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BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate)
and Refine Procurement Policies and)
Consider Long-Term Procurement Plans.)
_____)

R.12-03-014
(Filed March 22, 2012)

**ALLIANCE FOR NUCLEAR RESPONSIBILITY'S
MOTION SEEKING PERMISSION TO LATE-FILE
NOI FOR INTERVENOR COMPENSATION**

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Date: July 2, 2012

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I. INTRODUCTION

Pursuant to Rule 11.6 of the California Public Utilities Commission (“Commission” or “CPUC”) Rules of Practice and Procedure, as well as the Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans, the Alliance for Nuclear Responsibility (“A4NR”) respectfully submits this motion seeking permission to late-file its Notice of Intent (“NOI”) to claim intervenor compensation. By separate motion, A4NR seeks party status in this proceeding in order to address the role of Long-term Procurement Plans in responding to the contingency of extended outages of the San Onofre Nuclear Generating Station (SONGS) and/or the Diablo Canyon Nuclear Power Plant (DCPP).

II. BACKGROUND

A4NR represents residential and small business customers on nuclear energy issues before California and Federal regulatory agencies, the Legislature, and Congress. A4NR has been concerned that, despite the recommendation of the California Energy Commission (“CEC”) in 2008¹ that the CPUC and California Independent System Operator (“ISO”) need to plan for possible extended outages at SONGS and/or DCPP, state government’s various energy and environmental agencies have premised their once-through-cooling, AB 1318 and AB 32 analyses on assumptions that the nuclear units are continuously available. If granted permission to late-file its NOI to claim intervenor compensation, A4NR’s participation in this proceeding will focus on assuring a more prudent approach to uncertainties about the availability of SONGS and DCPP in designing the procurement system to meet local and system reliability needs.

¹ California Energy Commission, “An Assessment of California’s Nuclear Power Plants: AB 1632 Report,” adopted November 20, 2008.

The June 22, 2012 CEC workshop on Electricity Infrastructure, attended by both Commissioner Florio and Commissioner Sandoval, made clear that R.12-03-014 may play a major role in state government's response to the rapidly evolving status of the SONGS units. Pursuant to Commissioner Florio's invitation at the close of the CEC workshop for stakeholders to participate in the August Track 1 hearings, A4NR has committed to do so. A4NR does not believe allowing the late-filing of its NOI will in any way disadvantage the other parties or be disruptive to the schedule of the proceeding.

III. CONCLUSION

For the reasons stated herein, A4NR respectfully requests that the Commission grant its Motion Seeking Permission to Late-File NOI for Intervenor Compensation in the above-captioned proceeding.

Respectfully submitted,

By: /s/ John L. Geesman

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