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

Application of Pacific Gas and Electric Company for )  
Approval of the Retirement of Diablo Canyon Power ) A.16-08-006  
Plant, Implementation of the Joint Proposal, And ) (filed August 11, 2016)  
Recovery of Associated Costs Through Proposed )  
Ratemaking Mechanisms. )  
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**MOTION FOR PARTY STATUS  
OF THE  
TRANSMISSION AGENCY OF NORTHERN CALIFORNIA**

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September 15, 2016

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**I. INTRODUCTION**

Pursuant to Rule 1.4(a)(4) of the Rules of Practice and Procedure of the Public Utilities Commission of the State of California (“Commission”), the Transmission Agency of Northern California (“TANC”) respectfully moves for party status in the above-captioned proceeding, and states as follows:

**II. IDENTITY OF TRANSMISSION AGENCY OF NORTHERN CALIFORNIA AND BASIS FOR THE INTERVENTION**

TANC is a joint exercise of powers agency organized and existing under the laws of the State of California. Among TANC’s purposes is the provision of electric transmission facilities and services for the use of its Members.<sup>1</sup> TANC is the largest Participant in, and the Project Manager of, the California-Oregon Transmission Project and has an allocation of 300 MW of

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<sup>1</sup> TANC’s Members are the California cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, and Ukiah; the Sacramento Municipal Utility District; the Modesto Irrigation District; and the Turlock Irrigation District. The Plumas-Sierra Rural Electric Cooperative is an associate member of TANC.

firm bi-directional service from Pacific Gas and Electric Company (“PG&E”) pursuant to the Principles for Tesla-Midway Transmission Service.

On August 11, 2016, Pacific Gas and Electric Company (“PG&E”) submitted an Application to the Commission, requesting approval of the retirement of the Diablo Canyon Power Plant (“Plant”), implementation of a Joint Proposal among PG&E and other parties to facilitate retirement of the Plant, and recovery of costs associated with the Plant’s retirement through proposed rate mechanisms.

PG&E relies upon certain methodologies and expenses approved by the Commission, including cost allocation, for rates charged to TANC. TANC has an interest in the determination of such methodologies and expenses, as PG&E proposes in the instant Application, and will review PG&E’s documentation of both, including through discovery and other procedures ordered by the Commission, to determine the appropriateness of PG&E’s positions. Among the matters of concern includes PG&E’s “support [of] a change in existing policies to allow allocation of resource costs for integration and storage through the [‘California Independent System Operator Corporation’s (‘CAISO’)’] Transmission Access Charge (‘TAC’).” Joint Proposal § 2.5 at 9. TANC and its Members pay and are impacted by the CAISO TAC rate, and therefore, have an interest in any Application, such as the instant filing, that may purport to foster the change or increase of the CAISO’s TAC. In addition, the prospect of storage or other generator integration costs being included in transmission costs would constitute a novel approach to recovery of generation costs, inconsistent with electric industry practice and precedent, and has the potential to lead to a stark increase in transmission rates through the CAISO TAC. Such a proposal also raises questions as to whether PG&E intends to turn over control of certain storage and other generation resources to the operational control of the CAISO.

TANC's participation would allow it to explore PG&E's proposals on such matters. TANC's participation will pertain to the issues for decision by the Commission with respect to the above-captioned filing by PG&E.

### **III. SERVICE**

For purposes of receipt of all correspondence, pleadings, orders and notices in this proceeding, the following TANC representative should be placed on the service list under the "party" designation:

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In addition, TANC requests that the following TANC representatives be placed on the service list under the "information only" designation:

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#### IV. CONCLUSION

For the above reasons, the Transmission Agency of Northern California respectfully requests that the Commission grant its Motion for Party Status.

Dated: September 15, 2016, at Sacramento, California.

Respectfully submitted,

By: /s/ Sean M. Neal

Sean M. Neal  
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