



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

**FILED**  
10-16-15  
04:59 PM

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. (U 39 M)

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

**MOTION OF THE OF THE CONSUMER FEDERATION OF CALIFORNIA  
REQUESTING PARTY STATUS**

**I. Introduction**

The Consumer Federation of California ("CFC"), pursuant to California Public Utilities Commission Rules of Practice and Procedure Rules 1.4 and 11.1, files this Motion Requesting Party Status in Application 15-09-001 (A.15-09-001).

**II. Disclosure of Entity and Contentions**

The Consumer Federation of California is a non-profit federation of several organizations, as well as individual members. Organizational members include consumer groups, senior citizen groups, labor organizations and other organizations which are composed of California consumers, all of whom are residential customers of California public utilities.

Consumer Federation of California takes a broad view of consumer issues, considering the impact of public policy on the quality and cost of goods and services as well as its effects on working people.

CFC seeks involvement in this proceeding to add insight into the methodologies and expenses provided by PG&E to the Commission justifying its rate increases. In

particular, CFC has an interest in costs associated with work performed for third parties (in New Business at the Request of Others), Hydro ops costs, Compliance with the CPSP findings and resulting CPUC directives (following the San Bruno accident), and the identification and disposition of any anticipated efficiency or productivity gains, or other savings. More generally, to be narrowed as CFC works with other intervenors on avoiding duplication and the proceeding progresses, CFC will address the reasonableness of (i) increases in the costs of delivering energy safely to customers and providing responsive customer service; (ii) the need to make capital investments to replace aging infrastructure; (iii) the need for capacity-driven additions; (iv) recovery of costs for depreciation associated with PG&E's plant investments and Depreciation Study; (v) costs of complying with governmental regulations and orders; and (vi) PGE's method for determining the capital revenue requirement increases during the PTY period, and particularly in the appropriate measure for escalation and the forecast capital addition. CFC's participation will include filings, review of PG&E's documentation, discovery, and other procedures ordered by the Commission.

### **III. SERVICE**

Service of notices, orders, and other communications and correspondence in the proceeding should be directed to the Consumer Federation of California at the address set forth below:

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#### **IV. CONCLUSION**

Consumer Federation of California's 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. For the reasons stated above, Consumer Federation of California respectfully requests the Commission grant this Motion for Party Status.

Respectfully signed and submitted on October 16, 2015.

\_\_\_\_\_/s/\_\_\_\_\_,  
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