

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation on the  
Commission's Own Motion into the  
Operations and Practices of Pacific Gas  
and Electric Company's Natural Gas  
Transmission Pipeline System in  
Locations with Higher Population  
Density.

I.11-11-009  
(Filed November 10, 2011)

**MOTION OF THE UTILITY REFORM NETWORK  
FOR PARTY STATUS**



Marcel Hawiger, Energy Attorney  
**THE UTILITY REFORM  
NETWORK**

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February 15, 2012

# MOTION OF THE UTILITY REFORM NETWORK FOR PARTY STATUS

## I. INTRODUCTION

Pursuant to Rule 1.4(a)(4) of the Commission's Rules of Practice and Procedure, the Utility Reform Network ("TURN") hereby files this motion requesting party status in the above-referenced proceeding.

## II. GROUNDS FOR PROPOSED INTERVENTION

Pursuant to Rule 1.4(b), TURN provides the following information.

### A. Statement of interest

TURN is a non-profit consumer advocacy organization with a thirty year history of representing the interests of residential and small commercial customers before this Commission. TURN's articles of incorporation specifically authorize its representation of residential customers.

TURN's interest in this proceeding is to ensure that the alleged violations of state and federal pipeline safety rules and regulations are properly evaluated and adjudicated and appropriate remedies for such violations are assessed.

### B. Statement of factual or legal contentions

TURN intends to be an active party to this proceeding. The extent of TURN's participation is not yet certain and will depend on the outcome of the staff's investigation.

TURN has not determined what factual or legal contentions it intends to make. However, our analyses and contentions will be limited to the scope established in the OII and in any subsequent scoping memo.

### **C. No Prejudice to Other Parties**

This proceeding is in its initial stages. A prehearing conference was held on February 3, 2012. There has been no testimony, hearings or briefs filed. TURN does not believe that our intervention at this date would prejudice any party.

### **III. SERVICE**

TURN thus requests that the ALJ authorize TURN's intervention as a party in this proceeding. The persons who should receive all documents in this case are:

Marcel Hawiger (party status)  
Thomas Long (information only)  
The Utility Reform Network  
115 Sansome Street, Suite 900  
San Francisco, CA 94104

February 15, 2012

Respectfully submitted,

By: \_\_\_\_\_/S/\_\_\_\_\_  
Marcel Hawiger, Energy Attorney

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