

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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In the Matter of the Application of the Los Angeles County Metropolitan Transportation Authority for an Order authorizing the construction of a four-track at-grade pedestrian crossing from Willowbrook Avenue East to the Metro Blue Line Platform to Willowbrook Avenue West at the Willowbrook/Rosa Parks Station, in the County of Los Angeles.

Application 17-11-017
(Filed November 29, 2017)

**MOTION TO ACCEPT LATE-FILED RESPONSE
OF THE SAFETY AND ENFORCEMENT DIVISION**

I. INTRODUCTION

Pursuant to Rules 11.1(a) and 11.6 of the California Public Utilities Commission's ("Commission's") Rules of Practice and Procedure ("Rules"), the Commission's Safety and Enforcement Division ("SED") files this motion for acceptance of its late-filed response to Application ("A.") 17-11-017.

The Los Angeles County Metropolitan Transportation Authority ("LACMTA") filed A.17-11-017 on November 29, 2017, for authority to construct at-grade pedestrian-rail and light rail crossing. Notice of the application appeared in the Commission's Daily Calendar on December 5, 2017. Pursuant to Rule 2.6(a), SED's response to the application was due on January 4, 2017.

SED's response does not protest, or otherwise take issue with LACMTA's application, but instead lists relevant information on the crossing that may be useful to the Commission when assessing the application. For instance, SED's response lists information on SED's past site visits, and that SED has found no safety or other issues associated with the project. As the branch of the Commission tasked with ensuring the safety of all rail-crossings, SED's response to the application presents an important

perspective to ensure that the safety of the requested rail crossings has been adequately reviewed. The public interest and the Commission's interest in deciding matters on a full and complete record will be best served by granting SED's motion to accept the late-filed response.

Further, because SED is not seeking to protest or otherwise challenge LACMTA's application, no party would be prejudiced by SED's late filing. Moreover, SED's response to the application – while being filed after the 30 day deadline set forth in Rule 2.6(a) – is still being filed early enough in the proceeding to allow LACMTA adequate time to respond if needed. For these reasons, SED respectfully requests that its motion to accept its late-filed response be granted.

Respectfully submitted,

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