we just discussed.

19 Since the cost recorded in this memorandum
20 account are recovered through the SB 846 loan and other
21 government funding streams as opposed to from utility
22 ratepayers, Ms. Wilson, are there any specific actions
23 that the Commission would need to take including
24 potentially a Commission decision or further direction
25 in the scoping memo that would enable PG&E to use this

1 memorandum account to fund the additional operational
2 costs that DCISC might incur in these years?

3 MS. WILSON: PG&E is unaware of the specific
4 restrictions placed upon PG&E to fund the DCISC costs
5 through the memorandum account, which is funded by
6 government funding. I think the concern may be DCISC's
7 ability to receive those funds. And so I would defer to
8 DCISC on those concerns.

9 However, PG&E would be supportive of a
10 Commission order or decision which would permit DCISC to
11 receive those funds through that funding stream.

12 ALJ SEYBERT: Thank you. That's helpful.

13 So, sort of, going off that train of thought if
14 we use this memorandum account, what would the process
15 look like? Would PG&E be able to provide the funding up
16 front prior to the DCISC experiencing any funding
17 shortfall?

18 MS. WILSON: So my understanding is that the
19 DCISC could invoice PG&E for work to be conducted in
20 furtherance of their SB 846 activities. And PG&E would
21 process the invoice and fund those activities through
22 that funding stream.

23 ALJ SEYBERT: Thank you.

24 That, kind of, leads into my next question,
25 which is how should we determine what the additional

1 upfront funding would be following what you just said?
2 One of those options could be the DCISC could send an
3 invoice for that last quarter of the year, and that
4 might be one way to move forward; is that right?

5 MS. WILSON: Correct. I don't -- This is Maria
6 Wilson for PG&E. I do not have a DCISC projected budget
7 for example to discuss today. But my understanding is
8 that PG&E would receive the invoice and evaluate it
9 consistent with the processes to fund work conducted in
10 furtherance of SB 846 for the DCISC.

11 ALJ SEYBERT: Thank you, Ms. Wilson.

12 One last question then I'll open it up to the
13 other parties. One of the other options for addressing
14 this funding shortfall as mentioned in comments is to
15 use the DCISC's remaining 2022 balance, which is
16 approximately \$87,000 instead of returning this amount
17 to PG&E ratepayers. There's also the possibility of
18 increasing the 2023 and 2024 allowance amounts.

19 However, my understanding is that for either of
20 these actions it would require a change to the DCISC's
21 approved charter, which presumably would need to occur
22 through a Commission decision.

23 Is that your understanding as well, Ms. Wilson?

24 MS. WILSON: Yes. that's my understanding of
25 the issue.

1 But with regard to the rollover amounts, PG&E
2 is supportive of applying the rollover amounts to their
3 -- the DCISC's work stream in 2023 related to SB 846.
4 And to the extent that there's a need to return funds,
5 ordered under a Commission decision, we could work
6 through the balancing account and accounting processes
7 to do that to in fact transfer -- avoids the short-term
8 cash flow crunch that DCISC has indicated it may
9 encounter.

10 ALJ SEYBERT: Great. Thank you.

11 Does any other party wish to comment on this
12 issue? If so, please raise your hand.

13 (No response.)

14 ALJ SEYBERT: I am not seeing any hands raised.

15 So let's turn to a different issue. In written
16 comments, Cal Advocates recommends the Commission
17 coordinate with the California Natural Resources Agency
18 to ensure that the environmental review public input
19 process that's required in SB 846 occurs at least
20 30 days before issuing a decision in this proceeding.

21 However, in its comments, the County of San
22 Luis Obispo also notes that the Natural Resources Agency
23 has already held a public meeting on February 10th of
24 this year. And that this meeting was intended to
25 satisfy the public input process contemplated in SB 846.

1 Ms. Purchia, does Cal Advocates have any
2 comment on whether the existing February 10th meeting
3 would satisfy the public input requirement?

4 MS. PURCHIA: Thank you, your Honor. We don't
5 have a comment on the February 10th meeting.

6 I'll just say that it's our understanding of
7 the requirements of SB 846 that the Natural Resources
8 Agency has one public meeting and accepts written
9 comments. So if those requirements were met at the
10 February 10th meeting, then we would think it would
11 satisfy.

12 ALJ SEYBERT: Thank you.

13 Does any other party have a comment on this
14 issue? If so, please raise your hand.

15 (No response.)

16 ALJ SEYBERT: And a reminder. If you can't
17 find the raise hand Webex feature, you can also just
18 raise it physically, and I will be able to do that as
19 well.

20 Ms. Merrigan.

21 MS. MERRIGAN: Hi. It's Jean Merrigan for
22 Women's Energy Matters. I guess one suggestion is that
23 meeting was really under the radar for such an important
24 -- are we saying that that has fulfilled the
25 environmental review?

1 ALJ SEYBERT: That will have fulfilled the
2 public input process.

3 MS. MERRIGAN: Okay. Yes. I guess WEM's
4 position is that that was really under the radar. I
5 don't -- I think I may have received an email about
6 that meeting, but it wasn't really clear that this would
7 be the only -- the sole time for the public to make
8 comment on environmental impacts. So that's WEM's
9 position.

10 ALJ SEYBERT: Thank you.

11 Ms. Wilson?

12 MS. WILSON: Yes, thank you. It's PG&E's
13 understanding that no more meetings are required under
14 SB 846, but the California Natural Resources Agency, of
15 course, can have more meetings voluntarily. But the
16 statutory requirements have been met by the
17 February 10th meeting.

18 ALJ SEYBERT: Thank you.

19 And, Mr. Boyd?

20 MR. BOYD: Star zero?

21 ALJ SEYBERT: Mr. Boyd, I heard your voice for
22 a moment.

23 MR. BOYD: Hello? Can you hear me?

24 ALJ SEYBERT: I can hear you.

25 MR. BOYD: So I'm a little concerned. I didn't

1 hear anything about that meeting. And my understanding
2 is that we got -- this involved the Regional Water
3 Quality Control Board. It involved the California
4 Coastal Commission who is the lead agency on the
5 environmental review at the state level.

6 What about the federal EIS that's going to be
7 required for this?

8 It seems like -- like the previous speaker this
9 is totally under the radar. If it -- I object to using
10 that meeting. That's basically my comment.

11 Thank you.]

12 ALJ SEYBERT: Thank you, Mr. Boyd.

13 Ms. Somogyi.

14 MS. SOMOGYI: Thank you, your Honor. Megan
15 Somogyi for the County of San Luis Obispo. I did just
16 want to address Mr. Boyd's question about sort of
17 (indecipherable) the environmental review process for
18 Diablo Canyon is -- there are a number of moving parts
19 obviously.

20 The County is the lead agency for environmental
21 review for Diablo Canyon decommissioning, which is a
22 separate inquiry from extended operation. It's not
23 clear at this point if full-scale environmental review
24 is going to be required for -- for extended operations
25 because that's essentially continuing the status quo,

1 and the County can't speak to what the California
2 Natural Resources Agency has planned, if anything, for
3 additional meetings.

4 This is, you know -- as the County indicated in
5 its comments, we certainly support maximizing
6 transparency and the robustness of the record. It's
7 just given the lack of sort of a detailed requirement in
8 Senate Rule 846 for any kind of a written or formal
9 environmental review, our concern was more about the
10 logistical feasibility of incorporating the CNRA's
11 process into this proceeding. If we find a way to do
12 that, we certainly support it.

13 ALJ SEYBERT: Thank you, Ms. Somogyi. I would
14 like to now move along, but there will be additional
15 opportunity for comment.

16 I issued an email ruling yesterday containing a
17 preliminary scope of issues and preliminary schedule for
18 this proceeding.

19 I want to stress that both the preliminary
20 scope and schedule are straw proposals intended to
21 solicit discussion today and that the final scope of
22 issues and schedule are to be determined in the assigned
23 commissioner's scoping memo and ruling and will consider
24 the range of written comments filed as well as today's
25 discussion.

1 Since both the preliminary scope of issues and
2 schedule are available through the email ruling, I don't
3 intend to go over them word for word today; however, at
4 a high level, Phase 1, Track 1 of the proceeding would
5 focus exclusively on funding issues for the Diablo
6 Canyon Independent Safety Committee.

7 Phase 1, Track 2 would consider the
8 establishment of new retirement dates for Diablo Canyon,
9 as well as associated cost mechanisms and the
10 development of cost recovery and approval processes.

11 Phase 2 would consider several related issues
12 raised in party comments, including whether and how the
13 benefits of extended operations would be allocated
14 across load serving entities.

15 With all that said, do parties have any
16 comments on the preliminary scope of issues as they were
17 provided in yesterday's email ruling? If so, please
18 raise your hand and I will call on you.

19 And just so you have a sense of structure, I'm
20 intending to have two rounds of comments. The first
21 round will be for parties to provide initial comments on
22 the preliminary scope of issues, and then once everybody
23 has been called upon, I will then provide another
24 opportunity for any follow-up responses.

25 We will start with Mr. Lindl.

1 MR. LINDL: Thank you, your Honor. Tim Lindl
2 on behalf of CalCCA.

3 Your Honor, CalCCA agreed with the issue that
4 was included regarding benefit allocation as it was
5 stated within the preliminary scope of issues. In fact,
6 it was stated better than we had stated it in our
7 comments, so thank you for that.

8 The issue we have -- and I'm not sure if your
9 Honor would like us to address this at this point -- is
10 that we feel pretty strongly that issue should be moved
11 from Phase 2 into Phase 1, Track 2. I can address that
12 now or, if you'd like me to wait for scheduling, I can
13 address it at that point.

14 ALJ SEYBERT: I considered this might come up
15 in the scope of issues. Let's defer that question to
16 scheduling and we'll make sure to have time for it
17 there.

18 MR. LINDL: Okay. Thank you, your Honor.

19 ALJ SEYBERT: Thank you. Ms. Wilson.

20 MS. WILSON: Thank you, your Honor. Maria
21 Wilson for PG&E. And thank you for distributing the
22 preliminary schedule and scope in advance which PG&E had
23 an opportunity to review.

24 We have several comments, but I'll focus on, I
25 think, our primary concern, which is the consideration

1 of testimony from PG&E on April 27th concerning
2 historical and forecast data for Diablo Canyon, cost
3 data for Diablo Canyon, including nuclear fuel costs and
4 also requesting that PG&E identify the portion of costs
5 it expects to recover through the loans provided by the
6 DWR loans and from the U.S. Department of Energy's Civil
7 Nuclear Credit Program.

8 As specified in our opening and reply comments
9 and prehearing conference statement, PG&E disagrees with
10 the presentation of these costs within the scope of this
11 proceeding. Historic and forecast costs of Diablo
12 Canyon as part of this -- for Phase 1 proceeding is not
13 a tack that the legislature delegated to the CPUC. In
14 keeping these views, these are irrelevant to the matters
15 that the CPUC needs to decide in this proceeding.

16 In our view, SB 846 creates a comprehensive
17 approach to addressing extended operations and its
18 delegated tasks and responsibility for those tasks to
19 specific state agencies. The cost effectiveness
20 evaluation associated with Diablo Canyon extended
21 operations is to be conducted by the CEC.

22 With regard to consideration of past, current,
23 and future cost, the Commission, for example, has
24 already -- with regard to its transition costs --
25 determined just last year in D.22-12-005 that the

1 responsibility of reported transition costs is to be
2 overseen by a DWR process and not a Commission process.

3 So with regard to those costs, those costs
4 should be excluded from consideration of this proceeding
5 as well. And PG&E views the proceedings as focusing --
6 needing to focus on the tasks that are specifically
7 assigned to the CPUC and should not intrude upon or
8 expand upon those issues and topics that are expressly
9 tasked to other agencies. Doing so otherwise could
10 undermine and disrupt the specific framework that was
11 directed in SB 846 and contrary to legislative intent.

12 With regard to cost effectiveness, that
13 responsibility is expressly delegated to the CEC in
14 Public Resources Code Section 25233.2. The preliminary
15 order in my view -- or in PG&E's view -- recognized, you
16 know, the receipt of that report and assessment into
17 this proceeding for party comment and ultimately to
18 inform the Commission's decision.

19 However, there's no obligation under statute,
20 and it's been consistent with the statute to require
21 parties conduct that analysis here; likewise, there's no
22 obligation or requirement for PG&E to conduct that
23 analysis itself. If PG&E were ordered to do that, PG&E
24 has significant concerns about the achievement of other
25 items in this expedited proceeding.

1 At a high level, the direction to PG&E as
2 framed in yesterday's scoping -- or preliminary schedule
3 and ruling -- would require an extensive effort by PG&E
4 to prepare. The obligation to conduct that between now
5 and April 27th is completely infeasible. It's --

6 ALJ SEYBERT: That -- apologies. I don't mean
7 to interrupt you, but let's save that one for the
8 schedule discussion.

9 MS. WILSON: Great. Thank you. So, yeah. The
10 primary concern with yesterday's preliminary scope of
11 issues really arises from how that scoping matter is
12 addressed in the procedural schedule, we could talk a
13 little bit more about it then.

14 But at a high level, PG&E's core concern is
15 that the application of the scope rates to the schedule
16 is inconsistent with SB 846. And PG&E, you know,
17 recognizes that CEC is performing the analysis related
18 to the cost effectiveness of Diablo Canyon and that this
19 proceeding should not duplicate those efforts. To do so
20 would be inconsistent with the statutory intent set
21 forth in SB 846.

22 ALJ SEYBERT: Thank you. Ms. Purchia.

23 MS. PURCHIA: Thank you, your Honor.

24 Cal Advocates just wants to indicate its support of
25 including Resource Adequacy issues into the scope of the

1 schedule. We will have some comments as to the
2 scheduling of RA issues, but we can bring that up then
3 when we address that. Thank you.

4 ALJ SEYBERT: Thank you. Ms. Koss.

5 MS. KOSS: Thank you, your Honor. CUE agrees
6 with PG&E regarding SB 846's assignment of tasks to
7 various agencies specifically related to cost analyses.
8 Public Resources Code Section 25233.2 clearly tasks the
9 Energy Commission with the cost analysis.

10 Specifically, it provides that the Energy
11 Commission shall present a cost comparison of extended
12 operations of Diablo and a portfolio of other feasible
13 resources available for 2024 through 2035.

14 It also provides that if the costs of extended
15 operations exceed limits in the DWR loan agreement, the
16 Energy Commission must reevaluate the cost effectiveness
17 of extended operations. Public Utilities Code
18 Section 712.8 clearly lays out the Public Utility
19 Commission's tasks, none of which include analyzing of
20 cost forecast.

21 While it may be unusual for the Energy
22 Commission rather than the Public Utilities Commission
23 to perform cost analyses, the legislature specifically
24 made it so in SB 846. And practically speaking,
25 frankly, given the December 31, 2023, deadline for the

1 PUC to issue its decision here, we just don't have time
2 to do the cost analysis here.

3 Plus, it would be repetitive and wasteful given
4 that the Energy Commission is already undergoing that
5 analysis. So we don't agree that it should be included
6 in the scope here. Thank you.

7 ALJ SEYBERT: Thank you. Mr. Douglass.

8 MR. DOUGLASS: Thank you, your Honor. Daniel
9 Douglass for the Direct Access Customer Coalition.

10 DACC is a regulatory alliance with educational,
11 governmental, commercial, and industrial customers that
12 use Direct Access for all or part of their load. DACC
13 has two primary interests in this proceeding.

14 The first is cost recovery and how those costs
15 are allocated among load serving entities, or LSEs.
16 Your preliminary scope indicates this to be a Phase 1,
17 Track 2 issue with which we concur.

18 DACC members are also extremely interested in
19 what the preliminary scope describes as the allocation
20 of benefits such as Resource Adequacy and GHB-free
21 attributes. The preliminary scope includes this issue,
22 but it marks it for Phase 2 consideration.

23 In this case, we concur with the remarks by
24 Mr. Lindl, counsel for CalCCA, that we believe that
25 instead, the allocation of benefits should be included

1 in Phase 1. There's a fundamental reason for DACC's
2 interest in the allocation of benefits.

3 As customers, DACC members want to see that the
4 costs that they are obligated to pay under Senate Bill
5 846 should entitle their energy service providers, or
6 ESPs, to receive corresponding benefits. We believe
7 this to be a fundamental right for all customers of all
8 LSEs, be they Direct Access customers of ESPs, customers
9 of Community Choice Aggregators, or bundled customers of
10 the utilities.

11 My remaining remarks on the subject tend to
12 pertain more to schedule and so I will, as you indicated
13 to Mr. Lindl, conclude my remarks now. Thank you.

14 ALJ SEYBERT: Thank you. Mr. Geesman.

15 MR. GEESMAN: Thank you, your Honor. John
16 Geesman on behalf of the Alliance for Nuclear
17 Responsibility.

18 I want to register our strong disagreement with
19 PG&E and CUE's gross misreading of the statute. We
20 strongly support the draft scoping memo in terms of the
21 requirement that PG&E serve testimony on historical and
22 forecast cost data.

23 We don't believe that the Commission could
24 discharge its responsibilities under Section 451 of the
25 Public Utilities Code or the California Constitution

1 without receiving this information and certainly in
2 exchange for the \$1.4 billion of taxpayer money, which
3 SB 846 provided to PG&E, and the exceptional obligation
4 being passed through to all jurisdictional load serving
5 entities in SB 846.

6 It's not unreasonable to expect the Commission
7 to perform this function. And there's no reason to
8 believe that performing this function would in any way
9 intrude on the duties assigned by SB 846 to the
10 California Energy Commission.

11 I do have some related scheduling questions to
12 add on this subject when that topic comes up. Thank
13 you, your Honor.

14 ALJ SEYBERT: Thank you. Mr. Freedman.

15 MR. FREEDMAN: Thank you, your Honor. Matt
16 Freedman on behalf The Utility Reform Network.

17 I want to echo some of what Mr. Geesman just
18 said and strongly disagree with PG&E's contention. Our
19 comments do address the issue of PG&E providing a cost
20 forecast for Diablo Canyon extended operations in this
21 proceeding.

22 In our view, PG&E must be directed to provide
23 both historical costs and a forecast for extended
24 operations in this case. This information is critical
25 to the Commission's ability to determine whether the

1 costs of license renewal are too high to justify. Those
2 are the statutory words.

3 This determination is expressly delegated to
4 the PUC and not to any other state agency. There's no
5 way for the Commission to make this determination
6 without reviewing forecasted costs for extended
7 operations. The statute does not constrain the
8 Commission's ability and authority to independently
9 review these costs in making the statutory
10 determinations.

11 We believe that the Commission should take into
12 account the reports developed by the CEC and by the
13 recommendations from Diablo Canyon Independent Safety
14 Commission. The CEC comparison should be useful, but
15 it's not determinative.

16 In order to evaluate the results from the CEC
17 comparison report, the Commission should require PG&E to
18 provide, in this case, the cost forecasts already shared
19 with the U.S. Department of Energy. PG&E has already
20 provided such a forecast. The idea that they cannot
21 develop one on an expedited time frame seems
22 disingenuous, and they should be required to provide
23 forecasts that they are sharing with the Energy
24 Commission for use in the CEC's report.

25 PG&E should then endorse some sort of forecast

1 in this proceeding to help the Commission validate the
2 expected cost of future operations. Moreover, the PUC
3 is obligated to ensure that PG&E does not actually
4 collect or plan to collect the same categories of costs
5 from both ratepayers and sources outside of rates.

6 Requiring PG&E to provide this forecast of
7 future costs and to identify which sources of funding
8 are expected to be used to pay for these costs is
9 critical to allowing the Commission to enforce its
10 statutory obligations.

11 So for those reasons, we support the way that
12 this issue is included in the scope of the proceeding
13 and the requirement for PG&E to provide such a cost
14 forecast -- historical and forecast as part of Phase 1,
15 Track 2(a). Thank you.

16 ALJ SEYBERT: Thank you. Ms. Merrigan.

17 MS. MERRIGAN: Hi. Jean Merrigan for Women's
18 Energy Matters. WEM also supports the way it's been set
19 out in the preliminary scoping. WEM has supplied --
20 addressed this in our opening and reply comments and in
21 the PHC statement.

22 But essentially the CPUC can't make decisions
23 about cost and prudence without context. I guess I
24 could mention this later in the procedural when we talk
25 about schedule, but the idea that we don't have time,

1 that excuse is just -- that's just not good enough.

2 WEM has actually in our opening comments made
3 very specific recommendations about how we could get
4 that going, that discussion going, simply by updating
5 some tables that were provided in earlier -- in the
6 previous proceeding's testimony. So that's all I have
7 to say. Thank you.

8 ALJ SEYBERT: Thank you. Mr. Boyd.

9 MR. BOYD: Hello? Can you hear me?

10 ALJ SEYBERT: Yes.

11 MR. BOYD: Okay. Thank you. I just wanted to
12 let you know I didn't get a copy of your email yesterday
13 and would appreciate if somebody sends me the email with
14 your preliminary scope.

15 What I'm most confused about is that PG&E got
16 an extension of time from the NRC and they can -- they
17 basically were told that they could, as long as they
18 provided an adequate application to the NRC by the 31st,
19 that -- that -- they -- it could go past the retirement
20 dates and they could continue to process their
21 application.

22 I don't know what they're going to apply for.
23 Are they going to apply for five-year extension? Are
24 they going to apply for 20-year? That's all still up in
25 the air. How can we do any of these cost assessments

1 unless we know what they're going to apply for? I'm
2 just feeling like we're rushing something when we've got
3 more time.

4 So is there some kind of statutory requirement
5 that they -- that this be done in a short time frame?

6 And when are we going to have at least a draft
7 application to look at so we know what we're analyzing
8 is what's going to go to the NRC. That's my main
9 confusion here and why I'm not an advocate for rushing
10 anything. Okay.

11 And as far as the CEC being the one who is
12 going to decide, like, the need and reliability and all
13 that stuff, why is this a ratemaking proceeding? I
14 thought a ratemaking proceeding -- the Commission is
15 going to analyze all that irrespective of the
16 legislation. Isn't that the normal process that we
17 would go through in a ratemaking proceeding?

18 So, again, my concern is that we're rushing
19 things when we've got an extension in time now from the
20 NRC. Thank you.

21 ALJ SEYBERT: Thank you, Mr. Boyd. Mr. Morris.

22 MR. MORRIS: Excuse me. Thank you, your Honor.
23 I have a couple of comments.

24 One, in our comments or reply comments on the
25 OIR, we sort of expressed a skepticism about whether the

1 request to do the -- PG&E to do the cost study was
2 necessary. I'd like just to say, based on what I've
3 heard here, I think it makes sense to do that, and so we
4 endorse that item on the scope of work.

5 Under your Phase 1, Track 2, Number 1(e), you
6 list NRC Conditions of License Renewal as one of the
7 scoping items in this year but -- and we expressed a
8 little concern about how long its going to take PG&E to
9 actually put in their license renewal application.
10 They're saying they're going to do it at the end of the
11 year. How can we possibly know what NRC conditions
12 might be within Phase 1 if we don't even have an
13 application filed?

14 So I'd like to encourage PG&E to file that
15 application sooner so that we can get first round of
16 defense. Thank you.

17 ALJ SEYBERT: Thank you. Ms. Haug.

18 MS. HAUG: Thank you, your Honor. Lynn Haug on
19 behalf of the Northern Chumash Tribal Council.

20 We have no comment on the preliminary scope of
21 Phase 1 or Phase 2 but do want to appreciate and support
22 the note on page two of the preliminary scope of issues,
23 which points out that unless explicitly stated in the
24 preliminary scope for Phase 1 and Phase 2, this
25 proceeding will not consider any other issues referenced

1 in Senate Bill 846, including disposition of Diablo
2 Canyon and surrounding lands. That note is helpful and
3 we request that it be included in the scoping memo.

4 ALJ SEYBERT: Thank you.

5 MS. HAUG: Thank you.

6 ALJ SEYBERT: I'm going to open it up to see if
7 there are any reply comments based on what was just
8 heard. I ask parties this round to keep their comments
9 brief. If you have any reply comments, please go ahead
10 and raise your hand now.

11 Ms. Wilson.

12 MS. WILSON: Hello. Maria Wilson for PG&E, and
13 I will keep it brief.

14 To clarify, PG&E is not seeking cost recovery
15 here because in PG&E's view, the purpose of this
16 proceeding is to determine the structures that would
17 apply for extended operation cost recovery. And so the
18 statute directs the process in 712.8(h)(1) whereby the
19 operator would recover costs and fees from all CPUC
20 jurisdictional customers.

21 In our view, the purpose of this proceeding is
22 to develop that structure, and then, subsequently, if we
23 have a December 31st decision establishing new
24 retirement dates for PG&E, apply that structure, develop
25 the -- (audio interruption) -- to PG&E's future cost

1 recovery request.

2 So hopefully that clarifies, one, the
3 ratemaking aspect of this proceeding and then, two, to
4 clarify that PG&E is not seeking cost recovery of any
5 costs as part of this proceeding and the consideration
6 of costs would happen in a subsequent proceeding, the
7 structure for which would be developed here.

8 With regard to allocation of benefits in which
9 PG&E's view is set forth in comments, it says
10 inappropriate to allocate RA benefits, but we do think
11 that that could be a Phase 2 issue and is not essential
12 to determine by the end of 2023.

13 It could be an early Phase 2 activity to
14 determine whether and how any benefits from extended
15 operation of Diablo Canyon could be applied statewide.

16 And with regard to the, you know, questions
17 about what are we doing here in this proceeding, SB 846
18 would establish a requirement to have a decision on
19 those extended operation dates by the end of the year.

20 With regard to the NRC, you know, question, you
21 know, the -- PG&E has made clear in its comments that it
22 does not expect to have an application approved for
23 renewal by the end of the year, and we did request that
24 removal of that issue occur as part of preliminary
25 scoping memo Issue 1(e) and 1(c).

1 So the NRC has permitted DCPD Units 1 and 2 to
2 continue operating under its existing license through
3 the grant of the one-time exemption for Diablo Canyon
4 Power Plan Unit 1 and 2. This permits PG&E to submit a
5 license removal -- or, sorry -- renewal application for
6 the units less than five years from the expire date of
7 the license and no later than December 31, 2023.

8 That exemption allowed PG&E's licenses for DCPD
9 Units 1 and 2 to remain in effect beyond November 2,
10 2024, and August 25, 2025, respectively for the units,
11 provided that PG&E submits a sufficient license renewal
12 application for the reactors by December 31, 2023.]

13 So matters associated with those license
14 renewal processes will occur at the NRC and on the NRC's
15 timeframe not the Commission's.

16 ALJ SEYBERT: Thank you, Ms. Wilson.

17 I am hearing a bit of background noise on the
18 telephone line. Just a reminder for folks to please
19 mute your lines if you're not called upon to speak.

20 Ms. Purchia?

21 MS. PURCHIA: Thank you, your Honor. Robin
22 Purchia with Cal Advocates.

23 I just wanted to point out that SB 846, that
24 would be PU Code 712.8(h)1, requires the PUC to
25 establish an ERRA-like proceeding that explicitly

1 forecasts the cost of the Diablo extension. So that is
2 an SB 846 obligation.

3 Thank you.

4 ALJ SEYBERT: Thank you.

5 Mr. Freedman?

6 MR. FREEDMAN: Thank you, your Honor.

7 In response to PG&E's comments, we understand
8 that this proceeding does not authorize specific cost
9 recovery at least in the Phase 1, Track 2 process. But
10 the reason that PG&E should be providing an estimate as
11 to the cost it expects to recover in rates versus from
12 external sources is for the Commission to discharge its
13 responsibility to determine whether the cost of
14 operation to ratepayers are too high to justify. I
15 think it's simple accounting.

16 PG&E has certainly provided this information to
17 the U.S. Department of Energy, and there's no reason why
18 it can't provide the same information to this Commission
19 and to ratepayers as part of a review that's required
20 under SB 846.

21 The legislature has clearly directed the
22 Commission to review all these sources of information
23 and make a determination in its discretion as to whether
24 the costs are too high to justify. That really clearly
25 puts the ball in the PUC's court and gives the

1 Commission the primary role in making these
2 determinations.

3 We think it would be a serious mistake for the
4 Commission to adopt PG&E's proposal to simply defer to
5 the Energy Commission in terms of making a determination
6 regarding the reasonableness of future costs.

7 Thank you.

8 ALJ SEYBERT: Thank you, Mr. Freedman.

9 I don't see any other hands up. So let's go
10 ahead and move on to the next item I have, which are the
11 need for hearing and proceeding schedule.

12 Both of these topics were a central focus
13 within written comments and both are made more complex
14 by the expedited timeframe for an end of the year
15 decision required by SB 846 as well as by the various
16 sections of statute that require the Commission to
17 consider reports and determinations developed outside of
18 this proceeding.

19 The preliminary schedule included with
20 yesterday's email ruling attempts to accommodate the
21 varying parties' positions on the need for hearings by
22 including a set date by which parties may request
23 evidentiary hearing by mapping out a potential schedule
24 for the service of direct and rebuttal testimony should
25 the need arise.

1 As proposed the proceeding activities would
2 initially focus on party proposals and building the
3 record on issues of law and policy while the need for
4 testimony and potential hearings would occur later in
5 the year and would be limited to facts in dispute.

6 The general -- the one, sort of, exception to
7 this general framework, which we have heard about
8 already, is the current proposal to have PG&E serve
9 initial testimony on historical and forecast cost data.

10 With all this context in mind, I am now going
11 to ask parties to comment on the need for hearings and
12 the preliminary schedule as is presented in the email
13 ruling that was issued yesterday.

14 Please raise your hand, and I will call on you.
15 And similar to before, I anticipate an initial round of
16 opening comments and I will provide a separate round for
17 followup responses.

18 Let's go ahead and start with Mr. Lindl because
19 I know you have a scheduling issue that you raised a
20 little bit earlier.

21 MR. LINDL: Thank you, your Honor. Tim Lindl
22 with CalCCA. Two points we wanted to make on schedule,
23 your Honor. The first is we believe it's critical to
24 consider the allocation of benefits from this plant and
25 in particular RA capacity in Phase 1.

1 The purpose of SB 846 in the statute is to
2 consider extending the life of Diablo Canyon to protect
3 Californians from the risk of near-term shortfalls in
4 procured capacity as the State addresses GHG reduction
5 and electrification goals.

6 So the timing's all important and the only way
7 to ensure the question of near-term capacity can be
8 addressed in a timely manner is to nail down benefit
9 allocation in time for year-ahead RA procurement
10 decisions before extended operations at Unit 1 begins in
11 November 1, 2024, if the Commission allows continued
12 operation.

13 Working backwards, load serving entities need
14 to make their year-ahead RA showings by October 31st,
15 which means procurement for those showings has to start
16 between spring and summer of next year and at the very
17 latest July, 2024.

18 So load serving entities need a, "Yes, this
19 will happen and that's the Commission's decision." But
20 they also need a, "Heres how it will happen," by
21 July 2024. And that is advice letter implementation.

22 So we think we need a decision by the end of
23 this year, 2023 or very early 2024, in order for load
24 serving entities to be able to plan around whether or
25 not they will be impacted by the allocation of Diablo

1 Canyon's capacity benefits. So that's put in Phase 1.

2 And one point I just want to emphasize, your
3 Honor, as everybody on this call knows, this is a
4 massive power plant. The net qualifying capacity of
5 each unit is 1,140 megawatts. So if you take the RA
6 benchmark and multiply it by that net qualified
7 capacity, the cost of delay per unit is \$8.4 million per
8 month. So if we go a whole year without Phase 2
9 resolving this question, that's 12 months at \$8.4
10 million, which is over \$100 million. That's the cost of
11 delay here. If we go beyond August of 2025 when Unit 2
12 is supposed to come online in terms of extended
13 operation, that is \$17 million a month.

14 So we don't think ratepayers should be on the
15 hook for \$100 million simply because the Commission did
16 not address this issue in Phase 1.

17 Now, we understand the Commission's concerns.
18 There's a lot to do in this case. But we think the
19 Commission and parties can take on complex matters in an
20 expedited one-year proceeding because we do it all the
21 time in the ERRR forecast proceedings and other cases.

22 The second point, your Honor, is more schedule
23 and logistics based. We are largely fine with the
24 Phase 1, Track 2 schedule. We obviously would like you
25 to include benefit allocation as well. I did want to

1 suggest a couple of changes.

2 First, we think there's insufficient time
3 between proposals for cost allocation and the process of
4 surrounding -- make sure I get this right -- the process
5 surrounding cost recovery and approval. So right now
6 that's June 2nd and June 9th. Opening comments are due
7 four or five weeks later there. That is not enough time
8 for us to be able to submit discovery, get responses
9 back, any followups for unresponsive answers, and then
10 responding to the proposals. We'd like more time there.

11 Secondly, your Honor, it does seem a little
12 duplicative to have proposals on June 9th and June 15th,
13 then have opening and reply comments, and also have
14 place holders for potential testimony. That seems to be
15 six procedural points largely trying to do the same
16 thing. So our suggestion would be to first combine
17 June 9th and June 16th and just make those both
18 June 9th.

19 And then to take a page from Judge Hymes'
20 playbook in the Green Access Program Rulemaking where
21 she had parties serve their proposals as testimony and
22 that gave the Commission the flexibility to either
23 develop just a rulemaking record and hold workshops. Or
24 if necessary it allowed the efficient development of an
25 evidentiary record if that is what was required.

1 So our suggestion is essentially to combine
2 those six items and have a June 9th date for proposals
3 served as opening testimony; a July 28th date for
4 proposals served as rebuttal testimony; and then keeping
5 a day, and we would suggest August 4th, as a deadline to
6 request hearings and briefings.

7 So testimony takes off the board the proposals
8 and the comments and the testimony points, but you still
9 have the opportunity to request hearing and briefings if
10 parties feel it is necessary and those dates would stay
11 the same.

12 Thank you, your Honor.

13 ALJ SEYBERT: Thank you. One followup
14 question: To the extent the allocation of benefits is
15 moved to Phase 1, Track 2, the schedule for that would
16 you anticipate it being considered alongside proposals
17 for cost allocation?

18 MR. LINDL: Yes, your Honor. I think that our
19 proposal would be to include that within the dates I
20 just gave you, yeah.

21 ALJ SEYBERT: Thank you.

22 Mr. Fulmer?

23 MR. FULMER: Yes. Thank you, your Honor.

24 I won't repeat what Mr. Lindl has said. But
25 the Alliance for Retail Energy Market is particularly

1 concerned about the allocation of Resource Adequacy.

2 And were that to occur, to have the details in time for
3 this to be practically used in 2025.

4 Mr. Lindl had laid out the current RA schedule.
5 And it is clear that unless the LSEs know what this
6 might mean for them, it creates significant uncertainty
7 as they do their planning.

8 Thank you.

9 ALJ SEYBERT: Thank you.

10 Ms. Purchia?

11 MS. PURCHIA: Thank you, your Honor. Robin
12 Purchia with Cal Advocates. Cal Advocates is also
13 concerned about the schedule consideration of RA issues
14 in Phase 2 due to the impacts they may have on
15 ratepayers. Many Of the same reasons that Mr. Lindl
16 with CalCCA just laid out. I'll provide just a little
17 bit after extra context.

18 As Mr. Lindl said, in early to mid 2024, load
19 serving entities will be procuring capacity to meet
20 their year-ahead 2025 summer system RA needs.

21 Because of Unit 1's large capacity, market
22 conditions will be impacted whether the Commission
23 allocates Unit 1's capacity for RA year 2025.

24 If the Commission allocates Unit 1's system RA
25 capacity, it would reduce LSEs' procurement needs and

1 introduce more liquidity into the system RA market.
2 This is would (inaudible) competitive procurement
3 environment. It would mitigate RA prices for
4 ratepayers. But this benefit may not be achieved if the
5 Commission decides too late on the RA allocation for
6 Unit 1.

7 For this reason, Cal Advocates recommends
8 modifying the proposed scope and schedule so that RA
9 considerations in Phase 2 as Issue 1 are moved to
10 Phase 1, Track 2. And that would be part of the cost
11 allocation discussion.

12 Cal Advocates' recommendation ensures
13 (indecipherable) and LSEs are using the best and most
14 recent information in making their decision. If the
15 Commission determines that RA considerations are best
16 left for Phase 2, Cal Advocates supports the decision on
17 the relevant RA issues by no later than the second
18 quarter of 2024. We do not believe that a potential
19 July 2024 decision would give market enough time.

20 Thank you, your Honor.

21 ALJ SEYBERT: Thank you.

22 Mr. Boyd?

23 MR. BOYD: Michael Boyd, CARE. Your Honor, I
24 wanted to address the need for evidentiary hearings.
25 I'm looking at your schedule, and I agree with one of

1 the speakers earlier that suggested that you move the
2 date to August 4th for requesting the evidentiary
3 hearings.

4 And if we do have evidentiary hearings, I -- we
5 participated before the California Energy Commission in
6 a number of their applications for certification
7 proceedings for new power plants. And in their
8 evidentiary hearing process, they would typically have
9 staff that prepared their analysis available for
10 cross-examination.

11 And if we do have evidentiary hearings, I would
12 request that -- that similar type thing occur in the
13 evidentiary hearing proceedings at the PUC that staff
14 witnesses that the CEC had if they could be available
15 for evidentiary hearing.

16 Thank you.

17 ALJ SEYBERT: Thank you, Mr. Boyd. We will
18 take those under considerations as they're requested.
19 Currently I do not intend to subject anyone to
20 cross-examination if they are not a party in this
21 proceeding. And I think that is part of the purpose and
22 part of the question of whether or not additional party
23 testimony needs to be served here.

24 Ms. Wilson?

25 (No response.)

1 ALJ SEYBERT: Ms. Wilson, I think you may be
2 muted.

3 MS. WILSON: Apologies for that. Can you hear
4 me?

5 ALJ SEYBERT: Yes, thank you.

6 MS. WILSON: Maria Wilson for PG&E. With
7 regard to allocation in PG&E's view, SB 846 does not
8 contemplate allocating RA capacity and doing so would
9 undermine the benefits of the DCPD extension. LSEs
10 should not be delaying their procurement full stop. The
11 statute is very clear on that. And so that's the risk
12 that we see, and we do not believe it should be a Phase
13 1 issue.

14 With regard to overall scheduling matters as I
15 indicated in our discussion about scope, PG&E recommends
16 that the April 27th testimony date be struck from the
17 procedural schedule.

18 As I previously articulated, PG&E disagrees
19 with historic and forecast process being within scope of
20 this proceeding as suggested by the preliminary
21 schedule. These matters are irrelevant to those that
22 the CPUC needs to decide in this proceeding and that the
23 tasks specified there have been delegated to the CEC.
24 So we're requesting removal of that date and
25 requirements to file testimony.

1 Likewise, the May 18th and opening comments on
2 the historical and forecast cost data and the reply
3 comments that they would also pertain to PG&E's
4 historical and forecast cost data, which would be on
5 June 2nd, 2023. So we would recommend that those --
6 that aspect of those reply and opening comments be
7 struck.

8 With regard to the June proposals in PG&E's
9 view if the April 27th and corresponding May 18th and
10 June 2nd dates are modified to reflect the removal of
11 cost data, PG&E believes we could accelerate the
12 proposal for cost recovery in consideration of the
13 mechanism --

14 (Crosstalk.)

15 MS. WILSON: I'd also note that the preliminary
16 OIR contemplated use of a workshopping process, and PG&E
17 continues to believe that that process can be useful to
18 handle really technical matters and facilitate party
19 coordination and discussion and benefit proposal
20 development. And so we noted that the schedule
21 specified here removed the workshopping process which we
22 believe, you know, is unfortunate. And we would
23 recommend reinstatement of that process consistent with
24 the original schedule posed that parties commented on in
25 the OIR.

1 With regard to the July 10th milestone in the
2 procedural schedule, we think -- we -- and so that
3 July 10th milestone would pertain to PG&E providing any
4 cost estimates for new or revised recommended actions in
5 the DCISC's June 28th, 29th fact finding reported
6 applicable.

7 What I'll say there is currently we do not
8 anticipate, you know, the need for actions. But we'll
9 see that that report should the DCISC report, though,
10 recommend action for which PG&E would incur costs,
11 PG&E's cost estimate development may require more than
12 the time allotted, which was approximately one week.
13 And PG&E would recommend a minimum of 30 days to
14 consider and prepare a response to that.

15 (Crosstalk.)

16 MS. WILSON: -- process as needed after
17 receiving that report as well, but we wanted to flag
18 that right now.

19 And with regard to the overall proceeding
20 structure and need for hearing, it was specified in our
21 opening and reply comments and our statement we're
22 supportive of having a deadline for parties to, you
23 know, request hearings and consider narrowing the issues
24 for hearing if any. PG&E does not believe that they
25 should be required particularly if we modify the

1 procedural schedule in the manner recommended by PG&E.

2 And so that's our expectation.

3 However, we're supportive of having a milestone
4 deadline in the procedural schedule, which the provided
5 schedule does prepare and identify.

6 What I will also just note, and, again, I
7 believe (indecipherable) over time. The dates
8 identified for potential hearings actually do include
9 the holidays. So I wanted to flag that.

10 But I think the procedural schedule landmark of
11 setting a date for parties to identify issues will be
12 helpful in the efficient resolution of this proceeding.

13 Thank you.

14 ALJ SEYBERT: Thank you, Ms. Wilson.

15 And just another reminder. Please mute your
16 phone if you're not called upon to speak.

17 Mr. Freedman?

18 MR. FREEDMAN: Thank you, your Honor. Matt
19 Freedman on behalf of The Utility Reform Network. Just
20 a few thoughts about schedule. I think Mr. Lindl has a
21 good point about consolidating some of the dates to
22 reduce the number of total submissions. The two June
23 dates that are a week apart could easily be
24 consolidated. I don't see any harm in doing that.

25 With respect to PG&E's concern that it cannot

1 provide a cost forecast by April 27, TURN would not
2 oppose moving that date a bit later to accommodate
3 whatever time PG&E would need to prepare such a
4 forecast.

5 And then with respect to hearings, in the joint
6 prehearing conference statement, TURN is listed as a
7 party supporting hearings. I think I want to clarify
8 our position. We support the option of hearings, but
9 I'm looking at the schedule, and understanding fully the
10 Commission's statutory obligation to get a final
11 decision out by the end of the year, the schedule for
12 hearings and rebuttal testimony is almost unworkable
13 from a practitioner perspective.

14 I think one of the issues that comes up is
15 typically specifically utilities and rebuttal testimony
16 tend to put a lot of new information in. And the delay
17 between rebuttal testimony and hearings is designed to
18 allow parties to submit discovery requests to ensure
19 that hearings don't become a very long exercise in,
20 "What did you mean when you said this on page 27," and
21 whatnot. That would be impossible under the schedule,
22 and I just don't know how hearings would really work.

23 So we're -- you know, we're a fan of hearings
24 where appropriate. It's not clear how they would work
25 in this case. And I think their reason to include

1 hearings as a possibility would be in the event that
2 there's literally just not a sufficient factual record
3 for parties to argue for purposes of briefing or any
4 sort of inclusory arguments.

5 So just our thoughts about the hearings. We
6 understand that you're placed in a very difficult
7 position here. But it doesn't seem like the particular
8 dates out here that are on the schedule are going to
9 work.

10 Thank you.

11 ALJ SEYBERT: Thank you, Mr. Freedman. And not
12 to put you on the spot, but do you have any suggestions
13 for how the schedule might change to be more realistic
14 when it comes to testimony and hearings?

15 MR. FREEDMAN: Well, your Honor. I mean, part
16 of the challenge here is that many of the submissions by
17 parties are styled as comments, and then there's a
18 testimony phase. And so I'm guessing that the idea here
19 is that testimony would include the issues that still
20 remain live with respect to factual disputes. And I
21 think it would need to happen earlier in order to tee up
22 enough time to get to a hearing date that makes sense.

23 So I'm not going to throw out specific dates on
24 the fly here. I'm just going to highlight the sequence
25 of events here. And I know that comments are not

1 typically subject to cross-examination because they're
2 not sponsored by individual witness.

3 Maybe one way to get around it would be for
4 parties to style their submissions earlier in the case
5 as testimony so that if there's a need to do hearings,
6 there wouldn't be another round of testimony days in
7 between the first set of comments-slash-testimony and
8 when hearings actually occur.

9 ALJ SEYBERT: Thank you. That's helpful.

10 Mr. Geesman?

11 MR. GEESMAN: Thank you, your Honor. John
12 Geesman on behalf of the Alliance for Nuclear
13 Responsibility. I want to register our disagreement
14 with PG&E's interpretation of SB 846 with respect to
15 benefit allocation.

16 I also want to indicate A4NR's endorsement of
17 the recommendation by Public Advocates and CalCCA to
18 move the benefit allocation question into Phase 1. In
19 our judgment, rates that would be charged to non-PG&E
20 LSE customers could not be characterized as just and
21 reasonable if in fact those benefits weren't
22 appropriately allocated.

23 The more important question I wanted to raise
24 with respect to schedule, however, relates to the three
25 weeks that your preliminary schedule allows for comments

1 on PG&E's historical and forecast cost data submittal,
2 which your preliminary schedule indicates would come in
3 on April 27.

4 In our judgement, that process would be made
5 more efficient if you ordered PG&E to provide existing
6 reports such as the DOE Grant Application and the spent
7 fuel report that PG&E has submitted to the California
8 Energy Commission. If you ordered those existing
9 reports to be made available to parties in advance of
10 PG&E's testimony. Not doing so ends up forcing a
11 discovery process into a very small window. And at
12 least thus far our experience in discovery with PG&E has
13 been quite contentious. And we're continually bumped up
14 against rejoinders that certain questions are not within
15 scope.

16 So if in fact you keep this historical and
17 forecast cost data as a part of the scope, we would
18 recommend that you require that advance disclosure of
19 existing reports to make this a more efficient process.

20 I would reiterate our view that we think
21 hearings are likely to be necessary. But I think both
22 Mr. Freedman and Mr. Lindl have suggested a way in which
23 you might be able to squeeze some efficiency from
24 turning comments into testimony.

25 We also think that your provision for

1 considering hearings an option that can be addressed
2 later in the schedule is the right way to go.

3 Thank you very much for the opportunity the
4 comment.

5 ALJ SEYBERT: Thank you.

6 Ms. Karlstad?

7 MS. KARLSTAD: Thank you, your Honor. Cathy
8 Karlstad for Southern California Edison. SCE also
9 agrees with other parties that benefit allocation should
10 be considered as part of Phase 1, Track 2. We agree
11 that just like cost recovery mechanism should be
12 resolved in time to provide a cost recovery mechanism
13 for potential extended operations in late 2024, It's
14 also important that LSEs have certainty as to what, if
15 any, benefits will be allocated by -- you know, in time
16 for that extended operation and taking into account the
17 RA deadline.

18 And also we just think it makes sense to
19 consider costs and benefits together so we don't
20 inadvertently end up with a cost recovery framework that
21 doesn't really work for benefits that the Commission may
22 later decide need to be allocated.

23 So for that reason, we support benefit
24 allocation in Phase 1. As some other parties indicated,
25 I think it makes sense to just consider it along with

1 cost allocation in the schedule.

2 Thank you.

3 ALJ SEYBERT: Thank you. Ms. Karlstad, while I
4 have you on the line on a different issue, the
5 preliminary schedule considers -- currently considers
6 public participation hearings occurring in the late June
7 to July timeframe. To the extent that one or more of
8 these public participation hearings are conducted
9 remotely, and since SB 846 contemplates cost recovery
10 being shared along the different LSEs, do you have any
11 thoughts on whether or not the notice for the public
12 participation hearings should be included within SCE's
13 customer bill inserts?

14 MS. KARLSTAD: Yes, your Honor. We hadn't
15 actually considered this issue, but I think it's a good
16 question. I think in general we did not plan on
17 noticing public participation hearings because this is
18 more of a, sort of, a general non-bypassable charge
19 applicable to multiple load serving entities rather than
20 an SCE-specific rate increase request.

21 I mean, if the Commission determines that such
22 notice is appropriate, would we would obviously do so.
23 But we weren't planning on doing such a notice.

24 Thank you.

25 ALJ SEYBERT: Thank you.

1 Does anyone have any responses they would like
2 to provide given what was just said? If so, please
3 raise your hand.]

4 Mr. Lindl.

5 MR. LINDL: Thank you, your Honor. Tim Lindl
6 for CalCCA. I just wanted to respond briefly to
7 Ms. Wilson's comments.

8 Your Honor, I want to emphasize that the
9 request for allocation for capacity is not tied to any
10 desire to delay procurement. The Commission has
11 reliability procurement orders that will still stand
12 despite what happens in this case. Policies must meet
13 those orders. You can't delay procurement on those
14 orders.

15 The big problem in the RA market right now is
16 there is no capacity to procure. And we're about to
17 lose 2,400 megawatts of additional capacity if PG&E's
18 position is adopted. So this capacity needs to be
19 built. LSEs are working on building it. The entire
20 point of extending operation at Diablo Canyon is to give
21 load serving entities time to bring those resources
22 online while the State pursues its GHG and
23 electrification goals.

24 Very briefly, your Honor, what Mr. Freedman
25 raised in terms of concerns on the crunch in September,

1 that was part of the reason we made the suggestions we
2 did on the schedule, was to really do that crunch.

3 ALJ SEYBERT: Thank you. Mr. Douglass.

4 MR. DOUGLASS: Thank you, your Honor. I
5 actually had my hand raised for initial comments but --
6 so I actually would like to make initial comments and
7 reserve the right for reply.

8 As noted earlier, DACC believes the allocation
9 of benefits to be a Phase 1 issue rather than Phase 2.
10 It's important to consider that the units are currently
11 licensed by the United States Nuclear Regulatory
12 Commission to operate until November 2nd of next year
13 for Unit 1 and August 26, 2025, for Unit 2. This means
14 two things.

15 First, customers may be required to start
16 paying for the extended operations of Unit 1 as soon as
17 November 3, 2024.

18 Second, if the Commission does approve the
19 allocation of extended operations such as RA and
20 GHG-free attributes, theoretically any allocation could
21 also begin as soon as November 3, 2024, or at least by
22 January 1, 2025.

23 LSEs need time to plan their procurement. The
24 current RA schedule, for example, requires all LLCs to
25 submit annual filings on October 31st. It demonstrates

1 their procurement of local system and flexible RA for
2 the coming compliance year.

3 So LSE procurement planning, of course, starts
4 many months before that. In order to procure
5 appropriately, an LSE, whether it be an ESP, a CCA, or a
6 utility, needs to know any allocation of Diablo Canyon
7 benefits before they begin their procurement. That's
8 why it's so important for this to be a Phase 1 issue,
9 especially given the fact that the preliminary schedule
10 that you provided suggests -- well, actually did not
11 provide a schedule for Phase 2 at all.

12 Finally, Mr. Lindl's schedule suggestions,
13 including the submittal of comments in the form of
14 testimony, sounds efficient and appropriate to us and
15 DACC sports them. Thank you.

16 ALJ SEYBERT: Thank you, Mr. Douglass. And I
17 apologize for missing your hand in the first round.

18 MR. DOUGLASS: No -- no -- not necessary.

19 ALJ SEYBERT: Ms. Purchia.

20 MS. PURCHIA: Thank you, your Honor. Robyn
21 Purchia with Cal Advocates.

22 Ms. Wilson with PG&E suggested that LSEs might
23 deliberately delay the procurement activities if the
24 Diablo system RA capacity is allocated, but this
25 assertion is inconsistent with the Energy Commission's

1 March 2nd report on the prudence of the extension.

2 That report found that the risk to the
3 procurement landscape is not generally from LSEs'
4 insufficient efforts to bring these resources online,
5 but rather from the persistence of systemic risk to
6 bringing those new resources online in a timely fashion.

7 PG&E's position of excluding the RA capacity
8 would risk increasing RA prices for all ratepayers. At
9 a minimum, these issues should remain in the scope for
10 further record development. Thank you.

11 ALJ SEYBERT: Thank you. And Ms. Wilson.

12 MS. WILSON: Thank you. Maria Wilson for PG&E.

13 First, you know, PG&E has considered the
14 allocation of Resource Adequacy benefits from extended
15 operations completely inconsistent with the intent of
16 SB 846, and so I think we have spoken there.

17 With regard to the recommendation to submit
18 comments in the form of testimony, PG&E views that
19 proposal to be just overall favorable and helpful to the
20 Commission and parties as they seek to move through this
21 rulemaking. And so that is a very good recommendation
22 of Mr. Lindl.

23 With regard to the comments concerning the
24 complexity of the schedule, this reinforces the -- the
25 limited role, right, that was tasked to the CPUC in

1 connection with its December 31, 2023, decision, which
2 is statutorily required.

3 And so all of the complexities of -- that have
4 been described by parties here and the struggles to
5 potentially complete them really, in PG&E's view,
6 highlights, right, the limited tasks that the CPUC needs
7 to accomplish in connection with SB 846 and supports the
8 delegation of the cost forecasting and recovery -- cost
9 forecasting matters with respect to cost effectiveness
10 to the CEC and the cost forecasting component of any
11 extended operations to occur as part of the future ERRRA
12 forecast-like process, the process of which could be
13 applied, would be, of course, developed by parties in
14 this proceeding.

15 And so we view the role of the Commission to be
16 focused upon developing those processes rather than
17 forecasting the cost. Cost forecasts would occur in
18 2024 when PG&E seeks to prepare and submit that
19 application. So it's not appropriate or necessary to
20 forecast extended operation costs at this time and that
21 would occur in a future time.

22 With regard to transition costs and requests
23 for information involves transition costs and forecasts
24 there, you know, again, we would re-articulate that
25 SB 846 specify DNC considering those costs to the DWR,

1 and that review of those -- those costs and cost
2 forecasting is inconsistent with the scope of the
3 proceeding. Thank you.

4 ALJ SEYBERT: Thank you.

5 Mr. Douglass, do you have any reply comments
6 based on what you heard?

7 MR. DOUGLASS: Yes. Thank you, your Honor.

8 Ms. Wilson suggested earlier that SB 846 does
9 not permit the Commission to consider the allocation of
10 benefits. To the contrary, we believe the Commission's
11 authority to consider issues of relevance should not be
12 prescribed by the fact that the issue is not mentioned
13 in the statute because the Commission has the historical
14 jurisdiction, the authority, and, indeed, the
15 responsibility to consider all ratemaking issues
16 pertaining to customers.

17 It has also for decades followed the principle
18 cost causation. A corollary to that is the customer
19 should get what they pay for. In this case, Senate
20 Bill 846 provides that all customers should be paying
21 for extended operations. Then in fairness, they should
22 also be receiving the benefits. Thank you.

23 ALJ SEYBERT: Thank you. I do not see any
24 other hands up, so let's turn to other procedural
25 matters. I want to at the onset take a moment to

1 address two additional requests that were raised in
2 comments, and then I will open it up to see if there are
3 any other procedural questions.

4 The first is the request to incorporate the
5 entirety of the record in Application A.16-08-006 into
6 this new rulemaking.

7 The second is to create a new web page separate
8 from the Docket Card for this proceeding where parties
9 and the general public will have access to information
10 and documents related to Diablo Canyon and SB 846.

11 On the first issue, I had discussed with
12 Commissioner Douglas -- and I think we are both in
13 agreement -- that it would not be constructive or a good
14 use of party resources to incorporate the entirety of
15 the A.16-08-006 record into this rulemaking.

16 The issues in this proceeding are grounded in
17 the specific requirements set forth in SB 846 and are
18 distinct from many of the issues contemplated in PG&E's
19 2016 application. For example, for a statute that's
20 rulemaking cannot consider modifications to the employee
21 retention program.

22 Parties will have the opportunity, however --
23 and this has, I think, been a large focus of the
24 schedule today -- to conduct adequate discovery in this
25 proceeding, which may include requests for updated

1 testimony from A.16-08-006 when relevant to the specific
2 scope of issues that will be considered in this
3 proceeding and as determined by the assigned
4 commissioner's scoping memo.

5 Do parties have any additional and specific
6 comments on this topic? If so, please raise your hand.

7 Okay. I'm not seeing any hands raised.

8 Regarding the creation of a separate web page dedicated
9 to the potential extension of operations at Diablo
10 Canyon, I have discussed this idea with Energy Division
11 staff, and they have agreed to create a new web page for
12 this purpose.

13 Do parties have any comment on the type of
14 information and the specific documents that should be
15 included on this web page? And specifically here I'm
16 hoping to solicit ideas that may not have already been
17 provided in written comments. If so, please raise your
18 hand.

19 Ms. Merrigan.

20 MS. MERRIGAN: Hi. Jean Merrigan for Women's
21 Energy Matters.

22 Well, one thing on the record, I didn't get my
23 hand raised in time, but what I wanted to say was
24 WEM's -- I understand not bringing the full record of
25 the proceeding. It's an enormous record. But WEM would

1 still request that the final versions of all PG&E's
2 testimony and workpapers would be entered into the
3 record or -- and also included on that web page.

4 I think that would be a great thing to include
5 on the web page just to have -- the web page, as
6 envisioned by WEM, would be both for parties but also
7 for the public to follow this important, you know,
8 subject -- you know, the whole process that's going on
9 to evaluate the need for extended operations. So that
10 will be -- we would request that that -- that PG&E's
11 final versions of testimony and workpapers in
12 A.16-08-006 be included in the record, and also that it
13 be posted on the website.

14 I was -- when I originally thought of the
15 website, it was like it would have links to all
16 documents that -- reports and so forth that we will be
17 reviewing from other agencies, but also, when I tried --
18 I did track down -- I haven't had a chance to look at it
19 yet, but I tracked down the recording of the Natural
20 Resource Agency's February meeting in -- it was called
21 "The Listening Meeting" in San Luis Obispo.

22 There could also be recordings like that. So
23 anyway, these are some suggestions for what could be
24 included on the website.

25 ALJ SEYBERT: Thank you. Very much

1 appreciated.

2 Are there any other comments on this issue?

3 Ms. Wilson.

4 MS. WILSON: Yes. Maria Wilson for PG&E.

5 I think PG&E will comment that, you know, the
6 record supporting the 2016 application to the entire
7 DCPD is outdated and irrelevant in the rulemaking and in
8 subsequent meetings. And so we would, you know --
9 first, we'd agree with the preliminary determination
10 that the record shouldn't be refreshed.

11 But with regard to the need to update certain
12 components of testimony in that docket and the posting
13 of testimony from that docket onto a Commission's
14 website, we would view that as potentially burdensome,
15 time consuming, and unproductive given the changed
16 circumstances between 2016 and today.

17 So thanks for clarifying the Commission's
18 preliminary position. But the -- yeah. The -- we would
19 view the application and the record contained therein as
20 stale and unproductive to refresh.

21 ALJ SEYBERT: Thank you.

22 Ms. Merrigan, did you -- is this a new hand up?
23 Okay. I believe you're on mute, Ms. Merrigan, although
24 I appreciate you being on mute when you're not speaking.

25 MS. MERRIGAN: Thanks. Sorry. I guess I just

1 wanted to make a quick statement that I totally
2 understand why PG&E would not want all of the testimony
3 and evidence that it supported -- that it presented back
4 in 2017 to make -- to come into public view at this time
5 because it's quite contradictory to what I think its
6 positions are on in this proceeding, and that includes
7 around the issues of the liability particularly, which
8 we haven't really talked about much. I do support
9 the -- that being as it is included in your preliminary
10 scope.

11 So anyway, I just wanted to say that because
12 PG&E is kind of -- well, at any rate, I won't go on.
13 But I think there are many -- it's very relevant what
14 PG&E was arguing back in 2017 to evaluate many of the
15 things that are in scope. So I just repeat what I --
16 the requests that I made just a few minutes ago. Thank
17 you.

18 ALJ SEYBERT: Thank you.

19 Are there any other procedural matters that
20 parties wish to raise now?

21 Mr. Boyd.

22 MR. BOYD: Mike Boyd here. I just want to
23 support WEM's request. Thank you.

24 ALJ SEYBERT: Thank you.

25 I'm not seeing any other hands. So seeing

1 none, this concludes the matters to be addressed in
2 today's prehearing conference. As mentioned previously,
3 the issues and schedule discussed today will be
4 determined by Commissioner Douglas in a forthcoming
5 scoping memo and ruling.

6 And with that, thank you, everyone, for your
7 participation. This prehearing conference is concluded.
8 Let's go off the record. Thank you, everyone.

9 (At the hour of 11:48 a.m., this matter
10 having concluded, the Commission then
11 adjourned.)]

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, ANDREA L. ROSS, CERTIFIED SHORTHAND REPORTER
NO. 7896, IN AND FOR THE STATE OF CALIFORNIA, DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON MARCH 17, 2023.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.
EXECUTED THIS MARCH 20, 2023.



ANDREA L. ROSS
CSR NO. 7896

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, JASON STACEY, CERTIFIED SHORTHAND REPORTER
NO. 14092, IN AND FOR THE STATE OF CALIFORNIA DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON MARCH 17, 2023.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.
EXECUTED THIS MARCH 20, 2023.



JASON A. STACEY
CSR NO. 14092

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