

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



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Order Instituting Investigation and Order to Show Cause on the Commission's Own Motion into the Operations and Practices of Pacific Gas and Electric Company With Respect to Locate and Mark Practices And Related Matters

Investigation 18-12-007
(Filed December 13, 2018)

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



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I. INTRODUCTION

Pursuant to Rule 1.4 of the Commission's Rules of Practice and Procedure, The Utility Reform Network ("TURN") submits this motion for party status in this Order Instituting Investigation ("OII") into the conduct and practices of Pacific Gas and Electric Company ("PG&E") related to its locate and mark practices.

The OII "invites interested parties to actively participate in this proceeding as it involves important safety and other policy matters that may benefit from the expertise, participation, and evidence of other parties."¹

II. GROUNDS FOR PROPOSED INTERVENTION

A. Statement of Interest

TURN is a non-profit consumer advocacy organization with a 45-year history of representing the interests of residential and small commercial customers before this Commission. TURN's articles of incorporation specifically authorize its representation of residential customers.

TURN has a strong interest in natural gas pipeline safety, which directly impacts all PG&E ratepayers as well as all residents in PG&E's service territory. TURN is thus interested in all aspects of this investigation into PG&E's practices and policies that relate to its Locate and Mark practices.

As the Commission well knows, TURN is a frequent participant in Commission proceedings as a representative of the interests of California's residential ratepayers. TURN

¹ OII, p. 10.

participated extensively in the three enforcement proceedings related to the 2010 San Bruno explosion, I.11-02-016, I.11-11-009, and I.12-01-007 and has been found to have made numerous substantial contributions to those proceedings.²

B. Statement of Factual and Legal Contentions

TURN intends to be an active party to this proceeding. TURN intends to evaluate the alleged violations of applicable law and any proposed fines or other remedies. Although TURN has not determined the scope of its intended participation in this OII at this early stage of the proceeding, TURN's participation may include the submission of pleadings and testimony regarding the nature and extent of violations and proposed remedies for such violations. Those proposals may include ratemaking remedies, drawing on TURN's expertise in CPUC ratemaking matters. TURN's contentions will be reasonably pertinent to the issues identified in the OII and any subsequent scoping rulings.

III. CONCLUSION

For these reasons, TURN requests that the Commission grant TURN party status in this proceeding and that the undersigned counsel for TURN be added to the service list as TURN's representative in this case.

² D.15-10-043.

Date: January 14, 2019

Respectfully submitted,

By: _____/s/_____
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