

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



**FILED**

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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 PIONEER COMMUNITY ENERGY**

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February 4, 2019

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Pursuant to Rules 1.4(a)(4) and 11.1(b) of the Rules of Practice and Procedure of the California Public Utilities (“Commission”) and the Assigned Commissioner’s Scoping Memo and Ruling dated December 21, 2018 and amended January 22, 2019<sup>1</sup> (the “Amended Scoping Memo and Ruling”), Pioneer Community Energy (“Pioneer”) respectfully moves for party status in the above-captioned proceeding.

**I. BACKGROUND AND INTEREST IN THIS PROCEEDING**

Pioneer is the community choice aggregation (“CCA”) program that serves Placer County. Placer County, in collaboration with five cities within its geographic boundaries (the cities of Auburn, Colfax, Lincoln, Town of Loomis, and Rocklin), formed Pioneer to provide electric generation, including cost-competitive clean electricity, product choice, price stability, energy efficiency, and greenhouse gas emission reductions to the residents of Placer County. Pioneer initiated customer service on February 1, 2018. As of February 1, 2019, Pioneer is serving 94,394 customer accounts within Pacific Gas & Electric Company’s (“PG&E”) service territory.

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<sup>1</sup> On January 22, 2019, the presiding officer for this proceeding, ALJ Peter V. Allen, issued an E-MAIL Ruling Granting Extension of Time, which extends the comment and reply deadlines.

Pioneer is a customer of PG&E, and Pioneer's customers are also PG&E customers for transmission, distribution, and other services. The safety of PG&E's utility services has direct and significant effects on Pioneer's business, services, and customers. Moreover, the Amended Scoping Memo and Ruling asks direct questions regarding the services PG&E should provide and whether other types of load serving entities, such as CCAs, may be able to take on greater responsibility for providing retail services to PG&E's customers. Pioneer therefore has a direct and substantial interest in this proceeding.

## **II. PARTICIPATION IN THIS PROCEEDING**

Pioneer expects to provide the Commission with factual and legal information in response to the questions set forth in Assigned Commission's Scoping Memo and Ruling dated December 21, 2018. Such information is directly pertinent to the established subject matter of this proceeding.

## **III. SERVICE**

Service of notices, orders and other correspondence in this docket should be directed to:

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Additionally, Pioneer requests "information only" status for the following:

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#### **IV. REQUEST FOR PARTY STATUS**

For the reasons set forth herein, Pioneer respectfully requests that it be granted party status in this proceeding.

Respectfully submitted,

/s/ Kevin Fox

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Dated: February 4, 2019