

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



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Application of Pacific Gas and Electric Company
for Authority, Among Other Things, to Increase
Rates and Charges for Electric and Gas Service
Effective on January 1, 2011. (U39M)

Application 09-12-020
(Filed December 21, 2009)

**MOTION OF THE ENGINEERS AND SCIENTISTS OF
CALIFORNIA TO BECOME A PARTY**

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Attorneys for Engineers and Scientists of
California, Local 20

Date: February 17, 2010

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Pursuant to Rules 1.4 and 11.1 of the Commission's Rules of Practice and Procedure, the Engineers and Scientists of California, Local 20, International Federation of Professional & Technical Engineers, AFL-CIO & CLC (ESC) submits its motion to become a party in this proceeding.

ESC is a progressive labor union organizing and representing men and women in professional, technical, administrative and associated occupations in the San Francisco Bay Area and throughout Northern California. ESC represents about 2,400 technical and professional employees at Pacific Gas and Electric Company (PG&E). ESC and its members are concerned about PG&E's ability and obligation to provide safe, adequate and reliable service to the customers and communities it serves.

ESC plans to use the opportunity presented by the broad scope of PG&E's General Rate Case application to make the Commission aware of areas where PG&E's service can be made safer and more reliable, and ESC will suggest ways for the

Commission to ensure better performance by PG&E. In particular, ESC will contend that:

1. PG&E's excessive use of contractors instead of in-house employees in the areas of engineering and design results in unreasonably high costs to ratepayers, project delays, lower-quality work, a loss of efficiency, and safety problems.
2. PG&E must act promptly to recruit, train and transfer knowledge to a newer generation of professional and technical staff and to address the impending loss of large numbers of skilled employees in these areas.
3. PG&E's Short-Term Incentive Plan (STIP), a bonus program funded by PG&E's ratepayers, provides little, if any, benefit in terms of safety, reliability and adequacy of service.
4. PG&E must have a rational plan for addressing transformer safety at the Diablo Canyon Power Plant, and PG&E must also have the resources necessary to carry out its plan.

These contentions are reasonably pertinent to the broad scope of PG&E's General Rate Case application. In addition to these four main topics, ESC may provide evidence related to other aspects of PG&E's application.

ESC will participate in this proceeding through its representative, whose information is as follows:

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ESC respectfully requests the Commission to grant its motion and to allow ESC to participate as a party in this proceeding.

Respectfully submitted this 17th day of February, 2010 at San Francisco, California.

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By /s/ Brian T. Cragg
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CERTIFICATE OF SERVICE

I, Linda Chaffee, certify that I have on this 17th day of February 2010 caused a copy of the foregoing

MOTION OF THE ENGINEERS AND SCIENTISTS OF CALIFORNIA TO BECOME A PARTY

to be served on all known parties to A.09-12-020 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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ALJ David K. Fukutome
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 17th day of February 2010 at San Francisco, California.

/s/ Linda Chaffee
Linda Chaffee

Service List – A.09-12-020
Updated – February 16, 2010

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