

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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In the Matter of the Application of Pacific Gas and Electric Company (U39E) for a Certificate of Public Convenience and Necessity for the Contra Costa-Oakley Generating Station 230 kV Transmission Line Pursuant to General Order 131-D.

Application 15-06-015

**LATE-FILED STATUS UPDATE OF THE OFFICE OF RATEPAYER ADVOCATES
AND REQUEST FOR RELIEF FROM MISTAKE,
INADVERTENCE AND EXCUSABLE NEGLIGENCE OF COUNSEL**

I. INTRODUCTION

Pursuant to the ruling of Administrative Law Judge (ALJ) DeAngelis on October 12, 2017, directing parties to jointly or individually file a status report on or before October 17, 2017, the Office of Ratepayer Advocates (ORA) hereby submits this late-filed status update and request of counsel for relief from mistake, inadvertence and excusable neglect in failing to file a timely status update.

II. ORA HAS NO UPDATE INFORMATION

ORA has no information to report at this time on any developments concerning the Contra Costa-Oakley Generating Station 230 kilovolt (kV) Transmission Line. ORA has no privacy to the Large Generation Interconnection Agreement (LGIA), which forms the basis for Pacific Gas and Electric Company's (PG&E) claim that it has an obligation to build the transmission interconnection line in the absence of a generating station.

III. REQUEST FOR RELIEF FROM MISTAKE, INADVERTENCE AND EXCUSABLE NEGLIGENCE OF COUNSEL

On October 9, 2017, PG&E requested a two-week extension to file reply comments to the Proposed Decision (PD) on its motion for dismissal of the Application for a Certificate of Public Convenience and Necessity for the Contra Costa-Oakley Generating Station 230kV Transmission Line. The reply comments were also due on October 9, 2017, and ORA had

already filed its reply comments before PG&E requested an extension. However, ORA did not object to PG&E's request for extension.

On October 12, 2017, ALJ DeAngelis denied the request for extension and directed all parties to file status reports on or before October 17, 2017, either jointly or individually, and further gave parties the option to seek an extension to file the reply comments upon filing their status report. Having already filed ORA's reply comments to the PD, ORA would only have information on the status of the LGIA, when PG&E makes the information available to ORA. Consequently, counsel for ORA focusing mistakenly on the need for PG&E to provide additional information, misconstrued the date for filing ORA's status report as a date subsequent to the two-week extension that PG&E had requested.

Upon receiving PG&E's status report and uncovering this error, counsel is filing this late filed status report and request for relief from the mistake, inadvertence and excusable neglect of counsel. Further, ORA's late-filed status report has not commented or responded to PG&E's status report, in respect of the fact that a duly filed ORA status report may not have had the benefit of the information in PG&E's status report.

WHEREFORE, on the basis of the facts stated above, counsel for ORA, Noel Obiora, hereby seeks relief from his failure to file a timely status report and maintains that said failure was due to mistake, inadvertence and excusable neglect.

Respectfully submitted,

/s/ NOEL A. OBIORA

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October 24, 2017