

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



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ADMINISTRATIVE LAW JUDGES EHREN SEYBERT and CATHLEEN A.
FOGEL, co-presiding

Order Instituting Rulemaking to Further)	PREHEARING
Develop a Risk-Based Decision-Making)	CONFERENCE
Framework for Electric and Gas)	
Utilities.)	
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VIRTUAL PROCEEDING

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ADMINISTRATIVE LAW JUDGE FOGEL: We'll go ahead
and be on the record.

Good afternoon, everyone. This is
Administrative Law Judge Cathleen Fogel, and this is the
second prehearing conference for Rulemaking R.20-07-013,
which is the Rulemaking to Further Develop a Risk-Based
Decision-Making Framework for Electric and Gas
Utilities.

Myself, Cathleen Fogel, and Judge Ehren Seybert
are the administrative law judges assigned to this case.
The assigned commissioner is Commissioner John Reynolds
who is also with us today.

The purpose of the prehearing conference today
is to discuss the scope and the schedule for Phase III
of this rulemaking and to -- the agenda is to -- first
I'll be just going over the service list a little bit
and taking appearances, then we'll have the heart of our
discussion about scope and schedule, then we'll briefly
touch on proceeding categorization and the need for
evidentiary hearing, and then I'll offer you a final
opportunity to speak before we close. We'll also hear
some opening and perhaps closing remarks from

1 Commissioner John Reynolds.

2 Again as a reminder, I will not be making any
3 decisions in today's prehearing conference. We'll be
4 listening carefully to what parties say. We also have
5 your opening comments and will soon be receiving reply
6 comments.

7 With that, Judge Seybert and I will be working
8 with Commissioner Reynolds to put together a scoping
9 memo for Phase III.

10 Again, when you first speak, if you could,
11 please state your name and then spell it and then please
12 try and remember -- I know it's hard -- but try and
13 remember each time that you speak to please state your
14 name as you get started.

15 All righty. So with that, I'll just go over
16 the -- take appearances, so to speak. When I -- I'll be
17 going through a list of the parties who have indicated
18 you'd like to speak by -- alphabetically by the name of
19 the party. If you could just indicate you're present, I
20 guess that would be the time to state and spell your
21 name.

22 We'll start with Southern California Edison.
23 Kris Vyas, are you here?

24 MR. VYAS: Yes, your Honor. Good afternoon.
25 Kris Vyas on behalf of Southern California Edison. Last

1 name is spelled V-y-a-s. First name is spelled K-r-i-s.
2 Thank you.

3 ALJ FOGEL: Thank you, Kris.

4 Now for the Energy Producers and Users
5 Coalition and Indicated Shippers, representing two
6 parties is Nora Sheriff, I believe.

7 MS. SHERIFF: Yes. Good afternoon, your Honors
8 and Commissioner Reynolds. Nora Sheriff, N-o-r-a, last
9 name S-h-e-r-i-f-f for the Energy Producers and Users
10 Coalition, or EPUC, and the Indicated Shippers. Thank
11 you.

12 ALJ FOGEL: Thank you, Nora.

13 Now for Mussey Grade Road Alliance. Dr. Joseph
14 Mitchell, is it?

15 MR. MITCHELL: Yes. Joseph Mitchell,
16 J-o-s-e-p-h M-i-t-c-h-e-l-l, from the Mussey Grade Road
17 Alliance.

18 ALJ FOGEL: Thank you.

19 MR. WILLMAN: Pardon me. This is Jacob from
20 IT. Mr. Joseph Mitchell, could you just please speak a
21 little bit closer to the microphone. It will be better
22 for the court reporters.

23 MR. MITCHELL: Certainly.

24 MR. WILLMAN: Thank you.

25 MR. MITCHELL: Yes. Certainly. That's Joseph

1 Mitchell, J-o-s-e-p-h M-i-t-c-h-e-l-l. Thank you.

2 ALJ FOGEL: Thank you, Dr. Mitchell. And I do
3 see on our service list that I believe there is someone
4 else listed as the party contact. Does the service list
5 need to be updated? It is Diane Conklin as the party
6 representative.

7 MR. MITCHELL: Diane Conklin is the party
8 representative.

9 ALJ FOGEL: Very good.

10 For PG&E, Vincent Loh.

11 MR. LOH: Present, your Honor. Good afternoon.
12 This is Vincent Loh speaking on behalf of Pacific Gas
13 and Electric Company. My last name is spelled L-o-h.
14 My first name is spelled V-i-n-c-e-n-t.

15 ALJ FOGEL: All right. Thank you, Mr. Loh.
16 And can I assume that Mary Gandesbery should remain the
17 party contact on the service list rather than yourself?

18 MR. LOH: Yes, that's correct.

19 ALJ FOGEL: Thank you.

20 Now for Public Advocates Office, Michael
21 Einhorn.

22 MR. EINHORN: Good morning, your Honor and
23 Commissioner, parties. My name is Michael Einhorn,
24 M-i-c-h-a-e-l E-i-n-h-o-r-n, on behalf of the Public
25 Advocates Office known as Cal Advocates. Thank you.

1 ALJ FOGEL: Thank you, Michael.

2 For SoCalGas and San Diego Gas & Electric,
3 Elliott Henry, I believe.

4 MR. HENRY: Yes. Thank you. Good afternoon,
5 your Honors and Commissioner. Elliott Henry,
6 E-l-l-i-o-t-t, Henry, H-e-n-r-y, representing Southern
7 California Gas Company and San Diego Gas & Electric
8 Company. Thank you.

9 ALJ FOGEL: Thank you, Mr. Henry.

10 Now with Protect Our Communities Foundation,
11 Malinda Dickenson.

12 MS. DICKENSON: Yes. Hi, your Honor. Malinda
13 Dickenson on behalf of the Protect Our Communities
14 Foundation. My name is spelled M-a-l-i-n-d-a, last name
15 D-i-c-k-e-n-s-o-n, and the acronym for the organization
16 is PCF. Thank you.

17 ALJ FOGEL: Thank you. For The Utility Reform
18 Network, Katy Morsony.

19 MS. MORSONY: Yes. Good morning, your Honor.
20 My name is Katy, K-a-t-y, Morsony, M-o-r-s-o-n-y, here
21 on behalf of TURN, The Utility Reform Network. Thank
22 you.

23 ALJ FOGEL: Thank you.

24 And for the Utility Consumers' Action Network,
25 Dr. Eric Woychik, I believe.

1 MR. WOYCHIK: (Line muted.)

2 ALJ FOGEL: We cannot hear you right now,
3 Mr. Woychik. Let's go off the record.

4 (Off the record.)

5 ALJ FOGEL: Let's go back on the record.

6 While we were off the record, Dr. Eric Woychik
7 indicated his presence and he is having some
8 difficulties with his mic perhaps, so we will move
9 forward and hopefully those issues can be resolved as we
10 move forward. We'll see how that goes.

11 All right. So before we turn to the main
12 agenda, I want to turn to Commissioner John Reynolds and
13 invite some opening comments.

14 Please go ahead.

15 COMMISSIONER REYNOLDS: Thank you, Judge Fogel,
16 and thanks also to Judge Seybert. Thanks further to all
17 those participating today and for all the work that
18 you've done throughout this proceeding.

19 Good morning -- good afternoon now, everyone.
20 This is Commissioner John Reynolds. I'm the assigned
21 commissioner to the risk-based decision-making OIR.

22 I was assigned to this proceeding earlier this
23 year after my colleague Commissioner Rechtschaffen ended
24 his term on the Commission. I'm very excited to be here
25 working with this group of stakeholders and our CPUC

1 staff on this important policy area.

2 Risk-based decision-making has helped us
3 establish an important framework for risk analysis and
4 how we obtain the best information possible about
5 utility risk. Good risk analysis helps us make daily
6 informed decisions about the work that the regulated
7 utilities do in order to mitigate those risks.

8 I think that the S-MAP process has broken a lot
9 of new ground in finding ways for us to quantify the
10 relative benefits and costs of safety investments and
11 make meaningful comparisons.

12 Cost effective risk mitigation is critical to
13 meeting our goals on both safety and affordability. I
14 come to this case with a deep personal interest in rates
15 and affordability which is so critical to our work.

16 A large portion of my portfolio as a
17 commissioner here is just the proceedings that are rates
18 related. And so I'm particularly focused on how we can
19 make the S-MAP process and the potential remaining
20 topics in this OIR result in useful and actionable
21 insights that can be used in the record GRCs as the
22 basis for filing decisions.

23 I am also interested in finding and
24 strengthening feedback loops where our future analysis
25 on risk can be better informed by what a utility

1 actually achieved in the recent years of risk mitigation
2 work.

3 Some of the important questions in this case
4 from my perspective continue to be how do ratepayers get
5 the most value for their dollar when it comes to safety
6 investment?

7 How do we continue to refine our tools to make
8 the best comparisons we can about the relative costs and
9 benefits of safety work?

10 How do we track and ensure accountability over
11 time to ensure the future risk analysis and funding
12 awards are informed by a utility's actual performance?

13 I look forward to the discussion today and this
14 group's collective work on this important proceeding.

15 Thank you. With that, I will turn it back to
16 Judge Fogel.

17 ALJ FOGEL: Thanks so much, Commissioner.
18 We're happy to have you onboard as the lead commissioner
19 in this case.

20 All righty. So we're going to turn to
21 discussion of the scope and schedule here. As I
22 mentioned before we were on the record, yesterday I
23 circulated a draft of potential scope and schedule for
24 Phase III, and all parties indicated did receive that.
25 So I'd like us to invite comments in response to that

1 and also invite parties to elaborate on your comments
2 that you filed, I believe, on April 3rd.

3 I also want to mention that there -- what we're
4 more generally responding to is a direct -- a proposed
5 Phase III road map that was circulated, I believe, in a
6 March 13th ruling, assigned commissioner ruling, that
7 was prepared by the staff from Safety and Policy
8 Division.

9 So if you're listening in, you're not familiar
10 with that, you can find that attached to the draft
11 Safety and Policy Division road map for Phase III
12 appended to the March 13th ruling.

13 So with the draft that we circulated yesterday,
14 I attempted to balance parties' input with the
15 availability of staff resources and capacity. This
16 latter constraint is very important. We have very
17 limited staff resources generally, and there's a lot
18 that remains to be done and a lot of potential
19 priorities. So that was kind of the guiding principle
20 that I used to develop the proposed schedule.

21 Later in this conversation I will be asking
22 parties about if there's areas, specific technical,
23 substantive areas, where parties can submit to permit
24 authorizing white papers or presentations or proposals.
25 If there are parties that are able to do that, it will

1 certainly help us cover more ground more quickly and
2 thoroughly.

3 Again, yeah, if you could focus your comments
4 on giving feedback on the draft proposed schedule and
5 your other comments as well, and we'll go through a roll
6 call and allow everyone a chance to comment, and then
7 I'll ask some more questions. I suppose before I do
8 that, I should, perhaps, read over again the proposal
9 that was circulated.

10 So the general proposals are the issues in
11 scope for Phase III to be:

12 Should the Commission refine guidance regarding
13 the risk-based decision-making framework -- with the
14 acronym of RDF -- that was adopted in decision
15 D.18-12-014, elaborated on in certain parts in
16 D.19-04-020, and in D.22-12-027. Should the Commission
17 refine that idea regarding the following areas:

18 Implementation of RDF requirements for general
19 rate case, or GRC, for post-test years, this one
20 potentially;

21 Number two, risk scaling, previously referred
22 to as "risk attitude";

23 Number three, transparency requirements
24 regarding uncertainties associated with projected risk
25 mitigation benefits, in other words, the assessment of

1 and further guidance regarding So Cal Edison's
2 "transparency pilot." I believe that was filed or
3 circulated last year, 2022;

4 Number four, provide guidance on the Risk
5 Mitigation and Accountability Report requirements, or
6 sometimes called "RMAR." It's an acronym, R-M-A-R;

7 Number five, guidance regarding the
8 incorporation of climate change risks into the RDF;

9 Number six, risk tolerance potentially
10 considered in conjunction with the concept of simple
11 optimization of the various variables in the model;

12 Number seven, sensitivity analyses regarding
13 mitigation costs and cost-benefit ratios;

14 Number eight, uncertainty with regard to tail
15 risks;

16 Number nine, discount rates and potentially
17 additional topics, which I'm sure we'll get into more
18 later.

19 And the proposal discussed that -- proposed a
20 couple of -- several items to be addressed in the
21 decision targeted by the end of 2023, as well as one
22 targeted by May 2024.

23 So with that, I'd like to turn it over to the
24 parties and hear from you -- from your comments starting
25 with Mr. Kris Vyas from Southern California Edison.

1 Please go ahead.

2 MR. VYAS: Thank you, your Honor. Appreciate
3 the chance to speak. And thank you to yourself,
4 Judge Seybert, the assigned commissioner. Nice to see
5 you and all the parties. Thank you for the chance for
6 all of us to have a conversation here.

7 Just going to go over a couple of main points,
8 your Honor, in terms of the document you circulated and
9 the specific items.

10 SCE believes that risk tolerance should be the
11 highest priority for this upcoming track. It's
12 currently been deferred for potential inclusion in
13 Track 2 of this phase, but we think it should be the
14 highest priority because that can help serve as an
15 underpinning of a foundation so that we have a framework
16 that other work can spring from. Towards that end, we
17 should also be promptly addressing tail risk as well as
18 uncertainty.

19 Second, as a sort of due process type item,
20 SCE -- I think joined by at least one other utility --
21 believes that this phase will hopefully proceed in a way
22 that is more aimed at building a thorough and orderly
23 record so that -- we all want to proceed with
24 appropriate urgency, but we should also proceed in a way
25 that allows for alternative perspectives, for

1 alternative proposals, and for a chance for parties to
2 fully comment rather than there only being a staff
3 proposal, a workshop, and potentially that's all there
4 is.

5 Next, we believe that the RMAR -- we believe
6 that we need to have the framework settled and right,
7 and we need that to stop iterating so that RMARs can not
8 only be meaningful, but also would not inadvertently
9 lead to somebody's RMAR looking not what it should
10 because the framework or key part of the framework has
11 changed under their feet during the pendency of whatever
12 reporting period.

13 Lastly, with regard to the transparency
14 proposal, your Honor, SCE appreciates that this is the
15 subject of consideration here. We would note that we --
16 it was not our proposal. It was PG&E's transparency
17 proposal.

18 For informational purposes only, the Commission
19 said that we should provide it in our RAMP proceeding.
20 In the many months since that RAMP proceeding, there has
21 been no questions or discovery on that proposal. And as
22 a result, we believe that for an informational-only
23 filing, that SCE should not now have to do a workshop
24 to, in essence, defend a proposal whose framework wasn't
25 even ours.

1 Lastly, as to timing, we would ask that if,
2 despite what I said, the Commission decides that such a
3 workshop should go forward, we respectfully ask that it
4 occur after May 15th at the earliest. We are filing our
5 general rate case on May 15th, and these are the same
6 resources that would have to commit to a workshop.

7 And then, finally, one small point. We think
8 that it would be good to have a discussion here on the
9 incorporation of Commission guidance into climate change
10 risks in the RDF. All parties that spoke on this topic
11 did mention that they thought it was an important topic
12 to address promptly and it's currently been actually
13 moved to Track 2.

14 I'll have other things to say as we go along
15 but wanted to keep it fairly brief. Thank you, your
16 Honors, very much for the opportunity to speak.]

17 ALJ FOGEL: You're welcome. I think I'll go
18 ahead and ask now if Edison is prepared to offer a
19 white paper or presentation or proposal on the risk
20 tolerance topic to help move that along.

21 MR. VYAS: I would need to consult with my
22 management before volunteering a specific proposal. We
23 would certainly look to be a part of that dialogue in a
24 very substantive way, but I'm not authorized to just
25 commit us to a white paper that would be drafted and

1 worked by others.

2 ALJ FOGEL: As I understand, we did ask that
3 question when we circulated the draft and staff road
4 map. So that is one of the real obstacles on moving as
5 expeditiously, as we might like, on the risk topic is
6 finding a suitable technical author for such a
7 grounding, foundational paper presentation. So we'll
8 come back to that some more. Thank you.

9 MR. VYAS: Thank you.

10 ALJ FOGEL: Okay. Next we have, I believe,
11 Ms. Nora Sheriff representing EPUC and Indicated
12 Shippers. Go ahead.

13 MS. SHERIFF: Thank you, your Honor. I will
14 say that I really appreciated Commissioner Reynolds'
15 remarks and want to almost say ditto to that.

16 Regarding the proposed -- your proposal that
17 you circulated for discussion purposes, EPUC and
18 Indicated Shippers strongly support the inclusion of
19 implementation of the RDF requirements in the post-test
20 year and would -- we think that looking closely at how
21 that will play out may help with the RMAR requirements,
22 which we have suggested also be prioritized, because we
23 see the greater need for transparency, a greater need
24 for accountability looking at this from the -- from the
25 lens of not only trying to promote safety, but also with

1 the concern around affordability that I think we're all
2 hearing a heightened awareness of.

3 In connection with the white paper requests,
4 I'm in communication with Katy Morsony of TURN, and we
5 would work collaboratively. EPUC and Indicated Shippers
6 and TURN could work collaboratively on presenting a
7 white paper on risk tolerance and simple optimization.
8 And, again, that would include the concerns around
9 affordability. I can offer that. Thank you.

10 ALJ FOGEL: All right. Thank you so much.
11 That is music to my ears because I don't believe a party
12 has yet volunteered to make a proposal on those written
13 comments. I'm very happy to hear that. Thank you,
14 "parties," I should say. Great.

15 So moving to Dr. Joseph Mitchell from the
16 Mussey Grade Alliance. Please go ahead.

17 DR. MITCHELL: Thank you, Commissioner
18 Reynolds, and your Honors. Mussey Grade Road Alliance
19 is a grassroots citizens group in Ramona, California.
20 As a wildland-urban interface community, our main goal,
21 since we began intervening in 2006, has been to reduce
22 wildfires in a cost-effective manner. We've been
23 involved in safety rulemaking since 2008, including the
24 first S-MAP proceeding and the first phases of the
25 current proceeding.

1 We supported cost-benefit analysis as early as
2 2009 at SDG&E's first PSPS proceeding. We support the
3 Commission's effort to further risk-based
4 decision-making and ensure that mitigations are based on
5 cost-benefit analysis. We intend to fully participate
6 in this phase of the proceeding.

7 Regarding risk tolerance, there was an attempt
8 by staff about five years ago to come up with a risk
9 tolerance proposal; yet never was adopted. It is a very
10 difficult problem. So I can sympathize with Mr. Vyas's
11 position on that. If it were to be given higher
12 priority, because it is something that does keep getting
13 pushed off, it should probably be run as a separate
14 track because it's very unlikely that it would finish up
15 within the framework of Track 1.

16 Personally, I think that if staff would be
17 willing or be able to contract this out to a third
18 party, that might be another proposal that could be
19 initiated this year, and then the result could be
20 evaluated next year. And so regarding the rest of your
21 proposed schedule, yes, Mussey Grade Road Alliance
22 supports that. Thank you.

23 ALJ FOGEL: Thanks so much, Dr. Mitchell.

24 I should add some color here regarding
25 potential staff proposal and consultants. I have spoken

1 with staff about that. It does appear that there is a
2 desire to retain a consultant. This was with a
3 potential timeline.

4 If that turns out to be possible, the funds are
5 available, if there is interest, et cetera, actually our
6 thinking -- it's not really indicated in this draft
7 scope or schedule, but that, ideally, we could start it
8 in the January 2024 timeline if we were to be relying
9 primarily on a consultant's white paper for that
10 discussion.

11 That's one reason we didn't put that earlier in
12 the schedule, but if the stars align, and we want -- in
13 the end, the CPUC sort of takes the lead -- that's a
14 challenging topic -- that would be an ideal scenario --
15 so just to elaborate on that for other parties as well.

16 Certainly, we can come back and discuss more of
17 the proposal that Nora Sheriff made, and, perhaps, Katy
18 will talk about that a bit more. Thank you.

19 DR. MITCHELL: Thank you, your Honor.

20 ALJ FOGEL: Let's see. I guess, Mr. Loh, PG&E.

21 MR. LOH: Thank you, your Honor. So with
22 regards to the tracks and topics in the tracks, PG&E
23 responded in its comments to the March 13 proposal
24 ruling, and indicated that for Track 1 the items that we
25 would like to see in that track include the post-test

1 years, the climate change, and also the transparency
2 proposal.

3 In Track 2, we talk about risk attitude, risk
4 tolerance, as well as some other items that we crossed
5 out, including the need for having some threshold and
6 filing of errata for GRC, and also kind of an
7 implementation framework whereby we can have some kind
8 expectations around when divisions will be implemented
9 once they're made.

10 So I want to kind of switch my focus to the
11 proposal that came out yesterday. We're somewhat
12 concerned with the proposal that came out yesterday
13 because the timelines are quite aggressive and quite
14 rushed; for example, I was just looking at some of the
15 timelines for talking about the three topics that were
16 in Track 1, and the three topics were the post-test
17 years, risk attitude, and the transparency proposal.
18 And, effectively, the timeline would have us stopping
19 discussion on these topics by July?

20 So that's kind of extremely -- in our opinion,
21 it would not afford us the opportunity to have good
22 discussion on these topics, and I would like to bring
23 your attention to the Phase II position where some of
24 these topics were discussed. I wanted to point out on
25 page 22 -- I'm sorry -- on page 28 of the Phase III

1 position, and this is the discussion on risk tolerance.

2 It says, for example, that -- I'm reading from
3 the position. It says:

4 We intend to further explore the
5 application of risk attitude, risk
6 tolerance, and certainty, risk data in this
7 proceeding. The point is we authorize
8 continuation of the TWT established in
9 D.21-11-009. The authorized path and
10 parties participating in the TWT to prepare
11 and propose recommendations regarding the
12 application of risk attitude, risk
13 tolerance, and certainty (indecipherable)
14 risk in the RDF consideration. IOUs will
15 be afforded the opportunity to formally
16 propose methodologies for addressing these
17 issues. Opportunities for workshop
18 discussions and formal comment on all
19 proposals will be provided.

20 So we're just afraid that under the proposed
21 schedule that we saw yesterday, these opportunities will
22 not be afforded to us to present our thoughts on these
23 topics.

24 And, finally, with regard to technical working
25 groups, with regard to white paper, PG&E has stepped up

1 in the past to offer these white papers, and we stand
2 ready to do so again, particularly on the topics of risk
3 attitude, risk tolerance, transparency proposal, some of
4 the other things that we talked about. So, yes, we're
5 willing and eager to help. Thank you.

6 ALJ FOGEL: Great. Thank you. Thanks for that
7 reminder regarding what was said in the earlier
8 decision. I think that's partially why it was somewhat
9 confusing when no party indicated it would be ready to
10 prepare a proposal in response to the staff road map.

11 So, again, not having any indication in those
12 written comments that any party would be contributing a
13 foundational, substantive proposal, it was difficult to
14 develop a schedule based on what would be the basis of
15 the discussion.

16 So let's talk perhaps -- let's come back after
17 we've heard from the other parties, and we'll talk in
18 some more depth about the proposed schedule in a little
19 more detail about your concerns.

20 MR. LOH: Thank you.

21 ALJ FOGEL: Let's see. Who is next is
22 Mr. Einhorn from Cal Advocates.

23 MR. EINHORN: Thank you, your Honor.

24 Cal Advocates believes that there's an issue
25 that is sort of sprinkled throughout what was currently

1 in the proposed road map and in the ruling, and that the
2 current RAMP process should be revised to provide more
3 granular data. There should be, you know, prescriptive
4 templates, possibly, to provide the sort of granular
5 detailed data and information that support Utilities'
6 risk mitigation programs that are proposed in the
7 Utilities general rate case applications.

8 You can see this first, for instance, in
9 Item 1.1 of the road map and elsewhere, but
10 Cal Advocates believes this is an important enough issue
11 that it should be given its own -- its own topic. You
12 know, instead of 1.1, think of it as, maybe, Item 1.05
13 or a new Item 1 on the list you sent out yesterday.

14 And the reason is that this goes to something
15 very fundamental about all of the work that we're doing
16 here. The purpose of this RAMP filing are to inform the
17 subsequent GRC proceedings, including the mitigation
18 programs that are proposed there. I can just read one
19 quote from a finding of fact in Decision 14-12-025:

20 The purpose of the RAMP filing will be to
21 review the Utilities' RAMP submission for
22 consistency and compliance with its prior
23 S-MAP and to determine whether the elements
24 contained in the RAMP submission can be
25 used in Utilities' GRC filing to support

1 its position on the assessment of its
2 safety risk and its plan to manage,
3 mitigate, and minimize those risks in the
4 upcoming GRC filing.

5 So, your Honor, that's the intent of the RAMP
6 filings, and everything we are doing here needs to be --
7 is informed by this, but right now we have a situation
8 where Utilities' proposals and their RAMPs and their GRC
9 proceedings diverge substantially.

10 Right now we have, for instance, in PG&E's 2023
11 GRC, it proposes an undergrounding program that covers,
12 you know, a 10,000-mile undergrounding program, but that
13 wasn't proposed at all in the 2020 RAMP filing, and,
14 similarly, PG&E's proposing an enhanced powerline safety
15 settings program.

16 And Cal Advocates is not asking to consider the
17 reasonableness of those -- those GRC issues in this RDS.
18 We're just acknowledging that those were proposed in the
19 GRC, and we want to make sure that RAMPS contain the
20 information to inform the program proposed in GRC.

21 And, yes -- so, basically, we need to include
22 this as its own topic at a very early stage of the
23 proceeding. And doing this, as you've brought up, will
24 conserve resources, including the Commission's
25 resources, at every subsequent step.

1 If we do this at the beginning of Phase III, it
2 will help inform all the other issues that need to be
3 discussed in this RAMP, especially if a Track 1 decision
4 comes out. And, importantly, it also addresses the
5 waste of resources that occur elsewhere like the GRC.

6 You know, programs are proposed and then
7 parties try to get as much information as they can, and
8 then the ALJs and the Commission have to decide
9 discrete, you know -- discrete issues, data requests,
10 mitigation programs, justifications all on a
11 case-by-case basis, but if we're able to address those
12 systematically in a single issue in this Phase III, it
13 will really conserve a lot of resources.

14 And then to address the transparency pilot that
15 was raised, we want to make sure -- Cal Advocates would
16 like to make sure that the potential revision go to the
17 broader transparency proposal in terms of that, and that
18 it's not limited to SCE's specific application in its
19 transparency pilot.

20 The wording is a little ambiguous in the road
21 map and a little -- a little in the -- in the document
22 that came out yesterday, the draft ruling.

23 As you heard from SCE a little earlier, SCE
24 wants to distance us -- well, let's not say that SCE
25 wants to do this. SCE states that it is simply

1 implementing a proposal that was -- that was discussed
2 by other parties. Cal Advocates wants to make sure
3 that -- that transparency proposal or whatever it is
4 that we address in this RDF proceeding in Phase III,
5 that it includes metrics to assess the mitigation
6 effectiveness; not limited to SCE's pilot itself as you
7 heard from SCE, but as to the entire prior proposal.

8 Prior to SCE's specific test drive,
9 Cal Advocates proposed a lot of these recommendations,
10 and the Commission said Cal Advocates' proposal should
11 be considered just in future phases of the proceeding;
12 so we want to make sure that we don't miss our
13 opportunity to -- now that we've been informed by SCE's
14 pilot to consider Cal Advocates' proposals for -- for
15 the mitigation-effectiveness assessment.

16 And, well, as I discussed before, this is
17 consistent with the intent of the transparency program
18 and the transparency pilot, which is to address the
19 issues of data transparency and uncertainty. That's all
20 from me at this time, your Honor. Thank you.

21 ALJ FOGEL: Thank you, Mr. Einhorn.

22 Let me just ask a couple of questions because I
23 was not clear on many of the things in Cal Advocates'
24 opening comments, and I'm not still not clear even after
25 having heard you speak. It seems to me that you

1 mentioned the need -- the first point you're making was
2 with regard for the need for a detailed template -- is
3 that correct -- that's for use in the RAMP?

4 MR. EINHORN: That's correct.]

5 ALJ FOGEL: And that template would cover what?
6 What would be in the template and what would it relate
7 to in terms of --

8 MR. EINHORN: Sure.

9 ALJ FOGEL: -- requirements?

10 MR. EINHORN: Sure. Thank you very much, your
11 Honor. That would be fine.

12 So that would include -- well, we would want to
13 develop the appropriate units for any specific
14 mitigation, such as, like, the number of circuit miles,
15 pipeline miles, or asset units, staffing levels, you
16 know. We want to be able to --

17 ALJ FOGEL: Right.

18 MR. EINHORN: -- to evaluate those -- those --
19 as they relate to the risks that are presented in a RAMP
20 filing. You know, if they're presented in the GRC
21 application as a new program and we don't have any data
22 related to it, well, we don't, you know -- even if it's
23 something that seems justifiably new because of changed
24 circumstances, you still need to be able to compare
25 that, you know, to the risk analysis that was done

1 before.

2 I think that goes directly to some of the
3 comments we heard from Commissioner John Reynolds
4 earlier that we are trying to build -- trying to develop
5 a system where we can build on prior work and not have
6 this sort of -- to -- to not waste resources in the RAMP
7 and then try to redo the information -- or try to redo
8 the analysis in the GRC.

9 ALJ FOGEL: Okay. I recall perhaps the
10 requirements for specification of units was related to
11 the Risk Spend Accountability Report. There was quite a
12 bit of discussion about it related to the RSAR. And so
13 what -- is what you're saying is that we need more
14 specification regarding mitigation, the units of
15 mitigation activity both in the RAMP and then following
16 through the GRC?

17 Is that kind of your basic point there in order
18 to analyze better sort of what's being proposed and
19 exactly, you know, what the mitigation effort will
20 accomplish in terms of --

21 (Crosstalk.)

22 ALJ FOGEL: -- the idea?

23 MR. EINHORN: Yeah, that's right. It's to
24 provide the necessary transparent data like the units
25 and scheduled costs and the progress that has been made,

1 basically the things that are needed to assess cost, you
2 know, cost effectiveness, mitigation effectiveness, the
3 past progress and performance in achieving the program
4 timelines.

5 ALJ FOGEL: Okay.

6 MR. EINHORN: That will help -- and moving down
7 the line, that will help future forecasts and programs.

8 ALJ FOGEL: And is this something that Cal
9 Advocates has submitted a detailed proposal on earlier
10 in this proceeding?

11 MR. EINHORN: This is something that Cal
12 Advocates has been proposing basically at many stages
13 through Phase I and Phase II. I think we did it in
14 Phase I, I'm sure we were doing it in Phase II, and it's
15 one of these things that has been sort of kicked down
16 the road a little each time to say, oh, well, that's not
17 exactly what we're looking at this time. It needs to be
18 looked at.

19 But it's one of these things that we didn't --
20 it's -- we don't want to miss the opportunity where we
21 get to a point where it seems like it's too late to look
22 at this. And it's important to do it as early as
23 possible because it does inform all the other -- all the
24 other activities that we're trying to accomplish here in
25 Phase III.

1 ALJ FOGEL: So, understood. I think it's just
2 that understood in a little bit more detail about what
3 it is specifically Cal Advocates is proposing.

4 I did mention in the draft schedule that there
5 will be an opportunity for parties to file
6 post-prehearing conference statements after this
7 prehearing conference concurrent with the reply comments
8 on the staff road map.

9 So perhaps, Mr. Einhorn, that might be a great
10 place to append to your post-PHC statement the previous
11 templates that were submitted or to refer to a specific
12 location where we could refer to what's been proposed
13 earlier and understand a little bit better what you're
14 proposing here. That would be helpful.

15 MR. EINHORN: Okay. Our opening comments do
16 sort of bullet-point what we mean by granular
17 transparent reporting when we talk about identifying the
18 level of risk mitigation programs and cost effectiveness
19 presented but -- so is there something more of a
20 proposal that you're looking for?

21 ALJ FOGEL: Well, perhaps that's enough there.
22 Maybe what I'm lacking is an understanding of what's
23 currently required. You are proposing these bullet
24 points to add more detail, and it's not clear to me what
25 is currently required. Is anything currently required?

1 There must be some requirements. So that would be
2 helpful. And perhaps putting it in context to kind of
3 what this would look like in terms of a RAMP filing that
4 perhaps could be helpful.

5 MR. EINHORN: Okay. Thank you very much, your
6 Honor. I'll talk to the team and make sure we can get
7 some things together for our post-PHC statement.

8 ALJ FOGEL: Okay. That would be great. Thank
9 you. And thank you for your other comments.

10 MR. EINHORN: Thank you, your Honor.

11 ALJ FOGEL: All right. Let's go on to
12 Mr. Elliott Henry, representing SoCalGas and SDG&E.

13 MR. HENRY: Thank you, your Honor. I've got
14 three points here, and I'll try to keep them pretty
15 tight.

16 The first one is on the climate change risk
17 that was identified in the road map and in your Honor's
18 message yesterday. As we explained in our comments, we
19 felt that there's a lot of value to having that
20 addressed earlier to allow the parallel effort that's
21 coming out of the climate change adaptation ruling.

22 That can be, perhaps, thoughtfully explored and
23 done so that when we have our RAMP filing we can make
24 sure that they're consistent, and we have time to make
25 sure that they do work together in a way that they

1 should.

2 The second point -- I know we're going to be
3 talking through this more in a minute -- it's on the
4 scheduling and making sure that there's time for robust
5 proposal. Hopefully the times allow for alternative
6 proposals and thoroughly going through the -- (audio
7 failure).

8 Risk scaling, for example, I know there are
9 only -- it sounds like we may be talking about that
10 one -- but there were questions identified and
11 responding to questions in the schedule from yesterday,
12 but it looked like that might be it. And we hoped there
13 could be more time and milestones for that.

14 And I'll say with all of this, this is not --
15 we don't want to push any PDs or decisions out unless
16 absolutely necessary because we want to make sure that
17 we can get to work on them, all these incorporated into
18 our RAMPs.

19 And lastly, just for SoCalGas and SDG&E
20 specifically, we are in the thick of our GRC right now
21 with hearings for us in the month of June, and we have
22 our rebuttal testimony due May 12th. So at least for
23 the first few months or first couple months, if anything
24 can be stretched out or expanded to allow us to really
25 be engaged, that would be appreciated.

1 ALJ FOGEL: Okay. Thank you.

2 MR. HENRY: Thank you, your Honor.

3 ALJ FOGEL: Yeah, we'll come back to the
4 schedule some more. Thank you.

5 Ms. Malinda Dickenson from Protect Our
6 Communities Foundation.

7 MS. DICKENSON: Yes. Thank you, your Honor.
8 This is Malinda Dickenson from Protect Our Communities
9 Foundation.

10 And our comments on the Phase III road map
11 refer to the imperative dictated by climate science that
12 the utilities must do everything that they can to reduce
13 greenhouse gas emissions.

14 The utilities' present approach focuses on
15 increasing capital expenditures to the benefit of
16 shareholders which receive profits from capital projects
17 in order to, quote, unquote, "adapt to climate change."
18 But the top priority now for all of us has to be
19 reducing greenhouse gas emissions. We would urge the
20 Commission to ensure that utility holders do not -- and
21 utility shareholders do not benefit from the very
22 climate change impacts that utility operations
23 exacerbate.

24 Climate change impacts remain the largest risk
25 to the public resulting from the utilities' operations.

1 And mitigation of climate change risks must avoid
2 exacerbating climate change and must involve rapid and
3 deep greenhouse gas emission reductions.

4 We also would request that any subsequent
5 scoping memo and subsequent documents in Phase III take
6 care to avoid making any suggestion that mitigating
7 climate change risk is not already required by the
8 Commission's RDF.

9 The RDF has required the utilities to provide
10 a, quote, "comprehensive view of the utilities'
11 potential safety risks and its plans for addressing
12 those risks," unquote, since the beginning of the
13 inception of the RDF and has required that
14 prioritization and, as Commissioner Reynolds mentioned,
15 comparisons. That has been the goals and the way to
16 achieve the accountability that is the central purpose
17 of the RDF.

18 So SDG&E and SoCalGas recognize climate change
19 as a risk in their first RAMP report, their 2016 RAMP
20 report, and, since then, have gotten farther and farther
21 away from taking action to reduce greenhouse gas
22 emissions, which is needed to avoid or mitigate the most
23 catastrophic anticipated climate change impacts.

24 So in summary, discussions about climate change
25 should focus on reducing the utilities' greenhouse gas

1 emissions and should avoid detracting from existing RDF
2 mandates. Thank you.

3 ALJ FOGEL: Thank you, Ms. Dickenson.

4 Katy Morsony from TURN.

5 MS. MORSONY: Good afternoon. Katy Morsony on
6 behalf of TURN.

7 I'm going to attempt to be brief. First, I
8 wanted to echo Ms. Sheriff's comments regarding the
9 importance of affordability in this phase of the
10 proceeding and also Commissioner Reynold's comments
11 earlier.

12 This is a really important topic as we move
13 forward because one of the key strengths of the -- of
14 scoring risk, as we have doing and building on over the
15 last ten years, is being able to work within the
16 constraint of affordability and constraint of budget to
17 do the most high priority work first, to use this tool
18 of restoring to identify not only the projects that
19 provide us the best benefit for our dollars, but also
20 defining the scope of those projects so that we are not
21 doing more work that is most cost effective, so that we
22 are doing only the most cost effective work. So I just
23 wanted to highlight that first.

24 Second, TURN certainly could have been more
25 forthcoming about our availability and agreeability to

1 providing proposal and white papers. For many of these
2 issues, TURN has previously presented its position and
3 we'd be happy to build upon that to provide proposals.

4 In particular, we could provide more
5 information on the uncertainty and data transparency.
6 We'd certainly be happy to address risk scaling.
7 Discount rates, as I indicated in my comments on the
8 road map, is something that has been addressed in a
9 variety of other proceedings or we've -- we've
10 established position.

11 The issue of how sensitivity can be used, we've
12 previously presented a white paper in A.15-05-002. That
13 was when I was still working at -- still representing
14 EPUC and Indicated Shippers, but TURN and EPUC/Indicated
15 Shippers presented a white paper that showed how
16 10-50-90 percentiles can be used to help identify risk
17 scoring.

18 And as Ms. Sheriff noted, we'd be happy to
19 work -- we're planning on working with EPUC and IS again
20 on risk tolerance, optimization, and affordability.

21 In our reply comments, post-hearing --
22 post-prehearing conference statements, I plan on
23 appending some of these documents, as the ALJ previously
24 suggested. And also I can be more clear on the format
25 and timing of when we could provide additional

1 presentations and comments. Thank you.

2 ALJ FOGEL: Thank you. That would be very,
3 very, helpful. And I believe we've -- oh, Dr. Woychik,
4 would you like to -- are you able to provide any
5 comments?

6 MR. WOYCHIK: (Line muted.)

7 ALJ FOGEL: Let's go off the record for a
8 minute.

9 (Off the record.)

10 ALJ FOGEL: Let's go back onto the record.

11 Excuse me. Please go ahead, Commissioner. And
12 we are on the record.

13 COMMISSIONER REYNOLDS: Thank you, Judge Fogel.
14 Thank you to all the parties. I do have a hard stop at
15 1:00 o'clock, so I'm afraid I have to drop off. My
16 advisors Suzanne Casazza and Jake McDermott will be
17 listening in and will be following up with the judges
18 after the PHC. Thank you all.

19 ALJ FOGEL: Thanks for joining us,
20 Commissioner.

21 All right. So I'd just like to review -- it's
22 a little hard to figure out how to go through this, but
23 I think it might be helpful to explain a little bit more
24 about the thinking behind the proposed schedule and to
25 discuss the schedule in more detail.

1 One important part of the schedule was when --
2 that we created was when staff thought they could have
3 ready a presentation that could anchor a discussion.
4 That was really the most important thing and also
5 getting going as quickly as possible.

6 So we did propose a workshop as early as
7 May 10th or 15th on post-test year implementation.
8 That's because we thought that it could be relatively --
9 perhaps hopefully -- simple for Edison to present on
10 what it did in attempting to implement the transparency
11 proposal provided by PG&E and then parties to provide
12 feedback on that, and that perhaps very few other
13 materials would be required to be prepared to discuss
14 that in a workshop on May 10th or 15th.

15 We do have potential other dates we could
16 choose for that discussion, May 24th or June -- well,
17 it's a little bit later, but that was the thinking
18 there.

19 Perhaps we'd like to discuss if that would be
20 sufficient basis to get that discussion started at this
21 point. And the basis of the workshop would be Edison's
22 pilot, which was already submitted, so I guess Edison
23 would speak to -- I know, Kris, you said that May --
24 those days were not good, May 10th and 15th, or perhaps
25 May 24th or -- what's the other date I'm looking for? --

1 June 6th would be a bit better.

2 But the thinking, again, was let's get started
3 on what we can get started on now. Perhaps folks would
4 like to respond.

5 MR. VYAS: Your Honor, before others talk, if
6 this is going forward, the June date would be -- we'll
7 make that work. It may also be helpful if parties could
8 provide some questions in advance so that we kind of
9 have a chance to think through some answers to such
10 questions.

11 And I say this with all respect because we
12 haven't gotten any questions, you know, during the many
13 months after it was filed in the RAMP.

14 So, you know, that may be helpful to contouring
15 the discussion and also contouring what SCE can respond
16 to versus what might be something, you know, that
17 perhaps PG&E, the author of the proposal, respond to,
18 meaning, perhaps, what's the thinking behind this aspect
19 of it. You know, we may not be the appropriate party to
20 respond on that. Thank you.

21 ALJ FOGEL: Sure. I appreciate that.

22 Ms. Dickenson, you have your hand up. Would
23 you like to respond on this topic?

24 MS. DICKENSON: Yes, just with respect to the
25 schedule. Thank you, your Honor.

1 The GRC evidentiary hearings for SDG&E and
2 Sempra start on June 5th and go through the end of that
3 month, so I would request that this proceeding not
4 schedule anything in that time period, if at all
5 possible. Thanks.

6 ALJ FOGEL: I'm sorry. You said June 5th
7 through?

8 MS. DICKENSON: Through the 30th.

9 ALJ FOGEL: Yeah. All right. It's going --

10 MS. DICKENSON: I would guess it would be safer
11 to schedule something toward the end of that time frame
12 rather than from the beginning, but certainly that first
13 week of -- I guess it would be the first full week of
14 June, I would say, should not -- we should avoid, if
15 possible.

16 ALJ FOGEL: Thank you.

17 Let's see. Would other parties be amenable to
18 this concept of circulating questions in advance?

19 Perhaps, PG&E, you could elaborate on or
20 perhaps provide some materials to elaborate on the
21 original proposal or recirculate the original proposal
22 if we are able to find a date in the May/June time frame
23 for this discussion.

24 MR. LOH: Yeah. We're amenable to helping out
25 and moving the topic forward, so we'll do what it takes.

1 ALJ FOGEL: All righty. Now, yeah, go ahead,
2 Dr. Mitchell.

3 MR. MITCHELL: Yes. This would be a question
4 for SCE. Are there any workpapers available with it
5 that could be -- that supported it that could be
6 circulated? And also when and what time frame would you
7 like to receive those questions? What space would you
8 like prior to the workshop?]

9 MR. VYAS: Thanks for the question. Sorry. It
10 took me a second to get off of mute. There was an Excel
11 file that -- this is going off my recollection. There
12 was an Excel file that accompanied the transparency
13 proposal, and I believe there was a Word document as
14 well. We'd be happy to recirculate those.

15 And in terms of the timing of when we would
16 receive questions -- and thank you for that very
17 courteous offer -- we think that two weeks in advance
18 would be helpful in particular for things where we might
19 need to talk with PG&E about who would be -- who is the
20 appropriate party to answer that question so that a
21 productive answer can be provided.

22 And, obviously, this doesn't foreclose anybody
23 from asking us about anything during the workshop
24 itself. It's not meant to restrict the conversation
25 during the workshop, but, hopefully, can help kind of

1 hone the discussion on the workshop, at least on our
2 end, so that we can kind of go in knowing -- we do need
3 to address these topics, and we want to make sure we get
4 to those, you know, in advance, you know, because there
5 may be certain questions where we'll need to talk, you
6 know, to our technical experts, et cetera.

7 ALJ FOGEL: Thank you. And from my earlier
8 notes, it looks as though May 24th would be acceptable
9 date for this on your end; is that true?

10 MR. VYAS: Let me do a little ping realtime,
11 here, your Honor. June is much preferable. June is
12 much preferable.

13 ALJ FOGEL: Perhaps -- I know I got a list of
14 dates that would work well for SPD staff. If staff
15 wants to indicate if there's any dates prior to June 5th
16 that work for you. We can't guarantee the perfect date
17 for everybody, but we can give it a shot. I think the
18 point is that this is a topic that could be discussed
19 without too much additional labor by the parties so
20 that's one reason we have put it closer to the front.

21 MR. VYAS: Your Honor, as your Honor knows, the
22 filing of a GRC application is an enormous burden, and I
23 also would like to just speak on behalf of the team that
24 there are questions of people's well-being. The idea of
25 turning around right after filing a GRC and going to

1 work on a workshop that will be a short time later, I
2 just think we need to recognize we're human beings,
3 present company included.

4 I've been working very hard on the GRC, and I
5 think it would be very helpful if we could just get a
6 little bit of breathing room because it's going to be
7 the exact same resources.

8 ALJ FOGEL: Okay. All right. Thank you for
9 that. There is the issue about the post-test year
10 implementation that was -- one of a number of parties
11 indicated -- some of the intervenors indicated a great
12 deal of interest in.

13 That is something that we would like to target
14 for a decision by the end of the year, certainly by May
15 of next year because that would allow at least a year in
16 advance of Sempra's 2025 RAMP filing, which we feel is
17 an appropriate target for any resulting, you know,
18 guidance to be implemented. So that's the thinking
19 about keeping -- moving that item to the forefront, is
20 let's have a decision in time for it to be implemented
21 in Sempra's 2025 RAMP filing.

22 And, again, that's a topic that staff thought
23 that they could prepare the information on fairly
24 quickly to have a proposal to be released as early as
25 April 26. So that's the thinking there. If anyone

1 wants to give feedback on that, that would be fine.

2 (No response.)

3 ALJ FOGEL: Okay. Seeing none.

4 With regard to climate change, a number of
5 parties mentioned that as being a priority and the
6 original staff road map had indicated that could be in
7 Track 1. I don't see myself -- again, I think, perhaps,
8 the most important timeline is think about what could be
9 adopted prior to May 2024 and be represented in the
10 Sempra RAMP filing. The climate change issue is going
11 to be a little bit tricky because there's coordination
12 with the adaptation rulemaking.

13 And there's also the fact that the current
14 CAVA, the Climate Adaptation and Vulnerability Analysis,
15 required -- and adaptation rulemaking, won't be filed
16 until 2025, concurrent with Sempra's RAMP.

17 So there are some limitations in terms of any
18 guidance that would be adopted in this proceeding and
19 how it might influence Sempra's 2025 RAMP. So
20 considering all those items, whether it's considered
21 Track 1 or Track 2, we thought an August workshop to
22 start that conversation off. Perhaps, that would be a
23 joint workshop with the other proceeding; perhaps not.
24 It's not clear. We also have some dates in June, but --
25 Please, Mr. Loh, go ahead.

1 MR. LOH: Your Honor, I just wanted to speak a
2 little bit about climate change. You know, our thoughts
3 on climate change, you know, it's going to be
4 incremental work, but are we going to get everything
5 spot on first time? Probably not, but, you know, I
6 think we wanted it in Track 1 because we wanted to show
7 incremental progress, you know. Some of the issues --
8 we don't even though know some of the issues that we
9 don't know. And so we want to use this opportunity to
10 kind of refine -- give a first pass of attacking this
11 climate problem, and so that's why we feel that is
12 something that can be achieved in Track 1. Once again,
13 we're not necessarily going to get everything resolved,
14 but I think it's (indecipherable) to get started on the
15 problem. Thank you.

16 ALJ FOGEL: Yes. Thanks, Mr. Loh.

17 So leaving aside the track question, the
18 schedule, proposed schedule, currently indicates a
19 workshop on that topic on August 21st. Are you thinking
20 that -- again, you know, would parties be prepared to
21 discuss that topic before August 21st or have proposals
22 on it?

23 MR. LOH: Your Honor, I mean -- I think it
24 depends on the kind of volume of the topics that are
25 going to be discussed in this Track 1. If it was just

1 purely climate alone, we would definitely have something
2 to say before August proposal, to be had before August,
3 but, once again, it depends on what other topics are out
4 there.

5 In our -- in our comments, we have proposed a
6 kind of schedule that really goes around these
7 manageable chunks. We would respect the end of the
8 year's position, but in order to do that, we wanted to
9 have these manageable chunks so that we don't overload
10 any one of these tracks or too many of these top
11 priority issues. So if we've got our risk tolerance,
12 risk attitude, risk -- I'm sorry -- climate, stay on one
13 track, then I think -- (audio failure).

14 (Reporter clarification.)

15 MR. LOH: I just wanted to mention that we
16 had -- if we have too many high priority, top priority,
17 important items in any one particular track, then we run
18 the risk of not being able to accomplish anything in
19 that track. So it's important for us to make these
20 tracks -- these tracks into kind of manageable -- pick
21 the topics that we feel that -- maybe one in our
22 proposal -- we have one important topic, high priority
23 topic in each of these tracks, so that we can focus on
24 it. Use the remaining time to work on some of the other
25 topics that can be addressed in the short time, but not

1 necessarily all at once.

2 ALJ FOGEL: Thank you.

3 MR. LOH: So I just want to use this
4 opportunity -- we feel that climate, once again, is an
5 area where we need to start working on it sooner rather
6 than later. Are we going to get everything right? As I
7 said earlier, probably not, but I'm reasonably confident
8 that we can make progress in Track 1. Thank you.

9 ALJ SEYBERT: This is Judge Seybert. Can I say
10 something quickly? I just want to interject one thought
11 that came to mind. I think as we currently envision it,
12 Track 1 and Track 2 isn't about priority --
13 prioritization of different issues.

14 As Judge Fogel mentioned, it's really about,
15 one, what do we think we can get in prior to Sempra's
16 next RAMP filing; and, two, what issues do we think we
17 already have some record development on or do we think
18 we could quickly get some record development on in order
19 to get a decision by the end of the year.

20 So when parties speak about what issues are
21 priority to them, I think it's also good to specify
22 where that fits: Does it fit in a Track 1 or does it
23 fit into a Track 2 schedule, recognizing that, you know,
24 both -- both will contain priority issues.

25 Along those lines, I would also welcome

1 comment, either here or in the reply comments next week,
2 on whether or not we should go forward with the proposal
3 to do Track 1 and Track 2 concurrently, to hold
4 workshops this year on both tracks and whether or not
5 that approach seems to make sense. Thank you.

6 ALJ FOGEL: Yes. Thanks for that,
7 Judge Seybert. It is a difficult thing to set up the
8 ideal schedule. It's not going to be ideal for everyone
9 or anyone necessarily, but we're doing our best to
10 reflect what the parties are saying. Perhaps, it would
11 be useful to -- well, we'll have to reflect on what
12 parties have said.

13 Is there any other party that would like to
14 indicate that it can prepare a proposal or a background
15 paper on any topic that hasn't been mentioned yet or I
16 would also invite parties to indicate that in your -- in
17 post-PHC statements, which can be -- you can indicate in
18 your reply comments to the staff proposal that the judge
19 authorized that to also include post-prehearing
20 conference statements.

21 Again, we can talk -- you know, talking about
22 climate change -- again, I'm just a little confused. A
23 number of parties mentioned that it's a priority, but we
24 have to develop the record. Should we start developing
25 that record through a workshop that is grounded with a

1 draft proposal? Should we start that record with ruling
2 questions? Parties can respond to ruling questions.

3 Is there another way we should start that
4 record?

5 (No response.)

6 ALJ FOGEL: All right. So, yeah. I think
7 we've heard a lot about -- a lot of feedback -- please
8 go ahead, Mr. Henry.

9 MR. HENRY: Yes. Thank you, your Honor. I'm a
10 little slow at the hand. I was just going to comment
11 that in our post-PHC statement, I'm sure there's
12 something that SoCalGas and SDG&E will be volunteering
13 to provide, whether it's a proposal or suggestions on
14 one or more of these topics, but just on the PHC here, I
15 can't say for sure which one that would be.

16 ALJ FOGEL: Thank you.

17 Ms. Morsony, and then back to Mitchell. Go
18 ahead.

19 MS. MORSONY: Thank you, your Honor. Katy
20 Morsony on behalf of TURN. I was just hoping to ask if
21 there was any flexibility on the post-PHC due date. I
22 think throughout this prehearing conference at least the
23 scope of what I was planning on filing has grown quite a
24 lot. Even to next Friday the 21st would be much
25 appreciated.

1 ALJ FOGEL: Certainly. That should be fine.
2 We can make -- unless other parties wanted to comment,
3 we can make the post-PHC statements to April 21st,
4 rather than April 19th.

5 And I believe Ms. Malinda Dickenson had her
6 hand up and then we'll go to the others.

7 MS. DICKENSON: Thank you, your Honor. I was
8 just going to address the question I think you raised a
9 little while ago about whether we could move the
10 proposed workshop on climate change from August up. And
11 I think that that would be a great idea with the caveat
12 that it not be the first couple of weeks in March -- I
13 mean in June. Excuse me.

14 But, certainly, the need for climate change
15 action is urgent. The IPCC recently published their
16 synthesis report of the IPCC 6 Assessment Report, and it
17 highlights all over the place the urgent need for
18 near-term climate action. So we can't -- we can't move
19 that quick enough. And we -- we should really get that
20 workshop going even this month if at all possible.

21 So I thought that that was -- that was a great
22 idea that I thought I heard you say about whether we
23 could move up the August proposed workshop date sooner
24 and I support that.

25 ALJ FOGEL: Thank you.

1 Vincent, and then Dr. Mitchell, and then Kris.
2 Go ahead, Vincent.

3 MR. LOH: Thank you, your Honor. I wanted to
4 address the question you brought up earlier on how to
5 proceed with the climate. And in our comments, we
6 recommended a kind of formalized procedure for all of
7 it. It's possible with white papers, and follows on
8 with presentation and workshops. So as far as climate
9 is concerned, I think we should follow that process with
10 white papers. Thank you, your Honor.

11 ALJ FOGEL: Thank you for that.

12 And I'll just note that that is, in fact, why
13 we scheduled the climate change topic for August. We
14 felt that was earliest for staff to prepare a white
15 paper as the foundation for that discussion.

16 MR. LOH: One of the things also was we think
17 that the white paper should be -- parties should be able
18 to have white papers, so it wouldn't necessarily just be
19 one party.

20 ALJ FOGEL: Certainly. Staff is not a party to
21 this proceeding, but, absolutely.

22 August 21st -- certainly any party that would
23 wish to provide a background paper two weeks before that
24 date, which is sometime in -- well, early August, so
25 that's several months. We felt that that gives that

1 topic adequate time for parties to prepare proposals as
2 well.

3 Do you feel that PG&E can prepare a proposal
4 prior to early August?

5 MR. LOH: Prior to early August?

6 ALJ FOGEL: Yes.

7 MR. LOH: My colleague next to me here said
8 August is probably preferable.

9 ALJ FOGEL: Right. Okay. Thank you.

10 And, certainly, parties can indicate if they
11 can prepare proposals prior to early August in your
12 post-PHC statements, but, again, that was the thinking
13 about why we chose that schedule.

14 Dr. Mitchell, then Mr. Vyas. Please go ahead.

15 DR. MITCHELL: Thank you, your Honor. Joseph
16 Mitchell, Mussey Grade Road Alliance. I would like a
17 little clarification on exactly what in Track 2 the tail
18 risk issues are going to entail.

19 I had written a white paper back in Phase I
20 that incorporated some tail risk issues. PG&E followed
21 up on that, I think, six months later or so. Some of
22 those findings have been adopted by PG&E and SDG&E.

23 So my question on that is -- so as not to
24 rehash old ground -- what are the remaining open issues
25 under tail risk? What needs to be done? And once

1 that's established, it will be easier for me to
2 participate and contribute a white paper on that topic.
3 I think we just need a little bit more clarity about
4 what we actually see with that.

5 ALJ FOGEL: Yes. I think that is a good
6 question, and I would put that also back to the parties
7 for party input on what is there to achieve with that.
8 I know that this was discussed in the staff road map,
9 and I think that this is an area where -- I believe we
10 left it off the potential schedule at the moment, but it
11 would be one where parties could identify subtopics in
12 background papers, which would help to guide discussion
13 as to whether further Commission guidance is needed in
14 this area.

15 That's something, again, that's -- as a result,
16 we thought that could be put off until 2024, but could
17 be guided primarily by parties, discussions, and
18 background papers if further action is recommended for
19 the Commission, and, if so, what that would be.

20 Does that answer your question?

21 DR. MITCHELL: Yes. Thank you, your Honor.]

22 ALJ FOGEL: Mr. Vyas, please go ahead.

23 MR. VYAS: Thank you, your Honor. Just a quick
24 procedural clarification.

25 For the 21st, would that mean that both the

1 post-PHC statements and reply comments would be due?
2 And how is your Honor foreseeing, if they are separate
3 documents, what division do you foresee within those two
4 documents?

5 ALJ FOGEL: Yeah. Thanks for that question. I
6 think it's reasonable if we're going to -- let's delay
7 the date for -- the reply comments can be delayed also
8 until April 21st for reply comments.

9 As you know, reply comments are meant to reply
10 to the opening comments only. But in the opening -- so
11 the document can be entitled "Reply Comments and
12 Post-PHC Statement."

13 In the opening paragraph, the parties should
14 state that the administrative law judge authorized both
15 delaying of the reply comments until April 21st and
16 inclusion in the document of a post-PHC statement that
17 responds to this whole general discussion here.

18 Does that provide enough guidance?

19 MR. VYAS: Yes, your Honor. Thank you.

20 ALJ FOGEL: Thank you.

21 All right. I think we should -- we've talked
22 about these issues quite a bit. As I said, our thinking
23 was really guided by what is staff prepared to author --
24 a white paper or presentation or proposal -- in order to
25 get the record development started? That's how we --

1 that was one way that we really prioritized things in
2 our proposed schedule.

3 In the post-PHC statements, if parties are able
4 to indicate that there's specific areas that you can
5 take the lead in preparing presentations, white papers
6 and proposals, that will certainly help us to rethink
7 the schedule and perhaps make some adjustments.

8 One thing before we close that I'd like to ask
9 is we had thought that it might be possible for the risk
10 scaling topic to be addressed solely via questions in
11 response to a ruling. I think some parties perhaps have
12 different views.

13 We think that's a good way to get started on
14 that topic, and would, again, welcome any specific
15 comments from those parties that do think a discussion
16 is necessary still on the risk scaling questioning now.

17 Yeah. Mr. Loh, please go ahead.

18 MR. LOH: Thank you, your Honor. The risk
19 scaling -- also risk attitude -- topic, we feel that
20 this is one that needs to be discussed thoroughly. I
21 know there's been some thoughts about, you know, we
22 discussed this topic for a while already, there have
23 been opinions formed, so on and so forth, but things
24 have really changed for us anyway in terms of thinking
25 about the risk attitude function, the risk scaling

1 function given the new decision that came out in the
2 Phase II decision.

3 So this new information that's new, there's new
4 ways of looking at the problem, and, frankly, unless we
5 do have this discussion, I don't think we'll be able to
6 do justice to the topic. So that's our view.

7 Once again, we recommend the formalized
8 procedure that we have in our comments. And I think
9 this is right for this kind of topic. It's a very
10 important topic. We want to make sure that the
11 Commission has all the information it needs to make a
12 really good, informed decision on this topic. Thank
13 you.

14 ALJ FOGEL: Sure. Thanks, Mr. Loh.

15 And I'll turn to you, Katy, in just a minute.

16 Could you indicate, Vincent, if PG&E would be
17 willing to prepare a presentation to kick off a workshop
18 on the risk scaling question in the May/June time frame.

19 MR. LOH: Yes. We would be able to do it in
20 the May/June time frame to kick off the process. Once
21 again, our concern is that there's just not enough time
22 for a thorough discussion, but we would definitely be
23 okay kicking it off in May/June time frame.

24 ALJ FOGEL: Okay. Thank you very much.

25 Ms. Morsony.

1 MS. MORSONY: Yes. Katy Morsony on behalf of
2 TURN.

3 I think we were the ones that made comments
4 that there's been significant discussion of this issue
5 on the record already. I just wanted to highlight again
6 that TURN is willing to also make a presentation or
7 provide a white paper on risk -- or risk attitude slash
8 scaling, and we would be prepared to do that in the May
9 or June time frame.

10 I do recognize that perhaps additional
11 discussion is appropriate given the adoption of the
12 December decision, but I also would urge that we also,
13 you know, be very clear in the limitations of that
14 process in advance as well. Thank you.

15 ALJ FOGEL: Sorry. The limitations to which
16 process?

17 MS. MORSONY: I would say being clear about
18 what would be included and how long the discussion
19 progress -- process would occur, be it presentations, a
20 workshop, and then formal comments as the decision is
21 decided, rather than iterative rounds of informal
22 comments when this is an issue that has already been
23 discussed in the past.

24 ALJ FOGEL: Great. Thank you. We did indicate
25 earlier that June 6th was a good date for a potential

1 workshop.

2 I'll get to you in just a minute, Mr. Henry.

3 So that would imply, if we have a two-week
4 circulation of papers or thoughts before that, to have
5 those circulated by May 23rd. I'll put that out there
6 as a potential placeholder. That might apply to TURN
7 and PG&E who have offered to provide some starting
8 materials for that discussion.

9 Mr. Henry, please go ahead.

10 MR. HENRY: Thank you, your Honor. Yeah. If
11 things begin at that time, I think that's okay. Again,
12 we have the constraints with our GRC. I would just want
13 to make sure that it's not done and closed up in a
14 month. I really do think we need the time.

15 You know, I'm not suggesting multiple workshops
16 because I feel -- I think I generally agree with some of
17 what Ms. Morsony said about too much iterative
18 back-and-forth. But I do think that having a workshop,
19 having a ruling with the questions, providing comments
20 or proposals, I feel like there should be a few more
21 steps in there and stretched out or at least extended
22 just a little bit so that we have time to meaningfully
23 participate.

24 ALJ FOGEL: Okay. Thank you for that comment.
25 Perhaps we'll be looking at a date a little later. It's

1 all sort of just trying to take some input now from
2 parties on these concepts.

3 Ms. Dickenson and then Mr. Mitchell.

4 MS. DICKENSON: Yes. First on the timing
5 issue, if we could please avoid the week -- first week
6 of June -- if we could please avoid that first week, it
7 would preclude our participation and probably the
8 participation of others.

9 I think that the month of June would be
10 difficult, but that first week, in particular, if we
11 could not hold any workshops in this proceeding on that
12 first week, that would be very helpful. Thanks.

13 ALJ FOGEL: Mr. Mitchell.

14 MR. MITCHELL: Yes. Thank you, your Honor.
15 Joseph Mitchell, Mussey Grade Road Alliance.

16 I would just like to suggest that perhaps if
17 the initial presentations are focused on the scaling and
18 how it's affected by the Phase II decision, that might
19 be helpful because this is an issue that's been
20 litigated not only in this proceeding but in GRCs and
21 RAMPs, in the S-MAP. There is a very large record on
22 this particular topic.

23 So in order to focus so we don't rehash the old
24 ground, because I think we know what PG&E's old position
25 was -- it may have changed based on Phase II -- it would

1 be good to focus so that we can get a very rapid -- more
2 rapidly come to a conclusion. Thank you.

3 ALJ FOGEL: That certainly sounds amenable to
4 me.

5 Is there any party that would like to disagree
6 with that?

7 (No response.)

8 ALJ FOGEL: All right. Thank you. Just
9 getting ready to close here I think fairly soon after
10 going through some of the final items, but just to --
11 one more sort of detailed discussion, if you'll bear
12 with me, is regarding the post-test year implementation.

13 The draft schedule does indicate we are -- the
14 staff is almost ready to circulate a proposal on that,
15 and so we could hold a workshop on May 10th, or sometime
16 in May. May 10th, 15th and 24th are staff's preferred
17 dates on that topic.

18 What I'm hearing is parties would perhaps like
19 also to have ruling questions, not only of staff
20 proposals to comment on, but, again, if parties would
21 like to comment in more detail on what record
22 development they would like to see with regard to --
23 have a chance to participate in with regard to the
24 post-test year implementation, that would be helpful
25 because we do hope to move a little more quickly on that

1 topic because we are prepared to do so.

2 (No response.)

3 ALJ FOGEL: All right. I'm going to take that
4 as agreement that that is a pretty good idea. We will
5 probably go ahead with that proposal that's in the draft
6 schedule to start moving on that topic in April and May
7 in terms of circulating a draft staff proposal and
8 holding a workshop to develop the record.

9 So this has been a very detailed discussion and
10 thank you for bearing with me on this. It's very
11 challenging to determine how to move forward again with
12 the combination of parties' constraints, staff
13 constraints, et cetera.

14 I certainly would be most happy to, you know,
15 encourage parties to get together off-line, see if you
16 can come up with a census proposal off-line prior to the
17 April 21st date. That could help us move along. We'd
18 certainly entertain any joint party -- parties' joint
19 proposal for scope and schedule that's able to merge the
20 various opinions more effectively than you've seen us
21 attempting to do during this prehearing conference.

22 So with that, I think we'll wrap up the
23 discussion of scope and schedule, unless anyone would
24 like to add anything there, and move, finally, to just
25 the issues of categorization and the need for

1 evidentiary hearings. This is currently categorized as
2 a rulemaking, and I don't see any reason to change that.
3 We don't see any need for evidentiary hearings at this
4 point in time.

5 Would any parties like to differ on that
6 topic -- those topics?

7 (No response.)

8 ALJ FOGEL: If not, we will go ahead and close.
9 Commissioner Reynolds has left us. I see a final
10 question from Ms. Dickenson. If any other party has a
11 final question or comment, please go ahead and raise
12 your hand.

13 Yes, Ms. Dickenson.

14 MS. DICKENSON: Just in response to your
15 question about the evidentiary hearings. I think that
16 there is a possibility that they could become useful in
17 the event that a party presents an alternative or a
18 proposal that other parties have -- wish to test the
19 scope of or benefits of.

20 That's just something that I would like to
21 present then as a possibility for further consideration
22 later down the road depending on how the proceeding
23 develops.

24 ALJ FOGEL: Thank you. Thank you for that.

25 Any other questions or comments from parties?

1 (No response.)

2 ALJ FOGEL: If not, I want to thank you all
3 very much for your time and for contributing to this
4 discussion.

5 Again to reiterate, we did delay the date for
6 the reply comments to the staff proposal road map as
7 well as a post-prehearing conference statement to
8 April 21st. Please do indicate that the judge
9 authorized that in the opening paragraph of those
10 comments. I think it should be fine for that to be a
11 single document. Thank you all very much for your time.

12 Off the record.

13 (At the hour of 1:40 p.m., this matter having
14 concluded, the Commission then 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
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TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON APRIL 11, 2023.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.
EXECUTED THIS APRIL 17, 2023.

A handwritten signature in black ink, reading "Andrea L. Ross". The signature is stylized with a large, looping "R" and a cursive "A".

ANDREA L. ROSS
CSR NO. 7896

BEFORE THE PUBLIC UTILITIES COMMISSION
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STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

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