

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA



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Application of Pacific Gas and Electric
Company for Authority, Among Other
Things, to Increase Rates and Charges
for Electric and Gas Service Effective
on January 1, 2020. (U39M.)

Application 18-12-009
(Filed December 13 2018)

CENTER FOR ACCESSIBLE TECHNOLOGY'S MOTION FOR PARTY STATUS

CENTER FOR ACCESSIBLE TECHNOLOGY
MELISSA W. KASNITZ
3075 ADELINE STREET, SUITE 220
BERKELEY, CA 94703
510/841-3224

January 30, 2019

service@cforat.org

I. INTRODUCTION

Pursuant to Rule 1.4 of the Commission's Rules of Practice and Procedure, the Center for Accessible Technology (CforAT) respectfully requests party status in this proceeding.

II. COMPLIANCE WITH RULE 1.4(b)

Rule 1.4(b) provides that a person seeking party status by filing a motion to become a party shall:

- (1) fully disclose the persons or entities in whose behalf the filing, appearance or motion is made, and the interest of such persons or entities in the proceeding; and
- (2) state the factual and legal contentions that the person intends to make and show that the contentions will be reasonably pertinent to the issues already presented.

CforAT seeks party status in order to represent the interests of PG&E customers with disabilities. CforAT regularly represents the interests of customers with disabilities before the Commission, including efforts to ensure that regulated utilities provide services in a manner that is accessible to such customers. CforAT has been a party to multiple prior General Rate Cases involving PG&E, as well as General Rate Cases involving other IOUs.

In this proceeding, as in previous General Rate Cases, CforAT has entered into separate discussions with PG&E, which resulted in a signed Memorandum of Understanding (MOU) on access issues. This MOU was incorporated into the testimony submitted with PG&E's GRC Application as Attachment 5A to Exhibit (PG&E-6) Customer Care.

CforAT intends to participate in a limited manner in the active litigation of this proceeding, primarily to support adoption of the MOU. To the extent that the contents of the MOU are challenged by any other party, CforAT will respond as appropriate. If the MOU is not challenged, CforAT does not anticipate active participation, but will monitor the proceeding in a general manner. CforAT also anticipates ongoing efforts to oversee implementation of the comparable agreement that was incorporated as part of a multi-party settlement and adopted in D.17-05-013, issued in PG&E's 2017 GRC proceeding (A.15-09-001), which remains in effect. This may include efforts to ensure that implementation of the currently active agreement is not impeded by PG&E's bankruptcy filing.

III. SERVICE LIST REQUEST

CforAT requests that our formal appearance be entered in this proceeding as follows:

Melissa W. Kasnitz
Center for Accessible Technology
3075 Adeline Street, Suite 220
Berkeley, CA 94703
Phone: 510-841-3224
Fax: 510-841-7936
Email: service@cforat.org

IV. CONCLUSION

CforAT is filing this motion at the beginning of this proceeding. Our 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.

Respectfully submitted,

/s/ Melissa W. Kasnitz

MELISSA W. KASNITZ

Attorney for Center for Accessible Technology

3075 Adeline Street, Suite 220

Berkeley, CA 94703

Phone: 510-841-3224

Fax: 510-841-7936

Email: service@cforat.org

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