

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's
Own Motion to Consider Revising Energy Utility
Tariff Rules Related to Deposits and Adjusting Bills
as They Affect Small Business Customers.

R. 10-05-005

***MOTION OF CALIFORNIA SMALL BUSINESS ROUNDTABLE AND
CALIFORNIA SMALL BUSINESS ASSOCIATION
FOR PARTY STATUS***

Pursuant to Rule 1.4, California Small Business Association and California Small Business Roundtable request party status in the above entitled proceeding. California Small Business Association (CSBA) is a 501(c)(6), nonprofit organization that grew out of the 1980 White House Conference on Small Business. It is a grassroots, volunteer-driven organization dedicated to helping members "grow their businesses," informing members about government programs and other resources available to assist them and advocating the views of small business in Congress, California Legislature and federal and state agencies. CSBA regularly polls its members on public policy issues affecting small business and receives guidance from its California Small Business Roundtable (CSBRT), which consists of 40 leading business owners from across the state. CSBA has approximately 203,000 members, in the State of California.

CSBA, CSBRT and their members and all small businesses have an interest in this proceeding. According to the U.S. Small Business Administration, there are over 3.4 million small businesses in California. Small businesses employ approximately 7 million Californians or about 50 percent of the state's non-farm, private workforce. Small businesses owners depend on electric and/or gas service to operate and grow their businesses. As a result, small business owners have an interest in ensuring that the terms and conditions for these services (including deposit, back-billing and refund requirements) are fair and reasonable. CSBA/CSBRT intend to focus on the following

issues in this proceeding: (a) Whether the terms and conditions for back-billing and refunds should be modified and if so how, (b) Whether the terms and conditions for deposits should be modified and if so how, and (c) Whether the definition of small business in the proposed rule or an alternative definition should be adopted.

As the Staff Report of July 28, 2010 states, the Small Business Program Staff specifically invited CSBA and other small business organizations to attend the Workshop held on July 6 in this matter. (Small Business Program Staff Report, p. 1.) As reflected throughout the Staff Report, CSBA/CSBRT attended the Workshop, presented its views on the issues in this proceeding and actively participated in the discussion that led to a consensus on many of the issues. (*Id.*, pp. 9, 14, 15.) Indeed, as reflected in the Workshop Report, it seems that CSBA/CSBRT was the only small business organization to offer comments at the Workshop. CSBA/CSBRT would like to continue to participate in this proceeding on behalf of their small business members.

Granting CSBA/CSBRT's motion will not delay the resolution of any matter in this proceeding. Pursuant to the Administrative Law Judge's Ruling of July 28, 2010, CSBA/CSBRT submitted their Opening Comments to the Small Business and Community Outreach Staff Report on August 6, 2010. Copies of CSBA/CSBRT's comments were served on all parties appearing on the service list for this proceeding.

Dated: September 1, 2010

Respectfully submitted,

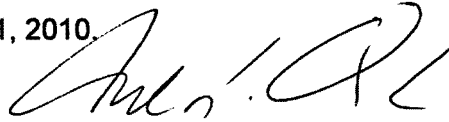

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CERTIFICATE OF SERVICE

Re. Order Instituting Rulemaking on the Commission's Own Motion to Consider Revising Energy Utility Tariff Rules Related to Deposits and Adjusting Bills as They Affect Small Business Customers (OIR 10-05-005).

I hereby certify that on this day I served a copy of the attached **MOTION OF CALIFORNIA SMALL BUSINESS ROUNDTABLE AND CALIFORNIA SMALL BUSINESS ASSOCIATION FOR PARTY STATUS** on all known parties by (i) emailing a copy to each party with an email address appearing on the official service list for the above proceeding and (ii) mailing by first class mail to all others. (Pursuant to Rule 1.9, a list of the names of the persons and entities served is attached to the original certificate filed with the Commission.)

Dated in Larkspur, California on September 1, 2010.



Carl K. Oshiro