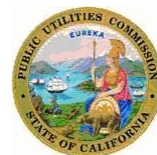


**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

12-03-15
04:59 PM

Order Instituting Investigation and Ordering
Pacific Gas and Electric Company to Appear
and Show Cause Why It Should Not Be
Sanctioned for Violations of Article 8 and
Rule 1.1 of the Rules of Practice and
Procedure and Public Utilities Code Sections
1701.2 and 1701.3.

Investigation 15-11-015
(Filed November 19, 2015)

**MOTION OF THE UTILITY REFORM NETWORK
FOR PARTY STATUS**

December 3, 2015

Hayley Goodson
Staff Attorney

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MOTION OF THE UTILITY REFORM NETWORK FOR PARTY STATUS

I. INTRODUCTION

Pursuant to Rule 1.4 of the Commission's Rules of Practice and Procedure, The Utility Reform Network (TURN) respectfully submits this motion for party status in the instant proceeding.

II. REQUIREMENTS OF RULE 1.4(b)

Rule 1.4(b) provides that a person seeking party status by filing a motion to become a party shall:

- (1) fully disclose the persons or entities in whose behalf the filing, appearance or motion is made, and the interest of such persons or entities in the proceeding; and
- (2) state the factual and legal contentions that the person intends to make and show that the contentions will be reasonably pertinent to the issues already presented.

TURN seeks party status in this proceeding in order to advance and protect the interests of the residential customers that it has represented in Commission proceedings for over thirty years. These customers clearly have a strong interest in policies that promote compliance with the Commission's rules governing *ex parte* communications. Non-compliance with these rules, such as the conduct of PG&E at issue here, undermines the integrity of the Commission's decisionmaking process and the Commission's ability to carryout its duty to protect the public interest.

While TURN cannot yet indentify all of the factual and legal contentions TURN intends to make, TURN would, if granted party status, make contentions reasonably pertinent to the issues already identified by the Commission as appropriate for

consideration in this proceeding, as well as issues that might additionally be included in the final Scoping Memo. Moreover, TURN would coordinate our participation to the extent feasible with the other intervenors with similar interests.

III. SERVICE LIST REQUEST

TURN requests that its formal appearance be entered in this proceeding as follows:

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IV. CONCLUSION

For the foregoing reasons, TURN respectfully requests to be granted party status in this proceeding.

Date: December 3, 2015

Respectfully submitted,

By: /s/
Hayley Goodson
Staff Attorney

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