



FILED

01/10/19
04:59 PM

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

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.)

Application 18-12-009
(filed December 13, 2018)

(U 39 M))

MOTION FOR PARTY STATUS

OF THE

TRANSMISSION AGENCY OF NORTHERN CALIFORNIA

Sean M. Neal
DUNCAN, WEINBERG, GENZER &
PEMBROKE, P.C.
915 L Street
Sacramento, CA 95814
Telephone: (202) 467-6370
Facsimile: (202) 467-6379
E-mail: smn@dwgp.com

January 10, 2019

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

Application of Pacific Gas and Electric Company for)	
Authority, Among Other Things, to Increase Rates)	Application 18-12-009
and Charges for Electric and Gas Service Effective on)	(filed December 13, 2018)
January 1, 2020.)	
)	
)	
(U 39 M))	
)	

**MOTION FOR PARTY STATUS
OF THE
TRANSMISSION AGENCY OF NORTHERN CALIFORNIA**

I. INTRODUCTION

Pursuant to Rule 1.4(a)(4) of the Rules of Practice and Procedure of the Public Utilities Commission of the State of California (“Commission”), the Transmission Agency of Northern California (“TANC”) respectfully moves for party status in the above-captioned proceeding, and states as follows:

II. IDENTITY OF TRANSMISSION AGENCY OF NORTHERN CALIFORNIA AND BASIS FOR THE INTERVENTION

TANC is a joint exercise of powers agency organized and existing under the laws of the State of California. Among TANC’s purposes is the provision of electric transmission facilities and services for the use of its Members.¹ TANC is the largest Participant in, and the Project Manager of, the California-Oregon Transmission Project and has an allocation of 300 MW of

¹ TANC’s Members are the California cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, and Ukiah; the Sacramento Municipal Utility District; the Modesto Irrigation District; and the Turlock Irrigation District. The Plumas-Sierra Rural Electric Cooperative is an associate member of TANC.

firm bi-directional service from Pacific Gas and Electric Company (“PG&E”) pursuant to the Principles for Tesla-Midway Transmission Service.

On December 13, 2018, Pacific Gas and Electric Company (“PG&E”) submitted an Application to the Commission, requesting approval of a Test Year 2020 General Rate Case. PG&E requests an increase to its gas and electric distribution and generation base revenue requirements of \$1.058 billion (a 12.4 percent increase over the 2019 adopted revenue of \$8.518 billion), effective January 1, 2020.² PG&E attributes this increase primarily to: (1) its Community Wildlife Safety Program; (2) increased Liability Insurance premiums; (3) capital investments to replace aging infrastructure; and (4) depreciation associated with PG&E’s plant investments.³

PG&E relies upon certain methodologies and expenses approved by the Commission, including cost allocation, for rates charged to TANC and its Members. TANC has an interest in the determination of such methodologies and expenses, and will review PG&E’s documentation of both, including through discovery and other procedures ordered by the Commission and Assigned Administrative Law Judge, to determine the appropriateness of PG&E’s positions and make contentions pertinent to the appropriateness and accuracy of those rate methodologies and expenses. TANC’s participation will pertain to the issues for decision by the Commission with respect to the above-captioned filing by PG&E.

III. SERVICE

For purposes of receipt of all correspondence, pleadings, orders and notices in this proceeding, the following TANC representative should be placed on the service list under the “party” designation:

² See Application at 1.

³ See *id.* at 7-8.

Sean M. Neal
Duncan, Weinberg, Genzer & Pembroke, P.C.
915 L Street, Suite 1410
Sacramento, CA 95814
Tel: (916) 498-0121
Fax: (916) 498-9975
E-mail: smn@dwgp.com

In addition, TANC requests that the following TANC representatives be placed on the service list under the “information only” designation:

Lauren M. Perkins
Duncan, Weinberg, Genzer &
Pembroke, P.C.
915 L Street, Suite 1410
Tel.: (916) 492-2801
Fax.: (916) 498-9975
E-mail: lmperkins@dwgp.com

David Cohen
Navigant Consulting
2855 SW Scenic Drive
Portland, OR 97225
(503) 708-7852
E-mail: dcohen@navigant.com

IV. CONCLUSION

For the above reasons, the Transmission Agency of Northern California respectfully

requests that the Commission grant its Motion for Party Status.

Dated: January 10, 2019, at Sacramento, California.

Respectfully submitted,

By: /s/ Sean M. Neal_____

Sean M. Neal

Special Counsel for the Transmission Agency of
Northern California

DUNCAN, WEINBERG, GENZER &
PEMBROKE, P.C.

915 L Street, Suite 1410

Sacramento, CA 95814

Telephone: (916) 498-0121

Facsimile: (916) 498-9975

E-mail: smn@dwgp.com