

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

Order Instituting Rulemaking on the
Commission's Own Motion to Address the
Issue of Customers' Electric and Natural
Gas Service Disconnection.

Rulemaking 10-02-005
(Filed February 4, 2010)

**JOINT MOTION OF THE OFFICE OF RATEPAYER ADVOCATES; THE UTILITY
REFORM NETWORK; THE GREENLINING INSTITUTE; THE CENTER FOR
ACCESSIBLE TECHNOLOGY; PACIFIC GAS AND ELECTRIC COMPANY (U39E);
SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E); SAN DIEGO GAS &
ELECTRIC COMPANY (U902M); AND SOUTHERN CALIFORNIA GAS COMPANY
(U904G) TO SHORTEN TIME TO RESPOND TO THE PETITIONS FOR
MODIFICATION OF DECISIONS 10-12-051 AND 12-03-054**

HARVEY MORRIS
NOEL OBIORA
Attorneys
THE OFFICE OF RATEPAYER ADVOCATES
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
415-703-2130 (Tel); 415-703-2262 (Fax)
noel.obiora@cpuc.ca.gov

HAYLEY GOODSON
Attorney
THE UTILITY REFORM NETWORK
785 Market Street, Suite 1400
San Francisco, CA 94103
415-929-8876 (Tel); 415-929-1132 (Fax)
hayley@turn.org

ENRIQUE GALLARDO
Attorney
THE GREENLINING INSTITUTE
1918 University Avenue, 2nd Floor
Berkeley, CA 94704
(510) 926-4009 (Tel); 510-926-4010 (Fax)
enriqueg@greenlining.org

MELISSA KASNITZ
Attorney
3075 Adeline, Suite 220
Berkeley, California 94703
CENTER FOR ACCESSIBLE TECHNOLOGY
(510) 841-3224 (Tel); (510) 841-7956 (Fax)
mkasnitz@cforat.org

CHONDA NWAMU
Attorney
PACIFIC GAS AND ELECTRIC COMPANY
77 Beale Street
San Francisco, CA 94105
(415) 973-6650 (Tel); (415) 973-0516 (Fax)
cjn3@pge.com

MONICA GHATTAS
Attorney
SOUTHERN CALIFORNIA EDISON
COMPANY
2244 Walnut Grove Ave.
Rosemead, CA 91770
(626)302-3623 (Tel); (626)
Monica.Ghattas@sce.com

KIM F. HASSAN
Attorney
SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
555 West Fifth St
Los Angeles, CA 90014
(213) 244-3061 (Tel); (213) 629-9620 (Fax)
khassan@semprautilities.com

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

Order Instituting Rulemaking on the
Commission's Own Motion to Address the
Issue of Customers' Electric and Natural
Gas Service Disconnection.

Rulemaking 10-02-005
(Filed February 4, 2010)

**JOINT MOTION OF THE OFFICE OF RATEPAYER ADVOCATES; THE UTILITY
REFORM NETWORK; THE GREENLINING INSTITUTE; THE CENTER FOR
ACCESSIBLE TECHNOLOGY; PACIFIC GAS AND ELECTRIC COMPANY (U39E);
SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E); SAN DIEGO GAS &
ELECTRIC COMPANY (U902M); AND SOUTHERN CALIFORNIA GAS COMPANY
(U904G) TO SHORTEN TIME TO RESPOND TO THE PETITIONS FOR
MODIFICATION OF DECISIONS 10-12-051 AND 12-03-054**

Pursuant to Rule 11.1 of the Commission's Rules of Practice and Procedure, Pacific Gas and Electric Company ("PG&E"), Southern California Edison Company ("SCE"), San Diego Gas & Electric Company ("SDG&E"), and Southern California Gas Company ("SoCalGas"), The Utility Reform Network ("TURN"), the Greenlining Institute ("Greenlining"), the Office of Ratepayer Advocates ("ORA"), and the Center for Accessible Technology ("CforAT") (collectively referred to as the "Settling Parties"), submit this request for an order shortening time for parties to respond to the petition for modification of Decisions ("D.") 12-03-054 and D.10-12-051.

This Motion to Shorten Time is being filed concurrently with the "Petition for Modification of Decisions 12-03-054 and 10-12-051," ("Petition"), and the "Joint Motion for the Adoption of the Settlement Agreement" ("Joint Motion"). The Parties' petition for modification addresses credit, collection and disconnection practices that PG&E, SCE, SDG&E and SoCalGas will implement subsequent to the expiration of the requirements adopted in D.10-12-051 and D.12-03-054, which were set to expire on December 31, 2013, but were extended by the investor owned utilities until

March 3, 2014 after a request from the Commission Executive Director.¹ On March 3, 2014, the Joint Utilities voluntarily agreed to maintain status quo of their customer disconnection rules for an additional two weeks until March 17, 2014 to allow the parties to continue settlement discussions.

I. A SHORTENED RESPONSE PERIOD IS APPROPRIATE.

The Settling Parties respectfully request a shortened time for responding to the Petition pursuant to Rule 1.2, which provides: “These rules shall be liberally construed to secure just, speedy, and inexpensive determination of the issues presented. In special cases and for good cause shown, the Commission may permit deviations from the Rules.”

As discussed in the Petition and the Joint Motion, the Settlement Agreement resulted from months of negotiations and resolves issues pertaining to the credit, collection and disconnection practices that PG&E, SCE, SDG&E and SoCalGas will implement upon the expiration of the related requirements adopted in D.10-12-051 and D.12-03-054. Because the majority of credit and collection policies mandated in D.10-12-051 and D.12-03-054 have already expired, it is important to ensure a timely decision on the Joint Utilities’ post-2013 credit and collection practices. Protracted litigation in this proceeding will delay implementation of the benefits intended by the Settlement Agreement.

In order for the Joint Utilities’ residential customers to benefit from the customer disconnection practices proposed in the Settlement Agreement, the Joint Parties seek to shorten the time for responding to the Petition from 30 days to 10 days.

II. NO PARTY WILL BE PREJUDICED BY A SHORTENED RESPONSE TIME.

There will be no prejudice to the Settling Parties, customers of PG&E, SCE, SDG&E, SoCalGas or other parties to this proceeding if the time for responding to the Petition is

¹ The Joint Utilities voluntarily agreed to extend their respective status quo credit and collection practices until March 17, 2014.

shortened. As noted above, if the Commission grants the Petition, the Commission will help parties avoid additional litigation, which will in turn help avoid delay in implementing the terms of the Settlement Agreement.

III. CONCLUSION

Wherefore, the Settling Parties requests that the time to respond to the Motion be shorted to 10 business days.

Respectfully submitted,

CENTER FOR ACCESSIBLE TECHNOLOGY

By: /s/ Melissa W. Kasnitz
MELISSA W. KASNITZ

THE GREENLINING INSTITUTE

By: /s/ Enrique Gallardo
ENRIQUE GALLARDO

PACIFIC GAS AND ELECTRIC COMPANY

By: /s/ Chonda Nwamu
CHONDA NWAMU

SAN DIEGO GAS AND ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

By: /s/ Kim F. Hassan
KIM F. HASSAN

THE OFFICE OF RATEPAYER
ADVOCATES

By: /s/ Noel Obiora
NOEL OBIORA

THE UTILITY REFORM NETWORK

By: /s/ Hayley Goodson
HAYLEY GOODSON

SOUTHERN CALIFORNIA EDISON
COMPANY

By: /s/ Monica Ghatta
MONICA GHATTA

April 1, 2014