

**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)

MOTION OF DYNEGY INC. TO BECOME A PARTY

Jason A. Buchman
Chief Compliance Officer and Vice
President, Group General Counsel
Dynergy Inc.
601 Travis, Suite 1400
Houston, Texas 77002
Tel.: 713.767.8008
Email: jabu@dynergy.com

Date: May 14, 2012

**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)

MOTION OF DYNEGY INC. TO BECOME A PARTY

Pursuant to Rules 1.4 and 11.1 of the Commission's Rules of Practice and Procedure, Dynegy Inc. submits its motion to become a party in this proceeding.

Through its subsidiaries, Dynegy Inc. owns and operates the 2529 MW Moss Landing Energy Facility and the 650 MW Morro Bay Energy Facility. Both of these gas-fired generating facilities receive gas transportation service from Pacific Gas and Electric Company (PG&E).¹ Dynegy is thus directly affected by the safety and operation of PG&E's gas transmission system and by the proposals presented in this proceeding that call for PG&E's gas transportation customers to bear much of the cost of upgrading PG&E's system.

Dynegy's sole interest in this proceeding at this time is the allocation of the costs of PG&E's Pipeline Safety Enhancement Plan and in particular the proposed allocation of costs to noncore electric generators. Dynegy seeks to become a party to file

¹ Dynegy also owns the 165 MW Oakland Energy Facility, which uses oil as its fuel.

opening and reply briefs on the cost allocation issues in this proceeding and possibly to file comments and reply comments on the proposed decision. Dynegy's contentions are set forth more fully in its proposed opening brief, submitted at the same time as this motion.

Dynegy will participate in this proceeding through its representatives, whose information is as follows:

Jason A. Buchman
Chief Compliance Officer and Vice President, Group General Counsel
Dynegy Inc.
601 Travis, Suite 1400
Houston, Texas 77002
Tel.: 713.767.8008
Email: jabu@dynegy.com

and

Michelle D. Grant
Corporate Counsel - Regulatory
Dynegy Inc.
601 Travis, Suite 1400
Houston, TX 77002
Tel.: 713.767.0387
Fax: 713.507.6834
Email: michelle.d.grant@dynegy.com

Mr. Buchman will serve as Dynegy's primary contact in this proceeding for the next few months while Ms. Grant is on maternity leave.

Dynegy respectfully requests the Commission to grant its motion and to allow Dynegy to participate as a party in this proceeding.

Respectfully submitted this 14th day of May, 2012 at San Francisco,
California.

Jason A. Buchman
Chief Compliance Officer and Vice
President, Group General Counsel
Dynergy Inc.

By /s/ Jason A. Buchman
Jason A. Buchman
For Dynergy Inc.

3250/008/X140528.v1