



# Time Requirements of Phase 1 General Rate Cases for Energy Utilities

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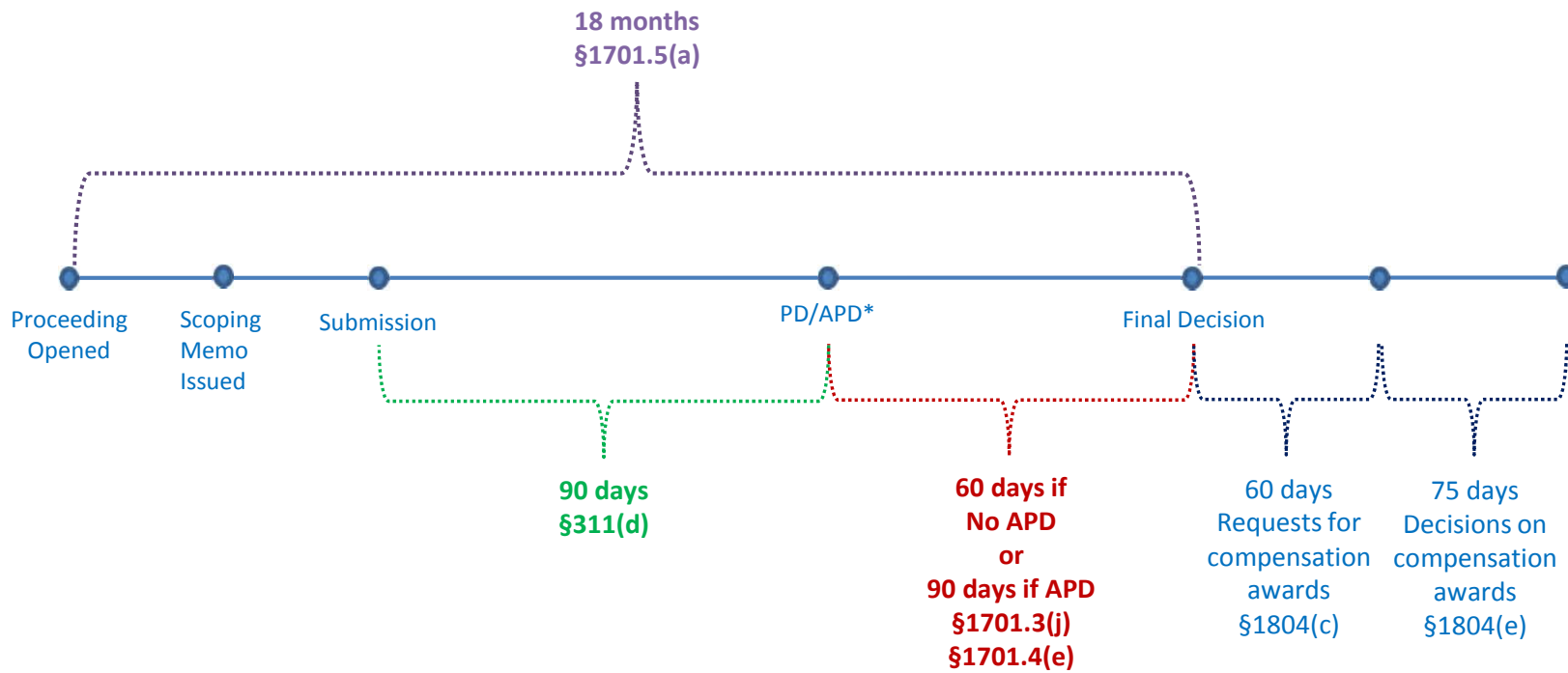
# Statutory Requirements for *All* Ratesetting Proceedings

- § 311(d) – Proposed decision 90 days after proceeding is submitted
- § 1701.5 – Ratesetting proceeding must be resolved within 18 months of initiation
  - Previously: 18 months from scoping memo
  - Scoping memo may set later date for resolution





# Statutory Deadlines for Issuing Proposed Decision and Commission Decision in Ratesetting or Quasi-legislative Proceeding (and Intervenor Compensation Statutory Deadlines)





# Challenges of 90 Day Requirement

- GRC decision scope & length

<u>With Major Settlement</u>	<u>Without Major Settlement</u>
Many issues must be closely reviewed	Many issues, mostly with 2+ conflicting positions
200-400 pages	400-1,000+ pages

- Scale of record

<b>&gt;10,000 pages of testimony</b>	<b>&gt;10,000 pages of testimony</b>
100s of pages of briefs	100s-1,000s of pages of briefs





# 90 Day Challenges, continued.

- Results of Operations Modeling
- Format, Review, Publish





Given these challenges . . .

. . . in order to meet the 90 day requirement . . .

. . . a significant fraction of the proposed decision must be written before the 90 day clock starts.





# Challenges of 18 Month Req.

- Large, complex proceedings
  - Many parties
  - Lengthy hearings
  - Unforeseen issues
  - New risk processes (S-MAP, RAMP)
- Limited resources of parties, staff, judge(s)





In theory, there are ways to expedite GRCs,

. . . but they all come with tradeoffs.







Questions?

