



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED

Application of Pacific Gas and Electric Company for Approval of the Retirement of Diablo Canyon Power Plant, Implementation of the Joint Proposal, And Recovery of Associated Costs Through Proposed Ratemaking Mechanisms	<p style="text-align: right;">11-07-16 A.16-08-006 04:59 PM (Filed August 11, 2016)</p>
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**NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION
AND, IF REQUESTED (and ¹ checked), ADMINISTRATIVE LAW JUDGE'S
RULING ON CENTRAL COAST WAVE ENERGY HUB DIRECTOR SAM
BLAKESLEE'S SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP**

NOTE: After electronically filing a PDF copy of this Notice of Intent (NOI), please email the document in an MS WORD format to the Intervenor Compensation Program Coordinator at Icompcoordinator@cpuc.ca.gov.

Customer (party intending to claim intervenor compensation): Sam Blakeslee, Ph.D. Director, Central Coast Wave Energy Hub	
Assigned Commissioner: Michael Picker	Administrative Law Judge: Peter Allen
I hereby certify that the information I have set forth in Parts I, II, III and IV of this Notice of Intent (NOI) is true to my best knowledge, information and belief.	
Signature:	-----/S/-----
Date: November 7, 2016	Printed Name: Sam Blakeslee

PART I: PROCEDURAL ISSUES

A. Status as “customer” (see Pub. Util. Code § 1802(b)): The party claims “customer” status because the party is (check one):	Applies (check)
<p>1. A Category 1 customer is an actual customer whose self-interest in the proceeding arises primarily from his/her role as a customer of the utility and, at the same time, the customer must represent the broader interests of at least some other customers.</p> <p>In addition to describing your own interest in the proceeding you must show how your participation goes beyond just your own self-interest and will benefit other customers.</p>	<input checked="" type="checkbox"/>

¹ DO NOT CHECK THIS BOX if a finding of significant financial hardship is not needed (in cases where there is a valid rebuttable presumption of eligibility (Part III(A)(3)) or significant financial hardship showing has been deferred to the intervenor compensation claim).

<p>2. A Category 2 customer is a representative who has been authorized by actual customers to represent them. Category 2 involves a more formal arrangement where a customer or a group of customers selects a more skilled person to represent the customer’s views in a proceeding. A customer or group of customers may also form or authorize a group to represent them, and the group, in turn, may authorize a representative such as an attorney to represent the group.</p> <p>A representative authorized by a customer must identify the residential customer(s) being represented and provide authorization from at least one customer. <i>See</i> D.98-04-059 at 30.</p>	<input type="checkbox"/>
<p>3. A Category 3 customer is a formally organized group authorized, by its articles of incorporation or bylaws to represent the interests of residential customers or small commercial customers receiving bundled electric service from an electrical corporation.² Certain environmental groups that represent residential customers with concerns for the environment may also qualify as Category 3 customers, even if the above requirement is not specifically met in the articles or bylaws. <i>See</i> D.98-04-059, footnote at 3.</p>	<input type="checkbox"/>
<p>4. The party’s explanation of its customer status must include the percentage of the intervenors members who are residential ratepayers or the percentage of the intervenors members who are customers receiving bundled electric service from an electrical corporation, and must include supporting documentation: (i.e., articles of incorporation or bylaws).</p> <p>Dr. Blakeslee is: (1) a long-time resident of San Luis Obispo County and a PG&E customer; (2) a small business owner; and (3) the Director of the Central Coast Wave Energy Hub (“CCWEH”), an extension of the California Innovation Hub for Defense, Energy and Aerospace (“iDEA Hub”).</p>	
<p>Identify all attached documents in Part IV.</p>	
<p>Do you have any direct economic interest in outcomes of the proceeding?³</p> <p>Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/></p> <p>If “Yes”, explain: As a residential customer and the owner of a business with small commercial</p>	

² Intervenors representing either a group of residential customers or small commercial customers who receive bundled electric service from an electrical corporation, must indicate in Part I, Section A, Item #4 of this form, the percentage of their members who are residential customers or the percentage of their members who receive bundled electric service from an electrical corporation. The NOI may be rejected if this information is omitted.

³ See Rule 17.1(e).

accounts served by PG&E, Dr. Blakeslee has a direct economic interest in the outcome of the proceeding as other PG&E ratepayers. (While some of the entities that collaboratively support CCWEH activities may derive economic benefits from the outcomes of this proceeding, Dr. Blakeslee does not receive financial compensation for his service as the Director of CCWEH.)

B. Conflict of Interest (§ 1802.3)	Check
1. Is the customer a representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. If the answer to the above question is “Yes”, does the customer have a conflict arising from prior representation before the Commission?	<input type="checkbox"/> Yes <input type="checkbox"/> No

C. Timely Filing of Notice of Intent (NOI) (§ 1804(a)(1)):	Check
1. Is the party’s NOI filed within 30 days after a Prehearing Conference? Date of Prehearing Conference: 10/6/2016	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. Is the party’s NOI filed at another time (for example, because no Prehearing Conference was held, the proceeding will take less than 30 days, the schedule did not reasonably allow parties to identify issues within the timeframe normally permitted, or new issues have emerged)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2a. The party’s description of the reasons for filing its NOI at this other time:	
2b. The party’s information on the proceeding number, date, and decision number for any Commission decision, Commissioner ruling, Administrative Law Judge’s ruling, or other document authorizing the filing of NOI at that other time:	

PART II: SCOPE OF ANTICIPATED PARTICIPATION

A. Planned Participation (§ 1804(a)(2)(A)(i)):
<p>The party’s statement of the issues on which it plans to participate: Dr. Blakeslee plans to work collaboratively with community leaders, PG&E, and the Commission to identify opportunities and actions that, in addition to the measures outlined in the Joint Proposal, will mitigate the community impacts of the Diablo Canyon Power Plant’s closure, with a focus on actions that will promote local economic activity not only during the period transitioning up to the closure but also during the critical time-frame afterward, when the community’s employment and economic needs will be the most acute. The focus of this effort is to local identify PG&E-owned assets that would produce better value to the community and to rate-payers if repurposed in a strategic manner that considers the larger economic-activity needs of the community which are negatively impacted by the closure. Such actions may include but are not limited to:</p> <p>(1) <u>Identifying existing fixed assets (buildings, facilities, etc.) that could be “repurposed” to serve a community economic revitalization need once they are no longer needed for the operation of Diablo Canyon the nuclear power plant.</u> Assets with the potential to be</p>

repurposed not only include the complex of office, maintenance, and service buildings at the plant site, but also include special-use assets such as marine laboratories, water intake facilities, breakwaters, switchyards and transmission lines. In addition, PG&E owns buildings purposed for training, technical support and public communications near the San Luis Obispo County Regional Airport and on Ontario Road. A subset of these existing assets could be repurposed to stimulate research, entrepreneurship, job training, and education; as repurposed, the facilities would become an innovation “anchor” that attracts academic, business, and innovation activities and cooperation between private and public sector organizations. Employment changes will likely occur over time such that some of these facilities may experience partial vacancies prior to the plant closure. Planning and potential use of the facilities should occur as soon as possible to mitigate job losses and facilitate retraining.

- (2) Preservation of the PG&E-owned lands surrounding Diablo Canyon, which constitute pristine and relatively undisturbed remnants of a coastal California that is rarely seen today. If existing assets (see above) are to be repurposed it is important that certain environmental preservation and conservation efforts be undertaken to ensure a balanced solution that is supported by the broader community. The Diablo Resource Advisory Measure (DREAM) was an advisory measure passed by county residents that sought to direct the use of these lands once the plant ceased operations. The measure passed with 75% approval. During the operating life of Diablo Canyon, these lands have served as a safety buffer between the nuclear plant and the public. Once they are no longer needed as a buffer they could be repurposed in a number of different ways, some very advantageous to the community and others less so. These intact and undivided expanses of wild lands possess significant value from a scenic, environmental, and recreational perspective in a community highly dependent upon tourism. Rather than the marginal utility of a few large estates or a collection of private homes, the lands would serve a better and higher purpose as a new state park or other public space to meet the ever expanding need in California for outdoor enjoyment, recreation, and communion with nature. Due to the ready accessibility and the fact that these coastal lands lie directly between Montana de Oro State Park and Avila Beach, this asset could become a significant attraction to visitors and provide value to the tourist-serving economy on the Central Coast.
- (3) PG&E’s assistance in establishing a dedicated fund for a Central Coast Education and Workforce Training Initiative. Local workforce education and training would benefit from a dedicated fund that is competitively awarded to local educational programs that are designed to help transition the community’s workforce to a post-Diablo Canyon economy. This fund would be administered with the goal of maximizing general career tech training and STEM education programs as well as opportunities in specialized fields such as CyberSecurity, a growing area of expertise at Cal Poly. These programs would be encouraged to optimize connections between K-12, Cuesta College, and Cal Poly while working closely with the businesses community to ensure that the training is optimized to the real-world needs of students seeking future employment opportunities.

The party’s explanation of how it plans to avoid duplication of effort with other parties: Dr. Blakeslee will liaison with the local government entities, environmental groups, and any other

customer or community groups that are parties to the proceeding and have stated an interest in the outcomes of the issues on which Dr. Blakeslee plans to engage, so as to gain a better understanding of which parties are focusing on what issues, to reach consensus on the “division of labor” among the parties and, to the extent possible, avoid duplication of effort. (For example, Dr. Blakeslee has already consulted with the San Luis Coastal Unified School District about their planned efforts, and as a result of that consultation he plans to not engage on issues related to the property tax offset payments contemplated by the Joint Proposal.)

The party’s description of the nature and extent of the party’s planned participation in this proceeding (to the extent that it is possible to describe on the date this NOI is filed): Dr. Blakeslee, with the assistance of regulatory counsel, plans to prepare and submit written testimony, participate in any settlement negotiations, prepare and file post-hearing briefs, and prepare and file comments on the proposed decision.

B. The party’s itemized estimate of the compensation that the party expects to request, based on the anticipated duration of the proceeding (§ 1804(a)(2)(A)(ii)):				
Item	Hours	Rate \$	Total \$	#
ATTORNEY, EXPERT, AND ADVOCATE FEES				
Regulatory counsel (TBD)	75	500	37,500	
			<i>Subtotal: \$37,500</i>	
OTHER FEES				
Paralegal	10	125	1,250	
			<i>Subtotal: \$1,250</i>	
COSTS				
Travel			7,500	
Overnight mail charges			150	
Photocopying			50	
			<i>Subtotal: \$7,700</i>	
			TOTAL ESTIMATE: \$46,450	
Estimated Budget by Issues: Community Impacts Mitigation – 50%; Land Use and Decommissioning – 50%				

PART III: SHOWING OF SIGNIFICANT FINANCIAL HARDSHIP

A. The party claims “significant financial hardship” for its Intervenor Compensation Claim in this proceeding on the following basis:	Applies (check)
1. “[T]he customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate’s fees, expert witness fees, and other reasonable costs of participation” (§ 1802(g)); or	<input type="checkbox"/>
2. “[I]n the case of a group or organization, the economic interest of the Individual	<input type="checkbox"/>

members of the group or organization is small in comparison to the costs of effective participation in the proceeding” (§ 1802(g)).	
3. A § 1802(g) finding of significant financial hardship in another proceeding, made within one year prior to the commencement of this proceeding, created a rebuttable presumption in this proceeding (§ 1804(b)(1)). Commission’s finding of significant financial hardship made in proceeding number: Date of Administrative Law Judge’s Ruling (or CPUC Decision) in which the finding of significant financial hardship was made:	<input type="checkbox"/>

B. The party’s explanation of the factual basis for its claim of “significant financial hardship” (§ 1802(g)) (necessary documentation, if warranted, is attached to the NOI:

PART IV: ATTACHMENTS DOCUMENTING SPECIFIC ASSERTIONS MADE IN THIS NOTICE

Attachment No.	Description
1	Certificate of Service
2	
3	
4	
5	
6	

ADMINISTRATIVE LAW JUDGE RULING⁴

	Check all that apply
1. The Notice of Intent (NOI) is rejected for the following reasons:	<input type="checkbox"/>
a. The NOI has not demonstrated the party’s status as a “customer” for the following reason(s):	<input type="checkbox"/>
b. The NOI has not demonstrated that the NOI was timely filed (Part I(B)) for	<input type="checkbox"/>

⁴ A Ruling needs not be issued unless: (a) the NOI is deficient; (b) the Administrative Law Judge desires to address specific issues raised by the NOI (to point out similar positions, areas of potential duplication in showings, unrealistic expectations for compensation, or other matters that may affect the customer’s Intervenor Compensation Claim); or (c) the NOI has included a claim of “significant financial hardship” that requires a finding under § 1802(g).

the following reason(s):	
c. The NOI has not adequately described the scope of anticipated participation (Part II, above) for the following reason(s):	<input type="checkbox"/>
2. The NOI has demonstrated significant financial hardship for the reasons set forth in Part III of the NOI (above).	<input type="checkbox"/>
3. The NOI has not demonstrated significant financial hardship for the following reason(s):	<input type="checkbox"/>
4. The Administrative Law Judge provides the following additional guidance (see § 1804(b)(2)):	<input type="checkbox"/>

IT IS RULED that:

1. The Notice of Intent is rejected.	<input type="checkbox"/>
2. The customer has satisfied the eligibility requirements of Pub. Util. Code § 1804(a).	<input type="checkbox"/>
3. The customer has shown significant financial hardship.	<input type="checkbox"/>
4. The customer is preliminarily determined to be eligible for intervenor compensation in this proceeding. However, a finding of significant financial hardship in no way ensures compensation.	<input type="checkbox"/>
5. Additional guidance is provided to the customer as set forth above.	<input type="checkbox"/>

Dated _____, at San Francisco, California.

Administrative Law Judge