



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

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Application of Pacific Gas and Electric Company
Proposing Cost of Service and Rates for Gas
Transmission and Storage Services for the period of
2019-2021. (U39G)

Application 17-11-009
(Filed November 17, 2017)

**MOTION FOR PARTY STATUS OF DYNEGY MOSS
LANDING, LLC**

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Attorneys for Dynegy Moss Landing, LLC

Dated: August 7, 2018

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I. Introduction

Dynegy Moss Landing LLC (“Moss Landing”) respectfully moves for party status in this proceeding under Rule 1.4 of the Commission’s Rules of Practice and Procedure. Moss Landing is the direct owner of two gas-fired combined cycle units connected to PG&E’s local natural gas transmission system, with a combined capacity of 1060 MW. Moss Landing is one of the largest customers of PG&E’s gas transportation services and will be directly affected by the outcome of this application.

Dynegy Inc. (“Dynegy”), the parent company of Moss Landing, and current party to this proceeding, has been acquired by Vistra Energy Corp. (“Vistra”). In light of Vistra’s acquisition of Moss Landing, changing the appearance to the direct owner of the plant is appropriate.

II. Interest in this Proceeding

Dynegy first became a party to this proceeding on December 20, 2017, by filing its Protest to Pacific Gas and Electric Company’s (“PG&E’s”) Application. Moss Landing’s interests in this proceeding are derivative of the concerns raised in Dynegy’s protest.¹ Specifically, Moss Landing endeavors to provide useful information, experienced-based input,

¹ See, Dynegy Protest of A. 17-11-009, p. 2.

comments on testimony and proposed Commission decisions, and participate in settlements as it relates to rate design.

Moss Landing is concerned with the competitive implications that arise from the disparate treatment between classes of noncore electric generation customers. Because noncore electric generators compete in the same wholesale power markets, we contend that the different rate treatment PG&E proposes for the two groups of electric generators could distort that competition and affect the efficiency of the dispatch of electric generation units by the California Independent System Operator (CAISO).

III. Notice

Direct service of notices, orders, and other correspondence in this proceeding to the address below:

Brian Cragg
505 Sansome St., Ste. 900
San Francisco, CA 94111

IV. Conclusion

If this motion is granted, for all purposes going forward, Moss Landing will replace Dynegy as a party to this proceeding. Moss Landing's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, Moss Landing respectfully requests that the Commission grant this Motion and to allow Dynegy Moss Landing LLC to become a party to this proceeding.

Respectfully submitted August 7, 2018, at San Francisco, California.

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By /s/ Benjamin C. Bodell

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