

**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, 2017. (U39M)

Application 15-09-001  
(Filed September 1, 2015)

**MOTION OF THE ENERGY FREEDOM COALITION OF AMERICA, LLC  
FOR PARTY STATUS**

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Counsel to Energy Freedom Coalition of  
America, LLC

October 28, 2015

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FOR PARTY STATUS**

Pursuant to Rule 1.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Energy Freedom Coalition of America, LLC (“EFCA”) respectfully moves for party status in the above captioned proceeding.

**I. Description of EFCA**

EFCA members include distributed rooftop solar providers and solar product manufacturers operating across the country including within Pacific Gas & Electric Company’s (“PG&E”) service territory.<sup>1</sup> Therefore, EFCA members have a material interest in changes to or development of PG&E cost of service and rates as those issues will impact the rooftop solar industry in the PG&E service territory.

**II. Statement of Factual and Legal Contentions Pertinent to the Issues Presented**

In the instant proceeding, PG&E has filed this three-year general rate case for electricity and natural gas service for 2017, 2018, and 2019. Phase 1 of the PG&E application focuses on revenue requirements, while Phase 2 will address electric marginal cost, revenue allocation, and rate design. PG&E has requested the Commission to issue a final decision in Phase 1 by

December 8, 2016. Among the reasons PG&E cites for the requested increase in revenue requirements is the cost of complying with governmental regulations and orders, including programs or orders pertaining to distributed rooftop solar development as a result of the Commission's ongoing Rulemaking (R.) 14-08-013 (the Commission's Distribution Resources Planning proceeding). While EFCA's review of PG&E's application is still ongoing and may lead to other matters EFCA identifies as having an interest in, at this time, EFCA intends to review PG&E's revenue requirement request for inclusion of certain costs attributed to upgrades purportedly necessary to serve distributed generation ("DG") customers. EFCA expects to question whether these costs are necessary, are actually related to installation of customer-sited DG and comport with prior Commission decisions pertaining to these costs. Because these proposed costs will necessarily impact the final rates PG&E charges its customers and could lead to proposals for additional fees and charges on utility customers installing customer-sited renewable DG, the Commission's disposition of this case will materially impact the interests of EFCA members. EFCA also intends to address Phase 2 matters at the appropriate time.

### **III. Communications**

EFCA consents to "email only" service and requests that the following individuals be added to the service list for Application (A.) 15-09-001 on behalf of EFCA as Party

Representative:

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<sup>1</sup> EFCA's members currently include Silevo, SolarCity, and ZEP Solar.

#### **IV. Conclusion**

For the foregoing reasons, EFCA respectfully requests the Commission grant its motion for party status.

Respectfully submitted at Oakland, California,

/s/ Joseph Wiedman

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