

**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, 2009)

**MOTION OF THE NORTHERN CALIFORNIA
INDICATED PRODUCERS FOR PARTY STATUS**

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Indicated Producers

November 15, 2011

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I. INTRODUCTION

Pursuant to Rule 1.4 of the California Public Utilities Commission's Rules of Practice and Procedure, the Northern California Indicated Producers (NCIP)¹ respectfully move to become a party in the above-captioned rulemaking. The NCIP are to be distinguished from the Southern California Indicated Producers, who are located in the service territory of Southern California Gas Company and also seek, under a separate motion, to become a party to this proceeding.²

II. COMMUNICATIONS

Communications and correspondence regarding this proceeding should be directed to the following individuals:

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¹ Member companies include Aera Energy LLC, ConocoPhillips Company, and Chevron U.S.A. Inc.

² Member companies included within the Southern California Indicated Producers will differ from the companies that comprise the NCIP.

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III. DESCRIPTION OF PARTY

The NCIP consume natural gas at their oil and gas production and petroleum refining operations. These operations will be affected by rate increases and potential service disruptions under PG&E's pipeline safety implementation plan (PSIP). The NCIP also engage in the marketing and transportation of natural gas in the PG&E service territory.

IV. STATEMENT OF INTEREST

PG&E's PSIP, filed on August 26, 2011, has the potential to significantly increase customer costs and cause system disruptions. The PSIP anticipates incremental expenditures exceeding \$2 billion in the first phase of upgrade efforts alone. The resulting revenue requirement and rate design decisions made in this proceeding will directly impact the NCIP. In addition, the service disruptions caused by anticipated upgrade efforts are likely to impact the NCIP's business operations. The interests of the NCIP are not represented by any other party in this case.

V. CONCLUSION

The NCIP respectfully request that the Commission grant this motion for party status.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Evelyn Kahl Seema Srinivasan". The signature is written in a cursive, flowing style.

Evelyn Kahl
Seema Srinivasan

Counsel to the Northern California
Indicated Producers

November 15, 2011