

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



**FILED**

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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

**MOTION FOR PARTY STATUS OF  
THE AD HOC COMMITTEE OF SENIOR UNSECURED NOTEHOLDERS OF  
PACIFIC GAS AND ELECTRIC COMPANY**

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October 21, 2019

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Pursuant to Rules 1.4 and 11.1(b) of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, the Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company<sup>1</sup> (“Ad Hoc Committee”)<sup>2</sup> hereby moves for party status in the above-captioned proceeding.

The United States Bankruptcy Court for the Northern District of California (the “Bankruptcy Court”) has terminated the Debtors’ exclusive right to propose a plan of reorganization, permitting the Ad Hoc Committee and the Official Committee of Tort Claimants (“TCC”) to jointly file and solicit acceptances of an alternative plan of reorganization (the

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<sup>1</sup> Pacific Gas and Electric Company (the “Utility”) and its parent, PG&E Corporation are collectively referred to herein as the “Debtors.”

<sup>2</sup> The Ad Hoc Committee is comprised of a diverse group of financial institutions with long-term interests in California. The Ad Hoc Committee currently consists of Angelo, Gordon & Co., L.P.; Apollo Global Management LLC; Aurelius Capital Management, LP; Canyon Capital Advisors LLC; Capital Group; Carval Investors; Castle Hook Partners LLP; Citadel Advisors LLC; Citigroup Global Markets; Cyrus Capital Partners, L.P.; Davidson Kempner Capital Management LP; Deutsche Bank Securities Inc.; Diameter Capital Partners LP; Elliott Management Corporation; Farallon Capital Management, L.L.C.; Fir Tree Partners; Oaktree Capital Management, L.P.; Och-Ziff Capital Management Group LLC; Pacific Investment Management Company LLC; Pacific Life Insurance Company; P. Schoenfeld Asset Management LP; Senator Investment Group LP; Taconic Capital Advisors LP; Third Point LLC; and Värde Partners, Inc. Members of the Ad Hoc Committee hold in excess of \$10 billion of funded debt claims against the Utility.

“TCC/AHC Plan”).<sup>3</sup> The Ad Hoc Committee has submitted the most recent version of the TCC/AHC Plan, filed with the Bankruptcy Court on October 17, 2019, as Exhibit A to its response filed on October 18, 2019, in Investigation 19-09-016.

The Utility’s proposed revenue requirement and rates, including increases to address wildfire prevention, risk reduction, and safety enhancements such as infrastructure hardening and enhanced vegetation management, constitute foundational elements in ensuring that the Utility emerges from bankruptcy as a financially robust utility, capable of providing safe, reliable, and cost-effective service on a sustainable basis.

The Utility’s proposed revenue requirement and rates also represent integral components of the TCC/AHC Plan. The TCC/AHC Plan is designed to be, at a minimum, rate neutral and will ensure that when the utility emerges from bankruptcy it will have the financial, managerial, and operational capability and corresponding commitment to provide safe, reliable, and cost-effective service to California customers. Accordingly, the Ad Hoc Committee has a substantial interest in this proceeding and others involving the Debtors’ financial condition, ability to address fire safety and risk mitigation, and emergence from bankruptcy. The Ad Hoc Committee’s intervention will not unduly broaden the issues under consideration in this proceeding. Therefore, the Ad Hoc Committee respectfully requests party status in this proceeding.<sup>4</sup> Granting the Ad Hoc

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<sup>3</sup> *In re PG&E Corp., et al.*, No. 19-30088 (Bankr. N.D. Cal. Oct. 9, 2019) (order granting joint motion to terminate the Debtors’ exclusive periods pursuant to section 1121(d)(1) of the Bankruptcy Code).

<sup>4</sup> *See, e.g.*, A.19-01-014, Email Ruling Granting Comcast Phone of California, LLC’s Motion for Party Status (Oct. 10, 2019) (granting motion for party status nine months after proceeding was initiated, and after issuance of proposed decision); A.18-07-011, *et al.*, Administrative Law Judge’s Ruling Granting in Part and Denying in Part the Motion of DISH Network Corporation for Party Status and for Official Notice of Documents Filed with the Federal Communications Commission (Feb. 25, 2019) (granting motion for party status seven months after proceeding was initiated, and several months after scoping memo and prehearing conference).

Committee's motion for party status will not disadvantage any other party, and the Ad Hoc Committee's participation will not cause delay.

The Ad Hoc Committee requests that all correspondence, pleadings, notices, orders, rulings, and other communications concerning this proceeding be provided to the following:

Party Status:

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For the reasons above, the Ad Hoc Committee respectfully requests that it be granted party status in this proceeding.

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Respectfully submitted,

/s/ Steven F. Greenwald

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**[PROPOSED] ADMINISTRATIVE LAW JUDGE’S RULING ON  
MOTION FOR PARTY STATUS OF THE AD HOC COMMITTEE OF  
SENIOR UNSECURED NOTEHOLDERS OF PACIFIC GAS AND  
ELECTRIC COMPANY**

On October 21, 2019, the Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company (“Ad Hoc Committee”) moved for party status in the above-captioned proceeding. The Ad Hoc Committee has a direct and significant interest in this proceeding, and the Ad Hoc Committee’s intervention will not unduly broaden the issues under consideration in this proceeding.

Therefore, **IT IS RULED** that, good cause appearing,

1. The request of the Ad Hoc Committee for party status in A.18-12-009 is granted.
2. The Ad Hoc Committee shall serve all parties of record and any other entities designated for service with any pleadings filed by the Ad Hoc Committee in this proceeding.

Dated \_\_\_\_\_, 2019 at San Francisco, California.

\_\_\_\_\_  
Administrative Law Judge