

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Investigation on the
Commission's Own Motion to Determine
Whether Pacific Gas and Electric Company
and PG&E Corporation's Organizational
Culture and Governance Prioritize Safety

Investigation 15-08-019
(Filed August 27, 2015)

**MOTION FOR PARTY STATUS OF EDF TRADING NORTH AMERICA, LLC
AND EDF INDUSTRIAL POWER SERVICES (CA), LLC**

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February 4, 2019

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AND EDF INDUSTRIAL POWER SERVICES (CA), LLC**

Pursuant to Section 1.4 of the California Public Utilities Commission's Rules of Practice and Procedure, EDF Trading North America, LLC ("EDFT") and EDF Industrial Power Services (CA), LLC ("EIPS CA") submit this Motion for Party Status in this proceeding to investigate the corporate organizational culture and governance of Pacific Gas & Electric Company ("PG&E"). EDFT and EIPS CA seek party status in this proceeding to address issues raised in the "*Assigned Commissioner's Scoping Memo and Ruling*," issued on December 21, 2018 ("Scoping Memo"). Issues related to the future structure of PG&E will impact both EDFT and EIPS CA as participants in the gas and electric markets in California. In support of this motion for party status, EDFT and EIPS CA state the following:

I. EDFT'S and EIPS' INTEREST IN THIS PROCEEDING

EDFT is a limited liability company with its principal North American place of business in Houston, Texas. EDFT is a power marketer authorized by the Federal Energy Regulatory Commission to engage in the wholesale sale of electricity and related services at market-based rates. EDFT is a natural gas shipper on PG&E's pipeline that makes sales to PG&E and other parties within PG&E's service territory. In the wholesale energy markets, we are a major participant operating in every market and providing coast to coast coverage of financial and

physical products in the power, natural gas and NGLs, financial crude oil and environmental markets.

EIPS CA is a limited liability companies with market-based rate authority primarily engaged in retail marketing activities. EIPS CA is registered by this Commission as Electric Service Provider (“ESP”) #1384. As a registered ESP, EIPS CA makes retail sales of electric power to commercial and industrial customers throughout California, including customers in PG&E’s service territory.

Both EDFT and EIPS CA share a common ultimate parent, Électricité de France, S.A., the world’s biggest electricity generator and a global leader in low carbon energies.

II. SCOPE OF PROCEEDING

The Scoping Memo sets forth the issues to be addressed in the next phase of this proceeding and asks several significant and pertinent questions, such as:

- Should PG&E’s gas and electric distribution and transmission divisions be separated into separate companies? If so, should the separate companies be controlled by a holding company? Should the holding company be a regulated utility?¹
- Should some or all of PG&E be reconstituted as a publicly owned utility or utilities?²
- Should PG&E be a “wires-only company” that only provides electric distribution and transmission services with other entities providing generation services? If so, what entities should provide generation services?³

¹ Scoping Memo, at p. 11.

² Id, at p. 12.

³ Ibid.

These issues are of significant importance to both EDFT and EIPS CA, given their extensive California operations and ongoing relationships with PG&E and customers located within its electricity and natural gas service territories. EDFT and EIPS CA therefore expect to be active participants in this proceeding and to respond to proposals on these and other issues to advocate for maintaining competitive market opportunities in the PG&E electricity and natural gas service territories. Accordingly, EDFT and EIPS CA each have a material interest in the matters being addressed in this next phase and request party status in this proceeding to address the structural issues identified in the Scoping Memo.

III. NOTICES

Service of notices, orders, and other communications and correspondence in this proceeding should be directed as follows:

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In addition, the following EDFT representative should be placed on the “information only” list for this proceeding:

Jason Cox
Director, Regulatory Affairs
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IV. CONCLUSION

EDFT's and EIPS CA's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, EDFT and EIPS CA each respectfully request that the Commission grant this Motion for Party Status for each party.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Daniel W. Douglass", written in a cursive style.

Daniel W. Douglass

DOUGLASS & LIDDELL

Attorneys for

EDF Trading North America, LLC

EDF Industrial Power Services (CA), LLC

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