

**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 the Center for Climate Protection**

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February 13, 2019

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**Motion for Party Status of the Center for Climate Protection**

Pursuant to Rule 1.4 and Rule 11.1 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, the Center for Climate Protection ("CCP") submits this motion for party status in the *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*.<sup>1</sup> For the reasons explained below, CCP respectfully requests that its motion be granted.

**I. Background**

CCP is a California 501(c)(3) nonprofit organization founded in 2001 with a mission to inspire, align and mobilize action in response to the climate crisis. The organization works with a broad group of community stakeholders to advance practical, science-based solutions designed to achieve significant greenhouse gas emission reductions. CCP creates and advances model programs and policies that can be replicated across communities to reduce greenhouse gas emissions. CCP also organizes communities, distributes information about developments in renewable

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<sup>1</sup> Investigation ("I.") 15-08-019, filed August 27, 2015.

energy, shares strategies to reduce emissions thorough its Clean Power Exchange network, and holds an annual symposium that is attended by policy makers and industry professionals, among other initiatives. CCP strongly supports California's decarbonization efforts and seeks to advance these efforts through the development of new policies and regulations.

## **II. CCP's Interest in this Proceeding**

As an organization that distributes information, develops models, and works directly with and on behalf of communities to address the climate crisis, CCP has a strong interest in this proceeding. Specifically, CCP plans to contribute to answering important questions regarding alternatives to Pacific Gas and Electric Company's ("PG&E") current management and operational structures.

First, a critical review of PG&E's corporate governance, structure, operations, and consideration of alternatives is urgently needed. The review must address immediate concerns about safety and reliability of electric and gas service in the face of increased environmental volatility, such as ongoing fire risks. Without such a review, the communities that CCP serves will continue to experience risk of severe fire damage, potential loss of life and property, and disruption to electrical and other services. CCP's efforts to assist communities with emissions reductions and the state's interest in accomplishing the same goal must be pursued in an environment where safety is the first priority.

Second, CCP has an interest in determining how PG&E can best be structured to implement California's energy policies, such as decentralization, decarbonization of our energy systems and of the larger economy, and responding to needs for climate adaptation. So far, numerous important questions have been raised in this proceeding

regarding whether restructuring should take place, and if so, what it should entail.<sup>2</sup> CCP plans to concentrate its efforts in this proceeding on how reorganization or structural changes to PG&E might support or impede the state's decarbonization and other energy goals.

### **III. Request for Party Status**

While this proceeding has been active for some period of time, the potential impact of recent wildfires on PG&E has generated renewed interest and attention, as reflected in the discussion in the *Assigned Commissioner's Scoping Memo and Ruling* ("Scoping Memo").<sup>3</sup> Because this motion for party status is being filed within a relatively short time following the Scoping Memo, CCP's request will not cause any delay or prejudice any other party. As described above, CCP has a material interest in the matters being addressed in this proceeding, which are not being represented by any other party. For the reasons stated above, CCP seeks party status.

All pleadings, correspondence, Commission Orders, or other communications should be directed to the following CCP representative:

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<sup>2</sup> *Assigned Commissioner's Scoping Memo and Ruling* (Scoping Memo) in this proceeding, dated December 21, 2018, at 9-12.

<sup>3</sup> Scoping Memo at 7-8.

#### **IV. Conclusion**

For the reasons stated above, CCP respectfully requests that the Commission grant its motion for party status.

Dated: February 13, 2019

/s/ W. Woodland Hastings

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