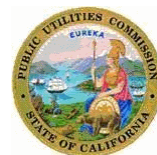


**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

9-18-17
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Application of San Diego Gas &
Electric Company (U 902 E) for
Authorization to Recover Costs
Related to the 2007 Southern
California Wildfires Recorded in the
Wildfire Expense Memorandum
Account

Application No. 15-09-010
(Filed September 25, 2015)

**MUSSEY GRADE ROAD ALLIANCE RESPONSE TO THE MOTION OF
PACIFIC GAS AND ELECTRIC FOR PARTY STATUS**

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Dated: September 18, 2017

Pursuant to Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), the Mussey Grade Road Alliance (MGRA or Alliance) files its response to the Motion by Pacific Gas and Electric Company (PG&E) for party status, filed September 11, 2017.

The Alliance fully concurs with the response filed by Office of Ratepayer Advocates (ORA), The Utility Reform Network (TURN), the Utility Consumers Action Network (UCAN), and the Protect Our Communities Foundation (POC), which urges that SCE's motion for party status be denied.

Additionally, the Alliance would like to raise two points.

The first issue is that it would be extremely prejudicial to grant comment and appeal privileges to SCE on the issue regarding this application at this late date. PG&E is not a small player has major league legal firepower and has known about this proceeding from the outset. Giving one of the "big three" IOUs party status in an application that has been ongoing for about two years seems absurd on its face.

Secondly, this is not the first time that PG&E has tried to piggyback on an SDG&E application at the expense of San Diego ratepayers. In the previous WEBA proceeding A.09-08-020, later denied by the Commission, SCE and PG&E filed a motion to withdraw from the proceeding while still asserting rights to maintain Wildfire Expense Management Accounts the disposition of which be subject to the outcome of the WEBA proceeding. The Alliance objected to this motion by SCE and PG&E, on the basis that it fulfilled no valid purpose or need, and the Alliance objection was upheld by the assigned Commissioner.¹ PG&E presents no argument in its present as to why it could not have joined as a party earlier in the proceeding if it felt that its vital interests were at stake. For it to join at this late date and be granted party status serves no valid purpose.

¹ D.12-12-029; pp. 4-5

The Alliance therefore requests that PG&E's motion for party status be denied.

Respectfully submitted this 18th day of September, 2017,

By: /S/ **Diane Conklin**

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