

**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 SIERRA CLUB

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Attorneys for Sierra Club

Dated February 4, 2019

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Pursuant to Rules 1.4 and 11.1 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, Sierra Club submits this motion requesting party status in this proceeding.

I. Description of Sierra Club

Sierra Club is a non-profit, member-based, "public benefit" California corporation with over 790,000 members nationwide and more than 172,000 members living in California. Many of Sierra Club's California members are residential customers of Pacific Gas and Electric Company ("PG&E"). Sierra Club's mission is to promote the responsible use of the earth's ecosystems and resources as well as to protect and restore the quality of the natural and human environment. A key priority of Sierra Club is to end the extraction and combustion of fossil fuels and thereby limit the severity of the impacts of climate disruption on the natural and human environment. To that end, Sierra Club advocates for the increased deployment of renewable energy and non-fossil integrative solutions as well as the electrification of vehicles and natural gas end-uses such as space and water heating. Sierra Club frequently appears before the Commission to ensure utility investments further California's greenhouse gas reduction requirements and are of sufficient scale to address the magnitude of the climate crisis.

II. Statement of Interest and Proposed Contentions

The interests of the customers represented by Sierra Club are unique and well suited to this proceeding. As the Commission has recognized, "[w]ith respect to environmental groups, we have concluded they were eligible in the past with the understanding that they represent customers whose environmental interests include the concern that, e.g., regulatory policies

encourage the adoption of all cost-effective conservation measures and discourage unnecessary new generating resources that are expensive and environmentally damaging. They represent customers who have a concern for the environment which distinguishes their interests from the interests represented by Commission staff, for example.”¹

In California, hotter, drier conditions caused by climate change, coupled with the failure of regulated utilities to operate the electric system in a manner commensurate with the corresponding increased risk to public safety, have resulted in a series of record wildfires at enormous personal, financial, and environmental cost. Sierra Club brings to this proceeding its members’ environmental concerns on slowing the climate crisis that has made massive wildfires no longer isolated disasters, but the new normal. To that end, Sierra Club’s focus in this proceeding will be ensuring that a restructured PG&E is both capable of ensuring safe service in the face of increased fire risks and making the investments necessary to rapidly decarbonize the power supply and electrify vehicles and homes so that California can succeed in moving to a zero emissions economy. As stated in the December 21, 2018 Scoping Memo, Sierra Club intends to provide its perspective on the impact of alternative utility structures on “the ability of the state to implement its energy policies, including the need to reduce GHG emissions and local criteria pollutants in both the utility sector and the economy as a whole.”²

III. Notice and Communications

Service of pleadings, notices, orders, and other communications and correspondence in this proceeding should be directed to Sierra Club’s counsel:

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In addition, the following representatives should be added to the Information Only portion of the service list for this proceeding:

¹ Decision 98-04-059, *Interim Opinion Revising the Intervenor Compensation Program and Inviting Legislative Amendment Programs*, at 30, fn. 14 (Apr. 23, 1998), http://docs.cpuc.ca.gov/WORD_PDF/REPORT/84455.PDF (citation omitted).

² Assigned Commissioner’s Scoping Memo and Ruling at 13 (Dec. 21, 2018).

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IV. Conclusion

Sierra Club is a frequent participant in utility applications for the design of utility programs and tariffs, and believes its intervention is warranted in this case. Sierra Club'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, Sierra Club respectfully requests the Commission grant this Motion for Party Status.

Respectfully submitted,

/s/ Matthew Vespa

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