

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Investigation on the)	
Commission's Own Motion to Determine)	
Whether Pacific Gas and Electric Company and)	I.15-08-019
PG&E Corporation's Organizational)	
Culture and Governance Prioritize Safety.)	
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MOTION FOR PARTY STATUS OF THE CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION

FRANK HARRIS
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Dated: February 13, 2019

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In accordance with Rule 1.4 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), the California Municipal Utilities Association ("CMUA"), respectfully files this motion for party status in the above-captioned docket.

I. DESCRITPION OF AMERICAN PUBLIC POWER ASSOCIATION

CMUA is a statewide organization of local public agencies in California that provide electricity and water service to California consumers. CMUA membership includes publicly-owned electric utilities ("POUs") that operate electric distribution and transmission systems. In total, CMUA members provide approximately 25 percent of the electricity load in California.

II. INTEREST IN THE PROCEEDING

On December 21, 2018, the Assigned Commissioner issued a Scoping Memo and Ruling ("Scoping Memo") posing various questions regarding alternatives to the current management and operational structure of Pacific Gas and Electric Company ("PG&E"). One of the questions posed in the Scoping Memo is whether PG&E should be reconstituted as a POU.\(^1\) As the statewide trade association for POUs in California, CMUA has a direct interest in the discussion of this issue and possesses unique knowledge regarding the creation and operation of POUs. The factual and legal contentions that CMUA intends to make in this proceeding will primarily relate

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¹ Scoping Memo at 12.

to ensuring that any discussion of the risks and benefits of a POU, as well as the process for creating a POU, is both comprehensive and accurate.

III. SERVICE

For the purpose of receipt of all correspondence, pleadings, orders, and notices in this proceeding, the following person should be placed on the service list as a "party":

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IV. CONCLUSION

CMUA's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, CMUA respectfully requests that the Commission grant this Motion for Party Status.

Dated: February 13, 2019 Respectfully submitted,

/s/ Frank Harris
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