

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 FOR LEAVE TO LATE-FILE
NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION

DISABILITY RIGHTS ADVOCATES
REBECCA S. WILLIFORD
2001 Center Street, Fourth Floor
Berkeley, California 94704-1204
Telephone: 510-665-8644
Fax: 510-665-8511
TTY: 510-665-8716
pucservice@dralegal.org

August 25, 2011

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

Disability Rights Advocates (DisabRA) hereby moves for leave to late-file the attached Notice of Intent to Claim Intervenor Compensation (NOI) 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. This motion is 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.

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/
Rebecca Williford
Disability Rights Advocates
2001 Center Street, Fourth Floor
Berkeley, CA 94704

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