

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

Order Instituting Rulemaking on the
Commission's Own Motion to Conduct a
Comprehensive Examination of Investor Owned
Electric Utilities' Residential Rate Structures,
the Transition to Time Varying and Dynamic
Rates, and Other Statutory Obligations.

Rulemaking 12-06-013
(Filed June 21, 2012)

**MOTION OF CHINESE AMERICAN INSTITUTE FOR EMPOWERMENT AND
ECUMENICAL CENTER FOR BLACK CHURCH STUDIES FOR PARTY STATUS**

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January 16, 2013

**MOTION OF CHINESE AMERICAN INSTITUTE FOR EMPOWERMENT AND
ECUMENICAL CENTER FOR BLACK CHURCH STUDIES FOR PARTY STATUS**

Pursuant to Rule 1.4 of the Commission’s Rules of Practice and Procedure, the Chinese American Institute for Empowerment (CIE) and the Ecumenical Center for Black Church Studies (ECBCS), hereby respectfully request to be granted party status in this proceeding. Our organizations will coordinate with the National Asian American Coalition (NAAC), Black Economic Council (BEC) and Latino Business Chamber of Greater Los Angeles (LBCGLA), which are already parties to this proceeding and have been involved in many cases before the California Public Utilities Commission (CPUC) as “the Joint Parties.”

Our organizations each have separate missions, membership and boards of directors, yet all of our efforts will be coordinated amongst ourselves, the NAAC, BEC, and LBCGLA. Their counsel will also be representing us in this proceeding. The CIE and the ECBCS will *not* be seeking intervenor compensation.

I. Areas of Interest

The CIE and the ECBCS desire to participate in this proceeding to ensure that this transition to dynamic pricing is carried out in a way that is cognizant of the particular challenges faced by communities of color, with a particular emphasis on recent immigrants. Our organizations advocate for low-income and minority communities and work to represent constituencies that will be affected by any dynamic pricing program. In this proceeding, we will seek to complement the issues identified by the NAAC with our grassroots knowledge and understanding of our own constituencies.

The CIE and the ECBCS wish to ensure that any rate implemented has sufficient consumer protections for individuals in the CPUC's low-income energy programs as well as to make the Commission aware of the crucial need for linguistically and culturally appropriate education to accompany the transition to dynamic pricing.

Our constituencies are unfamiliar with the particularities of electricity pricing structures. This unfamiliarity is amplified within the minority and immigrant communities, where there are frequently language and cultural impediments to engagement. This Commission has taken the view in the past that education and outreach are important to the success of utility interactions with ratepayers. With regard to low-income populations in particular, "one of the most notable barriers [to reaching those communities] was identified as *lack of trust . . .*"¹ which "was further compounded by cultural and language barriers. . . ." We hope to communicate the need for trust-building and culturally attuned education with regard to dynamic pricing, as well as to offer granular suggestions and input as to how this may be accomplished.

Our organizations additionally seek to aid in informing the Commission as to the particular difficulty that our constituencies, especially low-income consumers, have in reducing their electricity usage. We share a desire with the NAAC to bring to the Commission an understanding of the importance of the Family Electric Rate Assistance (FERA) program through each utility which ensures that the costs imposed on large households are reflective of the lower costs of serving them and the relative energy efficiency of their consumption.

The existing parties to this proceeding (the NAAC, BEC, and LBCGLA) have a substantial history of intervention before the CPUC and, in their advocacy, have provided their policy recommendations energy issues, particularly as they affect underserved communities. We

¹ D. 12-08-044, Finding of Fact 48, pg 318. (emphasis added).

respectfully request to be granted party status in this proceeding in order to add our own organizations' grassroots voice and perspective regarding the aforementioned issues.

Our organizations will not seek intervenor compensation in this proceeding, but merely wish to add to the Commission's understanding of the impact dynamic pricing plans will have on our constituencies.

II. Parties and Service Request

Service of notices, orders, and other correspondence in this proceeding should be directed to the addresses set forth below:

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as well as a copy to our counsel:

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Respectfully submitted,

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