

**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

A.13-12-012
(Filed December 19, 2013)

**MOTION FOR PARTY STATUS OF THE
AGRICULTURAL ENERGY CONSUMERS ASSOCIATION**

Ann L. Trowbridge
DAY CARTER & MURPHY LLP
3620 American River Drive, Suite 205
Sacramento, CA 95864
Telephone: (916) 570-2500, ext. 103
Facsimile: (916) 570-2525
E-Mail: atrowbridge@daycartermurphy.com
**Attorneys for Agricultural Energy
Consumers Association**

Michael Boccadoro
For Agricultural Energy Consumers
Association
925 L Street, Suite 800
Sacramento, CA 95814
Telephone: (916) 441-4383
Facsimile: (916) 441-4132
E-mail: mboccadoro@dolphingroup.org

September 9, 2014

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Pursuant to Rule 1.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission” or “CPUC”), Agricultural Energy Consumers Association (“AECA”) moves for party status in this proceeding.

1. Agricultural Energy Consumers Association.

AECA is a nonprofit organization representing the energy interests of California agriculture. AECA was founded in 1991 by growers and other members of the agricultural community concerned primarily about electricity costs, but also about gas costs. AECA represents the collective interests of the state’s leading agricultural associations, including California Citrus Mutual, Western Growers Association, California Grape and Tree Fruit League, Milk Producers Council, California Dairies, Inc., California Poultry Federation, Almond Hullers and Processors Association, California Grain and Feed Association, Agricultural Council, Western Agricultural Processors Association, and California Cotton Ginners and Growers Association. AECA also works on behalf of the combined interests of several county farm bureaus and more than forty agricultural water districts. AECA’s membership is broad based, reflecting family farmers from Redding in the north to San Diego in the south, who grow crops ranging from alfalfa to walnuts. Through its members and membership associations, AECA represents in excess of 40,000 California agricultural producers. Many of our members are vertically integrated and, as a result, AECA also represents the interests of numerous food and fiber processing operations located throughout California.¹

¹ The agricultural associations’ members are not direct customers of the utilities but collectively represent thousands of agricultural customers.

2. Basis for Interest.

AECA has actively participated in many Commission proceedings to advocate for reasonable and equitable rates for California's critically important agricultural community. AECA has participated in many of Pacific Gas and Electric Company's ("PG&E") and Southern California Edison Company's General Rate Cases over the years, but not in PG&E's Gas Transmission and Storage Services application proceedings.

In the pending application, PG&E requests a revenue requirement for gas transmission and storage services of \$1.286 billion for 2015, \$1.347 billion for 2016, and \$1.515 billion for 2017.² PG&E proposes that new rates go into effect as of January 1, 2015. As AECA's members have learned more about this proposal through Public Participation Hearing information, they have become very concerned about the potential rate increases that would be borne by non-core agricultural customers under PG&E's proposal. AECA seeks to participate in this proceeding to try to ensure reasonable gas transmission and storage rates for affected agricultural customers.

AECA understands that direct testimony has already been served. If this motion is granted, AECA plans to file briefs regarding issues that have been determined to be within the scope of this proceeding, based on the record that is developed in this proceeding. AECA may conduct limited discovery and limited cross examination and is still evaluating whether it will serve rebuttal testimony.³

AECA's participation in this proceeding will not prolong or delay this proceeding, nor will it adversely impact the interests of existing parties. Conversely, the interests of AECA's members will be adversely impacted if this motion is not granted.

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² PG&E Prepared Testimony, p. 3-1.

³ AECA does not intend or propose to develop its proposals in this proceeding through cross examination.

3. Service.

All pleadings and other communications in connection with this proceeding should be served as follows:

Michael Boccadoro
For AGRICULTURAL ENERGY
CONSUMERS ASSOCIATION
925 L Street, Suite 800
Sacramento, CA 95814
Telephone: (916) 441-4383
Facsimile: (916) 441-4132
E-mail: mboccadoro@dolphingroup.org

Ann L. Trowbridge
DAY CARTER & MURPHY LLP
3620 American River Drive, Suite 205
Sacramento, California 95864
Telephone: (916) 246-7303
Facsimile: (916) 570-2525
E-mail: atrowbridge@daycartermurphy.com

4. Conclusion.

Based on the foregoing, AECA respectfully requests that the Commission grant AECA party status in this proceeding and allow it to participate in this proceeding as described herein.

DATED: September 9, 2014

DAY CARTER MURPHY LLP

By: /s/ Ann L. Trowbridge

Ann L. Trowbridge
3620 American River Drive, Suite 205
Sacramento, California 95864
Telephone: (916) 570-2500, ext. 103
E-mail: atrowbridge@daycartermurphy.com
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