

September 13, 2016

California Public Utilities Commission  
Public Advisor's Office  
505 Van Ness Avenue  
San Francisco, CA 94102

Subject: Docket No. A. 15-09-001 – Pacific Gas and Electric Test Year 2017 General Rate Case; Opposition to proposed Rule 20A program moratorium

Dear Sir/Madam:

On behalf of the County of San Luis Obispo, our Board requests that the Rule 20A program not be held in abeyance over the next 3 years as part of the PG&E 2017 General Rate Determination. The Rule 20A program is a vital part of our community development activities and any delay in implementation will create immediate impacts.

The County, and our associated cities, have long standing projects in which the Rule 20A program is a key component. PG&E has been partnering with us to realize these projects after multiple years of planning for the undergrounding work and in accumulation of Rule 20A credits. The General Rate determination, if excluding continuity of Rule 20A credits for the next three years, will bring all these efforts to an abrupt halt. Key projects are as follows:

- Shell Beach Drive downtown street scope and multiuse path, City of Pismo Beach
- Grand Avenue Phase 3 downtown street scope improvement; City of Arroyo Grande
- Los Osos Valley Road Coastal Viewshed, County of San Luis Obispo

The recommendation by the Office of Ratepayer Advocate (ORA) to let the Rule 20A program lapse seems both hasty and short sighted; particularly expressing the need to reduce “backlog.” On the contrary, the Rule 20A credit is required to perpetuate and implement current active projects with real and imminent start dates.

These projects have been on the drawing board for the past decade; to defer their future only denies public benefit and will result in future costs increases to undertake the Rule 20A work. The County has had an Underground Utility Coordination Committee for over thirty years which has been very effective in delivering these underground improvements. The committee has established clear priorities for the individual projects and has worked with the utility companies to facilitate implementation. It has also promoted extensive collaboration between the local agency in coordinating credits so that projects are moving forward to completion and that no “backlog” is created. It would be disappointing to see our County penalized for doing a good job

in implementation based on ORA's generalization that a moratorium is needed due to a "perceived" backlog.

Our staff continues to work closely with PG&E on successfully implementing those Rule 20A projects and therefore requests your Board to reject the ORA's proposed halt to Rule 20A program.

Thank you for your attention to this urgent matter.

Sincerely,

LYNN COMPTON  
Chairperson  
Board of Supervisors  
County of San Luis Obispo

c: Shelly Higginbotham; Mayor, City of Pismo Beach  
Jim Hill; Mayor, City of Arroyo Grande  
John Wallace; Chair, Utility Undergrounding Coordinating Committee

File: CF 390.10.01

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