

Docket number of this proceeding: A-130355

Commenting party's name: James Adcock, Electrical Engineer

The title and date of the comment or comments:

Comments of James Adcock Regards A-130355 10/18/2018

I comment here to express general concerns about the over-designation of Utility-provided documents as being "Confidential" and in particular the use of mass-redaction or entire-document redaction. While Commissioners set rules that *only* "numbers, customer names, and planning details" will be redacted, in my experience trying to read and follow proceedings before the WUTC (without having access to this redacted information) is that this "numbers, customer names, and planning details" rule is routinely ignored, both by Utilities and by proceedings-officers -- routinely sacrificed in the name of "Expediency." [In fact Utilities even redact information that they have already made public in other forums!] And, once Utilities come to the realization that this "Expediency" trade-off will be made, then Utilities has the incentive to engage in the Ploy of forcing this time/efficiency trade-off, allowing themselves then "With Permission" to routinely engage in over-redaction and mass-redaction.

As an independent electrical engineer / ratepayer, why do I even bother to attempt to read and follow proceedings before the Commission? I am a great believer that Democracy must be performed before the public eye aka "Sunshine Laws", and that is all too easy for Government / Utility-Monopoly / Environmental-Groups to form an "Unholy Trinity" where each together or individually believe they are "Doing The Right Thing" when in fact the situation has spun out of control, with "Down the Garden Path" [see: WPPSS] decisions leading that Trio increasingly astray -- combined with the hubris of "Well We Are The Experts to Make All the Decisions in Secret in the Name of Everyone Else." Which is a self-fulfilling prophecy -- once Proceedings are increasingly hidden from public view -- including "Expert Testimonies" -- then the only people who can ever be "Experts" are those few who have access to the redacted documents. Add to this mix "Revolving Door" issues -- including where those who used to be on the UTC side now represent Utilities, and "Greenmail" issues, and the whole thing becomes extremely unattractive and problematic. And those who do have access to the "Secrets" increasing become a [self-appointed] "Insider Elite" forming a "Secret Fraternity." And then add to this secret-concerns re "Terrorism" and now Utility-secrets become "Military-Weaponized." I would hope that Commissioners can recognize that the combination of "Secrets" and "Government-Sponsored Monopolies" can become antithetical to Democracy!

Here are some example issues re Secrets aka Redacted where I think there are problems -- where the reasonable expectations of Citizen Ratepayer / Voters are being routinely violated:

* That when Utility "Experts" testify before Commission -- and other Government venues, including Federal, Local, County -- that those "Experts" testify in a consistent manner across those venues, and don't just keep changing their testimonies like a leaf blowing before the wind in order to best help win the Utility that immediate case. It should be obvious that when

inconsistent testimony is given across various jurisdictions, that some of that Utility's "Expert" testimony must be untruthful.

* That ratepayer monies be spent wisely and frugally -- solving problems in the most cost-effective way possible [including the effects of environmental damages] -- and that Utilities are not Overbuilding primarily simply to capture excessive profits. And that when Utility A builds something that Ratepayers A pay for, then that build doesn't primarily benefit Utilities and Ratepayers B, C, and D -- where I guess we should let "C" stand for "California!"

* That ratepayers can generally read and understand how their monies are actually being spent, especially re controversial issues like keeping coal power plants alive [verses killing them] and whether or not to build new NG plants, or rebuild old ones -- or close them. And the emissions associated with these decisions. And that these general issues can actually openly and honestly be discussed in public by the public -- without Utility game-playing and "Everything is a Secret."

In contrast to existing practice -- in practice -- I would ask:

That mass-redactions, and entire-document redactions not be allowed, ever, no matter what the excuse is. If the Utility doesn't have time to do it "right" then they shouldn't be doing it at all!

That redactions *Actually* be restricted *Only* to "numbers, customer names, and planning details."

That "Expert Testimony" be made public in at least enough detail that the Public can see whether or not a Utility's "Experts" are testifying in a self-consistent manner across proceedings and jurisdictions.

And, That in general [if not in exact contractual details] that ratepayers be allowed to see how their monies are being spent, so that they can see for themselves whether or not that money is being spent wisely -- including trade-offs of immediate-cost verses long-term environmental damages.

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