

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

Order Instituting Rulemaking to Address Natural Gas  
Distribution Utility Cost and Revenue Issues  
Associated with Greenhouse Gas Emissions.

Rulemaking 14-03-003  
(Filed March 13, 2014)

**MOTION OF ENVIRONMENTAL DEFENSE FUND FOR PARTY STATUS**

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Dated: April 10, 2014

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**I. INTRODUCTION**

Pursuant to Rules 1.4 and 11.1 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Environmental Defense Fund, Inc. (EDF) respectfully moves for party status in this proceeding.

**II. DISCUSSION**

EDF is a leading non-profit organization representing nearly 315,000 members across the country, including almost 55,000 in California. Since 1967, EDF has linked science, economics, law, and innovative private-sector partnerships to create breakthrough solutions to the most serious environmental problems. The organization has been active in California on environmental issues since the 1970's, and has participated in proceedings on energy-related topics at the Commission since 1976. EDF has interest and expertise in the role that market-based approaches can play in achieving positive environmental outcomes, an approach that is particularly salient in the field of energy regulation.

EDF is involved in pilots, legislation and dockets addressing a myriad of clean energy matters in California and other states. The organization has expertise in and has or

is currently participating in other proceedings at this Commission related to treatment of demand response, smart grids, time-variant rates, alternative-fueled vehicles and energy storage. In addition, EDF co-sponsored California's landmark bipartisan 2006 climate bill, the Global Warming Solutions Act (AB 32). This bill has resulted in a suite of climate change regulations, including an innovative cap-and-trade system, and carries with it the potential to inspire the proliferation of preferred resources by utilities.

EDF seeks to participate in Rulemaking 14-03-003 to ensure that the policies, programs, rules and tariffs necessary for natural gas investor-owned utilities (natural gas corporations) to comply with the California Air Resources Board's (ARB) greenhouse gas (GHG) cap-and-trade program are in place and that they will positively impact California's residents and the environment. While EDF will not be alone in this endeavor, EDF's unique and significant contribution will be our advocacy for reducing methane emissions in the natural gas system, as a highly harmful short-term climate pollutant.

EDF seeks party status on its own behalf, as a non-profit environmental advocacy organization with a long history of work on shaping and implementing climate change policy. It is important for our organization to ensure that AB 32 keeps working towards meeting its emission reduction goals in this next phase of the cap-and-trade program – i.e., when the natural gas sector comes under the cap in 2015. The outcome of this proceeding can have dramatic health and environment consequences (both at the state and regional scale), as well as impact rates for natural gas customers. Accordingly, EDF's

nearly 55,000 members in California, many of whom are served by the regulated investor-owned natural gas corporations, will be well served by our participation.

### **III. SERVICE**

Services of notices, orders, and other communications and correspondence in this proceeding should be directed to EDF at the addresses set forth below.

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#### IV. CONCLUSION

For the reasons stated above, Environmental Defense Fund respectfully requests the Commission grant this Motion for Party Status.

Respectfully signed and submitted on April 10, 2014.

#### ENVIRONMENTAL DEFENSE FUND

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