

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Pacific Gas and Electric Company)
) Docket Nos. ER20-2878-000, *et al.*
)

**MOTION TO INTERVENE OUT-OF-TIME OF THE
CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION**

Pursuant to Rules 212 and 214, 18 C.F.R. §§ 385.212 and 385.214, of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), and the Commission’s Combined Notice of Filings #1 dated September 15, 2020, the California Municipal Utilities Association (“CMUA”) respectfully submits this Motion to Intervene Out-of-Time in the above-captioned proceeding. Docket No. ER20-2878-000 was initiated by the filing of Pacific Gas and Electric Company (“PG&E”) on September 15, 2020, as supplemented on September 16, 2020, proposing rate changes and revisions to non-rate terms and conditions in its Wholesale Distribution Tariff (“WDT”).

I. MOTION TO INTERVENE OUT-OF-TIME

Pursuant to Rule 214, CMUA submits the following in support of its Motion to Intervene Out-of-Time. CMUA is a statewide organization of local public agencies in California that provide water and electricity service to California consumers. In total, CMUA members provide water service to 70 percent of Californians and electricity service to approximately 25-30 percent of the state. Among CMUA’s water members, many take electric service at wholesale to enable

their core pumping, irrigation, water delivery and water treatment functions. Several of CMUA's water members are direct participants in the wholesale markets administered by the California Independent System Operator Corporation ("CAISO"). In addition, certain CMUA water members take service under WDTs, and are directly affected by the rate increases and rate design changes proposed by PG&E in the above-captioned docket. CMUA therefore has a direct interest in this proceeding, which interest cannot be represented by any other party. CMUA's participation in this proceeding is necessary and appropriate as CMUA's membership will be directly affected by the outcome of this proceeding.

Rule 214(d) of the Commission's Rules of Practice and Procedure provides that, in deciding whether to grant late intervention, the Commission consider whether: (i) the movant has good cause for failing to file the motion within the time prescribed; (ii) the granting of the motion will disrupt the proceeding; (iii) the movant's interest is not adequately represented by other parties in the proceeding; and (iv) any prejudice to, or additional burdens upon, the existing parties might result from permitting the intervention.¹

Good cause exists to grant CMUA's late intervention. CMUA does not normally intervene in rate cases of individual transmission owners, but in this instance the impact of the proposed rate changes on certain CMUA members is substantial. CMUA will accept the record of the proceeding as it currently stands, and as such granting the motion at this early stage will not disrupt or delay the

¹ 18 C.F.R. § 385.214(d)(1).

procedural schedule. Finally, granting intervention will not prejudice or place extra burdens on the existing parties to this proceeding.

II. CONCLUSION

For the foregoing reasons, CMUA respectfully requests that the Commission grant its Motion to Intervene Out-of-Time.

Dated: December 31, 2020

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused a copy of the foregoing document to be served to the service list established by the Secretary in this proceeding.

Dated at Sacramento, California, this 31st day of December 2020.

/s/Amy Freeman

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