

**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 Leave to File Opening Comments
of the Center for Climate Protection**

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February 13, 2019

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I. Introduction

Pursuant to Rule 11.1 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure and the *Assigned Commissioner's Scoping Memo and Ruling* ("Scoping Memo") in this proceeding,¹ the Center for Climate Protection ("CCP") submits this motion for leave to file opening comments 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*.² The opening comments are attached to this motion as

¹ *Assigned Commissioner's Scoping Memo and Ruling* ("Scoping Memo"), December 21, 2018, at 14. The deadline for comments was subsequently modified by the *E-Mail Ruling Granting Extension of Time*, dated January 22, 2019, from Administrative Law Judge Peter V. Allen.

² Investigation ("I.") 15-08-019, filed August 27, 2015.

Attachment A.³ This motion is being filed and served concurrently with CCP's motion for party status in this proceeding.⁴

II. Motion for Leave to File Opening Comments

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. As further explained in its motion for party status, CCP has two primary interests in this proceeding: (1) to ensure that a review of PG&E's corporate governance, structure, and operations, and a consideration of alternatives, is accomplished, in order to address immediate concerns about safety and reliability of electric and gas service; and (2) to determine how PG&E can best be structured to implement California's energy policies, particularly the decentralization and decarbonization of our energy systems, and of the larger economy more generally, as well as and responding to needs for climate adaptation.⁵ CCP's opening comments, which can be found in **Attachment A**, address these subjects in a thoughtful and constructive manner, exploring possible changes to PG&E's structure in great detail.

Given that this motion for leave to file comments and the accompanying motion for party status are being filed within a relatively short time after the Scoping Memo was issued, on December 21, 2018, CCP is seeking to participate in this proceeding relatively early at this stage in the process. CCP's request will not cause any undue

³ *Attachment A: Opening Comments of the Center for Climate Protection in Response to Assigned Commissioner's Scoping Memo and Ruling*, I.15-08-019, February 13, 2019.

⁴ *See Motion for Party Status of the Center for Climate Protection* ("Motion for Party Status"), I.15-08-019, February 13, 2019.

⁵ Motion for Party Status at 2.

delay in the proceedings or prejudice any other party. Provided the motion is granted, CCP will file and serve its opening comments pursuant to the direction provided.

III. Conclusion

For the reasons stated above, CCP respectfully requests that its motion for leave to file opening comments be granted.

Dated: February 13, 2019

/s/ W. Woodland Hastings

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