

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

Application of Pacific Gas and Electric Company for Authority, Among Other Things, To Increase Rates And Charges For Electric And Gas Service Effective On January 1, 2014 (U39M).)	A.12-11-009
)	(Filed November 15, 2012)
)	
)	

**MOTION FOR PARTY STATUS OF THE
POWER AND WATER RESOURCES POOLING AUTHORITY**

Pursuant to Rule 1.4(a)(4) of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, the Power and Water Resources Pooling Authority (“PWRPA”) respectfully submits this motion for party status.

PWRPA is a joint powers authority, with nine member irrigation districts, organized in January 2004. As such, PWRPA is a “local publicly owned electric utility” (“POU”) consistent with the definition found in California Public Utilities Code section 224.3. PWRPA provides retail electric service to its member districts and seven other public agency customers (collectively, “Participants”). Each Participant is an end-user of electricity for agricultural pumping, municipal water supply, or other water-related functions. While the majority of the Participants’ electric load is served at retail by PWRPA, certain electric load continues to be served by Pacific Gas and Electric Company (“PG&E) with the possibility that such electric load will switch to PWRPA service in the future.

PWRPA has three primary interests in this proceeding. First, the rates charged by PG&E to PWRPA for wholesale distribution service are influenced by the determinations made in PG&E’s General Rate Case (“GRC”). PG&E recently filed with the Federal Energy

Regulatory Commission (“FERC”) (Docket No. ER13-1188-000 *et al.*) for a rate change for wholesale distribution service that would, if approved by FERC, effectively double distribution service rates. In its filings at FERC, PG&E repeatedly references and cites as precedent actions taken by the Commission with respect to PG&E’s distribution costs. PWRPA has an interest in ensuring that the costs proposed by PG&E in this proceeding, which may influence the amount PG&E charges for wholesale distribution service, are just and reasonable.

Second, as a POU that may add additional delivery points for retail service to its Participants, PWRPA also has an interest in PG&E’s proposal to collect funds from its customers for “ratepayer retention” activities. As parties have already pointed out, the collection of these funds would inhibit competition among service providers and would also unfairly force ratepayers to fund activities that PG&E has previously paid for without contribution from ratepayers.¹

Third, several of PWRPA’s Participants also receive retail electric service from PG&E. As an agency that, among other things, reviews and jointly responds to matters that affect its Participants, PWRPA has an interest in ensuring that the rates that its Participants pay to PG&E are reasonable.

PWRPA fully recognizes that this proceeding is well underway. PWRPA does not wish to slow down or delay this process in any way. Consistent with this understanding, PWRPA does not anticipate that it will cross-examine witnesses at the upcoming evidentiary hearing, but PWRPA will likely participate in post-hearing briefs and any settlement discussions that occur. Moreover, wherever possible PWRPA will seek to join with other similarly situated parties so

¹ *See, e.g.*, Protest of the Merced Irrigation District and Modesto Irrigation District of General Rate Case Application of Pacific Gas and Electric Company, December 17, 2012.

that PWRPA does not duplicate contributions made by other parties. Because of the limited nature of PWRPA's participation, no party should be prejudiced by the Commission granting this motion.

For these reasons, PWRPA seeks party status in this proceeding.

All pleadings, correspondence, Commission Orders, or other communications should be directed to the following PWRPA representative:

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PWRPA respectfully asks other parties to include PWRPA on their service list in this proceeding effective with the date of this filing and to serve PWRPA with any documents submitted in the future for the record in these proceedings.

In conclusion, PWRPA asks to be granted party status in this proceeding.

Dated: July 9, 2013

Respectfully submitted,



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