

DOCKETED

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California Energy Commission
Dockets Office, MS-4
Docket No. 17-SIT-2
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket 17-SIT-2: Pacific Gas and Electric Company Comments on the Draft Compliance Docketing Policy

DayZen, LLC files these comments on behalf of Pacific Gas and Electric Company (PG&E). PG&E appreciates the opportunity to provide comments on the California Energy Commission's (CEC) November 14, 2017 Draft Compliance Docketing Policy and to have participated in the January 25, 2018 workshop discussion on the same topic.

PG&E appreciates that the CEC's goal in developing the draft compliance docketing policy is to provide additional transparency to document the interaction between regulated facility owners and the Commission during the construction and operation compliance phases of a licensed facility. PG&E acknowledges this is a useful goal, but is concerned that creating such a policy could encourage the public to engage on highly technical compliance documents when in reality, there is no legal right in the compliance process for public comment. Creating a requirement to docket every compliance item and making it available via hyperlink may mislead the public that they are invited and have a right to comment on every compliance document, when they do not.

Accordingly, PG&E requests that the CEC modify its draft compliance policy to require docketing of final summaries, such as annual reports, and to make them available via hyperlink.

PG&E's proposal to docket only final summaries would also reduce the burden to continuously redact certain information from compliance documents. For example, compliance documents that include identifying information about employees should not be readily available to the public. If the policy is implemented as drafted, complying parties may need to file some compliance documents under a request for confidentiality. The request would need to be repeated frequently, creating a burden on facility owners and operators as well as the Commission Staff.

For the above reasons, PG&E asks that the CEC modify its draft compliance docketing policy to require only the docketing of final summaries and to make those final summaries available via hyperlink.