



PROFESSIONAL ENGINEERS

IN CALIFORNIA GOVERNMENT

November 8, 2016

Ms. Marzia Zafar  
Director, Policy & Planning Division  
Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Dear Ms. Zafar:

As requested, the Professional Engineers in California Government (PECG) welcomes the opportunity to provide in writing a summation of our testimony at the Public Utilities Commission's (PUC) workshops in Sacramento and San Francisco about the location – now and in the future – of PUC headquarters and staff per SB 840 of 2016.

PECG represents approximately 200 PUC employees working primarily in San Francisco, but also in Sacramento, Los Angeles and other regions as their jobs dictate. PECG believes that the PUC should maintain San Francisco as its primary headquarters and the report required by SB 840 should state affirmatively that San Francisco will remain the headquarters for Commission operations. The seemingly annual rumors about relocation of PUC operations is unsettling and unfair to the engineers and other career public servants who have bought homes, raised families, and dedicated their careers to the PUC in the Bay Area. Affirmatively stating that the PUC will be headquartered in San Francisco without any mandatory up-rooting of staff would help ease the concerns of PECG members and all staff in the Bay Area.

Maintaining the San Francisco headquarters is also clearly the best decision from a financial perspective. Of the options identified and discussed by the PUC at workshops, the office space at PUC Headquarters at 505 Van Ness Avenue is far and away the most cost effective location with square footage costs below \$2. The Golden Gate Avenue State Office Building also offers affordable options for locating PUC staff and would allow continued close collaboration with their colleagues on Van Ness.

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The PUC Headquarters also provides space to grow. Currently there is room to accommodate at least 150 new hires in the building. It makes no sense from a cost or policy perspective to not utilize this space. On the other hand, there are no state building options available to the PUC in Sacramento and private options in Sacramento are at least twice as expensive as the San Francisco facilities.

PECG believes current proximity of staff to the “operational” needs of the PUC reasonably addresses the PUC’s critical functions, especially safety, needed in Sacramento, the Central Valley, Southern California and other parts of the state.

PECG understands that at times the changing regulatory environment may require adjustments in staffing levels and locations. When that situation actually occurs, PECG believes that the PUC should make employee and staffing location decisions to make certain the public is best served, operations facilities are safe, and utilities are effectively regulated. Staffing decisions must be undertaken based on actual “operational” needs and that would be best achieved by the PUC adopting Scenario 1 in its workshop materials. Specifically, by fully maintaining staffing at its San Francisco headquarters and expanding operations in its Los Angeles and Sacramento locations, or incrementally staffing additional locations, as needed for operations.

Of course, it is imperative that all PUC employees, regardless of their locations, are able to enjoy the same employment and promotional opportunities they do now consistent with our merit-based civil service system.

It has been suggested that the high cost of living in San Francisco makes locating the PUC or any other state operation there prohibitive. The solution to that problem is not to abandon the City to technology companies and their employees. Instead, the answer lies in paying state employees competitive wages, developing affordable housing throughout the Bay Area, and providing relief from high health care, child care, and transportation costs in the region.

If there is a need to provide PUC employees with expanded collaborative and interactive opportunities with their colleagues working in global climate change remediation programs at the ARB, CEC, Department of Transportation and other state agencies – the solution lies in the expanded use of communication technologies, expanded travel allowances to allow PUC staff to work in other regions, and, in specific circumstances, relocation of certain functions to facilitate operational improvements.

Finally, the PUC has endured much criticism in recent years related to the loss of focus on public safety and public service. The Legislature and the Administration acted proactively to put in place many reforms to improve governance, increase transparency, and refocus on the safety of utility operations. These important issues were not related in any way to where the PUC maintains its headquarters or houses its employees.

PECG believes the PUC should focus on addressing the big picture concerns, affirm San Francisco as the PUC's headquarters to keep faith with employees, continue improving morale and, when operationally necessary, establish and incrementally staff offices in other parts of the state as needed to meet the PUC's mission.

Thank you for this opportunity to comment. If PECG can provide any additional questions, please call Ted Toppin at 916/446-0400.

Sincerely,



Robert Lumahan  
PECG President

Cc: Christian Griffith, Chief Consultant, Assembly Budget Committee