

**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 VALLEY CLEAN ENERGY ALLIANCE

Kevin Fox, Partner
Keyes & Fox LLP
436 14th St., Suite 1305
Oakland, California 94612
Tele: (510) 314-8201
Email: kfox@keyesfox.com

*Counsel to
Valley Clean Energy Alliance*

February 5, 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, 2019¹ (the "Amended Scoping Memo and Ruling"), Valley Clean Energy Alliance ("VCEA") respectfully moves for party status in the above-captioned proceeding.

I. BACKGROUND AND INTEREST IN THIS PROCEEDING

VCEA was formed as a Joint Powers Authority of the City of Davis and County of Yolo in 2016. The City of Woodland joined the Joint Powers Authority in June 2017. VCEA is governed by a six-member Board of Directors consisting of two each from the Woodland City Council, Davis City Council and the Yolo County Board of Supervisors. The members formed VCEA for the purposes of implementing a community choice aggregation ("CCA") program to allow VCEA to provide electric generation, including cost-competitive clean electricity, product choice, price stability, energy efficiency, and greenhouse gas emission reductions within its service area. VCEA initiated customer service on June 1, 2018. As of January 29, 2019, VCEA

¹ 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.

is serving 54,609 customer accounts within Pacific Gas & Electric Company's ("PG&E") service territory.

VCEA is a customer of PG&E, and VCEA'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 VCEA'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 service to PG&E's customers. VCEA therefore has a direct and substantial interest in this proceeding.

II. PARTICIPATION IN THIS PROCEEDING

VCEA 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:

Kevin Fox, Partner
Keyes & Fox LLP
436 14th St., Suite 1305
Oakland, California 94612
Tele: (510) 314-8201
Email: kfox@keyesfox.com

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

Mitch Sears, Interim General Manager
Valley Clean Energy Alliance
604 2nd Street
Davis, California 95616
Email: mitch.sears@valleycleanenergy.org

IV. REQUEST FOR PARTY STATUS

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

Respectfully submitted,

/s/ Kevin Fox

Kevin Fox, Partner

Keyes & Fox LLP

436 14th St., Suite 1305

Oakland, California 94612

Tele: (510) 314-8201

Email: kfox@keyesfox.com

Counsel to

Valley Clean Energy Alliance

Dated: February 5, 2019