



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

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Application of Pacific Gas and Electric
Company, a California corporation, for a
Permit to Construct the Santa Cruz 115
Kilovolt Reinforcement Project Pursuant to
General Order 131-D (U39E)

Application 12-01-012

**NEIGHBORS ORGANIZED TO PROTECT OUR COMMUNITY'S
PRE-HEARING CONFERENCE STATEMENT**

December 5, 2014

William P. Parkin (SBN 139718)
WITTWER PARKIN LLP
147 S. River Street, Suite 221
Santa Cruz, CA 95060
(831) 429-4055 (voice)
(831) 429-4057 (fax)
wparkin@wittwerparkin.com

**Attorneys for NEIGHBORS ORGANIZED
TO PROTECT OUR COMMUNITY**

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Application of Pacific Gas and Electric Company, a California corporation, for a Permit to Construct the Santa Cruz 115 Kilovolt Reinforcement Project Pursuant to General Order 131-D (U39E)

Application 12-01-012
(Filed January 25, 2012)

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PRE-HEARING CONFERENCE STATEMENT**

Pursuant to Administrative Law Judge Robert Mason's October 28, 2014 E-Mail Ruling Setting Further Pre-Hearing Conference ("Ruling") in the above-captioned matter, Neighbors Organized to Protect Our Community (NOPOC) hereby submits this Pre-Hearing Conference Statement.

By conference call held on November 20, 2014, at 4:30 p.m., the following parties met and conferred: PG&E, NOPOC, Nancy Bensen, David Black, Britt Haselton, James Kerr, Marco Romanini, and Richard Ulrick. In addition, the following members of NOPOC attended the conference call: Carolyn Carney, Mariposa Kercheval, Ed Murrer, Evelyn Sharp and Frederick Voegelin.

Below is NOPOC's discussion of the three issues identified in the Ruling.

- 1. Should this Application for a Permit to Construct be Dismissed, Without Prejudice, While PG&E and CAISO Re-evaluate the Need for the Santa Cruz 115-kV Reinforcement Project?**

PG&E's has represented that it is its understanding that the CAISO will provide its re-

assessment of the need for the Project within a few weeks. PG&E has stated that given this short time-frame, and the fact that under the CAISO tariff PG&E is currently required to construct the Project, PG&E believes the most prudent course is to continue with the permitting process until such time as the CAISO definitively states whether the Project is needed. Once the CAISO provides its re-assessment, the Parties can reconvene to determine next steps.

At this time NOPOC has no information that would contravene the timing of CAISO's re-assessment. However, NOPOC believes that if the re-assessment is not forthcoming in the short time frame stated, that this application should be dismissed without prejudice. This pending application has many in the community on edge about deadlines, gathering evidence, and preparing for review of the Environmental Impact Report (EIR). If the application were not pending, the community will be at more ease regarding potential deadlines while PG&E and CAISO reevaluate the need for the Project. NOPOC actually believes the project is not necessary at this time, and the information provided by PG&E suggests that it too believes that the project is not needed at this time. Given this, if a re-assessment from CAISO is not forthcoming in short order, NOPOC respectfully requests that this application be dismissed with prejudice. Moreover, if CAISO's re-assessment concurs with PG&E's assessment of the need, and determines that the project is not needed at this time, NOPOC asserts that this application should be dismissed without prejudice.

2. Will there be any Negative Impacts in the Santa Cruz Area if the Application for a Permit to Construct is Dismissed, Without Prejudice?

NOPOC believes that dismissal without prejudice will in no way cause negative impacts to the Santa Cruz area. If the project is not necessary at this time, the community is spared

disruption and time and resources to review and participate in these proceedings. Moreover, the impact to the community is far greater with a pending application that may not be necessary due to the continued expenditure of time and resources by NOPOC, other parties and the community at large to participate in these proceedings and to remain vigilant.

3. If This Application for a Permit to Construct is Not Dismissed, Without Prejudice, What is the Timeline for When this Matter Should Be Put to the Commission for a Vote?

NOPOC has no opinion as to the timeline for when this matter should be put to a vote because it does not have all the understanding and information that PG&E may have in this regard. However, NOPOC believes that it is possible that given the community interest and the expected number of comments on the EIR that will be generated once the draft EIR is released, that a Commission vote on June 11, 2015 may be optimistic.

Dated: December 5, 2014

Respectfully submitted,
WITTMER PARKIN LLP



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