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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)	Application 15-09-001
Charges for Electric and Gas Service Effective on)	(Filed September 1, 2015)
January 1, 2017.)	

**MOTION FOR PARTY STATUS BY THE
Alliance for Nuclear Responsibility**

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ATTORNEYS FOR ALLIANCE FOR NUCLEAR RESPONSIBILITY

OCTOBER 6, 2015
SACRAMENTO, CALIFORNIA

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**Motion for party status by the
alliance for nuclear responsibility**

I. Introduction

Pursuant to Rules 1.4(a)(4) and 11.1 of the Commission's Rules of Practice and Procedure, the Alliance for Nuclear Responsibility ("A4NR") submits this Motion for Party Status in the above-captioned proceeding. A4NR is a California nonprofit corporation registered and qualified under Section 501(c)(3) of the Internal Revenue Code. A4NR represents the interest of residential and small business customers in nuclear energy issues before California and federal regulatory agencies, the California State Legislature, and the United States Congress.¹ A4NR is well known to the Commission, having participated in numerous Commission proceedings involving California's nuclear power plants, including the Diablo Canyon Nuclear Power Plant ("Diablo Canyon") owned and operated by Applicant Pacific Gas & Electric Company ("PG&E").

II. DISCUSSION

A4NR's interest in this proceeding centers on identifying, examining, and addressing matters related to Diablo Canyon operating costs and capital expenditures as forecasted by PG&E for the test year and ensuing two-year attrition period. In particular, A4NR's participation in this proceeding will address, as related to Diablo Canyon operations, whether PG&E's proposed revenue requirement, annual attrition adjustments, forecasts of operating expenses, capital expenditures and weighted average rate base, and changes to PG&E's nuclear-related balancing accounts are just and reasonable. Based upon its review of the application and the supporting documents served by PG&E to date, A4NR believes various of PG&E's cost estimates and

¹ Most recently, A4NR was the sponsor of 2015 Assembly Bill 361 (*Stats.2015, ch.399*), which extended, until August 26, 2025, the existing method for funding state and local costs for emergency services activities associated with a nuclear power plant. See Public Utilities Code Section 712 and Government Code Section 8610.5, as amended.

proposals are not supported by sufficient evidence to justify their adoption and/or will not result in rates meeting the requirements of Section 451 of the Public Utilities Code, other applicable law, and/or the prior orders and regulations adopted by this Commission. A4NR intends to conduct such discovery as may be necessary to confirm or contest the sufficiency of PG&E's evidence and/or the reasonableness of PG&E's proposals on the issues described above and, further, to present more specific findings, conclusions and recommendations at the conclusion of its discovery efforts.

Upon the granting of this motion, A4NR will participate actively in this proceeding. A4NR intends to conduct discovery, introduce its own evidence, conduct cross-examination of PG&E's witnesses and the witnesses of other parties, and file briefs at the times and pursuant to the directions specified by the Commission for interested parties. To the extent A4NR finds that its interests overlap with the positions of other interested parties, A4NR will actively seek to collaborate with those parties so as to assure that its participation does not duplicate the efforts of those other parties and the resources of the Commission are not wasted. Thus, granting the motion will serve to enhance the record adduced in this proceeding without unduly prejudicing the interests of other parties or causing any undue delays in the timely disposition of this proceeding.

III. CONTACT INFORMATION

A4NR's primary contact in this proceeding will be its attorney, whose contact information is as follows:

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A4NR also requests that the following individuals be placed in the "information only" category of the Service List and be served with all communications and documents in this docket by electronic mail only:

Rochelle Becker
Executive Director

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IV. CONCLUSION

For the reasons stated herein, A4NR respectfully requests that the Commission grant its Motion for Party Status and thereby grant A4NR all the rights and privileges of an interested party as provided under the Commission's rules.

Respectfully submitted,

/s/ Meghan Cox

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