



**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, 2017. (U39M)

Application 15-09-001  
(Filed September 1, 2015)

**MOTION FOR PARTY STATUS BY FRIENDS OF THE EARTH**

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Attorneys for Friends of the Earth

Date: October 21, 2015

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Pursuant to Rule 1.4(a)(4) of the Commission’s Rules of Practice and Procedure, Friends of the Earth hereby files a motion for party status in the above-referenced General Rate Case Application of Pacific Gas and Electric Company. Friends of the Earth is a U.S. Internal Revenue Code § 501(c)(3) non-profit organization with approximately 6,200 members in California. Many of these members live within the service territory of PG&E. For over forty years, FOE has worked to educate the public about the costs and risks of nuclear power, including the Diablo Canyon Power Plant (“DCPP”). FOE members who are also PG&E ratepayers are obligated to pay for the cost of energy provided by the DCPP.

As a party to this proceeding, FOE would engage in discovery, submit testimony including expert testimony, participate in workshops and evidentiary hearings, and file briefs as well as comments on the application and the reasonableness of any rates requested for the DCPP. FOE also intends to address whether PG&E’s GRC application improperly includes costs to address the imprudence of PG&E’s actions with respect to operation of the DCPP. PG&E has already stated that this general rate case application

will “address costs for utility-owned facilities, including DCP. . .”<sup>1</sup> Therefore, according to PG&E, “If FOE is concerned about the cost-effectiveness of continuing to operate DCP after January 1, 2017, it can raise that issue in the 2017 GRC proceeding.”<sup>2</sup>

For the reasons described above, FOE respectfully requests that the Commission grant its Motion for Party Status.

If the Commission grants this Motion, FOE requests that the Commission add the following contact information to the “Parties” service list:

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FOE also requests that the following parties be added to the “Information only” service list:

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<sup>1</sup> Response of Pacific Gas and Electric Company (U 39 E) to Petition of Friends of the Earth, (Petition 14-10-007) at p. 9.

<sup>2</sup> *Id.* at p. 10.

Date: October 21, 2015

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By: /s/ Ellison Folk

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