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

Expedited Application of Pacific Gas and
Electric Company Under the Power Charge
Indifference Adjustment Trigger.

(U 39 E)

Application No. 20-09-014
(Filed September 28, 2020)

**JOINT PREHEARING CONFERENCE STATEMENT OF
PACIFIC GAS AND ELECTRIC COMPANY, THE PUBLIC
ADVOCATES OFFICE, THE UTILITY REFORM
NETWORK, ALLIANCE FOR RETAIL ENERGY
MARKETS, DIRECT ACCESS CUSTOMER COALITION,
THE CALIFORNIA COMMUNITY CHOICE ASSOCIATION
AND THE JOINT COMMUNITY CHOICE AGGREGATORS**

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Dated: October 28, 2020

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Pursuant to Administrative Law Judge ("ALJ") Toy's email *Ruling Setting Protest And Protest Response Due Dates, and Noticing Prehearing Conference*, dated October 14, 2020, and email *Ruling Directing Parties to Meet and Confer and File Prehearing Conference Statement and Providing Prehearing Conference Information*, dated October 20, 2020, Pacific Gas and Electric Company ("PG&E"), the Public Advocates Office ("Cal Advocates"), The Utility Reform Network (TURN), Alliance for Retail Energy Markets ("AReM"), Direct Access Customer Coalition ("DACC"), the California Community Choice Association ("CalCCA"), and the Joint Community Choice Aggregator ("Joint CCAs")^{1/} hereby submit a joint prehearing conference ("PHC") statement. This joint statement identifies areas of agreement and disagreement among the parties with respect to the scope and schedule for the proceeding and briefly sets forth the positions of the parties on those issues. The joint statement also identified speakers for parties at the upcoming prehearing conference.

^{1/} The Joint CCAs are comprised of the following ten community choice aggregators: Central Coast Community Energy, CleanPowerSF, East Bay Community Energy, Marin Clean Energy, Peninsula Clean Energy Authority, Pioneer Community Energy, San José Clean Energy, Silicon Valley Clean Energy Authority, Sonoma Clean Power, and Valley Clean Energy Alliance. CalCCA is also coordinating with the Joint CCAs.

I. BACKGROUND

On September 28, 2020, PG&E filed the above-captioned seeking to implement the “trigger” portion of the “cap and trigger” mechanism in D.18-10-019, Ordering Paragraph 10, which directs PG&E to file an application for expedited approval within 60 days once the PCIA Undercollection Balancing Account (“PUBA”) undercollection reaches a certain threshold. The following parties filed timely protests to the Application pursuant to Rule 2.6 of the Commission’s Rules of Practice and Procedure: the Public Advocates Office, TURN, AReM/DACC, and the Joint CCAs. On October 23, PG&E filed its reply to the protests.

The October 20, 2020 email ruling from the assigned ALJ directed the parties to meet and confer and file a joint prehearing conference statement that presents the parties positions on scope and scheduling and also provide a list of speakers for the PHC. Pursuant to the October 20, 2020 email ruling, the parties met and conferred telephonically on October 23, 2020, to discuss and attempt to reach agreement on the issues set forth in the ruling. Approximately 30 persons attended the teleconference. The parties were able to reach agreement as to a proposed schedule and several of the factual and legal issues to be decided in this proceeding. The parties’ agreements are described below. The parties were not able to reach agreement as to two issues proposed to be decided in this proceeding. These issues are addressed below. With respect to issues on which the parties could not agree, the parties’ positions are briefly set forth herein.

II. DISCUSSION OF ISSUES

A. Factual and Legal Issues.

As a result of meet and confer discussions, the parties have agreed that the following are issues that will need to be determined by the Commission in this proceeding:^{2/}

^{2/} The parties did not reach agreement as to other legal and factual issues proposed to be determined in this proceeding, and those issues are identified below.

1. *Whether PG&E has satisfied the requirements of D.18-10-019 to file an expedited application?*
2. *Whether the Commission should adopt a projected \$252.8 million undercollection of the PUBA?*
3. *Whether the Commission should authorize PG&E to refund \$252.8 million to bundled service customers?*

Although not necessary to include as separate scoping issues, the parties also agree that any final decision in this proceeding will need to recognize or be coordinated with the outcome of other pending proceedings, such as PG&E’s ERRA Forecast proceeding. Further, the parties also agreed to address at a future date the issue of whether a Tier 1 or Tier 2 advice letter is appropriate to implement a final decision from this proceeding.

The parties did not reach agreement with respect to two issues to be determined by the Commission in this proceeding. The following are the disputed issues, with parties’ positions supporting and opposing the proposed issue set forth below.

4. *Whether the Commission should adopt PG&E’s cost recovery proposal to amortize the PUBA balance over a 12-month amortization period beginning on January 1, 2021 and ending December 31, 2021 [for some other period]?*

Parties Supporting Issue (without bracketed text)^{3/}	Parties Supporting Issue (with bracketed text)^{4/}
<p>D.18-10-019 established a formulaic, mechanistic process to reach an expedited decision within 60 days of filing the application. PG&E has further designed its application to facilitate a timely decision on its proposal (<i>e.g.</i>, relies on recorded actuals, approved forecasts, approved allocation factors). Expanding the scope to consider alternative amortization proposals is unnecessary and will only delay resolution. It is sufficient to evaluate whether PG&E’s</p>	<p>In the event PG&E’s amortization proposal is not adopted, the Commission should adopt an alternative approach.</p>

^{3/} The following parties have confirmed they support excluding the bracketed text: PG&E.

^{4/} The following parties have confirmed they support including the bracketed text: Joint CCAs, TURN, Cal Advocates, and AReM/DACC.

proposed approach is reasonable and, if so, adopt it.	
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5. *Whether the Commission should approve PG&E's proposed revenue requirement and rate calculation methodology for determining the vintage specific PUBA rate adder to be applied in addition to the authorized PCIA rates for eligible departing load customers [for some other rate proposal]?*

Parties Supporting Issue (without bracketed text) ^{5/}	Parties Supporting Issue (with bracketed text) ^{6/}
D.18-10-019 established a formulaic, mechanistic process to reach an expedited decision within 60 days of filing the application. PG&E has further designed its application to facilitate a timely decision on its proposal (e.g., relies on recorded actuals, approved forecasts, approved allocation factors). Expanding the scope to consider alternative rate proposals is unnecessary and will only delay resolution. It is sufficient to evaluate whether PG&E's proposed approach is reasonable and, if so, adopt it.	In the event PG&E's rate proposal is not adopted, the Commission should adopt an alternative approach.

B. Proposed Schedule.

The parties were able to reach general agreement with respect to the proposed schedule for this proceeding. PG&E appreciates the willingness of the parties to support an expedited schedule in this proceeding and further acknowledges the challenges that the schedule below creates for both the assigned ALJ and the parties. While the schedule below does not lead to a final decision within the 60-day period outlined in D.18-10-019, it does provide for a final decision in time for PG&E to implement the decision in rates on January 1, 2021:^{7/}

^{5/} The following parties have confirmed they support excluding the bracketed text: PG&E.

^{6/} The following parties have confirmed they support including the bracketed text: Joint CCAs, TURN, Cal Advocates, and AReM/DACC.

^{7/} It is PG&E's position that this schedule can only achieve implementation of rates on January 1, 2021, if those rates are implemented via a Tier 1 advice letter.

Event	Revised Proposal
PG&E files Application	September 28, 2020
Protests Filed	October 19, 2020
Reply filed	October 23, 2020
Prehearing Conference	October 30, 2020
Scoping Memo Issued	November 4, 2020
Technical Workshop	~November 9, 2020 ^{8/}
Meet and Confer to Stipulate to Admission of Exhibits	November 11, 2020
Opening Briefs	November 17, 2020
Reply Briefs	November 24, 2020
Proposed Decision	December 1, 2020
Opening Comments (expedited)	December 8, 2020
Reply Comments (expedited)	December 15, 2020
Final Decision	December 17, 2020

C. Party Representatives/Speakers at PHC.

The following parties have identified their speakers for the upcoming prehearing conference on October 30, 2020:

AReM/DACC – Dan Douglass, Mark Fulmer

Cal Advocates – Christopher Clay

Joint CCAs – Tim Lindl

PG&E – Tyson Smith

TURN – Matthew Freedman

^{8/} Exact date and time to be determined after coordinating among the parties regarding representative and witness availability.

III. CONCLUSION

The parties appreciate this opportunity to submit their positions on these issues in advance of the PHC and look forward to working with the ALJ and Assigned Commissioner in this proceeding.

Respectfully submitted,

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By: /s/ Tyson R. Smith
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Dated: October 28, 2020

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