

**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 CITY OF SAN JOSE

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February 5, 2019

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Pursuant to Rules 1.4(a)(4) and 11.1(b) of the Rules of Practice and Procedure of the California Public Utilities (“Commission”) and the Assigned Commissioner’s Scoping Memo and Ruling dated December 21, 2018 and amended January 22, 2019¹ (the “Amended Scoping Memo and Ruling”), the City of San José (“San José”) respectfully moves for party status in the above-captioned proceeding.

I. BACKGROUND AND INTEREST IN THIS PROCEEDING

San José is the largest and most populous city in Northern California. In May 2017, the San José City Council unanimously voted to create San José Clean Energy (“SJCE”), a community choice aggregation (“CCA”) program that provides electric generation, including cost-competitive clean electricity, product choice, price stability, energy efficiency, and greenhouse gas emission reductions to residents of San José. SJCE initiated customer service on February 1, 2019 and is currently serving commercial and residential customer accounts within Pacific Gas & Electric Company’s (“PG&E”) service territory.

¹ On January 22, 2019, the presiding officer for this proceeding, ALJ Peter V. Allen, issued an E-MAIL Ruling Granting Extension of Time, which extends the comment and reply deadlines.

San José is interested in this proceeding because many of its residents receive bundle service from PG&E. Further, SJCE is a customer of PG&E, and SJCE's customers are also PG&E customers for transmission, distribution, and other services. The safety of PG&E's utility services has direct and significant effects on San José's residents and SJCE's business, services, and customers.

Moreover, the Amended Scoping Memo and Ruling asks direct questions regarding the services PG&E should provide and whether other types of load serving entities, such as CCAs, may be able to take on greater responsibility for providing retail services to PG&E's customers. The Amended Scoping Memo and Ruling also sets forth factors that will guide the Commission's assessment of alternatives to existing management and operational structures of the electric and gas service in Northern California. These factors include the utility's relationships with and role in local communities such as San José. As the largest and most populous city in Northern California, and as the operator of SJCE, San José has a direct and substantial interest in the issues that will be considered and decided in this proceeding.

II. PARTICIPATION IN THIS PROCEEDING

San José expects to provide the Commission with factual and legal information in response to the questions set forth in the Assigned Commission's Scoping Memo and Ruling dated December 21, 2018 and the Amended Scoping Memo and Ruling. Such information is directly pertinent to the established subject matter of this proceeding.

III. SERVICE

Service of notices, orders and other correspondence in this docket should be directed to:

Luisa F. Elkins
Senior Deputy City Attorney
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200 East Santa Clara Street, 16th Floor
San Jose, CA 95113-1905
Tele: (408) 535-1953
Email: luisa.elkins@sanjoseca.gov

Additionally, San José requests “information only” status for the following:

Kari Smith
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San Jose Clean Energy
200 East Santa Clara Street, 14th Floor
San Jose, CA 95113-1905
Tele: (408) 793-5317
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IV. REQUEST FOR PARTY STATUS

For the reasons set forth herein, San José respectfully requests that it be granted party status in this proceeding.

Respectfully submitted,

/s/ Kevin Fox
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Dated: February 5, 2019