



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

**FILED**

09-16-10  
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Application of San Diego Gas & Electric ) A.09-08-020  
Company (U 902-M), Southern California ) (Filed September 16, 2010)  
Edison Company (U 338-E), Southern )  
California Gas Company (U 904-G) and )  
Pacific Gas and Electric Company (U 39-M) )  
for Authority to Establish a Wildfire Expense )  
Balancing Account to Record for Future )  
Recovery Wildfire-Related Costs )

**MOTION OF CITY OF SAN DIEGO AND THE COUNTY OF SAN DIEGO FOR PARTY  
STATUS IN THIS PROCEEDING**

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Dated: September 16, 2010

I.

**Introduction**

Pursuant to 1.4 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, the City of San Diego ("City") and the County of San Diego ("County") respectfully submit this motion for party status in the instant proceeding. On August 6, 2010, Administrative Law Judge Maribeth A. Bushey set forth a schedule requiring protests to the Joint Amended Application of Southern California Edison Company (U 338-E), Pacific Gas and Electric Company (U 39-M), San Diego Gas & Electric Company (U 902-M), and Southern California Gas Company (U 904-G) (hereafter, "Joint Amended Application") be filed and served by September 8, 2010.

The City Council and County Board of Supervisors were on Summer legislative recess at the time the Joint Amended Application was filed and during the majority of the scheduled protest period, and have not had an opportunity to review the application and be consulted regarding whether or not the City and/or County wish to intervene in the matter and file a protest. Accordingly, the City and County seek party status in this proceeding so they can file a request to not expedite consideration of, and to extend the deadline to protest, the Joint Amended Application.

II.

**Description of the Parties and Interests in Proceeding**

The City and County are large San Diego Gas and Electric ("SDG&E") rate payers and therefore have a vested interest in the Utilities' application. The City and County are also currently financially limited and have an interest in the base, method, and time for the proposed rate payer charges and how such may affect City and County tax revenues and public services. Additionally, the City and the County are plaintiffs in pending civil lawsuits against SDG&E and its parent company, Sempra Energy, over government losses sustained in the 2007 Witch Creek, Guejito, and Rice Canyon Fires caused by SDG&E power lines. The City and County thus also have a vested interest

in the Utilities' application to transfer fire related risks to ratepayers via the proposed Wildfire Expense Balancing Account ("WEBA"), which might provide reimbursement to SDG&E for the very damages the City and the County seek from SDG&E and Sempra.

Accordingly, the City and the County request the Commission grant the City and County party status in Application 09-08-020.

The City requests that its formal appearance be entered in this proceeding as follows and requests that the City be added to the service list as a party.

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The County requests that its formal appearance be entered in this proceeding as follows and requests that the County be added to the service list as a party.

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For the foregoing reasons, the City and County respectfully request to be granted party status in this proceeding.

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Dated: \_\_\_9/16/2010\_\_\_\_\_

/s/ DANIEL F. BAMBERG

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Dated: \_\_\_9/16/2010\_\_\_\_\_

/s/ WILLIAM A. JOHNSON, JR.

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