

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



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Order Instituting Investigation and
Order to Show Cause on the
Commission's Own Motion into the
Operations and Practices of Pacific Gas
and Electric Company with Respect to
Locate and Mark Practices
and Related Matters.

Investigation 18-12-007

**MOTION OF THE
COALITION OF CALIFORNIA UTILITY EMPLOYEES
TO BECOME A PARTY**

January 15, 2019

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Utility Employees

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TO BECOME A PARTY**

Pursuant to Rule 1.4 of the Commission's Rules of Practice and Procedure, the Coalition of California Utility Employees (CUE) respectfully submits its motion to become a party to this proceeding.

I. DESCRIPTION OF CUE AND INTEREST IN THE PROCEEDING

CUE is a coalition of labor unions whose approximately 35,000 members work at essentially all of the California utilities, both publicly and privately owned. CUE has been active in proceedings before the Commission since 1994. The International Brotherhood of Electrical Workers Local Union 1245 is a member of CUE and represents approximately 12,000 PG&E workers, including more than 3,000 workers on the gas side of the company. The Commission's Safety and Enforcement Division alleges that from 2012 through 2017 PG&E falsified records to appear that it timely located and marked gas pipelines. During those years, Local 1245 members processed more than five million third party locate and mark

requests and, therefore, has firsthand knowledge of the issues raised in the OII which it seeks to provide to the Commission.

II. FACTUAL AND LEGAL CONTENTIONS CUE INTENDS TO ADDRESS

CUE intends to provide to the Commission its firsthand knowledge and experience with PG&E's locate and mark program. SED alleges that from 2012 through 2017, PG&E falsified records to appear that it timely located and marked gas pipelines. In a small number of the more than five million locate and mark requests processed by Local 1245 during this timeframe, the completion time did not reflect a start-to-finish time but was paused at some point in the process. SED alleges that this pause was intentional falsification of locate and mark rescheduling notes to stop the 48-hour clock and avoid late tickets. SED reports that the falsifications were due to inherent pressure to have zero late tickets. SED essentially concludes that locators intentionally did not follow policy or the law. CUE disputes SED's allegations and intends to show there was no intentional falsification of records; rather, there was a misunderstanding of how to process a renegotiation of the time to perform locate and mark work.

III. NOTICE AND COMMUNICATIONS

Communications to CUE in this proceeding may be directed to:

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Dated: January 15, 2019

Respectfully submitted,

/s/

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