

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

Application of Pacific Gas and Electric  
Company Proposing Cost of Service and Rates  
for Gas Transmission and Storage Services for  
the Period 2015-2017

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Application 13-12-012  
(Filed December 19, 2013)

**PROTEST OF THE CALIFORNIA LEAGUE OF FOOD PROCESSORS  
TO PACIFIC GAS AND ELECTRIC COMPANY'S APPLICATION  
PROPOSING COST OF SERVICE AND RATES FOR GAS TRANSMISSION AND  
STORAGE SERVICES FOR THE PERIOD 2015-2017**

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DATE: January 31, 2014

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Pursuant to Rule 2.6 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), the California League of Food Processors ("League") protests the Application of Pacific Gas and Electric Company ("PG&E") proposing cost of service and rates for gas transmission and storage services for the period 2015-2017 ("Application").

**I. DESCRIPTION OF THE LEAGUE**

The League is a non-profit trade association based in Sacramento that represents food processing companies with operations in California. The League represents its members regarding a range of regulatory issues related to energy rates and services and has participated in numerous proceedings before the Public Utilities Commission. The League has a number of members with processing facilities located within the service territory of Pacific Gas & Electric.

These processors consume significant quantities of natural gas and will be directly affected by changes in the rate design and other elements of this proceeding.

## **II. PROTEST OF THE LEAGUE**

The League protests PG&E's application on the following grounds.

PG&E's application contains extensive proposals for cost recovery of new and existing investments in system maintenance and operations, as well as increased expenses for safety related programs. The revenue requirements will result in enormous increases for ratepayers. Food processors, as noncore industrial transmission customers, will see transportation rates increase by 57%. While the League believes that safety is a paramount consideration, PG&E's request appears to take advantage of the increased attention on safety to fund an entire overhaul of their natural gas systems.

PG&E is asserting the need for substantial additional capital investment programs in their application. Again, it is certain that the costs of these proposals will have a significant effect on the gas transmission and distribution charges for all customers, including food processors.

Per the Public Utilities code, the Commission's duty to all ratepayers is to ensure that rates are just and reasonable. In this rate case, the Commission must take care to scrutinize the cost estimates, priorities, and programs that PG&E has proposed and is justifying as safety-related but which may not be central to the safe operation of the pipeline system.

The League intends to participate in this proceeding in order to further explore PG&E's expense and capital investment proposals and alternative solutions, as well as PG&E's proposed cost allocation, rate design, proposed and existing rates and tariff rules to determine their impact on the League's food processor members.

### III. SERVICE

For the purpose of receipt of all correspondence, pleadings, orders and notices in this proceeding please place the following representative for the League on the service list as a “party”:

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Larrea", with a long horizontal flourish extending to the right.

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