

BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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|--|---|---------------------------|
| Application of Pacific Gas and Electric |) | |
| Company for Authority, Among Other Things, |) | |
| to Increase Rates and Charges for Electric and |) | Application 12-11-009 |
| Gas Service Effective on January 1, 2014. |) | (Filed November 15, 2012) |
| (U 39 M) |) | |
| _____ |) | |
| |) | |
| And Related Matter. |) | Investigation 13-03-007 |
| _____ |) | |

ALLIANCE FOR NUCLEAR RESPONSIBILITY'S

MOTION REQUESTING OPPORTUNITY TO MAKE A FINAL ORAL ARGUMENT

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Date: June 30, 2014

Attorney for
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I. INTRODUCTION.

Pursuant to Rule 13.13(b) of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”) and the October 3, 2013 Ruling of Administrative Law Judge Thomas R. Pulsifer, the Alliance for Nuclear Responsibility (“A4NR”) files its Motion Requesting Opportunity to Make a Final Oral Argument (“Motion”) in the 2014 General Rate Case (“GRC”) of the Pacific Gas and Electric Company (“PG&E”).

II. SUBJECTS TO BE ADDRESSED.

If this Motion is granted, A4NR will address

- whether the Commission should condition its approval of PG&E’s request for \$26.1 million to construct the remaining five pads at the Diablo Canyon Interim Spent Fuel Storage Installation, and \$19.6 million for transfers of spent fuel to dry casks in 2015 and 2016, upon PG&E’s filing with its next General Rate Case a satisfactory plan to comply with the California Energy Commission’s repeated recommendations for accelerating the pace of spent fuel transfer to dry casks;
- whether the Commission should determine that PG&E’s Long Term Seismic Program (forecast annual cost of \$4.84 million for Test Year 2014) is more appropriately funded and scrutinized through the Diablo Canyon Seismic Studies Balancing Account (“DCSSBA”), subject to the same review process adopted for other DCSSBA-funded activities in D.12-09-008; and

- how the Commission should address the presiding officer's error in striking, with no explanation of the rationale for doing so, A4NR's prepared testimony on the unreasonableness of PG&E's recent conduct of its GRC-funded seismic programs.

III. AMOUNT OF TIME REQUESTED.

A4NR requests a total of 20 minutes, inclusive of time for any questions from Commissioners, to address these three subjects.

IV. RECOMMENDED PROCEDURE AND ORDER OF PRESENTATIONS.

A4NR requests permission to use PowerPoint slides in addition to paper handouts, but has no other recommendation concerning procedure or order of presentations.

V. CONCLUSION.

A4NR respectfully asks that this Motion be granted.

Respectfully submitted,

By: /s/ John L. Geesman

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Date: June 30, 2014

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