

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE  
STATE OF CALIFORNIA



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ADMINISTRATIVE LAW JUDGE ELAINE LAU, presiding

Order Instituting Rulemaking to Consider ) EVIDENTIARY  
Distributed Energy Resource Program ) HEARING  
Cost-Effectiveness Issues, Data Access )  
and Use, and Equipment Performance ) Rulemaking  
Standards. ) 22-11-013  
)

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Reported by: Karly Powers, CSR No. 13991  
Ashleigh E. Button, CSR No. 14013  
Jacquelyn Haupt, CSR No. 13964

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VIRTUAL PROCEEDING

JANUARY 25, 2024 - 10:02 A.M.

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ADMINISTRATIVE LAW JUDGE LAU: Let's go back on the record. The Commission will come to order.

This is day three of the evidentiary hearing in Order Instituting Rulemaking R.22-11-013, to Consider Distributed Energy Resource, DER, Program Cost-Effectiveness Issues, Data Access and Use and Equipment Performance Standards. For this evidentiary hearing, we are examining the facts related to the 2024 Avoided Cost Calculator, ACC, update.

Good morning. My name is Administrative Law Judge Elaine Lau, and the presiding officer for this proceeding.

The assigned officer -- sorry. The assigned commissioner is Commissioner Darcie Houck. But she will not be joining us.

We are resuming cross-examination of Mr. Strack. Mr. Strack, can you introduce yourself for the record again?

THE WITNESS: Yes. I'm Jan Strack with San Diego Gas & Electric Company, representing the Joint Utilities.

ALJ LAU: And the Joint Utilities are -- can

1 you explain what -- who are the --

2 THE WITNESS: The joint --

3 (Crosstalk.)

4 THE WITNESS: They are Pacific Gas and  
5 Electric, Southern California Edison Company, and San  
6 Diego Gas & Electric Company.

7 ALJ LAU: Thank you.

8 Mr. Strack, do you see the set of witness  
9 attestations put forth on the screen?

10 Yesterday, you --

11 THE WITNESS: Yes, I do.

12 ALJ LAU: Sorry. Sorry. I spoke over you.

13 Yesterday, you agreed to abide by these  
14 attestations. Do you remember and agree to abide by  
15 them today?

16 THE WITNESS: Yes, I do.

17 ALJ LAU: Thank you.

18 Can we bring forth Ms. White to the stage?

19 (Crosstalk.)

20 ALJ LAU: Ms. White, you may begin  
21 cross-examination of Mr. Strack.

22 Before you begin, please introduce yourself.

23 Thank you.

24 MS. WHITE: Yes. Thank you, your Honor.

25 So, I'm Andrea White. And I'm representing the

1 Protect Our Communities Foundation.

2 JAN STRACK,

3 resumed the stand and testified further as  
4 follows:

5 CROSS-EXAMINATION RESUMED

6 BY MS. WHITE:

7 Q Okay. So, if you're ready, Mr. Strack, for my  
8 first question, I would like to turn to page 20 of your  
9 rebuttal testimony. And this refers to lines 9 through  
10 11. Okay. So, I will read the sentence.

11 So, you testify that:

12 Updating avoided transmission costs for the  
13 2024 ACC update cycle, using the existing  
14 methodologies prior to completion of the  
15 Commission-directed study is unnecessary  
16 and would simply compound the  
17 uncertainties.

18 So, are you suggesting that we should reuse the  
19 2022 calculated avoided transmission values for the 2024  
20 update?

21 A Yes. That's -- that's our recommendation.

22 Q Okay. So, next, I want to turn to a sentence  
23 on the same page. It's beginning on line 1.

24 So, here you state:

25 These variations and calculated avoided

1 transmission costs raise legitimate  
2 questions as to the accuracy of the results  
3 and, subsequently, the veracity of DER  
4 program cost-effectiveness determination  
5 and the validity of ACC-based compensation.

6 So, in your opinion, do you think it's -- it's  
7 acceptable to use these previously-calculated avoided  
8 transmission costs, even though you state that they  
9 raise legitimate questions as to the accuracy of the  
10 results?

11 A Yes. That's the data we have now. It's gone  
12 through some vetting. The division's accepted them for  
13 purposes of the 2022 Avoided Cost Calculator. So, I  
14 think it's what we have now. I just don't think we need  
15 to layer on any more uncertainty, so -- so, yes.

16 Q Okay. So, just to clarify, this -- you're  
17 proposing reusing the 2022 values for 2024, not the  
18 methodology -- the values?

19 A No, I -- I -- I guess, I'm saying use the same  
20 numbers. The same numbers came out of the results of  
21 both inputs and methodology. We're saying, let's stick  
22 with that for now. Let's wait and what the avoided T&D  
23 cost study comes up with, in terms of both, perhaps, you  
24 know, changed methodologies, changed input assumptions  
25 -- don't know where it's -- what's going to come out of

1 that whole effort. But we want to see what it is. And  
2 I -- I think that's the proven course of action at this  
3 point.

4 Q Okay. So, next, I want to turn to PCF  
5 Exhibit-06, which was sent out last night. And let me  
6 know when you have it up.

7 MR. NEWLANDER: Your Honor, I'm going to object  
8 to questioning based on this exhibit. The -- this was  
9 the same issue that came up yesterday that Mr. Sung  
10 discussed, there was a batch of exhibits that had been  
11 served without any identification of the witness that  
12 was intended to be crossed. And then, you know, last  
13 night at -- I think it was about 10:45 p.m. --  
14 Ms. White served an email that indicated that she  
15 intended to use this -- this exhibit and a few others in  
16 her cross-examination of Mr. Strack and other witnesses.  
17 That -- that doesn't afford any time for us to confer  
18 and prepare, and it's potentially prejudicial. And I  
19 objection on that basis.

20 MS. WHITE: So --

21 ALJ LAU: Okay --

22 MS. WHITE: -- is it okay if I clarify, your  
23 Honor?

24 ALJ LAU: Okay. You can clarify.

25 MS. WHITE: Okay. So, I did -- I did -- this



1 is not a new document. I did already serve it on  
2 January 12th. And, additionally, this is also a  
3 document that's widely circulated on the Commission's  
4 website. It's on the DER cost-effectiveness page. So I  
5 think it should be pretty common knowledge. But --

6 ALJ LAU: Okay.

7 MS. WHITE: Yeah. It's a --

8 ALJ LAU: I -- I will agree with Mr. Newlander.  
9 It is kind of late, at 10:00, to advise the witness to  
10 prepare for it for the morning, at least, you know. So,  
11 I think I had asked earlier that, you know, this be  
12 done. And I would have preferred that this is done at  
13 least, you know, around the close of business or, if  
14 not, like, you know, preferably on the first day of  
15 hearing. I already kind of asked that.

16 So, I will sustain the objection of  
17 Mr. Newlander.

18 MS. WHITE: Okay. Thank you, your Honor.

19 So, just to clarify, for later in the day --  
20 for example, I have some exhibits for Rosalinda Magana.

21 Do you think it would be appropriate to include  
22 those exhibits?

23 ALJ LAU: Just so you know, Ms. White, before  
24 we went virtual and in-person, we do require a 24-hour  
25 service to the witnesses before their cross. And only

1 when -- if it's an impeachment that we use less than  
2 24 hours. I -- I want you to just work with  
3 Mr. Newlander. If they are okay with it, I'm okay with  
4 it -- maybe for the lunch ones, you know, after-lunch  
5 ones.

6 But that was the rule. And I've bended (sic)  
7 the rules a lot. I mean, for the virtual hearings, I --  
8 I -- most ALJs even use longer than 24 hours. So,  
9 in-person was 24 hours. And after we went virtual, for  
10 some reason, we made it even longer just so that people  
11 have access to it on Internet. So, please talk to  
12 Mr. Newlander.

13 I will say that I have set the rules on, you  
14 know, and spec- -- reiterated it. I set the rules in  
15 the ruling and I reiterated it on the first day of  
16 hearing. So, yeah, I will agree with Mr. Newlander's  
17 objection.

18 MS. WHITE: Okay. Thank you, your Honor.

19 So, if you'll allow me, then I will just  
20 proceed to my questions that don't address the exhibit.

21 (No response.)

22 BY MS. WHITE:

23 Q Okay. Okay.

24 So I'm, instead, going to proceed to questions  
25 about PCF-16, which I did serve in advance. Okay.

1           So, Mr. Strack, are you aware that in  
2 Decision 22-05-002 the Commission stated that it was  
3 prudent to conduct a study as soon as practicable?

4           A     Yes. I'm aware of that.

5           Q     Okay. So, next, I want to turn to Ordering  
6 Paragraph 8D?

7           A     I'm sorry. Which --

8           Q     Which page? Yes. So this is on page 124, on  
9 the last page of the document.

10           Okay. So, I'll read -- oh, I -- I'll let you  
11 -- are you there?

12           A     Yes. I'm there.

13           Q     Okay. So I will read Ordering Paragraph 8D.

14           So this says:

15                     The director of the Commission's Energy  
16                     Division is authorized to conduct analysis  
17                     on avoided transmission and distribution  
18                     costs to aid in the development during the  
19                     successor proceeding of the improved  
20                     methods to calculate these values.

21           So, just to clarify, do you think this is the  
22 successor proceeding?

23           A     I agree this is the successor proceeding. But  
24 I would just note that this particular section has been  
25 superseded by an ALJ ruling on October 13th of 2023.

1 And --

2 Q Okay. Okay.

3 So -- so, based on that, you do not think that  
4 the Commission is obligated to update avoided  
5 transmission values in this proceeding? ]

6 A Well, it's ultimately, of course, the  
7 Commission's call on what they're going to require their  
8 Energy Division to do but, again, as the  
9 October 13, 2023, ruling indicated, they've adopted the  
10 Energy Division staff proposal to defer to the -- to --  
11 deferring further analysis until the 2026 ACC cycle  
12 when, presumably, we will have the results of the T&D  
13 study available.

14 My hope is that, you know, the study will shed  
15 some light on what is the best way to estimate avoided  
16 transmission cost for purposes of the ACC. We will have  
17 to wait and see, and I am pretty confident the -- the  
18 Commission is going to allow the stakeholders to weigh  
19 in on that study, both the scope and hopefully the  
20 results. We will see, but that's our hope.

21 Q Okay. So, do you think the Commission has  
22 followed the appropriate procedures for, I guess,  
23 overruling this decision?

24 MR. NEWLANDER: Objection, your Honor. Calls  
25 for a legal conclusion.

1 ALJ LAU: Sustained.

2 MS. WHITE: Okay.

3 Q So, let's see.

4 Okay. So, next, I am going to turn to your  
5 rebuttal testimony. Let's see. So, this is on page 29.  
6 Okay, and it's lines 26 through 30.

7 Okay. So, I will read the sentence. So, it  
8 says:

9 Energy and Environmental Economics, E3,  
10 appropriately multiplied the Alberhill  
11 avoided costs by the percentage of SCE  
12 system load served by the Alberhill  
13 Substation to convert the locational  
14 avoided costs to a system-wide basis.

15 So, would you agree that multiplying the total  
16 project marginal costs by 4.45 percent results in a  
17 significantly smaller value for the avoided transmission  
18 costs? Avoided -- yeah.

19 A Well, numerically, yeah, multiplying it by that  
20 produces a much smaller number. I think it's an  
21 appropriate reduction, but I would agree with you, it's  
22 a much smaller number.

23 Q Okay. So, next, I -- it's okay if you don't  
24 know the answer to this question, but isn't it true that  
25 the justification for the Alberhill project was a seven

1 megawatts per year load growth in the Alberhill  
2 sub-area?

3 A That number sounds about right. That's what I  
4 remember, yes.

5 Q Okay. So, if seven megawatts of equivalent  
6 DERs capacity per year was added that would address the  
7 forecasted seven megawatts per year growth used to  
8 justify the Alberhill project, correct?

9 A Well, I am not -- I am not sure I can answer  
10 that. I mean, it depends on what kind of DERs are being  
11 added and the output profile and -- I think your  
12 statement is a little broad, frankly. I guess I would  
13 be uncomfortable dealing with that specifically.

14 Q Okay. So, then to clarify, what would you say?

15 A Well, I -- I think it's fair to say that if you  
16 had, you know, the -- the right renewables at the right  
17 location at the right time, there's a possibility you  
18 could defer some infrastructure. I don't -- you know, I  
19 think that's a fact.

20 But, again, whether -- whether the right ones  
21 are here at the right -- right time -- you know, and I  
22 just note this is very locational in nature, and the  
23 avoided calc -- the Avoided Cost Calculator is applied  
24 on a systemwide basis, so we can look at one location  
25 and what is happening there, then the question becomes

1 is that applicable to the entire system, which is where  
2 the ACC results are -- are really applicable; and I  
3 think that's why the -- you know, the adjustment was  
4 made that you indicated. A significant adjustment.  
5 You've got the spread the impact systemwide, because  
6 that's how the ACC is based, and that's how it's applied  
7 in cost effectiveness calculations and compensation and  
8 so forth.

9 Q Okay. So, if you're talking about systemwide,  
10 what are the systemwide benefits?

11 A Systemwide benefits of -- of what?

12 Q I guess of the Alberhill project?

13 A I am not sure I understand your question. Let  
14 -- let me just say this. By spreading it systemwide  
15 with -- with that adjustment, that -- that reduction --  
16 that significant reduction you mentioned. I think it  
17 affects what -- what the -- what you're saying is, if we  
18 had load growth throughout the system of this magnitude,  
19 you know, then this would be an appropriate way to --  
20 you know, as far as the calculation goes, it would be  
21 appropriate to incorporate the resulting cost as an  
22 avoided transmission cost.

23 But, again, you know, the whole point is, you  
24 need to assume that this event takes place on a whole  
25 systemwide basis. It's not reasonable to assume that

1 the Alberhill project itself is going to be built in  
2 every location on the Edison system. That is just not  
3 going to happen. That is not reasonable, so significant  
4 adjustment is needed in order to -- to spread it to a --  
5 on a systemwide basis, which is the basis of the Avoided  
6 Cost Calculator.

7 Q Okay. So, are you aware that over the last  
8 several years, including in 2023, that DERs have  
9 consistently gone into the Alberhill sub-area at a rate  
10 equivalent to or greater than the seven megawatts per  
11 year of the forecasted load growth?

12 MR. NEWLANDER: Objection, your Honor. Assumes  
13 facts not in evidence.

14 ALJ LAU: Ms. White, if you want to point to  
15 somewhere in his testimony that kind of relates to what  
16 you're saying.

17 MS. WHITE: Sure. I guess, it relates to the  
18 sentence on page 29, line 23 to 26. So, here -- here  
19 Mr. Strack is saying:

20 POC is assuming, without support, that DERs  
21 located throughout SCE's entire territory  
22 would avoid the same costs as those located  
23 within the Alberhill sub-area, even though  
24 no similar upgrade projects are planned for  
25 the rest of SCE's system.



1           So, the reason my question relates is -- well,  
2 I think -- I -- I don't want to speak for Mr. Powers,  
3 but I -- I think my question sort of relates to -- we  
4 are talking about systemwide but, you know, if there are  
5 DERs that are in the Alberhill sub-area, couldn't those  
6 replace Alberhill? So -- and then, I can just repeat my  
7 question.

8           MR. NEWLANDER: Well, your Honor, at this  
9 point -- yeah, I mean, I would appreciate the question  
10 being repeated or rephrased, but I -- I heard the word  
11 "if" in there, which suggests that she's calling for the  
12 witness to speculate; and so, I object on that basis.

13           ALJ LAU: I want to --

14           MR. NEWLANDER: In addition to the prior  
15 objection.

16           ALJ LAU: I want to try to hear -- I want to  
17 hear the question first.

18           MS. WHITE: Okay.

19           Q     Let's see. So, are you aware that over the  
20 last several years, including 2023, that DERs have  
21 consistently gone into the Alberhill sub-area at a rate  
22 equivalent to or greater than seven megawatts per year  
23 of the forecasted load growth?

24           MR. NEWLANDER: Object -- same objection, your  
25 Honor. There's -- the question assumes facts not in

1 evidence.

2 ALJ LAU: Well --

3 MS. WHITE: I --

4 ALJ LAU: Go ahead, Ms. White.

5 MS. WHITE: I think I can rephrase the question  
6 where I can just ask for Mr. Strack's opinion.

7 ALJ LAU: Okay.

8 BY MS. WHITE:

9 Q Okay. So, Mr. Strack, in your opinion, if DERs  
10 are going into the Alberhill sub-area at a rate  
11 equivalent to or greater than seven megawatts per year  
12 of the forecasted load growth, would that change your  
13 mind about the necessity of the Alberhill project?

14 A I -- I am not going to comment on the need for  
15 the Alberhill project. That is not something I'm  
16 involved with, and that -- that's completely outside of  
17 my knowledge, so I -- I am not going to comment on that  
18 further.

19 I think the -- the central issue we are dealing  
20 with here is is Alberhill representative of the entire  
21 system? And I think, as I've indicated, it is not. An  
22 adjustment is needed, and a significant adjustment is  
23 needed. That's what was done.

24 Q Okay. Let's see. I am going to -- ah, okay.

25 So, are you -- or do you know what the

1 assumption is for SCE's forecast for the DERs in the  
2 Alberhill sub-area?

3 A I do not know specifically what SCE's  
4 assumptions are, no.

5 Q Okay. So, then do you know whether the  
6 seven-megawatt justification for the Alberhill project  
7 involves anticipated DERs?

8 MR. NEWLANDER: Objection, your Honor. Can  
9 counsel point to a source for the seven-megawatt figure?

10 MS. WHITE: I can. It's in PCF-04, though,  
11 which is the ACC; and so, I am concerned about  
12 referencing one of my exhibits.

13 ALJ LAU: Well, isn't it on the rebuttal  
14 testimony on page 30 that Mr. Strack has acknowledged  
15 that it --

16 MS. WHITE: Oh, yes.

17 ALJ LAU: -- is?

18 MS. WHITE: Yes, that's true. Yes. Thank you,  
19 your Honor.

20 Okay, I -- I guess, I should repeat my question  
21 then?

22 ALJ LAU: Yeah.

23 MS. WHITE: Okay.

24 ALJ LAU: So, if you want Mr. Strack to look at  
25 his own testimony, page 30, lines 2 to 6.

1 MS. WHITE: Okay, yeah.

2 Q So, based on this, do you acknowledge the seven  
3 megawatts of load growth, Mr. Strack?

4 A What -- what I acknowledge is that -- that  
5 there was a forecast of seven megawatts per year of load  
6 growth in this sub-area. I don't know when that  
7 particular forecast was put together or who put it  
8 together, any details around that but, yeah, that's the  
9 number that was presented.

10 Q Okay. So, then do you know where -- whether  
11 the seven megawatts justification for the Alberhill  
12 project involves anticipated DERs?

13 A I am going to assume it does but, again, I  
14 don't know any details behind how that specific number  
15 was arrived at, so I -- I can't comment further.

16 Q Okay. I -- I am going to turn back to page 29  
17 of the rebuttal, and this is lines 23 through 26, which  
18 I already mentioned.

19 So, it says:

20 PCF is assuming, without support, DERs  
21 located throughout SCE's entire territory  
22 would avoid the same costs as those located  
23 within the Alberhill sub-area, even though  
24 no similar upgrade projects are planned for  
25 the rest of SCE's system.

1           So, isn't it true that there are currently DERs  
2 located in the Alberhill sub-area?

3           A     I think that's a fair assumption, sure.

4           Q     Okay. So, I think you've already mentioned  
5 this but, in your opinion, should the Alberhill sub-area  
6 project be viewed as a systemwide project?

7           A     Can you repeat the question, please?

8           Q     Yes.

9           So, Mr. Strack, should the Alberhill -- in  
10 your -- in your opinion, should the Alberhill sub-area  
11 project be viewed as a systemwide project?           ]

12          A     You said, "Alberhill sub-area projects." Are  
13 you referring to the substation project? I'm confused  
14 what you mean by "project" here, I guess.

15          Q     Oh, okay. Yeah. I just mean the  
16 Alberhill Project as -- as its referenced in the ACC.

17          A     Okay. So as I understand it at least, the  
18 Alberhill substation is a major -- is a new substation,  
19 I believe, a greenfield substation project, intended to  
20 at least address the seven megawatts per year of load  
21 growth in that subarea, primarily. There may be other  
22 purposes that I'm not familiar with. But that's my  
23 understanding of what's going on there.

24                 And, again, the question becomes is that  
25 representative of the entire Edison system? And, again,

1 it is not. And so an adjustment is needed.

2 MS. WHITE: Okay. Let's see.

3 Okay. I think I don't have any further  
4 questions. So thank you, Mr. Strack.

5 And thank you, your Honor.

6 ALJ LAU: Thank you.

7 Let's see. Actually, Mr. Strack, I think  
8 you're done. Thanks for your -- for appearing yesterday  
9 and today and being so flexible. We're done with your  
10 cross-examination.

11 THE WITNESS: Thank you.

12 MR. NEWLANDER: And I do not have any redirect  
13 for Mr. Strack, your Honor.

14 ALJ LAU: Oh, sorry, Mr. Newlander. Yes. It's  
15 been a long three days. Did you have any redirect for  
16 Mr. Strack? And I guess you said you did not.

17 So -- okay. Sorry. Let's take Mr. Strack off  
18 stage. And yeah, feel free to prompt me if I forget  
19 something. But we have not had any redirect for this  
20 proceeding, which I thought was amazing.

21 So let us bring forth Mr. Lonnie Mansi.

22 Let's go off the record first then.

23 (Off the record.)

24 ALJ LAU: Let's go on the record.

25 So on stage we have Mr. Newlander and Mr. Mansi

1 as well as a set of witness attestations.

2 Mr. Mansi, can you introduce yourself by  
3 spelling your full name and the organization you're  
4 representing? And if you're representing the  
5 Joint IOUs, please elaborate which are the utilities you  
6 are representing today.

7 MR. MANSI: Thank you, Judge. My name is  
8 Lonnie Mansi. First name L-o-n-n-i-e. Last name M, as  
9 in Mary, -a-n-s-i. I represent the joint utilities.  
10 The joint utilities are PG&E, Southern Cal Edison, and  
11 San Diego Gas & Electric.

12 ALJ LAU: And for which utility do you work  
13 for?

14 MR. MANSI: I work for San Diego Gas &  
15 Electric.

16 ALJ LAU: Thank you, Mr. Mansi.

17 Do you see the set of witness attestations set  
18 forth on the screen?

19 MR. MANSI: Yes, I do.

20 ALJ LAU: Have you had the opportunity to  
21 review them in full?

22 MR. MANSI: Yes, I did.

23 ALJ LAU: Do you agree to abide by them?

24 MR. MANSI: Yes.

25 ALJ LAU: Thank you, Mr. Mansi.

1           Mr. Newlander, you may begin your direct  
2 examination of Mr. Mansi.

3           MR. NEWLANDER: Thank you, your Honor.

4                           LONNIE MANSI,

5           called as a witness on behalf of San Diego  
6 Gas & Electric, having attested, testified as  
7 follows:

8                           DIRECT EXAMINATION

9 BY MR. NEWLANDER:

10          Q     Mr. Mansi, do you have the exhibits that have  
11 been marked and identified as Exhibits IOU-01 and  
12 IOU-02, which are the prepared opening and rebuttal  
13 testimonies of the joint utilities in this proceeding?

14          A     Yes, I did.

15          Q     Are you sponsoring the portion of Exhibit  
16 IOU-01 at section B3 and the portion of Exhibit IOU-02  
17 at section B6?

18          A     Yes.

19          Q     Were the portions of the joint testimonies you  
20 are sponsoring prepared by you or under your direction?

21          A     Yes.

22          Q     Do you have any changes or corrections to make  
23 to that material?

24          A     No.

25          Q     Do you adopt the reference material as your



1 testimony in this proceeding?

2 A Yes.

3 Q Are the factual statements in your testimony  
4 true and correct to the best of your knowledge?

5 A Yes.

6 Q Insofar as statements in your testimony reflect  
7 opinion or judgment, do such statements reflect your  
8 best professional opinion or judgment?

9 A Yes.

10 MR. NEWLANDER: Your Honor, the witness is  
11 available for cross-examination.

12 ALJ LAU: Thank you, Mr. Newlander.

13 Can we bring forth Mr. Roger Lin on stage?  
14 Let's go off the record while we're doing that.

15 (Off the record.)

16 ALJ LAU: Okay. Let's go back on the record.

17 We have on stage Mr. Roger Lin -- actually,  
18 Mr. Lin, can you introduce yourself before you begin the  
19 cross-examination of Mr. Mansi?

20 MR. LIN: Yes. Roger Lin on behalf of the  
21 Center for Biological Diversity.

22 ALJ LAU: And you may proceed.

23 MR. LIN: Thank you, your Honor.

24 ///

25 ///

CROSS-EXAMINATION

BY MR. LIN:

Q Good morning, Mr. Mansi.

In your opening testimony at page 49, line 10, you discuss non-energy benefits and say that they should be used as informational only. What do you mean by "informational only"?

A The -- the phrase "informational only" applies to qualitative analysis of any NEB or NEI as opposed to any calculated quantitative values. In addition, the NEBs are at a higher level of assessment as opposed to the more detailed value-based concept currently.

Q And do you propose that because non-energy benefits like avoided harms to air quality or water quality -- are you proposing information only because those benefits are hard to quantify?

A I think currently the -- the notion of non-energy benefits are essentially issues before the Commission. They have sort of a higher level assessment, especially for guidance and policy. There's quite a lot of issues or components of non-energy benefits that still currently have to be assessed going forward.

Q Okay. And can that informational only use that you describe be used to inform procurements or

1 investment decisions?

2 A I have no opinion with respect to how NEBs  
3 guide investments.

4 Q Okay. Thank you.

5 And moving -- sticking on your opening -- I'm  
6 only covering your opening testimony today. Page 49,  
7 line 19. You discuss, "Participants are not expected to  
8 receive enough benefits to offset the full costs."

9 A I see that.

10 Q And this is in a cost-effective program or  
11 programs that do not score above 1.0 on the total  
12 resource cost test; is that correct?

13 A Generally that's correct.

14 Q Okay. And then hopefully we can have a quicker  
15 answer than from Cal Advocates yesterday. But generally  
16 speaking, do most programs that serve disadvantaged  
17 communities score higher than -- or sorry -- score lower  
18 than 1.0 on the total resource cost test?

19 A It depends what proceeding you define these  
20 disadvantaged, I guess, sectors. There are proceedings  
21 where individual technologies are cost effective, but  
22 perhaps the program in total may be not cost effective  
23 and vice versa. There are other programs where the  
24 Commission has specific goals or legislations that wish  
25 to provide sort of a plain level for people who are

1 disadvantaged. Inherently, they provide not  
2 requirements but guidance in terms of maybe a value to  
3 obtain enters of the total resource cost test.

4 Q Okay. And then those -- for -- sticking with  
5 those programs where cost effectiveness is not  
6 considered, the disadvantaged -- is it correct that the  
7 disadvantaged community-targeted programs that score  
8 less than 1.0 have to be counterbalanced by other  
9 programs in the service territory that do score above  
10 1.0 so that overall in the service territory, all the  
11 programs collectively are scoring above 1.0?

12 MR. NEWLANDER: Objection, your Honor. Counsel  
13 is testifying, and there was a lot loaded into that  
14 question.

15 ALJ LAU: I will agree with that objection.

16 Mr. Lin, can you try to break it down and --

17 BY MR. LIN:

18 Q Well, how then -- how do we make sure that in a  
19 service territory -- in SDG&E's service territory, for  
20 instance, if we have all of these cost-ineffective  
21 programs that serve disadvantaged communities, how do we  
22 ensure that collectively in SDG&E's service territory,  
23 the score is above 1.0 -- the TRC score is above 1.0?

24 MR. NEWLANDER: Objection, your Honor. There's  
25 no hook to Mr. Mansi's testimony, so I question whether

1 it goes beyond the scope.

2 ALJ LAU: I'm going to allow it.

3 Mr. Mansi, just answer to the best of your  
4 ability based on your opinion.

5 THE WITNESS: Could you repeat the question  
6 again?

7 BY MR. LIN:

8 Q Yes. So you talk about these programs -- some  
9 equity-focused programs that are exempt from the  
10 requirement to score above 1.0 on the total resource  
11 cost test. To make sure in SDG&E's all-service  
12 territory that programs are generally on average scoring  
13 above 1.0, how do we account for the programs that  
14 score -- how do we make sure that the total resource  
15 cost test still stays at 1.0 or above?

16 A This all depends on the particular DER program  
17 that you're referring to. The Commission has realized  
18 that the inequity for disadvantaged communities -- they  
19 set guidelines for either not adjusting the TRC because  
20 of other legislative mandates to enhance the  
21 opportunities for those particular sectors. And then  
22 there's a portion that, essentially, are programs where  
23 -- are not disadvantaged, and the test is required.

24 I think your question is whether or not -- how  
25 does the whole territory ensure a TRC test of 1 point --

1 and I don't think within the utility company, they  
2 assure that total territory cost-effectiveness test,  
3 that the utilities address specific mandates and goals  
4 of different programs as guided by the Commission. ]

5 Q Okay. Thank you.

6 And when you -- so these programs that are  
7 exempt because the benefits do not offset the full  
8 costs, these costs and benefits, are you referring to  
9 only finance role or economic benefits? -- and that's,  
10 again, at line 19 of your testimony at page 49.

11 A I'm -- I'm addressing the issue of the test  
12 itself, the cost-effectiveness test. And that test,  
13 essentially, is one of the -- one of the tests in the  
14 standard practice manual to -- for the Commission to  
15 have utilities use all those tests, as they relate to  
16 ratepayers in our service territory.

17 Q Okay. And then, moving along the same -- the  
18 same section, at line 19 to line 21, you say:

19 In these cases, generally, the participants  
20 are not expected to receive enough benefits  
21 to offset the full costs, or the programs  
22 are not expected to create the amounts and  
23 types of benefits to the grid at large.  
24 That would offset the costs to  
25 non-participants.

1 Same question: For those benefits to the grid  
2 at large and cost to non-participants, are you talking  
3 about -- are you only referring to financial and  
4 economic costs?

5 A Can you define what you mean by "financial and  
6 economic"?

7 Q Well, I guess it's probably the same answer as  
8 your -- your previous answer was that it's the factors  
9 in the total resource cost test.

10 A That's correct.

11 Q When you said cost and benefits here, are you  
12 also saying -- referring to the same thing, like the  
13 factors in the tot- -- in the current total resource  
14 cost test?

15 A Yes. The current position is, the standard for  
16 tests -- at least for the -- if the ratepayers is the  
17 TRC test for non-equity types of DER programs currently.

18 Q Okay. And moving on to page 50, lines 2 or --  
19 lines 2 and 3 say -- talk about the legislature  
20 evaluating what was needed to achieve greater deployment  
21 of solar in disadvantaged communities. And  
22 cost-effectiveness was not to be considered a factor.

23 Are you referring to the net metering program  
24 there?

25 A I believe this is the -- the green tariff

1 proceeding and -- which would address the disadvantaged  
2 solar versus non-disadvantaged solar.

3 Q Okay. And those are the programs authorized  
4 under line -- as you say in line 5, decision -- CPUC  
5 Decision 18-06-027?

6 A That is correct.

7 Q And that decision is the designing specific  
8 alternatives for disadvantaged communities and the  
9 specific alternatives; what are those specific  
10 alternatives to?

11 A I think, in general, for that particular  
12 proceeding, there was a parsing out of disadvantaged --  
13 of budgets and dollars, I believe -- and as opposed to  
14 non-disadvantaged. So I -- I think that's -- I think  
15 that's what that particular decision entails.

16 Q Okay.

17 Your Honor, just for clarity, it is the  
18 decision to authorize specific alternatives in  
19 disadvantaged communities, alternatives to the net  
20 metering program. And I think it's -- I think the  
21 decision is in the footnote. I don't think there's a  
22 need to provide an exhibit with the decision, right,  
23 because the decision is cited to.

24 But those --

25 ALJ LAU: Correct.



1 BY MR. LIN:

2 Q Those three alternatives to the net metering  
3 program, are you aware of the three programs generally  
4 as it's the -- the disadvantaged communities green  
5 tariff one you're talking about, the DAC-SASH program,  
6 the single family -- solar on single-family homes, and  
7 then the community solar green tariff program.

8 Are those the three programs in that decision?

9 A Per the decision, I believe you're correct.

10 Q Are you aware of the performance of those  
11 programs, as far as how many customers they have  
12 enrolled, how quickly customers have enrolled in those,  
13 whether they have oversubscribed, undersubscribed?

14 MR. NEWLANDER: Objection, your Honor. It's a  
15 compound question.

16 ALJ LAU: Can you break it down, Mr. Lin?

17 BY MR. LIN:

18 Q Mr. Mansi, are you aware of how well those  
19 programs have done with enrolling customers? And we can  
20 take each one at a time, if you'd like?

21 A I am not aware in terms of the numbers.

22 Q And you say that's one example of where we do  
23 carve-outs, where we say X percents, we have to get,  
24 say, 25 percent subscription to this program is for  
25 disadvantaged communities.

1           Are you aware of the performance of those  
2 programs that have carve-outs or prioritize  
3 disadvantaged communities?

4           MR. NEWLANDER: Objection, your Honor. Asked  
5 and answered.

6           MR. LIN: Oh, sorry --

7           ALJ LAU: I --

8           MR. LIN: -- Counsel, I was referring to other  
9 carve-out programs, except for these three.

10          ALJ LAU: Yeah.

11          MR. NEWLANDER: Objection on the ground that  
12 it's vague. What other programs is Counsel referring  
13 to?

14          ALJ LAU: Yeah. Mr. Lin, can you just restate  
15 your question?

16 BY MR. LIN:

17          Q     So, let's see. On page 49 of your testimony,  
18 line 16, you use the term "carve-out" referring to some  
19 equity programs.

20          MR. NEWLANDER: Is -- is that a question,  
21 Mr. Lin?

22          MR. LIN: I'm just making sure Mr. Mansi knows  
23 what I'm talking about before I ask my question.

24          THE WITNESS: Okay. I -- I understand the word  
25 carve-out here.

1 BY MR. LIN:

2 Q Okay. Do you -- are you -- do you have any  
3 examples of programs -- equity programs that do have  
4 this carve-out prioritization model?

5 A I think there's a couple. There's the -- the  
6 ESA program, which is our energy efficiency program.  
7 That's -- that's carved out. That -- that, I believe,  
8 has a -- a goal threshold for a cost-effectiveness.  
9 It's not a requirement. Our EE programs currently,  
10 based on our business plan portfolio are carved out now  
11 to resource market-related and an equity segmentation.  
12 Segmentation does not require a cost-effectiveness  
13 that's segmentation is a carve-out.

14 Q Okay. Taking the ESA program, as far as for  
15 equity customers or disadvantaged -- targeted at  
16 disadvantaged communities, are you aware of the  
17 performance of those -- of that program?

18 A No, I don't.

19 Q And going back to page 50 -- let's see. I want  
20 to find the exact line number for you. Sorry. Oh, I'm  
21 sorry.

22 On page 49, at line 2, you talk about the --  
23 you mention cost shifts. And the cost shifts that you  
24 mention are related to -- well, actually, I'll ask you a  
25 question.

1           When you talk about cost shifts here, are you  
2 talking about the net metering program or DERs,  
3 generally?

4           A     I would refer to DER, generally.

5           Q     Okay. Has SDG&E conducted analysis on whether  
6 -- and I'm just picking -- energy efficiency causes a  
7 cost shift?

8           A     It's a specific study that shows the impact of  
9 energy efficiency. Related to your question of cost  
10 shift, I don't know of a specific study.

11          Q     What about for demand response?

12          A     I'm not aware of one --

13          Q     Uh --

14          A     -- that's not to say that there may be one.  
15 But I'm not aware of it.

16          Q     Okay. Let's go with electric vehicles.

17          A     I'm not familiar with the (indecipherable)  
18 proceeding.

19                   (Reporter clarification.)

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

21           Let's go back on the record.

22           Mr. Lin, can you repeat your question again?

23           MR. LIN: Yes, your Honor.

24          Q     Mr. Mansi, has SDG&E conducted analysis of  
25 whether electric vehicles, as the DER, create a cost

1 shift?

2 A I don't know that. I don't know.

3 Q And now, going to where I know SDG&E has  
4 conducted analysis on the cost shift is through the --  
5 in the net metering program. Page 50 of your opening  
6 testimony, line -- it's throughout the page -- but  
7 specifically at line 16 and 17, you discuss the cost  
8 shift and the -- well, in our opinion, the alleged cost  
9 shift in the net metering program?

10 MR. NEWLANDER: Objection, your Honor. Counsel  
11 is testifying.

12 ALJ LAU: Why don't we just have Mr. Mansi read  
13 page 50. I forgot which line is it?

14 MR. LIN: Oh, it's okay, your Honor. I think  
15 just -- as long as Mr. Mansi knows which I'm talking  
16 about. At line 17, he discusses cost shifts. And I  
17 just want to make sure we're on the same page that that  
18 cost shift is referring to the net metering program.

19 ALJ LAU: And let's be careful not to  
20 characterize the witness' testimony and allow him speak  
21 to himself or herself as appropriate. Thank you.

22 THE WITNESS: Yeah. It -- yes. That statement  
23 is in respect to the -- the solar proceeding, I believe,  
24 the NEM.

25 ///

1 BY MR. LIN:

2 Q The solar one. Okay. Let's see.

3 On page 53, line 4 of page 53, you discuss the  
4 national standard practice manual for benefit cost  
5 analysis of DERs. I have a question on that one.

6 Are you familiar with the national standard  
7 practice manual?

8 A I'm familiar to what has been provided by them  
9 via, I believe, a handbook.

10 Q Okay. Does the handbook document non-energy  
11 benefits as benefits of DERs to potentially include in  
12 cost-effectiveness tests?

13 A Subject to check, I think they discuss it -- I  
14 think they have a brief discussion on it.

15 Q Okay. And are you aware of the companion  
16 Methods, Tools, and Resources, or MTR, Handbook that  
17 accompanies the national standard practice manual?

18 A I'm not familiar with that.

19 Q Okay. Then moving on to your -- your  
20 discussion of distributional equity analysis. Do I need  
21 to find a page number or -- I'm not going to represent  
22 anything specific, but just distributional equity  
23 analysis.

24 When you refer, in your testimony, to using  
25 distributional equity analysis, are you referring to the

1 distribution of only financial or economic benefits?

2 A Could you define "financial and economic" in  
3 your question?

4 Q Well, we could just go to the flip side.

5 Are you referring to the distribution of  
6 non-energy benefits?

7 A The DEA, the Distributional Equity Analysis, at  
8 least for my testimony, is a consideration by the  
9 Commission, among other analysis, which would provide in  
10 complement to the total standard practice manual of TRC  
11 and other tests to -- to determine, basically, whether  
12 or not there's a -- a finding of maybe, perhaps, a  
13 distribution that's between a particular host DER and  
14 the impact for the non-host. And it would just give  
15 more insight for the Commission to provide policy.

16 Q And then, you -- at the top of page 53, line 1  
17 -- well, continuing from the end of page 52 -- sorry.

18 The Distributional Equity Analysis can  
19 provide an understanding of how DER impacts  
20 will affect different populations to  
21 determine if any one population experiences  
22 a disproportionate burden because of the  
23 program.

24 That disproportionate burden, are you referring  
25 to the cost shift?

1           A     I think "burden" probably has several  
2 definitions -- or several, I guess, concepts. The  
3 burden could be -- yeah. The cause of what the impact  
4 to -- to the rates -- they -- what's the impact to their  
5 bill. And then, what's the impact to, maybe,  
6 participation rates by the -- more or less...

7           Q     Okay. And in footnotes -- just above Footnote  
8 91, at the bottom of page 52, you talk about the  
9 Distributional Equity Analysis Advisory Committee.

10                   Are you aware of the activities of that  
11 committee?

12           A     I'm not -- I'm not -- I'm not directly involved  
13 in that particular committee on -- I only know,  
14 essentially, what has been currently provided by those  
15 -- by that committee.

16           Q     Okay. So you track their recommendations and  
17 whatnot?

18           A     I've reviewed some of the documents, as  
19 provided here on -- from that committee.

20           Q     Okay. Have you seen the committee's case study  
21 on Washington State?

22           A     No, I haven't.

23           Q     Are you familiar with the guidance documents  
24 from that advisory committee?

25                   MR. NEWLANDER: Objection, your Honor. It's



1 beyond the scope of the witness' testimony. He doesn't  
2 reference that material.

3 ALJ LAU: I'm going to sustain that. He --  
4 this witness just says he's tracking it. And he's not  
5 -- cannot speak for that committee.

6 BY MR. LIN:

7 Q Okay. No problem. And, just two more  
8 questions.

9 And the first is, the cost benefit analyses,  
10 plus the distributional equity analysis, as you proposed  
11 in your testimony, you say that those address  
12 distributional justice.

13 Do those together -- again, the cost benefit  
14 analysis and distributional equity analysis -- do those  
15 discuss restorative justice?

16 MR. NEWLANDER: Objection, your Honor. Could  
17 we get a cite to a page and line number to where that  
18 phraseology was used?

19 ALJ LAU: I agree with Mr. Newlander, if  
20 Mr. Lin can point to a citation.

21 MR. LIN: Let's see. Hold on one second.

22 ALJ LAU: Maybe even a definition to  
23 restorative justice.

24 MR. LIN: Restorative justice is correcting the  
25 past wrongs; and in this case, the past environmental

1 injustices of our energy system. And these are from the  
2 advisory committee. These terms are from the advisory  
3 committee that Mr. Mansi says he's been following  
4 somewhat. Also, recognition just -- recognitional  
5 justice, procedural justice as well.

6 ALJ LAU: So maybe you can break it down to  
7 Mr. Mansi, that question, and even establish a  
8 foundation.

9 BY MR. LIN:

10 Q Okay. So, Mr. Mansi, you say that you somewhat  
11 follow the advisory committee on distributional equity  
12 analysis. That committee talks about restorative  
13 justice.

14 Are you aware of that discussion?

15 A Not specifically with -- in context of that  
16 committee.

17 Q Same questions for recognitional justice and  
18 procedural justice. I can do one at a time to avoid a  
19 compound, if you want.

20 So, recognitional justice first.

21 MR. NEWLANDER: Your Honor, Counsel's -- this  
22 is all hearsay referring to documents that haven't been  
23 put before Mr. Mansi. And, you know, I was a little  
24 slow on the uptake on the previous question. But I'm  
25 not missing it here.

1 ALJ LAU: So, why don't we just -- Mr. Lin,  
2 define one of the terms you want to use. And ask  
3 Mr. Mansi to opine on how, you know, his proposals  
4 affect those -- impact -- or be affected by those terms  
5 or concept.

6 MR. LIN: Okay. Thank you, your Honor. That's  
7 helpful.

8 Q Mr. Mansi, in your testimony, you propose using  
9 both benefit -- cost-benefit analyses, plus distribution  
10 equity analyses to address distributional justice.

11 Restorative justice and recognition justice  
12 is correcting the past injustices on somewhat, like,  
13 restitution.

14 Does your proposal address that?

15 A My proposal only provides the -- the analysis  
16 to other parties that would be, essentially, the  
17 cost-effectiveness and the de- -- distributional equity  
18 analysis to complement that. Those two would be among  
19 other issues that the Commission possibly could look at,  
20 with respect to the issue of how to address equity and  
21 cost-effectiveness. It does not -- my -- our -- my  
22 testimony does not provide any way or remedies as a  
23 result of those -- those -- that type of information.

24 Q Okay. Thank you.

25 And the last question on page -- page 56 of

1 your testimony, line 4 or line 5 -- or line 3:

2 Non-energy benefits should be extremely  
3 limited -- needs to be extremely limited to  
4 be considered carefully without  
5 overburdening ratepayers.

6 Has SDG&E done an analysis on whether including  
7 non-energy benefits in cost-effectiveness determinations  
8 would burden ratepayers?

9 A Not that I'm aware of, of a specific study.

10 Q And has SDG&E done a study on how or -- or  
11 analyzed how including non-energy benefits in the  
12 Avoided Cost Calculator could burden ratepayers?

13 A My testimony only re- -- applies to what falls  
14 out of the Avoided Cost Calculator, with respect to  
15 cost-effectiveness and equity. I believe the issue  
16 would be out of scope of my testimony.

17 Q Okay. Thank you for your time, Mr. Mansi.  
18 That was -- actually, was a pleasure compared to  
19 yesterday's debacle. I appreciate that.

20 A Okay.

21 Q And, Mr. Newlander, not a ball at all, if you  
22 saw yesterday's. So thank you for your time.

23 ALJ LAU: Mr. Newlander, do you have any  
24 redirected for Mr. Mansi?

25 MR. NEWLANDER: May I have a brief break to

1 confer with the witness?

2 ALJ LAU: Okay. Yes.

3 Let's take a five-minute break.

4 MR. NEWLANDER: Thank you, your Honor.

5 ALJ LAU: So, Mr. Lin, you should still stay  
6 on.

7 (Off the record.) ]

8 ALJ LAU: Back on the record.

9 Mr. Newlander, do you have any redirect for  
10 Mr. Mansi?

11 MR. NEWLANDER: I do not, your Honor.

12 Thank you.

13 ALJ LAU: All right. Mr. Mansi, I believe you  
14 are excused from the -- from your -- you're done for  
15 today. Thank you for your participation.

16 And we can also bring Mr. Lin off the stage as  
17 well.

18 Well, actually, I am really tired today.  
19 Mr. Mansi, you are not excused. Let's bring Ms. White  
20 on the stage. Apologies. There is one more cross for  
21 you, Mr. Mansi.

22 THE WITNESS: You got my hopes up, your Honor.

23 ALJ LAU: Ms. White, can you introduce yourself  
24 before you proceed with examining Mr. Mansi?

25 ///

CROSS-EXAMINATION

BY MS. WHITE:

Q Yes. Hello, I am Andrea White, and I am from the Protect our Communities Foundation.

Okay. One second. Okay. So, I would like to begin with your opening testimony on page 46 at about line 23.

Okay. So, on page 46 of your opening testimony, you testify about concerns of equity and costs to ratepayers, correct?

A That's correct.

Q Okay. But you do not address shareholder profits in your testimony, correct?

A That's correct.

Q Okay. And then, on lines 29 through 30 -- oh, sorry, I have an interruption.

ALJ LAU: We can go off the record.

(No response.)

ALJ LAU: Let's go back on the record.

Ms. White, can you repeat your question?

MS. WHITE: Yes.

Q Okay. So, on lines 29 through 30 on page 46 of your opening testimony, you testify about the fair and just distribution of benefits and costs within the energy system.

1           So, would you consider utility shareholders as  
2 part of that energy system?

3           A     The -- the language that I am supporting in my  
4 opening statements are related to the issue of fair and  
5 equity proposals with -- for essentially  
6 disadvantaged -- disadvantaged sectors as they relate to  
7 additional analysis beyond the standard practice, and  
8 the standard practice effectively addresses the impacts  
9 particularly to -- to ratepayers only.

10          Q     Okay. So, in your opinion, do utility  
11 shareholders benefit from the energy system?

12          A     I am unable to answer that question on  
13 benefits. I have no knowledge.

14          Q     Okay. Next, I will turn to page 47, line 3  
15 through 6.

16                 Okay. So, this states:

17                     In each separate proceeding, such as those  
18                     dedicated to approving individual end-use  
19                     portfolios and programs such as energy  
20                     storage, demand response and EE as  
21                     examples, the IOUs are then required to  
22                     layer additional factors over the ACC  
23                     outputs to arrive at a more nuanced  
24                     cost-effectiveness score.

25                 So, here, you are testifying about various

1 proceedings the ACC is used in, and you provide several  
2 examples, correct?

3 A That is correct.

4 Q Okay. So, would you be able to provide the  
5 names of the existing proceedings the utilities use the  
6 ACC in?

7 A Could you repeat that again.

8 Q Yes.

9 So, I was wondering if you could list some of  
10 the names of the existing proceeding utilities use the  
11 ACC in?

12 A Is this is a requirement to me to provide a  
13 list, or do you want me to list a few?

14 Q You can list a few.

15 A The ACC is utilized in the currently energy  
16 efficiency programs. The ACC is utilized in the demand  
17 response programs. To a certain extent, the -- the ACC  
18 or what comes out of the ACC -- or either what comes out  
19 of the ACC includes some of the low-income programs is  
20 an example.

21 Q Okay. Do you have any other examples you can  
22 think of off the top of your head?

23 A Not off the top of my head. These are some of  
24 the other ones.

25 Q Okay. Thank you.



1           Okay. So, in the next lines on page 47, line 7  
2 and 8. You say that:

3                   These methods are the application of  
4                   certain CPUC approved protocols for  
5                   determining cost effectiveness.

6           Okay. So, how many of these protocols do you  
7 think exist?

8           A     This particular protocol, based on footnote 83,  
9 applies to demand-response protocols specifically.

10                   If your question is whether or not this  
11 particular program applies to other DER programs, I  
12 don't believe this particular program protocol applies  
13 to the other DER programs.

14           Q     Okay. So, you list one of the protocols at 83.

15                   So, do you think there are any other protocols  
16 that you can think of?

17                   MR. NEWLANDER: Objection, your Honor. If  
18 she's asking for his knowledge or, you know, whether he  
19 knows that something exists, you know, that's one thing,  
20 but the phrasing was asking him to speculate.

21                   ALJ LAU: Can you ask the question again?

22 Sorry.

23                   MS. WHITE: Oh, yeah, sure. Okay. So, one  
24 second.

25                   Mr. Mansi lists an example of the DER -- the DR

1 cost-effectiveness protocol in footnote 83, so I -- I  
2 was wondering if he could list any other examples of  
3 similar protocols.

4 ALJ LAU: I am going to overrule the objection.

5 Mr. Mansi, just answer the -- to the best of  
6 your knowledge.

7 THE WITNESS: An example would be energy  
8 efficiency. The -- the energy efficiency test utilizes  
9 the ACC as part of the test. In that test, there are  
10 additional factors that go into, specifically, the --  
11 the calculation of -- of the -- the TRC value. Those  
12 values are predicated on different variables based on  
13 particular program.

14 BY MS. WHITE:

15 Q Okay. So -- so, then on lines 8 through 10,  
16 you talk about these additional factors on lines 8  
17 through 10 on page 47; and so, you say that:

18 The additional factors are determined  
19 portfolio by portfolio, or end use by end  
20 use.

21 So, based on this, could you provide an  
22 estimate of how many additional factors there are?

23 A In terms of, like, a numerical value of the  
24 amount? I think you're assuming -- this assumes -- I --  
25 I am not aware of all the DER programs that have

1 additional -- additional values, I guess, related to  
2 that protocol, so I can't really provide the numeric  
3 estimate, since I don't know those additional values  
4 that may be in other DER programs.

5 Q Okay. Could you provide some examples of  
6 additional factors then?

7 A For the energy efficiency programs, an example  
8 would be the assessment of a particular EE technology.  
9 There is factors that -- that are outside the Avoided  
10 Cost Calculator, and that would include issues of -- of  
11 the -- the -- what we call the free ridership, the  
12 (indecipherable) technology, the nuance of the actual  
13 unit savings of that particular technology, what we call  
14 realization rates and other factors that would be  
15 applied to that particular technology in the EE program.

16 Those are factors that are outside the output  
17 of the Avoided Cost Calculator.

18 Q Okay. Thank you.

19 So, are you aware if there's a list of factors  
20 written down somewhere?

21 A Are you referencing specific DER programs?

22 Q I am not. I am just referring to generally.

23 A I am not really sure, and I really can't attest  
24 to other DER programs where respect to a -- a published  
25 set of other factors that you -- you have referenced.

1 Q Okay. So, I will move onto page 48. Starting  
2 at line 7, and this is the opening testimony.

3 Okay. Let's see. So, on page 48, starting on  
4 line 7, you testify:

5 Such an adder may or may not apply to all  
6 DERs, but it is included in the demand  
7 response protocols to meet Commission  
8 goals, i.e., to encourage the IOUs to  
9 utilize DR in ways that supports T&D  
10 capacity.

11 So, what do you mean by the phrase, "Supports  
12 T&D capacity," when you use it at lines 9 and 10?

13 A I -- I think the Commission, through the 2016  
14 DR protocol says to recognize the -- the -- somewhat of  
15 a uniqueness about demand response that -- that is not  
16 captured in the ACC model. The AC model tends to be  
17 somewhat standardized. When you add a DR application,  
18 there are specific attributes of the actual demand  
19 response program, which the Commission, based on the  
20 2016 protocols, provides adjustments to those particular  
21 values coming out of the ACC in determining the cost  
22 effectiveness of the particular program.

23 Q Okay. So, to clarify, when you say, "Supports  
24 T&D capacity," do you mean maintain existing T&D  
25 capacity?

1           A     I believe that in my -- I think this really  
2 means it's in -- what is the relationship or the impact  
3 to that portion of the avoided cost and the relation to  
4 demand response.

5           Q     Okay. So, you mean adding T&D capacity?

6           A     No, I am not saying that. It's -- the program,  
7 it's, in itself, is not meant to determine addition or a  
8 subtraction to a transmission distribution facility.

9           Q     Okay. Thank you.

10          A     It's -- sorry.

11          Q     No, no, you can proceed.

12          A     That's it.

13          Q     Oh, good. Okay. So, I -- I will move onto  
14 page 48. So -- so, start -- let's see. At -- so, on  
15 line 8 -- yes, line 8, you identify Commission goals, so  
16 as you sit here today, can you think of any other  
17 Commission goals?

18                 MR. NEWLANDER: Objection, your Honor, that  
19 misstates the testimony. The testimony speaks for  
20 itself, but it does not identify Commission goals, it  
21 refers -- well, other than the one that was identified  
22 as an -- you know, an i.e.

23                 ALJ LAU: Can you restate your question,  
24 Ms. White? I am going to sustain the objection.

25                 MS. WHITE: Yes, yes. And I think it would be

1 helpful if I just read the whole sentence.

2 So, starting on line 7, it says:

3 Such an adder may or may not apply to all  
4 DERs, but it is included in the DR  
5 protocols to meet Commission goals, i.e.,  
6 to encourage the IOUs to utilize DR in ways  
7 that support T&D capacity.

8 Q So, Mr. Mansi, you provide an example of the  
9 Commission goals, so I am wondering if you can provide  
10 any other examples of Commission goals similar to this  
11 one, and it's okay if you can't.

12 MR. NEWLANDER: Objection, your Honor. It's  
13 vague. Is -- is counsel referring to only Commission  
14 goals in the context of DR protocols or DERs generally?  
15 If she can be more specific.

16 ALJ LAU: Ms. White, if you just want to  
17 specify.

18 MS. WHITE: Yes.

19 Q I think probably DERs generally would be the  
20 most useful.

21 A I -- I think based on the Commission's guidance  
22 on the -- the various DER programs, each of those  
23 programs have within their guidance a -- probably set a  
24 -- of -- of goals and attainments or -- which are --  
25 more or less address the Commission's statewide goals in

1 general.

2 Q Okay. Thank you.

3 So, I am going to move onto page 54 of your  
4 opening testimony, starting at line 3.

5 Okay. So here you testify:

6 Distributional equity analysis can also  
7 improve other comparisons between DER  
8 participants and non-DER participants.

9 So, the distributional equity analysis you're  
10 testifying about does not include any comparisons  
11 between ratepayers and shareholders, correct?

12 A That's correct.

13 Q Okay. So, does the ratio to capital expenses  
14 to noncapital expenses ever enter into the analysis?

15 MR. NEWLANDER: Objection, your Honor. Is  
16 there a reference? It -- it -- I don't see a reference  
17 to that in the -- in the testimony.

18 If -- if counsel can point somewhere, that  
19 would be helpful.

20 ALJ LAU: Yeah, I agree with Mr. Newlander.

21 MS. WHITE: Okay. So, I think it would be  
22 helpful to provide a background explanation for my  
23 question.

24 So, I think as part of the -- you -- you know,  
25 I am just trying to understand Mr. Mansi 's proposal the

1     distributional equity analysis, so I just want to  
2     understand if it includes capital expenses and  
3     noncapital expenses.

4             MR. NEWLANDER:  And -- and, your Honor, I -- I  
5     would just respond, if I may, that -- I mean, there was  
6     an opportunity for discovery in this proceeding.

7             If counsel had that question, we could have  
8     respond to -- responded to it, you know, in due course  
9     but, you know, there's -- it's a new subject with no  
10    hook to the testimony being brought up on  
11    cross-examination, so I -- I object.

12            ALJ LAU:  Well, I am going to allow the  
13    question and have Mr. Mansi answer to the best of his  
14    ability.

15            THE WITNESS:  So, our proposal on  
16    distributional equity analysis, it -- it -- it stems  
17    from various -- various publications and about the  
18    concept of DEA, distributional analysis of -- the  
19    intention, again, is to determine a fair distribution  
20    between targets and non-targets, and it -- I don't  
21    believe, and I -- that the issue of the specific  
22    question you had cap -- the capital issue is  
23    specifically addressed in these proposals.

24    BY MS. WHITE:

25            Q     Okay.  So --



1 ALJ LAU: And I also -- I also want to note  
2 that, even though I allowed the question, please --  
3 like, for the future -- Mr. Newlander has a point that  
4 if you really wanted a better answer to provide data  
5 requests to SDG&E in advance for discovery -- during  
6 discovery.

7 MS. WHITE: Okay. Thank you, your Honor.

8 Q Okay. I am going to move onto my last  
9 question.

10 Okay. So, this is on page 55, lines 13 and 14.  
11 Okay. So, here you state:

12 A holistic view of any DER program and who  
13 it may assist or leave behind.

14 So, when you're referring to this holistic  
15 view, does that include shareholders?

16 A The holistic view really relates to the people  
17 who potentially could be participating in this  
18 particular program, and those who were not participating  
19 in the programs.

20 Q Okay. So, would you be open to considering  
21 that certain projects will assist shareholders more than  
22 other projects?

23 A Could you repeat the question?

24 Q Yes.

25 So, would you be open to considering that

1 certain projects will assist shareholders more than  
2 other projects?

3 MR. NEWLANDER: Objection, your Honor. It's  
4 beyond the scope of the witness's testimony.

5 ALJ LAU: Sustained, Ms. White. Yeah,  
6 sustained.

7 MS. WHITE: Sustained? Okay. That concludes  
8 my questions then.

9 Thank you, Mr. Mansi, and thank you, your  
10 Honor; and thank you, Mr. Newlander.

11 ALJ LAU: Mr. Newlander, do you have any  
12 redirect for Mr. Mansi?

13 MR. NEWLANDER: I do not, your Honor. Thank  
14 you.

15 ALJ LAU: All right. Mr. Mansi, for now -- or  
16 now, you are certainly excused from the witness stand.

17 Thank you for your participa --

18 THE WITNESS: Thank you, your Honor.

19 ALJ LAU: Thank you for participating today.

20 THE WITNESS: Thank you.

21 ALJ LAU: Let's take off the witness, and let's  
22 go off the record.

23 (Off the record.) ]

24 ALJ LAU: Let's go back on the record.

25 On the stage is Mr. Newlander and

1 Mr. William Saxe as well as a set of witness  
2 attestations.

3 Mr. Saxe, can you introduce yourself and the  
4 organization you're representing? And if it's the joint  
5 IOUs, please explain which IOUs you're talking about and  
6 which company do you work for.

7 MR. SAXE: Yes. My name is William Saxe. Last  
8 name spelled S-a-x-e. I work for San Diego Gas &  
9 Electric, sometimes we refer to as SDG&E. And I'm  
10 sponsoring the Joint IOU opening testimony and rebuttal  
11 testimony. And the Joint IOUs are Pacific Gas and  
12 Electric, Southern California Edison Company, and  
13 San Diego Gas & Electric.

14 ALJ LAU: All right. Thank you, Mr. Saxe.

15 Do you see the set of witness attestations put  
16 forth on the screen?

17 MR. SAXE: I do.

18 ALJ LAU: Have you had the opportunity to  
19 review them in full?

20 (Line muted.)

21 ALJ LAU: I did not hear you. I think you  
22 muted yourself, Mr. Saxe. I'm going to ask the question  
23 again.

24 Have you had the opportunity to review these  
25 sets of attestations in full?

1 MR. SAXE: I have.

2 ALJ LAU: Do you agree to abide by them?

3 MR. SAXE: I do.

4 ALJ LAU: All right. Mr. Newlander, you may  
5 begin your direct examination of Mr. Saxe.

6 MR. NEWLANDER: Thank you, your Honor.

7 WILLIAM SAXE,

8 called as a witness by San Diego Gas &  
9 Electric, having attested, testified as  
10 follows:

11 DIRECT EXAMINATION

12 BY MR. NEWLANDER:

13 Q Good morning, Mr. Saxe. Do you have the  
14 exhibits that have been marked and identified as  
15 Exhibits IOU-01 and IOU-02, which are the prepared  
16 opening and rebuttal testimonies of the joint utilities  
17 in this proceeding?

18 A I do.

19 Q Are you sponsoring on behalf of SDG&E the  
20 portion of Exhibit IOU-01 at section B1 -- B1 and  
21 Attachment A and the portion of Exhibit IOU-02 at  
22 section B4?

23 A I am.

24 Q Were the portions of the joint testimony that  
25 you are sponsoring prepared by you or under your

1 direction?

2 A Yes.

3 Q Do you have any changes or corrections to make  
4 to that material?

5 A I do not.

6 Q Do you adopt the reference material as your  
7 testimony in this proceeding?

8 A Yes, I do.

9 Q Are factual statements in your testimony true  
10 and correct to the best of your knowledge?

11 A Yes.

12 Q And insofar as statements in your testimony  
13 reflect opinion or judgment, do such statements reflect  
14 your best professional opinion or judgment?

15 A Yes, they do.

16 MR. NEWLANDER: Your Honor, the witness is  
17 available for cross-examination.

18 ALJ LAU: Thank you, Mr. Newlander.

19 Let's bring forth Ms. White. Can we bring  
20 forth Ms. White to the stage? Thank you.

21 Ms. White, you may begin your cross of  
22 Mr. Saxe, but please introduce yourself before you  
23 begin.

24 ///

25 ///

CROSS-EXAMINATION

BY MS. WHITE:

Q Yes. Hello. I'm Andrea White, and I represent the Protect Our Communities Foundation or PCF.

Okay. So I will try not to ask too many questions. But first I would like to begin with PCF-16, which is D.22-05-002, on page 123, ordering paragraph 7.

A Yes. I have that in front of me.

Q Okay. So here it states, "San Diego Gas & Electric Company (SDG&E) and Southern California Edison Company (SCE) shall work together to develop secondary distribution costs estimates based on the Pacific Gas and Electric (PG&E) distribution final line transformer approach approved in Decision 21-11-016."

Okay. And I know you were one of the authors for this study attached to the opening testimony, which I established yesterday was in response to this ordering paragraph. So do you think SDG&E has adequately developed these secondary distribution costs?

A Yes, we have. And in answering this question, I'll have you turn to the Attachment A. So if you turn to --

Q Yes.

A What's that?

If you turn to Attachment A -- and specifically

1 I'm looking at AtachA-15, which is shown as page 11 on  
2 the attachment.

3 ALJ LAU: For the --

4 THE WITNESS: I'm sorry?

5 ALJ LAU: For the clarity of the record, it's  
6 Attachment A in your opening testimony in IOU-01.

7 THE WITNESS: That is correct, yes. Let me  
8 know when you're at that page.

9 BY MS. WHITE:

10 Q I'm at the page.

11 A So if you go in -- it's section 3.3 SDG&E. And  
12 if you go to the second paragraph, it says: Although  
13 SDG&E does not define distribution capacity costs  
14 separately for FLTs like PG&E, SDG&E can breakout the  
15 FLT costs that are part of SDG&E's feeder and local  
16 distribution costs using an approach similar to PG&E.

17 And if you look at Table 11, it shows the  
18 breakout. So it shows the final marginal distribution  
19 costs from SDG&E and then the adjusted marginal  
20 distribution costs. So just like PG&E, we basically --  
21 we basically split out our circuit costs -- our feeder  
22 and local distribution costs and identified what the FLT  
23 distribution capacity rate or costs are for the FLT.

24 So the answer to your question is yes. We did  
25 follow the decision, and we did develop the FLT costs

1 consistent with how PG&E did it.

2 Q Okay. So can you -- so are there any  
3 differences that you can identify between SDG&E's  
4 approach and PG&E's approach?

5 A Not in breaking up. We followed the same  
6 approach PG&E did. I mean, the difference between SDG&E  
7 and PG&E is that SDG&E, our service territory isn't as  
8 big. We're not broken up as much as PG&E where they  
9 have different regions.

10 So PG&E actually goes in and splits out their  
11 marginal costs by region; whereas we look at our system  
12 as a whole. So I think we follow the same approach as  
13 PG&E. We follow the same break out of the FLT costs.  
14 And so I think we're consistent with the way that PG&E  
15 did it.

16 Q Okay. So now I'm going to turn to your summary  
17 of recommendations, which is on page Attachment A-25.

18 A At page 25 of the opening testimony?

19 Q Yes.

20 A Okay. One second.

21 Q Page A-25, yes.

22 A Yes. I'm there.

23 Q Okay. So you state in the first sentence of  
24 this section that non-coincident demand-based avoided  
25 cost benefits be estimated and cost effectiveness



1 studies on a case-by-case basis at a program or more  
2 granular level rather than having these costs be  
3 uniformly estimated in the ACC on an hourly basis.

4 So in your opinion, would estimating  
5 non-coincident demand-based avoided costs on a more  
6 granular level cause delays in issuing these  
7 distribution costs?

8 MR. NEWLANDER: Apologies, your Honor. I lost  
9 the page reference. Is it 25 of the testimony itself or  
10 A-25 of the attachment? Because both -- you know,  
11 there's a 25 in both.

12 ALJ LAU: I believe Ms. White was reading  
13 Attachment A-25. And let's go off the record so counsel  
14 can take the time to read it.

15 (Off the record.)

16 ALJ LAU: Let's go back on record.

17 Ms. White, can you repeat your question?

18 MS. WHITE: Yes.

19 Q Okay. So, Mr. Saxe, in your opinion, would  
20 estimating non-coincident demand-based avoided costs on  
21 a more granular level cause delays in issuing these  
22 distribution costs?

23 A I think, again, they -- it would have to be  
24 evaluated, as you said, on a -- you know, like, a  
25 DER-type basis, which would take time. We haven't even

1 figured out the scope of such a study. And I think  
2 that's part of the reason why in the opening testimony  
3 the IOUs had originally proposed to remove the  
4 non-coincident demand costs from the ACC calculator.

5 But in the rebuttal testimony, we changed that.  
6 And we stated that we would agree with SEIA that -- just  
7 change the allocation from an hourly to an  
8 equal-cents-per-kilowatt/hour basis because I think we  
9 realized that it's probably better not to remove those  
10 costs from the ACC calculator and that -- so let's leave  
11 the costs in the calculator. Even though it's not  
12 perfect allocation, it's better than if it was based on  
13 the hourly. So let's leave them in there on a temporary  
14 basis. And then once we complete the study, then we can  
15 hopefully update the allocation.

16 So I agree with you that I think it would delay  
17 things, but that's the reason why the Joint IOUs, I  
18 think, changed their position on that issue.

19 Q Okay. Okay. So to clarify, could you restate  
20 SDG&E's current position?

21 A Yes. Well, it's not -- it's really the  
22 Joint IOU's current position.

23 Q Apologies.

24 A That's okay. So I was going to say if you turn  
25 to page 33 of the rebuttal testimony --

1 Q Yes.

2 A And if you look -- starting on line 3, it  
3 states: The Joint IOUs would not oppose SEIA's proposal  
4 to allocate such costs, which are the non-coincident  
5 demand costs, across the hours of the day, which means  
6 kind of an equal -- they propose an  
7 equal-cents-per-kilowatt/hour. So it's not  
8 differentiated by hours.

9 But then we go on to say: However, using each  
10 utility's represented marginal costs methodology, as a  
11 temporary basis. And then we go on to state that we  
12 want a study to be done to look at -- as you were  
13 mentioning, to look at the allocations and what DERs can  
14 appropriately avoid.

15 So that's -- again, that's the Joint IOUs'  
16 current position. I think we -- again, we changed it  
17 because, I think, of what you stated, that doing the  
18 study will -- if we remove the costs, doing the study  
19 would delay the time before DERs could benefit from  
20 non-coincident demand costs -- avoided non-coincident  
21 demand costs.

22 Q Okay. Well, that concludes my questions then,  
23 Mr. Saxe. Thank you very much.

24 A Thank you.

25 ALJ LAU: Mr. Newlander, do you have any

1 redirect for Mr. Saxe?

2 MR. NEWLANDER: I just have one question for  
3 the witness, your Honor.

4 REDIRECT EXAMINATION

5 BY MR. NEWLANDER:

6 Q Mr. Saxe, you recall the questioning that  
7 Ms. White was just going through with you and the  
8 reason -- and the Joint IOUs' change in position;  
9 correct?

10 A Yes, I do.

11 Q Okay. And you outlined a concern. You said  
12 that the reason for the change in the position was  
13 that -- well, could you restate what the basis for the  
14 change in position was?

15 A Yes. I mean, I think I know where you're  
16 going. I don't want to speak for the other two  
17 utilities. I believe the change in the position where  
18 we had originally proposed to remove the non-coincident  
19 demand costs from the ACC calculator and we kind of  
20 changed our position to say we were agreeable to SEIA's  
21 revised allocation approach, I think it was due to the  
22 fact that we understood parties' concerns about removing  
23 non-coincident demand costs from the ACC calculator,  
24 considering the fact that some of those costs are --  
25 could be avoidable by DERs.

1           So that was my -- what I stated. And I -- you  
2 know, I do agree that I shouldn't be speaking for --  
3 even though it's a Joint IOU testimony, I shouldn't be  
4 speaking for the other two IOUs on why the position was  
5 changed.

6           Q     Would you characterize the -- the effect of the  
7 change in position as beneficial for DERs through the  
8 Avoided Cost Calculator?

9           A     Oh, absolutely. As I said, I mean, part of the  
10 problem is that -- as we tried to outline and explain in  
11 the testimony, is that non-coincident demands are not  
12 time differentiated, so there's no time basis for it.  
13 So that's why allocating it as we currently do based on  
14 the hourly factors is not going to not appropriately  
15 allocate those costs.

16                   SEIA's approach where we basically use, like,  
17 an equal-cents-per-kilowatt-hour -- we apply the same  
18 costs in every hour. We don't -- it's not  
19 differentiated by hour. It's a better way to allocate  
20 it, but it's still -- it's probably overcompensating  
21 DERs for non-coincident demand costs.

22                   But by leaving it in there -- if we remove the  
23 cost, then obviously DERs are going to be -- that  
24 provide non-coincident demand -- avoidance of  
25 non-coincident demand are not going to be getting the

1 benefit they should be getting. By leaving it in, even  
2 though we might be overstating the value of the  
3 avoidance of non-coincident demand costs, it continues  
4 to provide a benefit to DERs. So I agree with you that  
5 by leaving it in, it's beneficial to DERs.

6 MR. NEWLANDER: Thank you, your Honor. I have  
7 no further questions.

8 ALJ LAU: Ms. White, do you have any recross?

9 MS. WHITE: I do not have any recross. Thank  
10 you, your Honor.

11 ALJ LAU: Thank you, Ms. White.

12 I have a quick question for clarification based  
13 on the redirect of Mr. Newlander.

14 So, Mr. Saxe, you're stating that the  
15 Joint IOUs' position is what is stated in the testimony  
16 but that the reasoning for the change in position in  
17 rebuttal -- the reason you stated was more SDG&E's  
18 position, and you're not speaking on behalf of the  
19 Joint IOUs; is that correct?

20 THE WITNESS: Yes. I don't recall the exact  
21 reasoning for the change. You know, I think I was  
22 involved in some discussions. And so I think that I --  
23 what I said is for all three IOUs, but I realize that I  
24 probably don't want to speak for them because, again, I  
25 can't remember exactly the specifics of the -- or the

1 reasons why we decided to make that change.

2 ALJ LAU: All right. That sounds good. I --  
3 subject to check because I've been making some mistakes  
4 today, I believe, Mr. Saxe, that you are excused from  
5 the witness stand, that we are done with your cross.  
6 Thank you for appearing today.

7 I don't see any raised hands. So yeah, thank  
8 you, Mr. Saxe.

9 MR. SAXE: Thank you.

10 ALJ LAU: We are approaching 12:05. Let us  
11 have a one-hour lunch break. And when we are back from  
12 the lunch break, we have on schedule  
13 Ms. Rosalinda Magana from SoCalGas. And I believe she  
14 is represented by Edward Hsu. And we have cross  
15 scheduled for Ms. White first and then Mr. Lin -- oh,  
16 and that's -- and that's it. Just Ms. White.

17 So right now it's about a little -- couple  
18 minutes after 12:00. Let us try for a 1-hour-15-minute  
19 lunch break since we are ahead of schedule. Let's  
20 resume at 1:15 p.m.

21 Let's go off the record.

22 (At the hour of 12:03 p.m., a recess was  
23 taken until 1:25 p.m.)

24 \* \* \* \* \*

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AFTERNOON SESSION - 1:25 P.M.

\* \* \* \* \*

ALJ LAU: Let's go on the record.

We are resuming from our lunch recess. We will begin the cross-examination of Ms. Rosalinda Magana.

Ms. Magana, can you introduce yourself and the organization you're representing?

THE WITNESS: Yes. My name is Rosalinda Magana, that's M-a-g-a-n-a. And I am the Manager of Distributed Energy Resources Strategy at Southern California Gas Company.

ALJ LAU: And the testimony you're sponsoring, is it on behalf of the joint utilities?

THE WITNESS: No, it is not. It is only on behalf of Southern California Gas Company.

ALJ LAU: All right. Thank you.

Ms. Magana, do you see the set of witness attestations set forth on the stage?

THE WITNESS: Yes.

ALJ LAU: Have you had a chance to review them in its entirety?

THE WITNESS: Yes.

ALJ LAU: Do you agree to abide by them?

THE WITNESS: I do.



1 ALJ LAU: Thank you, Ms. Magana.

2 Mr. Shu, you may begin your direct examination  
3 of Ms. Magana.

4 MR. SHU: Thank you, your Honor.

5 ROSALINDA MAGANA,

6 called as a witness by Southern California  
7 Gas Company, having been sworn, testified as  
8 follows:

9 DIRECT EXAMINATION

10 BY MR. SHU:

11 Q Good afternoon, Ms. Magana. I want to bring  
12 your attention -- do you have before you SoCalGas-01 and  
13 SoCalGas-02?

14 And for the record, as well as for your  
15 understanding, Ms. Magana, when I'm referring to  
16 SoCalGas-01, I'm not going to be referring to sections  
17 2-D.2 -- which is, instead, sponsored by  
18 Anders Danryd -- I'll be referring to the remainder of  
19 SoCalGas-01.

20 For SoCalGas-02, I will not be referring to  
21 sections 2-A-3, which again is sponsored by  
22 Anders Danryd. And I will only be referring to the  
23 remainder of that testimony.

24 Do you understand?

25 A I do.

1 Q And was SoCalGas-01 and -02, as we just  
2 referenced, prepared by you or at your direction?

3 A Yes, it was.

4 Q And do you have any changes today to make to  
5 that testimony?

6 A There is a footnote that we need to correct, a  
7 typo. And that would be on -- at page RN/AD-3, Footnote  
8 5. And it should be corrected to say D.22-05-002,  
9 App 26.

10 Q Thank you.

11 And that citation you just provided, was that  
12 to SoCalGas-01?

13 A That is correct. Yes.

14 Q Thank you.

15 Do you have any more corrections to either that  
16 exhibit or the other exhibit?

17 A No.

18 Q Thank you.

19 And do you adopt -- with these revisions, do  
20 you adopt this as your testimony today in this  
21 proceeding?

22 A I do.

23 Q Thank you.

24 Your Honor, the witness is ready for  
25 cross-examination.

1 ALJ LAU: Thank you, Mr. Shu.

2 Let's bring forth Ms. Andrea White.

3 Ms. White, you may begin cross-examination of  
4 Ms. Magana. But before you begin, please introduce  
5 yourself again.

6 MS. WHITE: Yes, your Honor.

7 So, my name is Andrea White. And I represent  
8 the Protect our Communities Foundation.

9 CROSS-EXAMINATION

10 BY MS. WHITE:

11 Q Okay. So, Ms. Magana; correct?

12 A Yes.

13 Q Okay. So, I want to begin with -- let's see --  
14 one second. Okay. So, I'm going to begin with your  
15 rebuttal testimony. So -- and this is on page 1.

16 So, this is lines 12 through 14. And you  
17 testify:

18 As the State's energy and environmental  
19 goals continue to evolve, low-carbon fuels  
20 will become increasingly important as a  
21 tool to maintain a reliable and resilient  
22 decarbonizing electric grid as electric  
23 demand increases.

24 So, I'm just -- so, you don't have any evidence  
25 to support this statement; correct?

1 A I'm sorry. Was that -- you cut off a bit.

2 Was that a question?

3 Q Yes. Yes. Yes.

4 So, you don't cite to any evidence to support  
5 this statement; correct?

6 A There's no citation on that statement, no.

7 Q Okay. So, then, next -- on the same page, you  
8 refer to low-carbon fuels.

9 So, when you refer to low-carbon fuels, does  
10 that include hydrogen fuel?

11 MR. SHU: Objection. Counsel, can you be a  
12 little more specific on the reference to low-carbon  
13 fuels; if you have a citation, please?

14 ALJ LAU: I agree --

15 MS. WHITE: Yes, so --

16 ALJ LAU: Go ahead.

17 MS. WHITE: Yes.

18 So, it's 115 on page 1 of your rebuttal  
19 testimony.

20 ALJ LAU: So, specifically, Ms. White, are you  
21 referring to the sentence that -- that states:

22 Developing a more accurate adder could  
23 provide information on how to better  
24 evaluate avoided ratepayer costs from the  
25 use of low-carbon fuels.

1 MS. WHITE: Yes, I am, your Honor.

2 THE WITNESS: Can you re-ask your question,  
3 please?

4 BY MS. WHITE:

5 Q Of course.

6 So, Ms. Magana when you referred to low-carbon  
7 fuels at line 16, does that include hydrogen fuel?

8 A The statement that we're addressing at the  
9 moment in reference to low-carbon fuels is specific to  
10 the fuels that we are delivering through our system now,  
11 which includes natural gas and renewable natural gas.

12 Q Okay. So, it doesn't include hydrogen fuel  
13 then?

14 A That would be correct, in that statement.

15 Q Okay. Let's see. Okay.

16 I'm just going to pull up my notes.

17 ALJ LAU: Let's go off --

18 MS. WHITE: Okay. So --

19 ALJ LAU: -- the record.

20 (Off the record.)

21 ALJ LAU: Back on the record.

22 MS. WHITE: Yes. Yes. Sorry. It just took me  
23 a second. Thank you, your Honor.

24 Q Okay. So now I want to continue to refer to  
25 your rebuttal testimony at page 2, Footnote 3.

1           And are -- let me know when you're there.

2           A     I'm there.

3           Q     Okay. Thank you.

4           Okay. So, here you say:

5                   Behind the meter residential methane  
6                   leakage is likely to affect individual  
7                   customer bills because of increased natural  
8                   gas throughput through the meter. But  
9                   environmental and/or remediation costs  
10                  associated with leaking methane into the  
11                  atmosphere from behind-the-meter  
12                  applications is not borne by ratepayers or  
13                  customers.

14           Okay. So, I'm -- I'm wondering if you could  
15           explain the steps you took to reach that conclusion.

16           A     The extent of the testimony provided here was  
17           to address -- address transparency and suggest that the  
18           methane leakage adder needs to be reviewed. And we're  
19           providing -- the statement that you read is an example  
20           of what was already stated. And in that context, when a  
21           customer has a leak behind the meter, it is a -- an  
22           end-user impact that is not necessarily, at the moment,  
23           tied or associated -- or calculated, rather -- into the  
24           methane leakage adder, the way that I understand.

25           Q     Okay. So, to form your conclusions, did you

1 use -- did you review SoCalGas's GRC application?

2 A No, I did not.

3 Q Okay. Okay. Let's see. I'm going to move to  
4 line 12 on the same page.

5 Okay. So, here you say:

6 SoCalGas agrees, generally, with the Joint  
7 IOU explanation that activities that reduce  
8 natural gas usage while leaving the  
9 relevant pipelines intact and in use would  
10 not reduce methane leakage because gas  
11 system pipelines need continuous  
12 pressurization to serve other demand and  
13 maintain a safe and reliable service.

14 So, are -- are there programs that reduce  
15 methane leaks while allowing for continued use of the  
16 pipeline?

17 MR. SHU: Objection. I'm -- this is outside of  
18 the scope of the witness' testimony, what she's focusing  
19 on here.

20 ALJ LAU: I will try -- I will allow it,  
21 actually.

22 Ms. Magana, just try to answer to the best of  
23 your ability, if you're aware.

24 THE WITNESS: Can you repeat the question,  
25 please?

1 BY MS. WHITE:

2 Q Yes.

3 So, are there programs that reduce methane  
4 leaks while allowing for the continued use of the  
5 pipeline?

6 A To the extent of my knowledge, and subject to  
7 verification, there are programs that allow customers  
8 address their leaks. In context of Avoided Cost  
9 Calculator or methane leakage adder, I don't understand  
10 the connection between the two. So, I -- I -- if your  
11 question is to ask if there are programs that include a  
12 methane leakage adder as a benefit to that program, or  
13 to that customer, in a way of a program, I am not aware  
14 of one.

15 Q Okay. Okay. Thank you.

16 So then, are there -- and then, just to  
17 confirm, are you aware of federal regulations that  
18 detail the inspections and repairs that must be  
19 conducted on a pipeline in order to maintain safe and  
20 reliable service?

21 MR. SHU: Objection. Outside the scope of this  
22 witness' testimony.

23 ALJ LAU: I agree.

24 MS. WHITE: So --

25 ALJ LAU: Okay. Ms. White, why don't you make



1 your case, first?

2 MS. WHITE: Okay. So -- here --

3 ALJ LAU: So -- okay. If you're not going to  
4 make your case, then I agree with Mr. Shu's objections.

5 Are you making a case, or are you going to ask  
6 another question?

7 MS. WHITE: Oh, no. No. Sorry, your Honor. I  
8 was going to make my case. I was just taking a moment  
9 to gather my thoughts.

10 ALJ LAU: Okay. Why don't you make your case.

11 MS. WHITE: Okay. So -- so, Ms. Magana is  
12 referring to safe and reliable service. So I think,  
13 based on that, it's relevant whether federal regulations  
14 that require safe and reliable service should -- whether  
15 -- whether Ms. Magana's aware of them.

16 ALJ LAU: I --

17 MS. WHITE: And --

18 ALJ LAU: Actually, I will allow this one.  
19 This does, kind of, pertain to her expertise as an  
20 expert witness. And she is opining on the gas -- you  
21 know -- on the gas system.

22 MS. WHITE: Okay. And, your Honor, would it be  
23 appropriate if I asked my question again?

24 ALJ LAU: Yes. Can you ask your question  
25 again?

1 MS. WHITE: Yes. Okay. Thank you, your Honor.

2 Q Okay. So, Ms. Magana, there are federal  
3 regulations that detail the inspections and repairs that  
4 must be conducted on a pipeline in order to maintain  
5 safe and reliable service; correct?

6 A Yes.

7 Q Okay. So on the same page of the rebuttal  
8 testimony, at line 15, you testify that a recalculated  
9 methane leakage adder should only be used in cases where  
10 program activity is directly responsible for mitigating  
11 methane leakage of natural gas T&D pipelines.

12 So, I was hoping you could clarify what you  
13 mean by "directly responsible"?

14 A Sure. So, I'm going to try to answer as -- as  
15 clearly as possible, with an example. Customer  
16 programs, DER programs, have goals; and there's  
17 requirements that they must meet. And most programs are  
18 there to help customers reduce or manage their energy  
19 more efficient, which a byproduct of that is to reduce  
20 the use of gas or electricity. And that's what the  
21 program goal would be, as opposed to a program that  
22 requires the customers to eliminate transmission and  
23 distribution pipes that would transport natural gas.

24 And the intent of that statement is to provide  
25 clarity that programs that do not have a goal to reduce

1 the pipes are probably not best positioned to use a  
2 methane leakage adder, because they are not essentially  
3 reducing the flow of gas simply because they are  
4 reducing their energy consumption. Because the pipe  
5 works in the way that it is explained in testimony on  
6 page -- on line -- sorry -- taking you back to line 14.  
7 They need continuous pressure.

8 Does that help?

9 Q Yes. Thank you.

10 A Mm-hm.

11 Q Okay. So now I'm going to turn to page 4 of  
12 the -- hold on. Sorry. I need one second.

13 Okay. Okay. I clarified what I'm planning on  
14 referring to. So, it's on your opening testimony on  
15 page 4, starting at line 8. Okay.

16 So, have you -- have both of you found the --  
17 the relevant page? Okay.

18 A Yes.

19 Q Okay. So here, Ms. Magana, you testify:

20 SoCalGas believes rate bill impacts and the  
21 distribution of these impacts amongst  
22 participants, ratepayers, and  
23 non-participants are also key metrics in  
24 determining equity.

25 So, should shareholder benefits also be

1 considered, in your opinion?

2 A In my opinion, the Avoided Cost Calculator does  
3 not currently include the shareholder impacts. And my  
4 comment here -- or my testimony is in reference to an  
5 example of the DEA and ESP method. And what I was --  
6 what I attested to here is to highlight the use of a DA  
7 -- EEA approach to look at the benefits that the DEA  
8 tool already uses. I did not address shareholders in  
9 this statement.

10 Q Okay. So then, just to clarify, do you think  
11 shareholder benefits should be considered, in your  
12 opinion?

13 A I -- I don't have an opinion on whether  
14 shareholders should be included. I -- I was -- in this  
15 testimony, I was answering the question about equity as  
16 it is framed in front of us today and how the avoidance  
17 cost calculator does it.

18 Q Okay. Thank you. Okay. Let's see.

19 And then, in your opening testimony, again, on  
20 page 6, starting at line 10, you say:

21 The ACC currently relies on an interim  
22 greenhouse gas adder that was adopted in  
23 D.22-05-002, with the forethought that a  
24 more comprehensive adder would be added --  
25 would be developed later.

1           And then, you go on to state:

2           The staff proposal defers the development  
3           of the greenhouse gas adder until the 2026  
4           ACC update, however, which would delay  
5           assessment of a more accurate greenhouse  
6           gas adder for the -- for the gas sector.

7           And then -- okay. Sorry. I feel like I'm  
8           reading too much. But your next sentence says:

9           Particularly, the staff proposal notes that  
10          the current adder is only a very rough  
11          estimate of the likely value as reducing  
12          fossil gas (indecipherable) greenhouse gas  
13          emissions.

14          Okay. So, would your analysis -- so you -- you  
15          conclude that the interim greenhouse gas adder was not  
16          intended to delay the development of a more accurate gas  
17          sector, specific greenhouse gas adder.

18          So, would this statement analysis apply to the  
19          staff proposal's recommendation to defer to 2026 the  
20          development of more accurate avoided transmission cost  
21          calculation?

22          MR. SHU: I'm sorry. I'm going to object to  
23          that one. That was a bit compound. And I think you  
24          might have misstated some testimony at the beginning  
25          there.

1 ALJ LAU: Yeah. I think --

2 MR. SHU: Sorry.

3 ALJ LAU: Can you rephrase your sentence  
4 Ms. White? I actually got confused with the --

5 MS. WHITE: Okay.

6 (Crosstalk.)

7 BY MS. WHITE:

8 Q Okay. So -- let's see. Okay. I'm going to  
9 look at the specific reference that I think would help.  
10 One second.

11 Okay. So, at the beginning of page 6, you  
12 testify that:

13 SoCalGas recommends that the 2024 ACC  
14 update its scope to include work streams to  
15 begin the process of developing a natural  
16 gas specific greenhouse gas adder.

17 So, would you apply this same analysis to the  
18 staff proposal's recommendation to defer to 2026 the  
19 development of more accurate avoidant transmission cost  
20 calculations?

21 MR. SHU: Objection, your Honor. I'm having  
22 trouble following it.

23 Can -- Counsel, are you referencing the staff  
24 proposal, as well as our testimony here?

25 MS. WHITE: I am just -- well...

1 ALJ LAU: How about, Counsel -- Ms. White, can  
2 you just, like, state your question -- what you want to  
3 ask? Since we've read those test- -- statement, can you  
4 just, like, ask your -- you know, without having to kind  
5 of do -- just try to ask your question. We'll try from  
6 there.

7 BY MS. WHITE:

8 Q Okay. So, essentially, SoCalGas is  
9 recommending that the 2024 ACC begin developing a  
10 natural-gas-specific greenhouse gas adder; correct,  
11 Ms. Magana?

12 A That is correct.

13 Q Okay. And I'm assuming you developed some sort  
14 of analysis, right, to come to that conclusion?

15 A Can you refer me in my testimony where you  
16 might be seeing that?

17 ALJ LAU: How about -- Ms. Magana, how did you  
18 come to that conclusion?

19 THE WITNESS: Okay. In that -- my testimony,  
20 it was referencing to the decision and the previous  
21 decision stating that they are adopting an interim  
22 adder, and that a more permanent adder would later be  
23 developed. We were commenting or referencing to that.

24 BY MS. WHITE:

25 Q Okay. So -- and then, my -- my question that

1 -- my question is then, there's going to be a study  
2 about more accurate avoided transmission costs.

3 So, were your assessments that the 2020 -- that  
4 the 2024 ACC update include a process for developing a  
5 natural-gas-specific greenhouse gas adder, would that  
6 change based on your knowledge of the 2026 transmission  
7 updates?

8 ALJ LAU: I think that's a little compound.  
9 I'm sorry, Counsel. How about just --

10 MS. WHITE: Okay.

11 ALJ LAU: -- just the first part --

12 MS. WHITE: Okay.

13 ALJ LAU: The first part. Can I -- I forgot  
14 what the first part is.

15 MS. WHITE: Okay. I'll -- I'll try to ask a  
16 simpler question, your Honor.

17 Q So, when recommending that the 2024 ACC update  
18 its scope to include the process of developing a  
19 natural-gas-specific greenhouse gas adder, did you  
20 consider that there is going to be a study in 2026  
21 that's going to develop more accurate avoided  
22 transmission cost calculations?

23 A If I understand your question to be that if I  
24 have -- I've taken into consideration a transmission  
25 update in 2026 to provide testimony to an updated GHG



1 adder, then no, we did not consider that.

2 Q Okay. Okay.

3 So, to clarify, you wouldn't want to defer the  
4 natural-gas-specific greenhouse gas adder until 2026, to  
5 align with the avoided transmission study?

6 MR. SHU: Objection. I -- I think that's not  
7 entirely accurate paraphrasing. I think she answered  
8 the question the way she answered the question.

9 Do you want to ask it another way? ]

10 ALJ LAU: Why don't you try, Ms. White, to ask  
11 it another way.

12 MS. WHITE: Okay.

13 ALJ LAU: If -- if Ms. Magana disagrees, that's  
14 fine too.

15 MS. WHITE: Yeah. Yeah.

16 Q So, do you think SoCalGas would recommend  
17 delaying the natural gas specific greenhouse gas adder  
18 until 2026 to align with the transmission study?

19 A I would like to direct you back to my testimony  
20 to ensure that we -- I -- I can offer you some clarity  
21 on what I testified.

22 If you refer back to page, in my opening  
23 testimony, page RM- -- /AD-6, line 17:

24 It is prudent to adopt an interim natural  
25 gas specific greenhouse gas adder. While

1 additional study and discussion can occur  
2 to the development of a nat -- of a  
3 permanent natural gas specific greenhouse  
4 gas adder.

5 Our position is that we should get started on  
6 that. When it will be completed, or when it will be  
7 approved is not something that I provided testimony to.

8 MS. WHITE: Okay. Thank you, Ms. Magana.

9 Okay. I think that concludes my questions, so  
10 thank you, Ms. Magana. Thank you, your Honor.

11 ALJ LAU: Mr. Hsu, do you have any redirect for  
12 Ms. Magana?

13 MR. HSU: Your Honor, may we take a couple of  
14 moments here on our side to confer?

15 ALJ LAU: Yeah. Let's go off the record, and  
16 we will break for five minutes.

17 MR. HSU: Thank you.

18 (Off the record.)

19 ALJ LAU: Let's go back on the record.

20 Mr. Hsu, do you have any redirect for  
21 Mr. Magana?

22 THE WITNESS: No. Thank you, your Honor.

23 ALJ LAU: All right. Thanks, Mr. Magana --  
24 sorry -- Ms. Magana, I am sorry, thank you for your  
25 participation today. You may be excused.

1 THE WITNESS: Thank you, your Honor.

2 ALJ LAU: Let's bring forth Jaime McGovern, and  
3 we can take Mr. Hsu off the stage, too.

4 Let's bring forth the set of witness  
5 attestations. Let's bring forth attorney for TURN --  
6 should be David Cheng, correct? If I am wrong, someone  
7 should -- Ms. McGovern said yes, so.

8 Okay, let's go off the record.

9 (Off the record.)

10 ALJ LAU: Let's go back on record.

11 On the stage, we have Ms. McGovern representing  
12 TURN. Mr. Cheng and a set of witness attestations.

13 Ms. McGovern, can you introduce yourself and  
14 the organization you are representing?

15 THE WITNESS: Your Honor, I am Jaime McGovern,  
16 and I represent TURN, The Utility Reform Network in  
17 California.

18 ALJ LAU: Thank you, Ms. McGovern. Can -- do  
19 you see the set of witness attestations set forth on the  
20 screen?

21 THE WITNESS: I do.

22 ALJ LAU: Have you had the opportunity to  
23 review them in full?

24 THE WITNESS: (inaudible), your Honor.

25 ALJ LAU: Can you say that again?

1 THE WITNESS: (inaudible), your Honor.

2 ALJ LAU: You said "yes," right?

3 THE WITNESS: Yes, I have read them. My  
4 apologies.

5 ALJ LAU: And do you agree to abide by them?

6 THE WITNESS: Yes, your Honor.

7 JAIME MCGOVERN,

8 called as a witness by The Utility Reform  
9 Network, having been sworn, testified as  
10 follows:

11 ALJ LAU: All right. Thank you, Mr. Cheng, you  
12 may begin direct examination of Ms. McGovern, but before  
13 that, can you introduce yourself and the organization  
14 you're representing?

15 DIRECT EXAMINATION

16 BY MR. CHENG:

17 Q Thank you, your Honor. My name is David Cheng,  
18 and I am representing The Utility Reform Network or  
19 TURN.

20 Good afternoon, Ms. McGovern. Do you have  
21 before you the documents that have been identified as  
22 Exhibit TURN-01 and TURN-02?

23 A I do.

24 Q Were these documents prepared by you or under  
25 your supervision?

1           A     Yes, they were.

2           Q     To the extent these testimonies contain factual  
3 assertions, are those true and correct to the best of  
4 your knowledge?

5           A     Yes.

6           Q     To the extent your testimony expressed your  
7 opinions, are those opinions consistent with your best  
8 professional judgment?

9           A     Yes.

10          Q     Ms. McGovern, do you have any corrections to  
11 make to your testimony at this time?

12          A     No, I do not.

13                 MR. CHENG: Your Honor, Ms. McGovern is ready  
14 for cross-examination.

15                 ALJ LAU: Thank you, Mr. Cheng.

16                 Let's put forth Mr. Roger Lin. We may remove  
17 the -- okay, thank you.

18                 Mr. Lin, you may begin your cross, but before  
19 you do that, please introduce yourself again.

20                 MR. LIN: Yes, Roger Lin on behalf of the  
21 Center for Biological Diversity. And one quick  
22 procedural question, your Honor. I don't know if we  
23 have to go off record...

24                 ALJ LAU: We can go off the record.

25                         (Off the record.)

1 ALJ LAU: Let's go back on the record.

2 Mr. Lin, you may begin your cross of  
3 Ms. McGovern.

4 CROSS-EXAMINATION

5 BY MR. LIN:

6 Q Great. Thank you for the time today  
7 Ms. McGovern and counsel as well.

8 I am going to start with your opening  
9 testimony, and then go to your rebuttal testimony, and  
10 then land on the proposed decision.

11 In your opening testimony page 14, beginning at  
12 line 18, you state that:

13 The customer removing usage from the system  
14 in the form of a DER not only has the  
15 effect of relieving the customer of  
16 responsibility for some their incremental  
17 costs to the system, but also relieving  
18 themselves of some of their share of fixed  
19 costs of the system.

20 ALJ LAU: Mr. Lin, let's give Ms. McGovern some  
21 time to find her testimony.

22 THE WITNESS: Mr. Lin, can you provide the --  
23 the page and line again?

24 BY MR. LIN:

25 Q Yes, sorry. Page 14, beginning at line 18.

1 A Thank you.

2 Q So, this statement, though, relieving  
3 themselves of some of their share of fixed costs of the  
4 system, is this -- this share of fixed costs of the  
5 system part, does this assume that the DER is not  
6 avoiding any build out of infrastructure that could  
7 create fixed costs in the future?

8 A This statement does not make any assumptions.  
9 This statement is -- given various rate structures and  
10 rate design, this can happen with or without DER.

11 Q Okay. Can a DER avoid ratepayer costs by  
12 avoiding the need to build out other infrastructure?

13 A Can you ask the question again?

14 Q Well, I will just break it apart, sorry.  
15 Can a DER avoid other utility infrastructure?

16 A I'm having a little bit of a struggle  
17 considering can a DER avoid other utility  
18 infrastructure.

19 Are you asking whether the adoption or  
20 construction of the DER can allow the avoidance of their  
21 utility infrastructure?

22 Q Yes. Whether you look at a -- at a DER as a  
23 load modifier or a generation source, does -- can a DER  
24 avoid the need for other generation sources?

25 A So, this de -- this depends on how far in

1 advance the DER is -- is planned for; and so, I don't  
2 have the exact citation in our testimony, but we did  
3 discuss the difference between DER and DER that is  
4 acknowledged in IRPs; and so...

5 Q And --

6 A It's hard to --

7 (Crosstalk.)

8 Q I see. And can a DER avoid the -- avoid  
9 transmission build out?

10 A I -- so, in -- in my -- in my analysis,  
11 incremental DER is -- is much smaller than a  
12 transmission project, so the -- the method of accounting  
13 for incremental transmission and incremental DER is --  
14 is not apples to apples or synchronist in that way.  
15 They're -- they're -- they're different increments.

16 Q Okay. And so, on this question still, if we  
17 have build out of DERs -- not just one, but build out of  
18 DERs generally -- can that avoid the need for future  
19 transmission?

20 A So, yeah, potentially planned DER can be  
21 accounted for in IRP planning.

22 Q And if this is out of the scope of your  
23 testimony, that is fine, but has the CPUC identified  
24 transmission build out as the number one cause of rate  
25 increases?



1 MR. CHENG: Objection, your Honor. I believe  
2 that's outside of her testimony.

3 ALJ LAU: I am going to sustain the objection.

4 BY MR. LIN:

5 Q And towards the end of page 14, line 25 to 26:

6 TURN recommends that the Commission  
7 continue to explore cost shift mitigation  
8 policies.

9 Should the existence of a cost shift be based  
10 on data versus a theoretical assumption?

11 A So, the existence cost shift, there is or  
12 isn't, and the analysis to explore the degree of cost  
13 shift can be done through numerical analysis.

14 Q In your expert opinion, should -- should it --  
15 should that -- is that numerical analysis essential to  
16 verifying whether the -- the existence or degree of the  
17 cost shift?

18 A Okay. Yeah, I -- I -- I think that identifying  
19 the existence of cost shifting in various companies and  
20 rate designs requires analysis.

21 Q Okay. Thank you. And I agree, and I agree  
22 with the -- your testimony as well. The presence of  
23 good information and data should inform PUC decisions,  
24 for sure.

25 And going to the next page, page 15, line 10:

1                   There may be additional avoided costs if  
2                   the same amount of DER is adopted but in  
3                   different patterns and by different  
4                   customers.

5                   Could you provide one -- one or more examples  
6 of additional avoided costs in that situation, please?

7           A     Give me a second to read.

8                   Can you ask the question again? My apologies.

9           Q     Oh, no problem. Please take your time. I  
10 don't have that many questions for you today, so please  
11 take your time on these.

12                   At line 10 to 11, you say:

13                   There may be additional costs if the same  
14                   amount of DER -- oh, yeah, sorry -- if the  
15                   same amount of DER is adopted but in  
16                   different patterns and by different  
17                   customers.

18                   Could you provide an example of those  
19 additional avoided costs?

20           A     This is a -- a conceptual statement and a  
21 theoretical statement. I don't have numerical examples  
22 to discuss here of the -- the different avoided energy  
23 costs or otherwise.

24                   So, are you asking me to provide examples  
25 conceptually or numerically?

1 Q Conceptually, sure.

2 A So, we discussed in our testimony elsewhere  
3 that there are load shifting DER customers, load  
4 decreasing DER customers. Those different types of DER  
5 also potentially in different locations at different  
6 times of day will have different impacts on the system.

7 Q Okay. That's helpful. Thank you.

8 Moving onto page 16, line 17. An  
9 overaccounting -- or an -- sorry --

10 An overcounting of societal impacts, such  
11 as benefits to out-of-state populations,  
12 may unfairly burden ratepayers if results  
13 influence compensation determinations.

14 I understand the concern. Would you still have  
15 the same concern if we're dealing with in-state societal  
16 impact, such as local air quality?

17 A Let me just take a second to read.

18 Overcounting of societal benefits --  
19 overcounting of any benefits can be a problem for  
20 accuracy of the ACC.

21 In this case, we gave an example such as  
22 out-of-state populations versus your question about  
23 in-state. I can't comment to the -- how do I say this?  
24 The location of the customers to where the benefits  
25 accrue versus -- sorry -- the location of the

1 individuals where the benefits might accrue, even if  
2 they are in-state, versus whether they are customers of  
3 the same system.

4 Those are important components to -- to  
5 answering that question, and I am unable to make that  
6 distinction for all the individuals in California and  
7 all the customers of different companies in service  
8 territories.

9 Q Okay. Great.

10 And switching from the ACC, just for a second,  
11 to cost effectiveness or the societal cost test.

12 The same page below, line 21:

13 Applying the societal cost test evenly  
14 across resource types will help achieve the  
15 greatest benefits to Californians and then  
16 minimize -- minimize costs to ratepayers.

17 I think we agree on this one, but I just want  
18 to be sure. Are you saying that in cost effectiveness  
19 tests if we are to consider societal impacts, we should  
20 consider societal impacts on -- all the societal impacts  
21 imposed by all energy resources not just DERs?

22 A I am sorry; can you ask that again?

23 Q Well, I will just be blunt with it.

24 Should we -- if we were to modify cost benefit  
25 analysis to include societal costs and benefits,

1 those -- that analysis should apply to all energy  
2 resources?

3 A Okay. I think I understand.

4 I have a statement to make for clarity --

5 Q Uh-huh.

6 A -- that this section is in response to -- in  
7 the scoping memo -- asking questions about equity issues  
8 considered in evaluating DER cost effectiveness.

9 The -- the -- that component or that question  
10 that we are trying to answer in this section is -- is  
11 not a -- a -- it is -- it's different from the first two  
12 questions, which are focused in -- especially question  
13 number one focused on the technical accuracy of the ACC,  
14 so this is a question specifically to the societal cost  
15 test.

16 And to answer the question, that statement,  
17 applying the SCT evenly across resource types, in -- I  
18 will state that we support methodology that is equal  
19 across resource types, but doesn't necessarily mean that  
20 the outcome or the numerical value will be equal across  
21 resource types.

22 Q Okay. Thanks. We do agree on that one.

23 And so, moving over to your rebuttal testimony  
24 on page 9, line 14.

25 A Okay.

1 Q Now, you said:

2 In light of -- a lot of the bad things we  
3 have done, unfortunately -- even if a  
4 particular DER program is equally available  
5 in a region, people of color may be less  
6 able to participate due to inequity in  
7 resources, causing incentives to result in  
8 an unfair cost shift.

9 If we prioritize DERs in disadvantaged  
10 communities, would that remedy this concern?

11 MR. CHENG: Counsel, I am going to ask you  
12 to -- what is your context for prioritizing  
13 disadvantaged -- are you talking about making  
14 modifications to the ACC to prioritize?

15 MR. LIN: Good question, counsel. Thank you.  
16 No, I am just referring to utilizing to the best extent,  
17 federal and state subsidies or DERs.

18 Q So, if we were to target those federal and  
19 state subsidies -- or they are targeted towards DERs --  
20 if we were to target them toward disadvantaged  
21 communities, would that remedy or go, to some degree, to  
22 remedy this concern?

23 A So -- so, I would like to answer this question  
24 and make clarification, again, that -- so this -- so, in  
25 the statement that we've made throughout our testimony

1 that there are cost shifts or potential cost shifts with  
2 the deployment of DER, this is in light of my  
3 examination of various rate designs and identifying the  
4 opportunity for this to occur with possible location and  
5 rate design.

6 Those comments are on the construction of the  
7 ACC or the Avoided Cost Calculator, and -- and that  
8 is -- those are the statements about the construction of  
9 and the -- and accuracy of the ACC.

10 This is a -- this is -- this statement here is  
11 in reference to the location of the ACC and DER  
12 programs, not the construction of the ACC. So, that --  
13 that -- that is a clarification.

14 If your question is that if other funding  
15 mechanisms are used to supplement DER, I suppose that  
16 depends on the design of the -- the funding mechanisms  
17 and the targeting. ]

18 Q Okay. And if the funding mechanisms just  
19 covered up-front funding for the DERs -- let's say  
20 community solar and storage, for instance. If there  
21 were subsidies that cover the up-front funding for that,  
22 would you still have the same concern?

23 A So -- so I, in my analysis, if -- if there are  
24 fixed system costs that are collected through usage  
25 charges across individuals and classes or even within a

1 class, say, a residential class, and there's a program  
2 that you're suggesting that's designed to enhance  
3 adoption by certain groups, they -- I'm not confident  
4 that that would reach all of the individuals that might  
5 be affected by the cost shift. It may or may not.

6 Q I understand. And whether it may or may not,  
7 does that depend on the scale of -- going back to my  
8 hypothetical about community solar and storage, it may  
9 or may not, did that depend on the scale of deployment  
10 of community solar and storage to then avoid needs for  
11 other energy resources?

12 A Could you just phrase that question again?

13 Q Whether there is that cross-shift or not, does  
14 that depend on the degree to which the community solar  
15 and storage resources could avoid the need for other  
16 resources?

17 A I don't think so.

18 Q And then let's see. But doesn't the fixed --  
19 the fixed component aspect, wouldn't that decrease if we  
20 had community solar and storage -- I know it's a  
21 hypothetical. But if we had enough community solar and  
22 storage to decrease the need for building out  
23 transmissions, for instance, wouldn't that decrease the  
24 fixed cost that you're talking about?

25 A So --



1 MR. CHENG: I think we're deviating a little  
2 bit too far from the testimony. I think we're starting  
3 to talk about rate design cost allocation. It's not  
4 really the scope of this testimony here.

5 MR. LIN: It's still to --

6 MR. CHENG: Your Honor -- you're muted, your  
7 Honor.

8 ALJ LAU: I'm going to -- how about I listen to  
9 Mr. Lin's --

10 MR. LIN: I'm just focussing on avoided  
11 transmission, which I believe is in the scope of  
12 Ms. McGovern's testimony.

13 ALJ LAU: And you're talking about the fixed  
14 charges. You can talk -- can you kind of guide her to  
15 her testimony? I think we are kind of veering a little  
16 bit off scope too, so please tie it back more closely.

17 MR. LIN: Yes.

18 Q The same section on -- you know, you've  
19 identified an issue. If people -- if disadvantaged  
20 communities may be less able to participate, then there  
21 could be an unfair cost shift towards the disadvantaged  
22 community residents. If we flip the script and those  
23 disadvantaged community residents instead had up-front  
24 funding from subsidies for community solar and storage  
25 that also decrease the need for transmission build-outs,

1 does that address the cost shift issue to some degree?

2 Of course, going back to your prior response, we need  
3 data and everything. But theoretically, could it?

4 A Yeah. Okay. So the -- so it -- one is  
5 contingent on the rate design, which we're aware of.  
6 And if the question is if higher levels of adoption by  
7 those disadvantaged communities potentially coming from  
8 outside funding first -- does that mitigate the  
9 potential volume of cost shift? That's possible. If  
10 the adoption rates are either higher or equal in those  
11 sectors.

12 Q Everyone go vote. We need to preserve that  
13 funding. We know what's at risk. Okay.

14 A I'm sorry. Is it possible to just add one more  
15 thing to that statement?

16 Q Of course.

17 A And that is contingent on it being in planning  
18 as well -- acknowledged in planning.

19 Q Okay. And let's see. And now shifting back to  
20 the ACC, page 10 of your rebuttal testimony, line 17 to  
21 the end. You disagree with our proposal to include  
22 social costs in the ACC, and you state that, at line 18  
23 through 19, the ACC should only account for avoided  
24 costs the energy system.

25 My first question on this is, are greenhouse

1 gases an avoided cost to the energy system?

2 A So is the question -- in what context?

3 Q Let's just say the basis for disagreeing that  
4 social costs should be incorporated into the ACC itself  
5 is that the ACC should only account for avoided costs to  
6 the energy system. So I'm just trying to gauge where  
7 TURN is on GHGs and whether GHGs are an avoided cost to  
8 the energy system.

9 A Avoided costs if DER is deployed? Is that what  
10 you're asking?

11 Q Sure. But just as a factor. You know, like,  
12 are GHGs avoided --

13 A So -- the load serving entities in California  
14 are required to meet certain standards of compliance.  
15 And so when a -- when some DER is deployed, it -- it's  
16 possible that it moves the load serving entity towards  
17 their goal. We actually, in our testimony and in  
18 several places, prefer to use the word "compliance  
19 costs" because the only avoided costs, even for  
20 particular greenhouse gases, would only be the ones that  
21 the companies are responsible for in their compliance  
22 requirements.

23 Q Okay. So the -- to paraphrase -- let me know  
24 if this is fair to paraphrase. Your testimony is that  
25 the ACC should only account for avoided costs to the

1 energy system. Is it fair to paraphrase based on your  
2 response just now that those avoided costs should  
3 include compliance costs?

4 A TURN thinks that the compliance costs, energy  
5 costs, and capacity costs are -- should be and are  
6 modeled in the ACC.

7 Q Great. And, now, let's see. Just -- I think  
8 I'm okay without asking about the proposed decision.  
9 And this is just a general question. And it's based on  
10 your opening testimony, which just generally  
11 concludes -- and this is at the end of page 13.

12 DER cost effectiveness evaluation should answer  
13 two questions regarding equity. Do policies or  
14 mechanisms in place increase or decrease equitable -- so  
15 adoption rates of DERs? And does that do any harm to  
16 ratepayers?

17 Is there -- based on that overall framing of  
18 your opening testimony, is there an unfortunate tension  
19 in today's regulatory framework between meeting --  
20 providing community benefits through DERs and avoiding  
21 ratepayer impacts?

22 A I'm sorry. Can you just ask the last part of  
23 that question again?

24 Q Yes. Is there an unfortunate tension between  
25 getting more benefits to communities through DERs, a

1 tension with that and avoiding ratepayer impacts?

2 A Not -- I'm not sure. I don't --

3 Q It's okay. It's a tough one that I grapple  
4 with all the time. Could better data, for instance, on  
5 avoided costs alleviate competing needs to get more DERs  
6 out and avoid a negative ratepayer impact?

7 A So I -- I'm always a fan of better data. I do  
8 think that both in forecasting and in actual data, that  
9 we do have a lot of data for the calculation of the ACC.  
10 If there is this tension that you describe, I think,  
11 again, it is potentially an implication not in the  
12 calculation of the ACC or potentially connected to the  
13 program deployment or rate design. There's probably a  
14 lot of components that create the -- the uncertain DER  
15 environment we are in.

16 Q Agreed. Okay. Well, thank you. Those are all  
17 the questions I have today. I appreciate the time.

18 ALJ LAU: Thank you, Mr. Lin.

19 Mr. Cheng, do you have any redirect for  
20 Ms. McGovern?

21 MR. CHENG: No redirect, your Honor. Thank  
22 you.

23 ALJ LAU: All right. Thank you. Then we can  
24 take Mr. Lin off stage.

25 Let's go off the record.

1 (Off the record.)

2 ALJ LAU: Let's go back on the record. We'll  
3 take a ten-minute recess, and we'll be back at 2:55 p.m.  
4 Thank you.

5 (Off the record.)

6 ALJ LAU: Let's go back on record.

7 On the stage we have Ms. McGovern from TURN,  
8 Mr. Cheng, and Ms. Andrea White.

9 Ms. White, you may begin your cross of  
10 Ms. McGovern, but, again, please introduce yourself  
11 before you speak. Thank you.

12 MS. WHITE: Yes. Thank you, your Honor.

13 My name is Andrea White, and I represent the  
14 Protect Our Communities Foundation.

15 CROSS-EXAMINATION

16 BY MS. WHITE:

17 Q Okay. So, Ms. McGovern, I would like to begin  
18 with your rebuttal testimony at page 3, lines 21 and 22.

19 So you testified that only resources  
20 demonstrated to be avoidable should be factored into the  
21 ACC. So when you say "demonstrated," do you mean  
22 quantified?

23 A So I think there's two components there.  
24 Demonstrated to be avoidable means that it's  
25 functionally avoidable -- excuse me -- by the utilities

1 or load serving entities. So that's -- that's the  
2 recommendation for the modeling. The quantifiable  
3 component or the numerical component is the subsequent  
4 entries into the model.

5 Q Okay. So what do you suggest that the  
6 Commission should do in the event that an avoided cost  
7 is known to exist but has not been accurately  
8 quantified?

9 MR. CHENG: Counsel, can you clarify what you  
10 mean by "known to exist"?

11 BY MS. WHITE:

12 Q I guess in Ms. McGovern's opinion, if there was  
13 an avoided cost that was known to exist but it hasn't  
14 yet been accurately quantified, what should the  
15 Commission do?

16 A So in our testimony, we discussed situations  
17 where -- and I think for many cases, energy costs, for  
18 example, are one that are avoidable, but they aren't all  
19 known in advance, and so we use forecasts. And we  
20 discussed in our testimony the accuracy component of  
21 those forecasts are important. And so we discussed  
22 things like true-ups in the case where you -- you may be  
23 looking at things closer in real time. Yeah. I think  
24 there are -- you know, energy is probably a good  
25 example.

1 Q Okay. Thank you.

2 Let's see. So on page 20 -- sorry. On page 3,  
3 again, of your rebuttal at line 23, you testify that --  
4 oh, I guess it's on line 22. Sorry.

5 The nature of incremental DER adoption by  
6 individual consumers means that an increase in  
7 incremental DER does not correspond one-to-one with  
8 certain avoidance of utility commitments.

9 So is it your opinion that lack of a one-to-one  
10 correspondence means that DER adoption by individual  
11 consumers should not be part of the ACC?

12 A So I'm not comfortable with the one-to-one  
13 claim. I think what we're trying to say is that to the  
14 extent that DER is planned and observable, that -- and  
15 able to be included in planning processes, that changes  
16 what costs are able to be avoided versus incremental  
17 DER. And there are different avoided costs for  
18 unplanned adopted DER. And that is, of course, in, you  
19 know -- in our discussion of the staff proposal, which  
20 proposes to include the recent adopted plans.

21 Q Okay. Thank you.

22 So turning to page 4, line 7, you say, "This  
23 aligns with Cal Advocates' guiding principle that 'the  
24 ACC should only include clearly identifiable and known  
25 costs' with which TURN concurs and further extends to



1 only costs that are truly avoidable."

2 So when you say "truly avoidable," does that  
3 exclude costs avoided by DER adoption by individual  
4 consumers in your view?

5 A I'm sorry. I'm -- can you say that one more  
6 time?

7 Q Yes. So you refer to costs that are truly  
8 avoidable on line 7. So does that exclude costs avoided  
9 by DER adoption by individual consumers?

10 MR. CHENG: Objection, your Honor.

11 I think you're assuming facts in your question.  
12 You're assuming the fact the costs are avoidable in your  
13 question.

14 ALJ LAU: Sustained.

15 Can you rephrase your question, Counsel?

16 MS. WHITE: Sure.

17 Q So -- so in your testimony, you state that the  
18 ACC -- well, you're quoting Cal Advocates, which states  
19 that the ACC should only include clearly identifiable  
20 unknown costs. And you say that TURN concurs. And then  
21 you say that, furthermore, this should extend to only  
22 costs that are truly avoidable.

23 So based on that, would you also exclude costs  
24 that are avoided by DER adoption?

25 MR. CHENG: Counsel, you're assuming the costs

1 are avoided, again, in your question.

2 MS. WHITE: Okay. I apologize. So doesn't  
3 it -- just to clarify your objection, doesn't it say in  
4 Ms. McGovern's testimony "costs that are truly  
5 avoidable"? So --

6 MR. CHENG: Right. But --

7 MS. WHITE: I mean, couldn't Ms. McGovern  
8 answer the question based on her understanding of what  
9 that means?

10 MR. CHENG: I think the issue is, Counsel, with  
11 your hypothetical. You're asking her if the costs are  
12 avoidable if they're avoided. So you're already  
13 assuming that the costs are avoidable in asking her if  
14 those costs should be considered avoidable.

15 MS. WHITE: I see. Okay. I guess -- I guess  
16 I'll reframe the question then.

17 Q So -- okay. So when you refer to costs that  
18 are truly avoidable, does that exclude costs that are  
19 avoidable by DER adoption?

20 MR. CHENG: I think we're facing the same  
21 issue. You're assuming that the costs are avoidable in  
22 your hypothetical.

23 ALJ LAU: I agree with Mr. Cheng. Maybe --  
24 yeah. Try rephrasing the question or just simply ask,  
25 like, what are the costs -- what DER-related costs are

1 truly avoidable? I don't know. I'm just throwing out  
2 suggestions.

3 BY MS. WHITE:

4 Q Okay. I guess -- I guess -- I think it would  
5 be helpful here to ask for clarity.

6 So I -- I think, Ms. McGovern, if you could  
7 explain the sentence "This aligns with Cal Advocates'  
8 guiding principle" and then "with which TURN concurs and  
9 further extends to only costs that are truly avoidable"?  
10 So if you could explain that, I think that would be  
11 helpful for clarity.

12 A Yeah. So if you want me to clarify what I mean  
13 by the statement, so this is -- clearly we're quoting  
14 Cal Advocates. And so part of the statement is theirs.  
15 My understanding of that part their statement is this  
16 idea that while individuals may bring DER to the  
17 system -- you know, you could put solar on your roof, or  
18 you might load shift -- all the costs -- how do I say  
19 this? There may be benefits that accrue to the  
20 individual. Or if you're thinking about the avoided  
21 costs of those maybe two particular different  
22 situations, someone putting solar on their house or  
23 someone load shifting, for example, the load serving  
24 entity may not be able to avoid the same costs. And it  
25 is important to not count in the ACC costs that aren't

1 able to be avoided just because the DER shows up on  
2 their system through individual DER deployment.

3 And, in fact, somewhere else in one of our  
4 testimonies, we discuss this idea of prosumers versus  
5 load shifting and how -- discuss in detail how some  
6 costs may not be able to be avoided if distribution  
7 requirements are -- still exist for the DER to function,  
8 for example. And so only costs that are able to be  
9 avoided through that DER deployment. I hope that's  
10 clarity.

11 Q Yes. So when you say "TURN concurs and further  
12 extends to only costs that are truly avoidable," you're  
13 saying truly avoidable through DER deployment; is that  
14 correct?

15 A So if we're -- this -- the ACC, Avoided Cost  
16 Calculator -- we, in this proceeding, are looking at  
17 accurately modeling and calculating avoided costs or  
18 constructing an Avoided Cost Calculator. Now, I'm aware  
19 that we are focusing on various types of DER, and we  
20 acknowledge in our testimony that this Avoided Cost  
21 Calculator or the output of the Avoided Cost Calculator  
22 continues to be used or applied in increasing numbers of  
23 settings. ]

24 So --

25 Q Okay.

1           A     -- what I'm saying is, I can't speak to the  
2 future universe of all proceedings and all applications  
3 of the ACC.

4           Q     Okay. Okay.

5                     So, you're saying, you can't speak to DER  
6 adoption by individual consumers?

7                     MR. CHENG: I don't believe --

8                     THE WITNESS: No.

9                             (Crosstalk.)

10 BY MS. WHITE:

11           Q     Okay. I -- I think I'll move on.

12                     Okay. So, on page 5, starting at line 12, you  
13 testify:

14                             If DER participants, through various  
15 programs that utilize the ACC, are able to  
16 lock in at a high ACC, this can create cost  
17 shifts to other customers.

18                     So, I was wondering if you could elaborate on  
19 your evidence for this cost shift?

20           A     So, I've written in testimony. And I've spoken  
21 about given -- various rate designs that -- if some  
22 fixed costs of the system are recovered through usage  
23 charges, there is potential when some group of customers  
24 adopt DER, and are compensated for that, they are  
25 pulling, potentially, their own load off of the system.

1 And while their customers, in a sort of theoretically  
2 perfect universe, might be paying a perfectly-calculated  
3 ACC for that energy, so that in theory they would be  
4 indifferent. Since the rate design is such that fixed  
5 costs of the system might be collected through usage  
6 charges, they are now potentially being collected  
7 through a subset of those customers, and that creates  
8 cost shift.

9 That problem is exacerbated, potentially, if  
10 the compensation to the DER owners is artificially high.  
11 So that -- that calculation of the ACC isn't perfect.  
12 There -- it's clearly no perfection. So the goal is the  
13 high-level of accuracy. Because of this com- --  
14 potentially compounding problem.

15 Q Yes. So have you seen any evidence of cost  
16 shift at -- in your role as an expert?

17 A Yeah. So, I work on rate design and cost  
18 allocation. And we have calculated these values of  
19 fixed system costs allocated across customer groups and  
20 within customer groups and compared those to monthly  
21 fixed charges and usage charges repeatedly, observed not  
22 matching in -- in various settings.

23 Q Okay. Oh, so is the cost shift, to which you  
24 referred, based on the ACC as currently instituted?

25 A So, the rate design that may create cost

1 shifting results from lots of potential goals and  
2 objectives by the Commission and the parties. And so,  
3 the resulting rate design is the -- is a contributing  
4 component to -- to the potential cost shift. The DER  
5 deployment is another potential ingredient.

6 Q Okay. Okay. I will go to page 5 of your  
7 rebuttal, and starting at line 11.

8 A Okay.

9 Q So you say:

10 Any artificial balance may generate an  
11 artificially high or low calculated avoided  
12 cost. And if DER participants, through various  
13 programs that utilize the ACC, are able to lock  
14 in at a high ACC, this can create cost shifts  
15 to other customers.

16 A Okay.

17 Q And so -- okay?

18 So, based on this, would you agree that  
19 accurate avoided costs are required?

20 A I think I put in my testimony somewhere that  
21 perfection is not possible. So, the goal is the  
22 accuracy.

23 Q Okay. So then, if there were -- in your  
24 opinion, if there were inaccurate avoided costs, would  
25 you have concerns about your cost shift analysis?

1 MR. CHENG: So -- sorry. I'm not understanding  
2 your question.

3 Can you link the two?

4 MS. WHITE: Yes. So, Ms. McGovern has suggest  
5 that accuracy is important. But, you know, you can't  
6 expect perfection.

7 So, I'm just clarifying in a more specific  
8 instance, where there might be inaccurate avoided costs,  
9 would that lead her to have any concerns about the cost  
10 shift analysis that you were just discussing?

11 MR. CHENG: So, can you clarify what you mean  
12 by "would have concerns"?

13 Are you asking her: If ACC is inaccurate, then  
14 would that affect cost shift?

15 Are you asking her: Would that result in less  
16 cost shift?

17 Or are you asking her if it results in more  
18 cost shift or if it would result in --

19 MS. WHITE: Yeah. So, I'm asking her if she  
20 believes her analysis would still be valid if it turned  
21 out that there were inaccurate avoided costs in the ACC.

22 THE WITNESS: So when you say my analysis would  
23 still be valid, are you talking about my statement that  
24 cost shifts can exist?

25 ///



1 BY MS. WHITE:

2 Q Uh- --

3 A Which analysis are you asking about?

4 Q I am actually asking about that, when you state  
5 cost shifts exist. Yes.

6 A Yeah. So -- so as a mathematician and an  
7 economist, I think that bounds and degrees of accuracy  
8 are important. And so, all inaccuracy is not equal. So  
9 the goal of accuracy can be defined by percentages or  
10 error bounds. So, I think that's a really large -- the  
11 -- there's a lot of variants in that statement. And so,  
12 I -- the statement that, you know, this -- an artificial  
13 bound that creates high or low ACC -- if the ACC is  
14 inaccurate, there may be additional cost shift. I don't  
15 know how to qualify that statement in a different way.

16 Q Okay. So, from my understanding of what you  
17 just said, so you were talking about error. So, I mean,  
18 I'm not a statistician --

19 A Mm-hm.

20 Q -- but would you say that if there were  
21 inaccurate avoided costs, your confidence -- your  
22 statistical confidence, I think -- okay. Your -- there  
23 would be a larger error -- room for error as part of  
24 your cost shift analysis. And if I misstated it, just  
25 statistically, you could just explain that.

1           A     I think what I'm saying and -- and I don't  
2 think it's a surprise to anybody that the -- the CPUC  
3 utilizes estimates and forecasts all of the time with  
4 inherent imperfections. And that does not -- that does  
5 not equal a statement that we are indifferent to all  
6 inaccuracies. So, the statement that an inaccurate ACC  
7 may cause cost -- cost shift, I have confidence in that  
8 statement. If the inaccuracies are larger, would the  
9 cost shifts be larger? Yes. That's possible. That  
10 doesn't change my confidence in my analysis or my  
11 statement.

12           Q     Okay. Thank you.

13                     Okay. So, I'm going to move on to page 7 at  
14 lines 22 to 23.

15           A     Okay.

16           Q     Okay. So, the goal it -- it says:

17                     The goal regarding accuracy of the ACC  
18                     takes as given the IRP and marginal  
19                     resource for the individual utility.

20           A     Mm-hm.

21           Q     So, Ms. McGovern, would you agree that the ACC  
22 does not have to take the IRP as a given?

23           A     I'm not an IRP expert. They -- the -- this  
24 proceeding is, from my understanding, for the purpose of  
25 designing the Avoided Cost Calculator. And it is

1 currently designed in a different way than the staff  
2 proposal. So, the -- the ACC, I think by the existence  
3 of what we're doing right now, can -- can change in  
4 methodology. I -- I can't -- I make no plans on the  
5 constraints of the CPUC to -- to alter that methodology.

6 Q Okay. I'll move on to page 8 of your rebuttal  
7 still, line 12.

8 A Line 12. Okay.

9 Q Yeah.

10 So, here you say that the utility is not able  
11 avoid infrastructure investment because of that DER  
12 participation and, in fact, may make investments to  
13 accommodate the DER.

14 So, do you make any citations to support this  
15 claim?

16 MR. CHENG: Counsel, I think the document  
17 speaks for itself. If there's a citation, you would see  
18 it.

19 MS. WHITE: Okay. I -- I'll -- I'll move on to  
20 my next question.

21 BY MS. WHITE:

22 Q Okay. Let's see.

23 So, instead, we can go to page 9, line 9?

24 A Okay.

25 Q Okay. So here it says --

1 (Reporter clarification.)

2 MS. WHITE: Yes. Sorry.

3 Q Okay.

4 In designing DER policies, the Commission  
5 must ensure that DER customer incentives or  
6 compensation do not unfairly shift recovery  
7 of shared costs to non-DER customers,  
8 particularly members of disadvantaged and  
9 low-income communities.

10 So, do you think it is fair for low-income  
11 consumers to be paying for undergrounding in high-income  
12 communities?

13 MR. CHENG: Objection, your Honor. It's beyond  
14 the scope of the proceeding.

15 ALJ LAU: I'm going to sustain that objection.

16 And, Ms. White, can -- yeah. I don't know if  
17 you want -- if you can tie it.

18 MS. WHITE: I guess -- I guess, it -- at this  
19 point, I'll just move on to my next question.

20 Q Okay. So, Ms. McGovern, have you ever  
21 attempted to use accurate avoided transmission costs  
22 when assessing whether any cost shift actually exists?

23 MR. CHENG: Counsel, can you explain what you  
24 mean by "accurate transmission costs"?

25 ///

1 BY MS. WHITE:

2 Q Yeah. So, I just -- first, I can ask whether  
3 TURN has attempted to calculate avoided transmission  
4 costs?

5 A Yes. Well -- excuse me. I have worked on  
6 proceedings where we calculate allocated transmission  
7 costs.

8 Q Okay. So, while doing that, have you tried to  
9 use those values to calculate whether a cost shift  
10 exists?

11 MR. CHENG: Sorry. I -- objection. We're --  
12 I'm not even sure how we're -- the question is tied to  
13 this proceeding, Counsel.

14 ALJ LAU: I agree that it's a little bit beyond  
15 -- off scope, unless, Counsel, you can tie it to  
16 somewhere in the witness' testimony.

17 MS. WHITE: I guess, it is referring to cost  
18 shift, which Ms. McGovern discusses. And it's referring  
19 to the importance of accurate avoided transmission  
20 costs, which are part of calculating whether there is a  
21 cost shift or to what extent there is a cost shift.  
22 That --

23 MR. CHENG: Ms. McGovern doesn't discuss  
24 avoided transmission costs in the discussion of the cost  
25 shift.

1 BY MS. WHITE:

2 Q Is that correct?

3 Okay. Well, I will just -- okay. I'll just  
4 move on to a different analysis of cost shift.

5 Ms. McGovern, when you are talking about cost  
6 shifts in your testimony, would you say that you are  
7 comparing one group of ratepayers against another?

8 A I am conceptually comparing DER adopters, or  
9 participants, with non-participants and non-adopters,  
10 combined with my knowledge of rate design and cost  
11 allocation.

12 Q Okay. So, would you say that it's fair to say  
13 that you're not looking at shareholders as compared to  
14 ratepayers?

15 A That wasn't part of this -- this testimony.

16 Q Okay.

17 A The analysis of shareholders.

18 Q Okay. Could you elaborate on why it wasn't  
19 part of the testimony?

20 MR. CHENG: Your Honor, I think we already  
21 established it's not in the testimony.

22 ALJ LAU: Ms. White, I think she already  
23 answered your question, that she's comparing DER  
24 participants versus non-DER participants.

25 MS. WHITE: Yes. So, I think what -- what my

1 question is trying to get at is: When discussing the  
2 cost shift, you can compare ratepayers to each other; or  
3 you can compare the benefit to ratepayers versus  
4 shareholders.

5 So what I'm asking is: Why -- why Ms. McGovern  
6 -- why she looked at an analysis of ratepayers versus  
7 ratepayers rather than ratepayers versus shareholders,  
8 your Honor.

9 ALJ LAU: Okay. Ms. McGovern --

10 MR. CHENG: Asked --

11 ALJ LAU: Let -- I'm going to try to let  
12 Ms. McGovern answer that question.

13 THE WITNESS: So, the scoping memo asked three  
14 questions. The first question was in addressing, for  
15 us, the accuracy of the Avoided Cost Calculator. The  
16 second question was about guiding principles, which we  
17 included. And the third question, in part, we  
18 considered as application of -- of the ACC, along with  
19 other DER, cost-effectiveness issues. And that's -- we  
20 were a- -- we were attempting to answer the three  
21 questions in the scoping memo.

22 BY MS. WHITE:

23 Q Okay. Okay.

24 I believe that is all my questions,  
25 Ms. McGovern.

1           Thank you for your time, everyone. I  
2 appreciate it.

3           ALJ LAU: Mr. Cheng, do you have any redirect  
4 for Ms. McGovern?

5           MR. CHENG: No redirect, your Honor.  
6 Thank you.

7           ALJ LAU: Thank you.

8           Ms. McGovern, thank you for your time today.  
9 You may be excused.

10          So, we can take Ms. McGovern off the stage.

11          THE WITNESS: Thank you.

12          ALJ LAU: Thank you.

13          Mr. Cheng and Ms. White, IT, we can also take  
14 them both off the stage.

15          I believe, at this juncture, I'm happy to say  
16 that we have concluded all the cross-examination of  
17 witnesses scheduled for the evidentiary hearing. We are  
18 now almost into the conclusion of the evidentiary  
19 hearing. And I'm just going to go off record to discuss  
20 procedural matters.

21          So, let's go off the record. ]

22          (Off the record.)

23          ALJ LAU: Let's go back on the record.

24          I will now mark and identify four -- not --  
25 mark and identify exhibits -- the following four



1 exhibits:

2           Exhibit CA-04, which is titled: Second Errata  
3 to the Opening Testimony of the Public Advocates Office.

4           (Exhibit CA-04 was marked for  
5 identification.)

6           ALJ LAU: The second exhibit is identi  
7 -- marked and identified as PCF-10E, which is titled:  
8 Reporter's Transcript in R.20-08-002, Volumes 5 and 9.

9           (Exhibit PCF-10E was marked for  
10 identification.)

11           ALJ LAU: The third exhibit is IOU-04, which is  
12 titled: Revisions to Appendix A, Page A-12, Table 5.

13           (Exhibit IOU-04 was marked for  
14 identification.)

15           ALJ LAU: Fourth exhibit is SoCalGas-01E, which  
16 is titled: Errata to Prepared Direct Testimony of  
17 Southern California Gas Company.

18           (Exhibit SoCalGas-01E was marked for  
19 identification.)

20           ALJ LAU: So now, I can take motions for  
21 entering exhibits into evidence.

22           Do we have counsel for California Large Energy  
23 Consumers Association?

24           MR. HAFEZ: This is Samir Hafez on behalf of  
25 the California Large Energy Consumers Association.

1 ALJ LAU: Would you like -- go ahead.

2 MR. HAFEZ: Yes, your Honor. I move for the  
3 admission of exhibits marked as CLE-01 and CLE-02.

4 These exhibits have been stipulated to.

5 ALJ LAU: Okay. For entry into evidence? Are  
6 there are --

7 MR. HAFEZ: Yes.

8 ALJ LAU: Are there any objections?

9 (No response.)

10 ALJ LAU: All right. Hearing none. CLE-01 and  
11 CLE-02 are entering into evidence.

12 Thank you.

13 (Exhibit CLE-01 was received into evidence.)

14 (Exhibit CLE-02 was received into evidence.)

15 ALJ LAU: Can I have Mr. Lin on stage?

16 Mr. Lin, can you just make motions for the  
17 stipulated exhibit for now?

18 MR. LIN: Yes, your Honor. Motion to admit  
19 Exhibit CBD-01 into the record.

20 ALJ LAU: Any objections?

21 (No response.)

22 ALJ LAU: Hearing none. CBD-01 is entering  
23 into evidence.

24 (Exhibit CBD-01 was received into evidence.)

25 ALJ LAU: Can we bring forth Clean Coalition?

1 MR. HAGA: We have a hand up from a Ben  
2 Schwartz.

3 ALJ LAU: Okay. Yes, can you elevate Ben  
4 Schwartz to the stage?

5 MR. HAGA: Mr. Schwartz, you should be able to  
6 activate your mic and camera from your location.

7 MR. SCHWARTZ: There we go.

8 Your Honor, this is Ben Schwartz here with the  
9 Clean Coalition, and I am wondering whether I can move  
10 that CLC-01 and 02 be moved into the record.

11 ALJ LAU: Any objections?

12 (No response.)

13 ALJ LAU: All right. CLC-01 and CLC-02 are  
14 moved into evidence.

15 (Exhibit CLC-01 was received into evidence.)

16 (Exhibit CLC-02 was received into evidence.)

17 ALJ LAU: Thank you, Mr. Schwartz.

18 MR. SCHWARTZ: Thank you.

19 ALJ LAU: Let's have Coalition of California  
20 Utility Employees.

21 MR. LIN: Your Honor, this is Roger Lin from  
22 Center for Biological Diversity again.

23 I did not make a motion for CBD-02, because  
24 that was not stipulated to by Cal Advocates; is that  
25 okay?

1 ALJ LAU: Yeah, I understand. That -- that --  
2 we will take motion for that later.

3 MR. LIN: Okay.

4 ALJ LAU: All right. Let's -- do we have --  
5 who is counsel for Coalition of -- for CUE?

6 MR. SEZGEN: I -- I can motion if they're not  
7 here.

8 ALJ LAU: Okay.

9 MR. SEZGEN: Motion to admit CUE-01 and  
10 CUE-02E, which have been stipulated, into evidence.

11 ALJ LAU: All right. Thank you.

12 Any objections?

13 (No response.)

14 ALJ LAU: Hearing none. CUE-01 and CUE-02E are  
15 entered into evidence.

16 (Exhibit CUE-01 was received into evidence.)

17 (Exhibit CUE-02E was received into evidence.)

18 ALJ LAU: Do we have counsel for Google LLC?

19 MR. DOUGLASS: Good afternoon, your Honor.

20 This is Dan Douglass, counsel for Google LLC.

21 I would like to move for admission Exhibit  
22 GGL-01, which has been stipulated to by other parties.

23 ALJ LAU: Thank you. Any objections?

24 (No response.)

25 ALJ LAU: Hearing none, GGL-01 is entered into

1 evidence.

2 (Exhibit GGL-01 was received into evidence.)

3 MR. DOUGLASS: Thank you, your Honor.

4 ALJ LAU: Thank you.

5 Let's put Mr. Sezgen back on stage.

6 MR. SEZGEN: Yes. Motion to admit Exhibits  
7 IOU-01, IOU-02 and IOU-03, which have been stipulated  
8 into evidence.

9 ALJ LAU: Any objections?

10 (No response.)

11 ALJ LAU: Hearing none, IOU-01, IOU-02 and  
12 IOU-03 are entered into evidence.

13 (Exhibit IOU-01 was received into evidence.)

14 (Exhibit IOU-02 was received into evidence.)

15 (Exhibit IOU-03 was received into evidence.)

16 ALJ LAU: Let's bring forth Natural Resources  
17 Defense Council.

18 MR. SEZGEN: Quick question for IOU-04, which  
19 is the new one. Should I motion that in now or -- or  
20 later?

21 ALJ LAU: Later.

22 MR. SEZGEN: Okay.

23 ALJ LAU: Let's do all the stipulated first.

24 MR. SEZGEN: Thank you.

25 ALJ LAU: Natural Resources Defense Council.

1 David Pettit, I believe.

2 MR. SEZGEN: I am not sure that he is on right  
3 now, so I can -- I can do that as well.

4 ALJ LAU: All right.

5 MR. SEZGEN: Motion to admit Exhibits NRDC-01  
6 and NRDC-02, which have been stipulated, into evidence.

7 ALJ LAU: All right. Motion granted NRDC-01  
8 and NRDC-02 are entered into evidence barring any -- I  
9 mean, like, if there's no objections.

10 (Exhibit NRDC-01 was received into evidence.)

11 (Exhibit NRDC-02 was received into evidence.)

12 ALJ LAU: All right. What about Ms. White?  
13 Can we put Ms. White on stage?

14 MS. WHITE: Okay. Hello, your Honor.

15 So, I would like to motion PCF-01, PCF-02,  
16 PCF-03, PCF-04, PCF-05, PCF-06, PCF-07, PCF-08, PCF-09,  
17 PCF-11, PCF-12, and PCF-13.

18 ALJ LAU: Any objections to entering those into  
19 evidence?

20 (No response.)

21 ALJ LAU: Hearing none. Those exhibits are  
22 entered into evidence.

23 MS. HERBERT: Your Honor --

24 MR. HSU: Your Honor --

25 MS. HERBERT: -- Mr. Hsu has his hand up.

1 ALJ LAU: Oh, okay. Mr. Hsu?

2 MR. HSU: I apologize, your Honor. I think P  
3 -- PCF-13 was the one we had a discussion --

4 ALJ LAU: Okay.

5 MR. HSU: Sorry, I -- it was my mistake. I  
6 apologize. I have -- I have no issue. I apologize,  
7 counsel.

8 ALJ LAU: Okay. So, I am not amending my  
9 ruling. PCF-01 through PCF-13 remains entered into  
10 evidence.

11 Let's have Mr. --

12 MS. WHITE: Sorry, your Honor, PCF-10 is the  
13 one that has the errata, so.

14 ALJ LAU: Oh, right. Sorry, let me amend my  
15 earlier statement.

16 That PCF-01 through PCF-09 and PCF-11 through  
17 PCF 13 are entered into evidence.

18 (Exhibit PCF-01 was received into evidence.)

19 (Exhibit PCF-02 was received into evidence.)

20 (Exhibit PCF-03 was received into evidence.)

21 (Exhibit PCF-04 was received into evidence.)

22 (Exhibit PCF-05 was received into evidence.)

23 (Exhibit PCF-06 was received into evidence.)

24 (Exhibit PCF-07 was received into evidence.)

25 ///

1 (Exhibit PCF-08 was received into evidence.)

2 (Exhibit PCF-09 was received into evidence.)

3 (Exhibit PCF-11 was received into evidence.)

4 (Exhibit PCF-12 was received into evidence.)

5 (Exhibit PCF-13 was received into evidence.)

6 ALJ LAU: Now, let's bring forth Mr. Dutta from  
7 Cal Advocates.

8 MR. DUTTA: Thank you, your Honor.

9 Cal Advocates would like to move into evidence  
10 CA-01, CA-01E, CA-02 and CA-03, which have all been  
11 stipulated to.

12 ALJ LAU: All right. Any objections?

13 (No response.)

14 ALJ LAU: Hearing none, I will admit -- we will  
15 enter into evidence CA-01, CA-01E, CA-02 and CA-03.

16 (Exhibit CA-01 was received into evidence.)

17 (Exhibit CA-01E was received into evidence.)

18 (Exhibit CA-02 was received into evidence.)

19 (Exhibit CA-03 was received into evidence.)

20 ALJ LAU: Let's bring forth counsel for Small  
21 Business Utility Advocates.

22 MS. WEBERSKI: Good afternoon, your Honor,  
23 Jennifer Weberski on behalf of SBUA.

24 I make a motion to move SBUA-01 and SBUA-02  
25 into the record. They are both stipulated.



1 ALJ LAU: All right. Thank you.

2 Any objections from the parties?

3 (No response.)

4 ALJ LAU: No objections. We will enter into  
5 the record SBUA-01 and SBUA-02.

6 (Exhibit SBUA-01 was received into evidence.)

7 (Exhibit SBUA-02 was received into evidence.)

8 MS. WEBERSKI: Thank you, your Honor.

9 ALJ LAU: Thank you.

10 Can we bring forth Solar Energy Industries  
11 Association?

12 MS. ARMSTRONG: Yes, your Honor. Jeanne  
13 Armstrong for the Solar Energy Industries Association.

14 I would move exhibit SEIA-01 through SEIA-04  
15 into the record. They have been stipulated to.

16 ALJ LAU: Okay. Thank you.

17 Any objections from the parties?

18 (No response.)

19 ALJ LAU: Hearing none. SEIA-01 through  
20 SEIA-04 are entered into evidence.

21 (Exhibit SEIA-01 was received into evidence.)

22 (Exhibit SEIA-02 was received into evidence.)

23 (Exhibit SEIA-03 was received into evidence.)

24 (Exhibit SEIA-04 was received into evidence.)

25 ALJ LAU: Let's bring forth Mr. Hsu.

1 MR. HSU: Thank you, your Honor.

2 SoCalGas moves to enter into evidence  
3 SoCalGas-02, which has been stipulated by the parties.

4 ALJ LAU: And what about SoCalGas-01?

5 MR. HSU: And SoCalGas-01, your Honor.

6 ALJ LAU: Okay.

7 MR. HSU: I -- I wasn't -- I'm sorry, your  
8 Honor. I was confused at first whether or not you  
9 wanted the errata. Like, the errata just -- or the  
10 errata itself, correct?

11 ALJ LAU: Yes.

12 MR. HSU: I apologize. Yes. Thank you for  
13 clearing that up, your Honor.

14 We move both SoCalGas-01 and SoCalGas-02 to be  
15 entered into evidence. They've been stipulated to.

16 Thank you.

17 ALJ LAU: All right. Any objections from the  
18 parties?

19 (No response.)

20 ALJ LAU: Hearing none, SoCalGas-01 and  
21 SoCalGas-02 are entered into evidence.

22 Thank you, counsel.

23 (Exhibit SoCalGas-01 was received into  
24 evidence.)

25 ///

1 (Exhibit SoCalGas-02 was received into  
2 evidence.)

3 ALJ LAU: Let's bring forth Mr. Cheng, David  
4 Cheng.

5 MR. CHENG: Thank you, your Honor.

6 I would like to motion to move TURN-01 and  
7 TURN-02 into evidence.

8 ALJ LAU: Any objections?

9 (No response.)

10 ALJ LAU: Hearing none, TURN-01 and TURN-02 are  
11 entered into evidence.

12 (Exhibit TURN-01 was received into evidence.)

13 (Exhibit TURN-02 was received into evidence.)

14 ALJ LAU: Let's -- yeah, let's put Mr. Cheng  
15 off stage.

16 Now, I have 4 -- I have Exhibit CA-4.

17 Does counsel want to motion to enter CA-04 into  
18 evidence?

19 MR. DUTTA: Thank you, your Honor.

20 Cal Advocates moves to admit CA-04.

21 ALJ LAU: Any objections from the parties?

22 I will give 30 seconds or a minute for people  
23 to raise their virtual hands. Annalissa, can you  
24 monitor the list for me?

25 MS. HERBERT: Yes, your Honor. I am

1 monitoring, and I don't see hands raised as of yet.

2 ALJ LAU: All right. Hearing no objections,  
3 CA-04 is entered into evidence.

4 (Exhibit CA-04 was received into evidence.)

5 ALJ LAU: Okay. Is there --- let's bring  
6 forth -- or Mr. Dutta down from the stage.

7 Is there any motions for entry into evidence  
8 for PCF-10E?

9 MS. WHITE: Yes. I would like to make a motion  
10 for PCF-10E E as well as PCF-16.

11 ALJ LAU: Okay. We can address both actually,  
12 yes.

13 PCF-10E, are there any objections to entering  
14 that exhibit into evidence? Please raise your virtual  
15 hand and Annalissa will monitor the panelist list for  
16 me.

17 (No response.)

18 ALJ LAU: Annalissa, do you see any hands  
19 raised?

20 MS. HERBERT: No, your Honor. No, I do not see  
21 any hands raised at this time.

22 ALJ LAU: All right. Hearing no objection,  
23 PCF-10E is entered into evidence.

24 (Exhibit PCF-10E was received into evidence.)

25 ALJ LAU: Are there any objections to entering

1 PCF-16 into evidence?

2 (No response.)

3 ALJ LAU: Annalissa, do you see any -- any arms  
4 raised -- virtual hands raised?

5 MS. HERBERT: Your Honor, I do not.

6 ALJ LAU: All right. Then PCF-16 is entered  
7 into evidence.

8 (Exhibit PCF-16 was received into evidence.)

9 ALJ LAU: Are there any motions for  
10 SoCalGas-01E to be entered into evidence?

11 MR. HSU: Yes, thank you, your Honor. SoCalGas  
12 would like to move that into evidence.

13 ALJ LAU: Any objections from the parties?  
14 Please raise your virtual hand.

15 (No response.)

16 ALJ LAU: Annalissa, do you see any virtual  
17 hands raised?

18 MS. HERBERT: No, your Honor, I do not.

19 ALJ LAU: Okay. All right. Hearing no  
20 objection, SoCalGas-01E is entered into evidence.

21 (Exhibit SoCalGas-01E was received into  
22 evidence.)

23 MR. HSU: Thank you, your Honor.

24 ALJ LAU: Thank you.

25 Are there any other motions to enter additional

1 exhibits into evidence?

2 Let's have Mr. Lin put forth on stage. Oh.

3 MR. SEZGEN: Oh, apologies, your Honor.

4 PG&E would like to admit Exhibit IOU-4 into  
5 evidence.

6 ALJ LAU: Thank you, Mr. Sezgen.

7 Any objection to entering IOU-04 into evidence?

8 (No response.)

9 ALJ LAU: Annalissa, do you see any virtual  
10 hands raised?

11 MS. HERBERT: No, your Honor, I do not.

12 ALJ LAU: All right. Hearing no objections,  
13 IOU-04 is entered into evidence.

14 (Exhibit IOU-04 was received into evidence.)

15 ALJ LAU: Now, I am taking motions to enter any  
16 remaining exhibits into evidence.

17 I believe Mr. Lin was going to make a motion.

18 MR. LIN: Yes, your Honor. I move to admit  
19 Exhibit CBD-02 as evidence.

20 ALJ LAU: Any objections to CBD-02 into  
21 evidence?

22 MR. DUTTA: Yes, your Honor, from Cal  
23 Advocates.

24 ALJ LAU: Okay. Any other parties?

25 Annalissa, can you monitor the virtual hands

1 and see if anyone raised any virtual other than  
2 Mr. Dutta?

3 MR. HERBERT: No other parties have raised  
4 their hand, your Honor.

5 ALJ LAU: All right.

6 Mr. Dutta, can you raise your objection? Would  
7 you mind turning on your camera?

8 MR. DUTTA: Yes, your Honor.

9 Your Honor, in a nutshell, Exhibit 2 of Cal --  
10 of CBD consists of a proposed decision. It has no legal  
11 effect right now, and it is not -- and for that reason,  
12 it is not relevant to this proceeding; and on that  
13 basis, we object to the admission into evidence of that  
14 exhibit.

15 ALJ LAU: We can take official notice. Even  
16 though it's not -- it's not an official Commission  
17 decision, we can take official notice of the proposed  
18 decision.

19 I -- would you be amenable to that counsel,  
20 Mr. Lin?

21 MR. DUTTA: Thank you for the question, your  
22 Honor, your Honor.

23 Your Honor, what is problematic here is the  
24 relevance. Since this is a proposed decision, as  
25 everybody knows, proposed decisions can be amended if it

1 is not final; and so, it doesn't -- it has no effect at  
2 the moment.

3 I mean, it would be a different matter, your  
4 Honor, if this were an actual ruling from the  
5 Commission, but it's not.

6 ALJ LAU: Mr. Lin, did you want to make your  
7 case?

8 MR. LIN: Just -- I would just -- if Mr. Dutta  
9 can show some authority about how a proposed decision  
10 versus formally voted decision should not be included as  
11 evidence, I -- I would welcome that, but I am not aware  
12 of any authority in that regard.

13 ALJ LAU: So, I -- I will rule to take official  
14 notice of the proposed decision of ALJ Fitch in  
15 R.20-05-003. So, you know, we are just taking official  
16 notice that the decision was issued not for any facts  
17 that were stated therein.

18 So -- and we will call that Exhibit CBD-02 and  
19 enter that into evidence.

20 MR. LIN: And, your Honor, since the --

21 ALJ LAU: Wait, let me think. If I am -- if I  
22 am taking official notice of it, we are not entering  
23 that into evidence, so we are just taking official  
24 notice of proposed decision of ALJ Fitch. I'm sorry. I  
25 apologize.



1 MR. LIN: And, your Honor, once the decision --  
2 the proposed decision is voted on, then how does that  
3 effect the -- the facts in the proposed decision?

4 ALJ LAU: Then, you know, we can -- we can  
5 refer to that Commission decision as the Commission  
6 decision. If that -- there needs to be more  
7 clarification and briefing or whatnot, please send me an  
8 email through the service list. Right now, it's all  
9 hypothetical, and I can't answer the questions that  
10 well.

11 So, CBD is not -- CBD-02 is not entered into  
12 evidence, but we will take official notice of the  
13 proposed decision of ALJ Fitch in R.20-05-003.

14 MR. LIN: Okay. Sounds good.

15 ALJ LAU: Great, thank you.

16 Any other exhibits that need to be entered into  
17 evidence?

18 MR. DUTTA: Your Honor, just a point of  
19 clarification. Is -- CA-04 has been entered, correct?  
20 I want to be sure. I believe it has been.

21 ALJ LAU: Yes, CA-0 4 has been entered into  
22 evidence.

23 MR. DUTTA: Thank you.

24 ALJ LAU: But let's go off the record.

25 (Off the record.)

1 ALJ LAU: All right. Let's go back on the  
2 record.

3 Are there any other -- are there any further  
4 motions for entering additional exhibits into evidence?

5 (No response.)

6 ALJ LAU: All right. There have been some  
7 exhibits that have been withdrawn. If counsel for  
8 those, you know, parties can raise their hands and let  
9 us know which -- which exhibit is withdrawn. In fact,  
10 let me actually just have Mr. Sezgen speak on behalf of  
11 the parties, because he prepared the -- the list of  
12 stipulated exhibits.

13 Mr. -- Mr. Sezgen, can you clarify for the  
14 record which exhibits have been withdrawn for entry into  
15 evidence?

16 MR. SEZGEN: Yes, your Honor. Exhibit PCF-15  
17 has -- has been withdrawn by PCF and Exhibit SEIA-05 has  
18 been withdrawn by SEIA.

19 ALJ LAU: All right. Thank you, counsel.

20 We can take Mr. Sezgen off stage.

21 We are coming to the conclusion of the  
22 evidentiary hearing. I believe that I addressed all  
23 procedural matters and -- but before we conclude, I do  
24 want to ask parties if there are other procedural  
25 matters to be addressed?

1 Mr. Sezgen?

2 MR. SEZGEN: I do. Just -- just one matter for  
3 the common briefing outline that --

4 ALJ LAU: Ah, go ahead.

5 MR. SEZGEN: -- we briefly mentioned on -- on  
6 Tuesday. When -- when would you like that to be served?

7 ALJ LAU: I think what I desire is for the  
8 parties to all -- you know, like, get together and for  
9 the ease of, like, me and probably Commission staff  
10 that -- you know, I think whatever timeline works for  
11 the parties such that they have enough time to brief the  
12 matter.

13 Mr. Sezgen, do you have an inkling on a good  
14 timeline?

15 MR. SEZGEN: I think -- I think next -- by end  
16 of next week. We have a -- we have a meet and confer  
17 issue list that SCE put together. I think that's a good  
18 -- that's a framework there, so it shouldn't take too  
19 long.

20 ALJ LAU: So, by -- by February 2nd. If you  
21 need more time, just ask me but CC the service list for  
22 email if you need more time.

23 MR. SEZGEN: Okay. Thank you, your Honor.

24 ALJ LAU: All right. Thank you.

25 Any other procedural matters?

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(No response.)

ALJ LAU: Any other questions or concerns?

(No response.)

ALJ LAU: Annalissa, can you confirm and just look through the panelist that I am not missing anything or anyone?

MS. HERBERT: No one has their hands raised at this time, your Honor.

ALJ LAU: All right. Thank you for -- everyone for their participation in this three-day journey.

We are concluding our -- the evidentiary hearings regarding issues related to the 2024 Avoided Cost Calculator update.

Thank you all for your participation. We are now adjourned and off the record.

(At the hour of 4:13 p.m., this matter having been concluded, the Commission then adjourned.)

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