

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Own Motion to Adopt New
Safety and Reliability Regulations for
Natural Gas Transmission and Distribution
Pipelines and Related Ratemaking
Mechanisms

R.11-02-019
(Filed February 24, 2011)

DISABILITY RIGHTS ADVOCATES' MOTION TO INTERVENE AND FOR LEAVE
TO LATE-FILE NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION

DISABILITY RIGHTS ADVOCATES
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August 25, 2011

**DISABILITY RIGHTS ADVOCATES' MOTION TO INTERVENE AND FOR
LEAVE TO LATE-FILE NOTICE OF INTENT TO CLAIM INTERVENOR
COMPENSATION**

Pursuant to Rule 1.4 of the California Public Utilities Commission Rules of Practice and Procedure, Disability Rights Advocates (DisabRA) hereby moves to intervene in the Order Instituting Rulemaking on the Commission's Own Motion to Adopt New Safety and Reliability Regulations for Natural Gas Transmission and Distribution Pipelines and Related Ratemaking Mechanisms, under Rulemaking 11-02-019. DisabRA also moves for leave to late-file the attached Notice of Intent to Claim Intervenor Compensation (NOI) in this proceeding, based on significant staffing changes that caused DisabRA to inadvertently miss the July 5, 2011 deadline to timely file our NOI.

As stated in our opening comments, DisabRA began participating in this proceeding "in order to protect the interests of people with disabilities, who are particularly vulnerable in emergency situations, and who are disproportionately low income."¹ Since the February 25, 2011 issuance of the Order Instituting Rulemaking on the Commission's Own Motion to Adopt New Safety and Reliability Regulations for Natural Gas Transmission and Distribution Pipelines and Related Ratemaking Mechanism, DisabRA has timely filed three different pleadings in this proceeding. These include Opening Comments of Disability Rights Advocates filed on April 13, 2011; Disability Rights Advocates' Response to Pacific Gas and Electric Company's Motion for Adoption of a Maximum Allowable Operating Pressure Validation Methodology and Request for Order Shortening Time to Respond filed on April 29, 2011, and Response of Disability Rights Advocates and The Utility Reform Network to Motions of Southern California Gas Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company to Establish Memorandum Accounts filed on May 19, 2011.

¹ Opening Comments of Disability Rights Advocates, R.11-02-019, April 13, 2011 at 1-2.

Despite actively participating in this proceeding, DisabRA inadvertently missed the July 5, 2011 deadline for filing our NOI due to staffing changes within our organization; we just now learned of this deadline. While DisabRA understands the gravity of having missed this deadline, we believe that our steady participation in this proceeding, in light of acclimating to staffing changes, warrants the Commission granting this request for leave to late-file our NOI. DisabRA respectfully requests that the Commission rule on this request as soon as possible.

Signed: August 25, 2011

Respectfully Submitted,

_____/s/_____
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