


**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**
**FILED**  
 02/06/19  
 04:59 PM

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)
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**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION  
 AND, IF REQUESTED (and ☒ <sup>1</sup> checked), ADMINISTRATIVE LAW JUDGE'S  
 RULING ON EMF SAFETY NETWORK'S SHOWING OF SIGNIFICANT  
 FINANCIAL HARDSHIP**

**NOTE: AFTER ELECTRONICALLY FILING A PDF COPY OF THIS NOTICE OF INTENT, PLEASE EMAIL THE DOCUMENT IN AN MS WORD FORMAT TO THE INTERVENOR COMPENSATION PROGRAM COORDINATOR AT [Icompcoordinator@cpuc.ca.gov](mailto:Icompcoordinator@cpuc.ca.gov).**

<b>Customer or Eligible Local Government Entity (party intending to claim intervenor compensation): EMF Safety Network</b>	
<b>Assigned Commissioner: Michael Picker</b>	<b>Administrative Law Judge: Peter V. Allen</b>
I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent is true to my best knowledge, information and belief.	
Signature:	/s/ Sandi Maurer
Date: 2/6/2019	Printed Name: Sandi Maurer

**PART I: PROCEDURAL ISSUES**  
**(To be completed by the party intending to claim intervenor compensation)**

<sup>1</sup> DO NOT CHECK THIS BOX if a finding of significant financial hardship is not needed (in cases where there is a valid rebuttable presumption of eligibility (Part III(A)(3)) or significant financial hardship showing has been deferred to the intervenor compensation claim).

A. Status as “customer” (see Pub. Util. Code § 1802(b)) The party claims “customer” status because the party is (check one):	Applies (check)
1. A <b>Category 1</b> customer is an actual customer whose self-interest in the proceeding arises primarily from his/her role as a customer of the utility and, at the same time, the customer must represent the broader interests of at least some other customers. See, for example, D.08-07-019 at 5-10).	<input type="checkbox"/>
2. A <b>Category 2</b> customer is a representative who has been authorized by actual customers to represent them. Category 2 involves a more formal arrangement where a customer or a group of customers selects a more skilled person to represent the customer’s views in a proceeding. A customer or group of customers may also form or authorize a group to represent them, and the group, in turn, may authorize a representative such as an attorney to represent the group.	<input type="checkbox"/>
3. A <b>Category 3</b> customer is a formally organized group authorized, by its articles of incorporation or bylaws to represent the interests of residential customers or small commercial customers receiving bundled electric service from an electrical corporation (§1802(b)(1)(C)). Certain environmental groups that represent residential customers with concerns for the environment may also qualify as Category 3 customers, even if the above requirement is not specifically met in the articles or bylaws. See D.98-04-059, footnote at 30.	<b>X</b>

<p><b>4. The party's detailed explanation of the selected customer category.</b></p> <p><u>The party's explanation of its status as a Category 1 customer.</u> A party seeking status as a Category 1 customer must describe the party's own interest in the proceeding and show how the customer's participation goes beyond just his/her own self-interest and will benefit other customers. Supporting documents must include a copy of the utility's bill.</p> <p><u>The party's explanation of its status as a Category 2 customer.</u> A party seeking status as a Category 2 customer must identify the residential customer(s) being represented and provide authorization from at least one customer.</p> <p><u>The party's explanation of its status as a Category 3 customer.</u> If the party represents residential and small commercial customers receiving bundled electric service from an electrical corporation, it must include in the Notice of Intent either the percentage of group members that are residential ratepayers or the percentage of the members who are receiving bundled electric service from an electrical corporation. Supporting documentation for this customer category must include current copies of the articles of incorporation or bylaws. If current copies of the articles and bylaws have already been filed with the Commission, only a specific reference (the proceeding's docket number and the date of filing) to such filings needs to be made.</p> <p>Network is a sponsored project of Ecological Options Network, a 501(c)(3) not for profit organization. Network is a group authorized pursuant to its articles of organization and bylaws to represent and advocate the interests of residential and small commercial customers of electrical, gas, water and telephone utilities in California. Network's articles of organization and bylaws are filed in A. 11-03-014. Link to documents: <a href="http://docs.cpuc.ca.gov/EFILE/NOTICE/136653.htm">http://docs.cpuc.ca.gov/EFILE/NOTICE/136653.htm</a></p>	
<p><b>Do you have any direct economic interest in outcomes of the proceeding?</b></p> <p>If "Yes", explain:</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>
<p><b>B. Conflict of Interest (§ 1802.3)</b></p>	<p><b>Check</b></p>

1. Is the customer a representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. If the answer to the above question is “Yes”, does the customer have a conflict arising from prior representation before the Commission?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>C. Status as an Eligible Local Government Entity (§§1802(d), 1802.4, 1803.1)</b>	
The party claims “eligible local government entity” status because the party is a city, county, or city and county that is not a publicly owned public utility that intervenes or participates in a Commission proceeding for the purpose of protecting the health and safety of the residents within the entity’s jurisdiction following a catastrophic material loss suffered by its residents either in significant damage to infrastructure or loss of life and property, or both, as a direct result of public utility infrastructure.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<u>The party’s explanation of its status as an eligible local government entity must include a description of</u> (1) The relevant triggering catastrophic event; (2) The impacts of the triggering catastrophic event on the residents within the entity’s jurisdiction as a result of public utility infrastructure; and (3) The entity’s reason(s) to participate in this proceeding.	
<b>D. Timely Filing of Notice of Intent to Claim Intervenor Compensation (NOI) (§ 1804(a)(1)):</b>	
1. Is the party’s NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: <a href="#">Click here to enter a date.</a>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. Is the party’s NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2a. The party’s description of the reasons for filing its NOI at this other time: EMF Safety Network is filing this Notice of Intent one day after filling a Motion for Party Status in this proceeding. Our Motion is in response to a second scoping memo issued on December 21, 2018 by Commissioner Michael Picker. The scoping memo outlines new issues that EMF Safety Network intends to actively participate in and comment on.	

2b. The party's information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, Administrative Law Judge's ruling, or other document authorizing the filing of NOI at that other time:

**PART II: SCOPE OF ANTICIPATED PARTICIPATION**  
**(To be completed by the party intending to claim intervenor compensation)**

**A. Planned Participation (§ 1804(a)(2)(A)):**

The party's statement of the issues on which it plans to participate: Network has great concerns with the safety and reliability of PGE's utility infrastructure and overall management. Network intends that it will participate actively in this matter, by submitting comments on the issues outlined in the scoping memo, including: an overview of problems with PGE's safety culture; suggested solutions for the future of safe and reliable utility service; filing reply comments in response to other parties positions; and any other filings necessary to fully participate in this proceeding.

The party's explanation of how it plans to avoid duplication of effort with other parties: We will communicate with other parties who have similar positions via email and phone contact.

The party's description of the nature and extent of the party's planned participation in this proceeding (to the extent that it is possible to describe on the date this NOI is filed). We intend to actively participate in this proceeding by filing comments, reply comments and offering expert testimony as needed.

**B. The party's itemized estimate of the compensation that the party expects to request, based on the anticipated duration of the proceeding (§ 1804(a)(2)(A)):**

Item	Hours	Rate \$	Total \$	#
<b>ATTORNEY, EXPERT, AND ADVOCATE FEES</b>				
Attorney 1	20	350	7,000	
[Attorney 2]				
Expert 1	25	350	8,750	
[Expert 2]				
Sandi Maurer	100	143.5	14,350	
Advocate 2	25	75	1,875	
<b>Subtotal: \$31,975</b>				
<b>OTHER FEES</b>				
[Person 1]				
[Person 2]				
<b>Subtotal: \$</b>				

COSTS				
Postage	50			
Copies	150			
<b>Subtotal: \$ 200</b>				
<b>TOTAL ESTIMATE: \$ 32,175</b>				
<b>Estimated Budget by Issues:</b> Safe and reliable utility service 100%				
<i>When entering items, type over bracketed text; add additional rows to table as necessary. Estimate may (but does not need to) include estimated Claim preparation time. Claim preparation time is typically compensated at ½ professional hourly rate.</i>				

**PART III: SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP**  
**(To be completed by party intending to claim intervenor compensation;**  
**see Instructions for options for providing this information)**

<b>A. The party claims that participation or intervention in this proceeding without an award of fees or costs imposes a significant financial hardship, on the following basis:</b>	<b>Ap plie s (ch eck )</b>
1. The customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate's fees, expert witness fees, and other reasonable costs of participation. (§ 1802(h))	<b>X</b>
2. In the case of a group or organization, the economic interest of the Individual members of the group or organization is small in comparison to the costs of effective participation in the proceeding. (§ 1802(h))	<b>X</b>
3. The eligible local government entities' participation or intervention without an award of fees or costs imposes a significant financial hardship. (§ 1803.1(b).)	<input type="checkbox"/>



4. A § 1802(h) or § 1803.1(b) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption in this proceeding (§ 1804(b)(1)).



Commission's finding of significant financial hardship made in proceeding number:

Date of Administrative Law Judge's Ruling (or CPUC Decision) in which the finding of significant financial hardship was made:

Previous ALJ Ruling: A.11-03-014 Date of ALJ ruling: October 26, 2011 <http://docs.cpuc.ca.gov/EFILE/RULINGS/146245.htm>

**B. The party's explanation of the factual basis for its claim of "significant financial hardship" (§ 1802(h) or § 1803.1(b)) (necessary documentation, if warranted, is attached to the NOI:**

The economic interests of Network's individual members are small compared to the costs of effective participation in this proceeding. Most of Network's current members, including members that live in PG&E's service territory, are residential utility customers. None is a large commercial or industrial customer.

This year Network expected budget is between \$30-40K. EMF Safety Network Director Sandi Maurer receives a monthly stipend for projects management, policy change appeals, website administration, communication, email and phone support. Remaining donated funds are used for public education, and other professional costs.

**PART IV: ATTACHMENTS DOCUMENTING SPECIFIC  
ASSERTIONS MADE IN THIS NOTICE**

**(The party intending to claim intervenor compensation identifies and attaches documents;  
add rows as necessary)**

Attachment No.	Description
1	Certificate of Service



**ADMINISTRATIVE LAW JUDGE RULING<sup>2</sup>**  
**(Administrative Law Judge completes)**

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<sup>2</sup> A Ruling needs not be issued unless: (a) the NOI is deficient; (b) the Administrative Law Judge desires to address specific issues raised by the NOI (to point out similar positions, areas of potential duplication in showings, unrealistic expectations for compensation, or other matters that may affect the customer or eligible local government entity's Intervenor Compensation Claim); or (c) the NOI has included a claim of "significant financial hardship" that requires a finding under § 1802(h).

	<b>Check all that apply</b>
<b>1. The Notice of Intent (NOI) is rejected for the following reasons:</b>	<input type="checkbox"/>
a. The NOI has not demonstrated the party's status as a "customer" or an "eligible local government entity" for the following reason(s):	<input type="checkbox"/>
b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for the following reason(s):	<input type="checkbox"/>
c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	<input type="checkbox"/>
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	<input type="checkbox"/>
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	<input type="checkbox"/>
<b>4. The Administrative Law Judge provides the following additional guidance (see § 1804(b)(2)):</b>	<input type="checkbox"/>

**IT IS RULED that:**

1. The Notice of Intent is rejected.	<input type="checkbox"/>
2. The customer or eligible local government entity has satisfied the eligibility requirements of Pub. Util. Code § 1804(a).	<input type="checkbox"/>

3. The customer or eligible local government entity has shown significant financial hardship.	<input type="checkbox"/>
4. The customer or eligible local government entity is preliminarily determined to be eligible for intervenor compensation in this proceeding. However, a finding of significant financial hardship in no way ensures compensation.	<input type="checkbox"/>
5. Additional guidance is provided to the customer or eligible local government entity as set forth above.	<input type="checkbox"/>

Dated \_\_\_\_\_, at San Francisco, California.

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Administrative Law Judge