

**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.

Rulemaking 11-02-019
(Filed February 24, 2011)

**JOINT PARTIES' MOTION FOR LEAVE TO LATE-FILE NOTICE OF INTENT TO
CLAIM INTERVENOR COMPENSATION**

Faith Bautista, President
National Asian American Coalition

Jorge Corralejo, Chairman and President
Latino Business Chamber of Greater Los Angeles

Len Canty, Chairman,
Black Economic Council

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February 9, 2012

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Pursuant to Rule 11.1 of the California Public Utilities Commission's Rules of Practice and Procedure, the Black Economic Council, Latino Business Chamber of Greater Los Angeles and the National Asian American Coalition (cumulatively "Joint Parties") hereby move for leave to late-file the attached Notice of Intent to Claim Intervenor Compensation (NOI) in R.11-02-019. This motion is based on significant staffing changes that caused the Joint Parties to inadvertently miss the July 5, 2011 deadline to timely file the NOI. In addition, because of these staffing changes, the Joint Parties believed their NOI to be filed in accordance with the original deadline. The fact that the NOI had not been filed was only discovered very recently.

The Joint Parties have been active in this proceeding. Indeed, the Joint Parties were the first parties to request party status in this proceeding on March 3, 2011. The Joint Parties were active in informing community members of the public participation hearing in San Bruno on this matter, and were responsible for recruiting 44 of the approximately 140 persons at the hearing. The Joint Parties have conducted a survey of 190 ratepayers and introduced this as evidence before the Commission. The Joint Parties have filed two sets of Opening Comments in this

proceeding and have filed numerous *ex parte* meeting notices. The Joint Parties also filed a motion to create a ratepayer confidence fund in this proceeding. The Joint Parties also recently filed testimony in this proceeding. Lastly, the Joint Parties have been engaged in advocacy that the Commission has not yet seen the fruits of, including sending discovery requests and meeting with ratepayers, real estate agents, and other concerned community members in San Bruno. The Joint Parties are optimistic that this advocacy will be of benefit to this Commission and to the ratepayers.

It should also be noted that the Joint Parties occupy a unique space in this proceeding. The National Asian American Coalition is located in San Bruno itself. We are the only non-profit party located in San Bruno that is working closely with the San Mateo and San Bruno elected officials, local chambers of commerce, and community leaders on this matter. In addition, there is only one other intervenor in this proceeding who represents minorities, even though the majority of ratepayers within PG&E's service territory—including in San Mateo County—are minorities.

Despite actively participating in this proceeding, the Joint Parties inadvertently missed the July 5, 2011 for filing the NOI due to staffing changes within the organization. While the Joint Parties were aware of the original deadline, they believed this NOI had been filed in accordance with the CPUC's Rules of Practice and Procedure. The Joint Parties understand the need for the Commission to streamline proceedings, to adhere to procedure, and to maintain orderliness in each proceeding. The Joint Parties believe that their steady participation in this proceeding, their representation of ratepayers within San Bruno itself, the challenges faced by forming a new legal team, and the Joint Parties' continued participation in this proceeding warrants the Commission granting this request for leave to late-file this NOI.

Dated: February 9, 2011

Respectfully submitted,

/s/ Len Canty
Len Canty, Chairman
Black Economic Council

/s/ Faith Bautista
Faith Bautista, President and CEO
National Asian American Coalition

/s/ Jorge Corralejo
Jorge Corralejo, Chairman
Latino Business Chamber of Greater Los Angeles

/s/Robert Gnaizda
Robert Gnaizda, Of Counsel

/s/ Shalini Swaroop
Shalini Swaroop, Senior Staff Attorney