



**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, 2023. (U39M)

Application 21-06-021
(Filed June 30, 2021)
(Amended March 10, 2022)

**WILD TREE FOUNDATION
MOTION FOR PARTY STATUS**

April Rose Maurath Sommer
Executive and Legal Director

Wild Tree Foundation
1547 Palos Verdes Mall #196
Walnut Creek, CA 94597
April@WildTree.org
(925) 310-6070

Dated: May 11, 2022

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

Application of Pacific Gas and Electric
Company for Authority, Among Other Things,
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**WILD TREE FOUNDATION
MOTION FOR PARTY STATUS**

In accordance with the provisions of Rule 1.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Wild Tree Foundation (“Wild Tree”) respectfully moves for party status in this proceeding, *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, 2023*.

I. DESCRIPTION OF WILD TREE FOUNDATION

Wild Tree Foundation is a 501(c)(3) non-profit organization dedicated to protection of our environment, climate, and wildlife. Wild Tree advocates that our future is dependent upon a transition away from fossil fueled and utility-scale electricity generation reliant upon lengthy transmission from for-profit, investor owned utilities to a system based upon local, distributed, publicly and cooperatively owned renewable resources. Wild Tree intervenes in Commission

proceedings to further the interests of our environment, climate, wildlife, and ratepayers that are concerned about their protection. In furtherance of these interests, Wild Tree advocates for transparency, public participation, and compliance with the Rule of Law in government decision-making and against corruption by government agencies and officials and regulated entities.

II. INTEREST IN THIS PROCEEDING

Wild Tree has an interest in this proceeding in seeing that ratepayers are not harmed by any unreasonable and unjust rate increases and that ratepayers, the environment, and the climate are not harmed by the approval of rates for projects that will unduly impact the environment, climate, environmental justice communities, and wildlife.

III. WILD TREE ADVOCACY IN THIS PROCEEDING

In the instant proceeding, Wild Tree intends to raise and argue the following factual and legal contentions:

PG&E's proposed revenue requirements, proposed costs, and proposed recovery mechanisms for TY 2023 are not all just and reasonable, and should not be fully adopted by the Commission.

PG&E's proposed post-test year forecast adjustment mechanisms, and regulatory filings for 2024, 2025, and 2026 are not just and reasonable, and should not be adopted by the Commission.

PG&E's amended application will impact environmental and social justice communities and PG&E's requests are contradictory to achievement of the nine goals of the Commission's Environmental and Social Justice Action Plan.

Safety considerations, including wildfire-related matters, associated with PG&E's request can be mitigated in other ways than proposed and Wild Tree will make affirmative proposals on how to do this better than as proposed by PG&E.

Wild Tree is particularly concerned about PG&E's proposal in its March 2022 amended application to underground 10,000 circuit miles of distribution lines and the reduction of \$1 billion from vegetation management as cost shifting between vegetation management and undergrounding.

Wild Tree notes that the proceeding lacks parties that primarily advocate on behalf of California's environment or environmental justice communities even though the application includes proposals that would have significant impact on the environment and the scope of the proceeding specifically includes analysis of impact of the application on the environment and social justice communities.

IV. TIMING

Wild Tree intends to fully participate in this proceeding by filing testimony, taking part in hearings, and filing legal briefings and alternate proposals. Although the application was filed in 2021, the amended application was only recently filed and testimony on the amended application has not been submitted, evidentiary hearings have not been held, and there has been no legal briefing or acceptance of alternate proposals. Wild Tree's interest in this proceeding was triggered by the March 2022 amended application, in particular, the additional of billions of dollars to the application for PG&E's undergrounding scheme and cost shifting from vegetation management to undergrounding. Wild Tree is prepared to abide by the schedule set out in April 12, 2022 Administrative Law Judges' Ruling Adopting Revised Schedule beginning with testimony due June 13, 2022. Therefore, neither the Applicant nor any parties in this proceeding would be prejudiced by Wild Tree becoming a party at this time because Wild Tree will be able to participate in all substantive aspects of this proceeding.

V. NOTICES

Service of notices, orders, and other communications and correspondence in this proceeding should be directed to April Rose Maurath Sommer, Executive & Legal Director for Wild Tree Foundation at the address set forth below:

April Rose Maurath Sommer
Executive and Legal Director
Wild Tree Foundation
1547 Palos Verdes Mall #196
Walnut Creek, CA 94597
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VI. CONCLUSION

At this point in the proceeding, Wild Tree Foundation's participation in this proceeding will not prejudice the applicant or any other party. To the extent possible, Wild Tree will coordinate with other parties who share Wild Tree's concerns. For the reasons stated above, Wild Tree respectfully moves for a ruling granting this motion for party status.

Respectfully submitted,

/s/ April Rose Maurath Sommer

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