ATTACHMENT 1

PUBLIC VERSION
UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Pacific Gas and Electric Company	Docket No. ER18-1102-000

AFFIDAVIT OF ROD MASLOWSKI

1. My name is Rod Maslowski. I am currently a Consultant with Flynn Resource Consultants Inc. I have a B.S. in Electrical Engineering from the University of California, Berkeley and an M.B.A. from St. Mary's College. I am a Registered Electrical Engineer in the State of California. I have over forty-five years of experience working on utility electric transmission and distribution systems, including thirty-five years at Pacific Gas and Electric Company ("PG&E") and ten years of consulting on utility power systems, North American Electric Reliability Corporation requirements, and process improvements. While at PG&E, I was the division engineer, and later the division superintendent, for PG&E's San Francisco Division, which was responsible for distribution, including customer connections, planning/engineering, construction, operations, and other functions, within the City and County of San Francisco ("San Francisco").

BACKGROUND

2. At issue in this proceeding is service to a San Francisco [redacted] that San Francisco is upgrading. As part of this modernization effort, the load for this substation is expected to increase from approximately 1.5 MW to 3.0 MW.

3. Below are key dates in the request and development of the service requirements for the upgrade at [redacted]:

- 6/17/16 – Wholesale Distribution Tariff ("WDT") application sent to PG&E.
- 1/13/17 – PG&E required System Impact Study and sent San Francisco a System Impact Study Plan and Agreement.
- 3/10/17 – San Francisco sent payment for System Impact Study.
- 5/11/17 – San Francisco received final System Impact Study Report.
- 7/6/17 – PG&E sent Specifications for Distribution Service for Phase I.
- 7/20/17 – PG&E provided a cost breakdown to San Francisco.
- 7/24/17 – San Francisco asked PG&E for a more detailed breakdown.
- 7/25/17 – San Francisco scheduled a meeting with PG&E and San Francisco [redacted] to discuss the scope of work and the cost, but it didn't solve the cost issue.
- 10/23/17 – PG&E sent the Specifications for Distribution Service for Phase II.
- 2/13/18 – San Francisco requested PG&E to file the [redacted] Service Agreement unexecuted.
- 2/26/18 – San Francisco submitted payment under protest for Phase I and Phase II.

PG&E'S PROPOSED PHASE I SPECIFICATIONS FOR DISTRIBUTION SERVICE

4. With the increase in load, it appears to be PG&E's position that the existing local PG&E distribution facilities—the "local loop"—are not adequate to serve the upgraded [redacted] substation. To address this deficiency, PG&E has proposed two sets of facilities within its Phase I Specifications for Distribution Service: (1) insertion of a

[redacted] segment into PG&E's existing mainline [redacted]; and (2) construction of a [redacted] running from [redacted] to the new alignment of mainline [redacted].

5. The extension of mainline [redacted] will require running [redacted] to a [redacted] located between the mainline's current alignment and [redacted]. This portion of the work is marked as "I-A" in the diagram attached to this affidavit as Exhibit 1. It is my professional opinion that this new segment of mainline [redacted] is very likely a common facility that serves other PG&E customers besides the [redacted] load, on either normal or emergency bases. San Francisco has requested a circuit diagram from PG&E for the service arrangements that PG&E has proposed, which would enable San Francisco to confirm that other customers are served from the line; but PG&E has declined to provide the diagram.

6. Without more information from PG&E, the portion of the power flow over the mainline to serve the upgraded [redacted] substation is unknown. The line, however, has a [redacted], and San Francisco will use only 3.0 MW for the [redacted] substation at [redacted].

7. From the [redacted] will be extended to supply the upgraded [redacted] substation. It is marked as "I-B" in the diagram attached as Exhibit 1. This line will serve only the [redacted] substation, although it would be possible for PG&E to serve other customers off of this line in the future. The cable that PG&E has proposed has an estimated capacity [redacted], of which the [redacted] load will use only 3.0 MW.

8. PG&E will install and own all the [redacted] (both I-A and I-B) and is charging San Francisco for the cost of the [redacted] included in the service.

9. As shown in the diagram for Project No. 31325068 on page 51 of the combined PDF of PG&E's March 15, 2018 filing[1] under Supporting Documents Required Pursuant to Section 35.13(a)(2)(iii) of the Commission's Rules and Regulations (dated May 31, 2017, and titled "Install Primary Service (WDT)"), San Francisco is to [redacted]. *See* legend of diagram, which indicates how "Applicant Installed" facilities are depicted on the diagram. According to the diagram, San Francisco is to install [redacted] for the extension of the [redacted] mainline. San Francisco is also to install [redacted] from the new switching point to [redacted], but only one of these [redacted] will be used for the [redacted] to serve the upgraded [redacted] substation. The other [redacted] although it would be available for PG&E to [redacted] to serve other customers. PG&E has informed San Francisco that all of the facilities installed by San Francisco must be deeded to PG&E.

10. PG&E has estimated that the total cost for this project is about $378,000. This number, however, does not include the estimated cost for the [redacted] Francisco is required to construct. PG&E has estimated that the cost of that work being performed by San Francisco will be approximately $300,000. *See*

[1] PG&E, Unexecuted Distribution Service Agreements for the City and County of San Francisco (Mar. 15, 2018), eLibrary No. 20180315-5075 ("March 15, 2018 Filing").

PG&E's March 15, 2018 Filing, Specifications for Distribution Service for Customer 31325068 – Phase I, Clean Version of Revisions at 15, which identifies the value of the trenching and conduits subject to the income tax component of contribution ("ITCC").

11. San Francisco has requested that PG&E provide a breakdown of its $378,000 estimate, separately identifying the cost estimates for the extension of the [redacted] mainline extension versus the line extending from the new switchpoint to the [redacted] substation at [redacted]. PG&E has not done so. The cost associated with the [redacted] mainline extension may be up to one-third of PG&E's total estimate; but without more information from PG&E, the precise cost breakdown is unknown.

CONCERNS REGARDING
THE SPECIFICATIONS FOR DISTRIBUTION SERVICE

12. As noted above, the dedicated line that PG&E has chosen to serve the [redacted] point of delivery has significantly more capacity than is required to serve San Francisco's load. Further, PG&E has also chosen a more expensive [redacted] when a less expensive [redacted] could be installed. The combination of these requirements has raised the costs for San Francisco.

13. Page 6 of the System Impact Study Report listed the work that PG&E originally determined was needed to provide the requested service to [redacted]. (A copy of the System Impact Study Report is attached as Exhibit 2 to this affidavit; the System Impact Study Report refers to the "[redacted]," which is another name for [redacted].) That System Impact Study Report provided for [redacted] In contrast, the proposed Specifications for Distribution Service require the use of [redacted] for part of the

facilities, the installation of [redacted].

All the design changes between the System Impact Study Report and the Specifications for Distribution Service result in increased costs for San Francisco. There may be legitimate technical reasons for the differences, but these were never explained to San Francisco.

ERRORS AND MISSING INFORMATION IN THE SPECIFICATIONS FOR DISTRIBUTION SERVICE

A. Reserved Capacity

14. In the Specifications for Distribution Service, PG&E has listed the Reserved Capacity for [redacted] at 2000 kW. This is incorrect. PG&E's diagram for Project No. 31335049 on page 52 of the combined PDF of PG&E's March 15, 2018 Filing, under Supporting Documents Required Pursuant to Section 35.13(a)(2)(iii) of the Commission's Rules and Regulations, states that the work is to "[redacted]" (emphasis added). Further, [redacted].

The Specifications for Distribution Service should be corrected to indicate 3,000 kW as the Reserved Capacity.

B. Customer-Owned Intervening Facilities

15. PG&E has incorrectly described the Intervening Facilities that San Francisco will own and control to serve [redacted] in the Specifications for Distribution Service. The correct description is "San Francisco will own primary conductors, protective device, disconnect switch, and transformer."

C. Identification of Substructures to be Deeded to PG&E

16. The deeding of applicant-installed substructures to PG&E is not noted in the Specifications for Distribution Service. PG&E presented this requirement to San Francisco verbally after the project had commenced. To the extent such substructures must be deeded to PG&E, that requirement should be clearly stated in the Specifications for Distribution Service.

D. Reliability of PG&E's Design

17. The proposed design serves the upgraded [redacted] substation at [redacted] from a long radial line connected to the [redacted] mainline. As such, there is a degradation in the reliability of the new service relative to the existing service, which is from a looped distribution line. This could be addressed by modifying the proposed extension of the [redacted] mainline, so that it is closer to [redacted], which would allow the new radial from the [redacted] mainline to [redacted] to be shorter. The incremental cost of this change—which would require placing the switching point closer to [redacted] and running more [redacted] and less [redacted]—may be relatively small in comparison to the reliability and resilience benefits of that configuration.

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I, Rod Maslowski, being duly sworn, depose and state that the content of the foregoing Affidavit on behalf of the City and County of San Francisco, are true, correct, accurate and complete, to the best of my knowledge, information and belief.

Rod Maslowski

Rod Maslowski

Subscribed and sworn to before me, the undersigned notary public, this 4th day of April 2018.

COLLIN BECKER
COMM. # 2106174
NOTARY PUBLIC - CALIFORNIA
ALAMEDA COUNTY
My Comm. Exp. 4-9-2019

Notary Public

Notary Public

My Commission expires: April 09, 2019

EXHIBIT 1

PUBLIC VERSION

Privileged Materials Omitted

EXHIBIT 2

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Privileged Materials Omitted