



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

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Application of Pacific Gas & Electric Company to
Revise Its Electric Marginal Costs, Revenue
Allocation and Rate Design (U 39M)

Application No. 16-06-013
(Filed June 30, 2016)

MOTION OF THE COUNTY OF SANTA CLARA REQUESTING PARTY STATUS

COUNTY OF SANTA CLARA, a political
subdivision of the state of California

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Dated: October 25, 2016

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OF THE STATE OF CALIFORNIA**

Application of Pacific Gas & Electric Company to
Revise Its Electric Marginal Costs, Revenue
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I. INTRODUCTION

In accordance with Rule 1.4(a)(4) of the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”), the County of Santa Clara, a political subdivision of the state of California (“County”), respectfully submits this motion requesting party status in the above captioned proceeding.

II. DISCUSSION

The County purchases gas and electricity from Pacific Gas & Electric (“PG&E”), and generates electricity and alternative energy from solar photo-voltaic (“PV”) systems and other sources installed and operated on County-owned property. Energy generated on County property is transmitted back into the grid by way of existing contracts and related agreements with PG&E under the Renewable Energy Self-Generation Bill Credit Transfer (RES-BCT)¹ and Net Energy Metering (NEM)² programs.

As a major PG&E customer and as a generator of electricity through alternative energy sources, County is substantially and directly impacted by the outcome of this PG&E General Rate Case Phase II proceeding, both in terms of financial impact and in County’s ability to meet local, state and federal clean energy, sustainability or greenhouse gas emission reduction goals.

¹ Pub. Util. Code, § 2830 et seq.

² Pub Util. Code, § 2827 et seq.

The County’s participation in the PG&E General Rate Case Phase II proceeding will focus on aspects of marginal costs, revenue allocation, rates and/or rate design impacting County’s current and future participation in the RES-BCT program, the NEM program and other state and federal initiatives (that may be or are currently in place) to promote clean energy, sustainability or reductions in greenhouse gas emissions. For example, PG&E proposes changes to its definition of “seasonality,” changes in its “Time-of-Use” periods, and a reduction in the amount credited per kilowatt-hour, which if approved by the Commission has the potential to reduce the reimbursement amount PG&E credits to local governments under the RES-BCT program. If these PG&E recommendations are enacted, one of the impacts County could suffer is an estimated \$46.7 million in lost savings over a 25-year period—savings that served as one of several material considerations in the County’s decision to invest in the purchase and operation of multi-million dollar solar PV systems currently being installed at six major County sites this year. These PG&E recommendations, if enacted, will impact the County’s financial ability to continue to support local, state and federal clean energy or sustainability projects. Without party status, County’s interests will not effectively be addressed.

County’s anticipated involvement will be to actively participate in the workshops, submit responses related to the issues presented herein above, present direct and/or rebuttal testimony (as appropriate) and cross-examine witnesses during evidentiary hearings regarding the issues presented herein above and otherwise participate in the proceedings on these issues, as needed.

III. NOTICE

County will participate in this proceeding through its representatives listed below. Service of notices, orders, and other communications and correspondence in this proceeding should be directed to County via the following contacts:

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In addition, County requests that it be listed in the Information Only section of the service list of the proceeding as follows:

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IV. CONCLUSION

Given the precedential effect of Commission determinations in this proceeding, County is materially interested in and will be substantially impacted by the outcome of these proceedings. County's participation will not prejudice any party nor will it expand the scope of this proceeding. County's participation concerns issues that are currently under consideration by the Commission in this proceeding. Moreover, County's participation will not cause any delay in the proceeding. For the reasons stated herein, the County respectfully requests that the Commission grant this Motion for Party Status.

Respectfully signed and submitted this 25th day of October, 2016

COUNTY OF SANTA CLARA, a political
subdivision of the state of California

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