



# Setting a State Public Utilities Commission Agenda

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**“The secret of all victory lies in the organization of the non-obvious.”**

*Oswald Spengler 1880-1936*



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# Focusing Commission Attention on an Issue – 4 Prerequisites:

1. Timing
2. Credibility
3. Relationships
4. Flexibility



# Timing

- Make the most of a positive regulatory and policy climate
- Anticipate regulatory and policy shifts/avoid reacting
- Enhance presence and message if the environment becomes less favorable



# Credibility

- Know your issue
- Demonstrate likely, real world effects of, or need for proposed regulatory action
- Offer a solution
- Be reasonable



# Relationships

- Meet with Commissioners and their Advisors
- Get to know staff
- Establish contacts among similarly situated parties
- Develop working relationships with investor owned utilities and other potentially opposing parties



# Flexibility

- All progress at a PUC is incremental
- Be prepared to adjust your strategy
- Know when to compromise
- Judgment



# Advancing an Agenda

- Look ahead: anticipate regulatory next steps and predict outcomes
- Align self-interest with public interest
- Obtain buy-in
- Use the process to achieve objectives
- Pay attention to details
- Focus and re-focus attention on your issues



# Anticipate and Predict

- Continuous monitoring
- Relationships/Communication
- Use lead time to implement strategy



# Demonstrate Public Benefit

- Deflect focus from pure self-interest
- Give regulators a reason to agree with you



# Buy-In

- Industry
- Similary situated parties
- Ratepayer groups
- Commissioners and their Advisors
- Commission staff
- Legislators



# Work the Process

- Know procedural rules
- Use them to your advantage



# The Devil is in the Details

- Pay attention – look for opportunities
- Welcome slightly different perspectives



# Consistent Pressure

- Keep up momentum
- Counter regulatory inertia
- Focus and re-focus Commission attention



# Examples

- Individual Business Need
  - SCE Bill Limiter
  - DG Project Interconnection
- Industry Need
  - Implementation of Suspension of Direct Access
  - DG Tariffs/Standby Issues



**“If you’re not strong enough, there are no precedents.”**

*Francis Scott Key Fitzgerald 1896-1940*



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