

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



FILED

02/11/19
08:00 AM

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)

MUSSEY GRADE ROAD ALLIANCE MOTION FOR PARTY STATUS

Diane Conklin, Spokesperson
Mussey Grade Road Alliance
P.O. Box 683
Ramona, CA 92065
Telephone: (760) 787-0794
Email: dj0conklin@earthlink.net

Dated: February 11, 2019

1. INTRODUCTION

Pursuant to Rules 1.4 and 11.1 of the CPUC Rules of Practice and Procedure, the Mussey Grade Road Alliance (MGRA or Alliance) submits this motion to become a party to this proceeding.

2. IDENTITY OF THE MUSSEY GRADE ROAD ALLIANCE

The Alliance is a non-profit, grassroots, community-based advocacy organization dedicated to the preservation and protection of Mussey Grade Road and environs in Ramona, California. Since 2006 the Alliance has built an extensive history of successful intervention at the Commission regarding fire safety issues, motivated by our previous experience with wildfire in our area.¹ We were the first intervenors to bring the issue of wildfire and powerlines to the Commission as part of SDG&E's Sunrise Powerlink application (A.06-08-010). In the aftermath of the 2007 wildfires MGRA contributed to other Commission proceedings to improve wildfire safety for electrical utilities, proceedings in which Pacific Gas and Electric Company was a participant, including the safety rulemaking R.08-11-005 (and its successor R.15-05-006), the risk-based safety proceedings (S-MAP) R.13-11-006 and A.15-05-002-5. The Alliance is presently involved in the rulemaking regarding wildfire mitigation plans, R.18-10-007 and de-energization R.18-12-005.

3. INTEREST IN THE PROCEEDING

The Alliance had been a strong advocate for utility wildfire safety since we began our CPUC interventions in 2006. Among the innovations the Alliance brought to the Commission that have now been adopted into statewide regulations were the requirement that utilities collect fire ignition data and provide it to the Commission, the requirement that utilities prepare wildfire prevention plans, and the creation of statewide utility fire hazard maps.² One thing that we've learned is that we can always count on PG&E to be a powerful, active and eloquent opponent of safety measures we bring forward.³

¹ In 2003, 2/3 of the homes in the Mussey Grade Road corridor were destroyed by the Cedar fire. In 2007, the Mussey Grade area was surrounded on three sides by the Witch fire, ignited by SDG&E equipment.

² D.12-01-032; pp. 45-55; pp. 128-135; pp. 135-150.

³ For example, Id.

PG&E is now in the position that it may be utterly undone by wildfire. As the Commission and courts determine what will rise again in its place, MGRA would like to help ensure that a safety-centric view will be at the core of the culture of a rebuilt PG&E or its successor entities. While we are not PG&E customers this affects us in two ways: First, PG&E or its successors are still likely to be influential players at the Commission, and we would like to see a forward-thinking approach on safety rather than the foot-dragging that has blocked and slowed safety improvements over the last few years. This affects all Californians. Secondly, with the utility markets in turmoil as a result of recent massive and killer wildfires, the entire governing model for California utilities may change. What is decided for PG&E may well end up affecting all utilities in the state, including San Diego Gas and Electric Company, our provider. The outcome of this proceeding is therefore likely to impact future safety initiatives at the Commission, which is something the Alliance has a direct interest in.

MGRA intends to participate in this proceeding in issues that are directly related to safety. We will be filing comments on the Scoping Memo and Ruling related to safety. The participation of MGRA will not prejudice any party, expand the scope of the proceeding, or cause any delay in the proceeding.

4. SERVICE

MGRA representatives in this proceeding are as follows:

Party:

Diane Conklin
Spokesperson
Mussey Grade Road Alliance
PO Box 683
Ramona, CA 92065
760-787-0794
dj0conklin@earthlink.net

Information Only:

Joseph W. Mitchell, Ph.D.
M-bar Technologies and Consulting, LLC
19412 Kimball Valley Rd.
Ramona, CA 92065
760 703 7521
jwmitchell@mbartek.com

Respectfully submitted this 11th day of February, 2019,

By: /S/ ***Diane Conklin***

Diane Conklin
Spokesperson
Mussey Grade Road Alliance
P.O. Box 683
Ramona, CA 92065
(760) 787 – 0794 T
dj0conklin@earthlink.net