

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)

MOTION FOR PARTY STATUS FOR CENTER FOR ACCESSIBLE TECHNOLOGY

CENTER FOR ACCESSIBLE TECHNOLOGY  
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September 27, 2011

## I. INTRODUCTION

Pursuant to Rule 1.4 of the Commission's Rules of Practice and Procedure, CforAT respectfully requests to be granted party status in this consolidated proceeding.<sup>1</sup>

### A. Compliance With Rule 1.4(b)

Rule 1.4(b) provides that a person seeking party status by filing a motion to become a party shall:

(1) fully disclose the persons or entities in whose behalf the filing, appearance or motion is made, and the interest of such persons or entities in the proceeding; and

(2) state the factual and legal contentions that the person intends to make and show that the contentions will be reasonably pertinent to the issues already presented.

CforAT seeks party status in order to advance and protect the interests of customers with disabilities who depend on safe, reliable and affordable natural gas service. In doing so, CforAT seeks to act as the successor to Disability Rights Advocates ("DisabRA") and adopt DisabRA's prior pleadings as its own.<sup>2</sup> By allowing CforAT to join this proceeding as a party, CforAT will seek to ensure that customers with disabilities benefit from safety and reliability enhancements to California's natural gas transmission and distribution pipelines, including improved customer communications and education regarding natural gas as well as technical improvements to the pipeline system and the IOUs' record-keeping regarding the system. These customers will also benefit from public safety improvements stemming from improved emergency responses

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<sup>1</sup> While this Motion for Party Status is pending, CforAT respectfully requests to be added to the service list on an "Information Only" basis, to the same address as set forth below, so that we receive appropriate information as the proceeding develops.

<sup>2</sup> On August 23, 2011, CforAT and DisabRA executed an agreement in which they agreed that CforAT will move to succeed DisabRA in actively representing the disability community before the Commission, and DisabRA will support such motion or motions. With this Motion, CforAT is seeking to act as DisabRA's successor and adopt DisabRA's past filings as its own in this proceeding. CforAT has sought party status in several new proceedings in which DisabRA has not participated, and has filed motions to substitute for DisabRA in multiple proceedings in which DisabRA has been an active party. If this motion is granted, DisabRA will cease to participate as an active party, thus avoiding any duplication of effort. In A.10-03-014, a ruling by the Administrative Law Judge was issued on September 12, 2011, granting a motion similar to this one.

to incidents involving natural gas. Additionally, however, these customers are disproportionately low income relative to other residential consumers, while also tending to consumer greater-than-average levels of energy. Because of this combination of characteristics, people with disabilities are at risk of harm if the costs associated with pipeline improvements are allocated too substantially to residential customers.

The factual and legal contentions that CforAT intends to address in this proceeding include the following:

- The need for effective communication with disabled customers (including communications regarding emergency responses and customer education information),
- The need for safety improvements to the natural gas pipeline system and to emergency responses to incidents involving natural gas;
- The need for improvements to record-keeping by IOUs;
- The costs of system improvements and the allocation of such costs among shareholders and various classes of ratepayers;

CforAT intends to coordinate its participation to the extent feasible with the other intervenors with similar interests.

**B. Service List Request**

CforAT requests that its formal appearance be entered in this proceeding as follows:

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## II. CONCLUSION

For the foregoing reasons, CforAT respectfully requests to be granted party status in this proceeding, to be approved as DisabRA's successor, and to adopt DisabRA's prior filings as its own.

Respectfully submitted,

/s/ Melissa W. Kasnitz

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