



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

**FILED**

11-08-10  
01:32 PM

Application of Pacific Gas and Electric  
Company for Authority to Increase  
Revenue Requirements to Recover the  
Costs to Upgrade its SmartMeter™  
Program. (U39E)

Docketing No. A.07-12-009  
Application 7-12-2009  
(Filed December 12, 2007)

**MOTION OF THE STATE PRIVACY AND SECURITY COALITION, INC.  
("STATE COALITION")  
FOR PARTY STATUS**

Jim Halpert, Esq.  
Callie Carr, Esq.  
DLA Piper LLP (US)  
500 Eighth Street  
Washington, D.C. 20004  
Telephone: (202) 799-4441  
Email: [jhalpert@dlapiper.com](mailto:jhalpert@dlapiper.com)

November 8, 2010

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

Application of Pacific Gas and Electric Company for Authority to Increase Revenue Requirements to Recover the Costs to Upgrade its SmartMeter™ Program. (U39E)

Docketing No. A.07-12-009  
Application 7-12-2009  
(Filed December 12, 2007)

**MOTION OF STATE SECURITY AND PRIVACY COALITION, INC.  
FOR PARTY STATUS**

The State Security and Privacy Coalition, Inc. (“State Coalition”)<sup>1</sup> respectfully moves for party status in this proceeding in accordance with Section 1.4 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure.

**I. STATE COALITION’S INTEREST IN THIS PROCEEDING**

This Motion for Party Status is filed by State Coalition in order to submit comments jointly with The Technology Network (“TechNet”) on the City and County of San Francisco’s Petition to Modify Decision 09-03-026 To Temporarily Suspend Pacific Gas and Electric Company’s Installation of SmartMeters™ (“Petition”).

The State Coalition’s interest in this proceeding is that it is comprised of 16 leading technology companies and trade associations, and works in all 50 states to develop clear, workable solutions to privacy, security and e-commerce issues that protect consumers, while allowing continued economic growth. The Coalition has helped with

---

<sup>1</sup> The State Privacy and Security Coalition is a coalition of companies and trade associations working on the huge volume of State privacy, security, consumer protection, marketing, child online safety, government surveillance, Internet advertising, content regulation, taxation and VoIP legislation. Its company members include Amazon.com, AOL, AT&T, CareerBuilder, Comcast, Cox, Google, HP/EDS, Monster.com, NewsCorp, Reed Elsevier, Skype, Time Warner Cable, Verizon, and Yahoo! NetChoice, the Technology Association of America, The Entertainment Software Association, Internet Alliance, and TechNet also work actively in Coalition activities.

drafting of more than 100 state laws in these areas, and filed comments in many rulemaking proceedings.

**II. NOTICE**

Service of notices, orders, and other communications and correspondence in this proceeding should be directed to State Coalition's counsel at the address set forth below:

Jim Halpert, Esq.  
Callie Carr, Esq.  
DLA Piper LLP (US)  
500 Eighth Street  
Washington, D.C. 20004  
Telephone: (202) 799-4441  
Email: [jhalpert@dlapiper.com](mailto:jhalpert@dlapiper.com)

**III. CONCLUSION**

State Coalition'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, State Coalition respectfully requests that the Commission grant this Motion for Party Status and direct the Commission's Docket Office to accept the joint Comments of State Coalition and TechNet for filing.

DATE: November 8, 2010

Respectfully submitted,



---

Jim Halpert, Esq.  
DLA Piper  
500 Eighth Street  
Washington, D.C. 20004  
Telephone: (202) 799-4441  
Email: [jhalpert@dlapiper.com](mailto:jhalpert@dlapiper.com)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *Motion of the State Privacy and Security Coalition, Inc. for Party Status* on all parties of record in *A.07-12-009* by serving an electronic copy on their email addresses of record and, for those parties without an email address of record, by mailing a properly addressed copy by first-class mail with postage prepaid to each party on the Commission's official service list for this proceeding.

This Certificate of Service is executed on November 8, 2010, at DLA Piper U.S., LLP, 500 8th Street, NW, Washington, DC 20004



Callie J. Carr

Subscribed and sworn to  
before me this 8<sup>th</sup> day  
of November, 2010

Victoria K. Way  
Notary Public in and  
for the District of  
Columbia

My commission expires:

9/14/12

## SERVICE LIST - A.07-12-009

BKallo@rwbaird.com  
CCassman@abc-law.com  
CJGF@pge.com  
CManson@SempraUtilities.com  
DNG6@pge.com  
Dana.Mcrae@co.santa-cruz.ca.us  
JBarisone@abc-law.com  
KAF4@pge.com  
LDRi@pge.com  
RPrince@SempraUtilities.com  
SWF5@pge.com  
ag2@cpuc.ca.gov  
agc@cpuc.ca.gov  
austin.yang@sfgov.org  
bfinkelstein@turn.org  
bkc7@pge.com  
bschuman@pacific-crest.com  
bsk@cpuc.ca.gov  
case.admin@sce.com  
cem@newsdata.com  
chris@emeter.com  
cjb@cpuc.ca.gov  
cjn3@pge.com  
cjh5@pge.com  
crv@cpuc.ca.gov  
ctd@cpuc.ca.gov  
dbyers@landuselaw.com  
ehw2@pge.com  
ericd@silverspringnet.com  
janet.combs@sce.com  
jeff.francetic@landisgyr.com  
jmrb@pge.com  
joc@cpuc.ca.gov  
julien.dumoulin-smith@ubs.com  
karpiak@rwglaw.com  
kkm@cpuc.ca.gov  
kpowell@loganpowell.com  
kpp@cpuc.ca.gov  
lwt@cpuc.ca.gov  
mdjoseph@adamsbroadwell.com  
mjd@cpuc.ca.gov  
mrw@mrwassoc.com  
nsuetake@turn.org  
pfa@cpuc.ca.gov  
pforkin@daystartech.com  
regrelcpuccases@pge.com  
rhd@cpuc.ca.gov  
rmason@rwbaird.com  
rogerl47@aol.com  
rrh3@pge.com

rschmidt@bartlewells.com  
sandi@emfsafetynetwork.org  
service@spurr.org  
srovetti@sfgov.org  
tburke@sfgov.org  
tcr@cpuc.ca.gov  
theresa.mueller@sfgov.org  
wharrison@rwbaird.com  
william.sanders@sfgov.org  
wtr@cpuc.ca.gov  
zango@zimmerlucas.com  
saw0@pge.com  
scl@cpuc.ca.gov