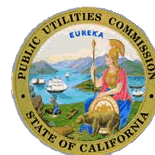


**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

11/02/18
04:59 PM

Order Instituting Rulemaking to Establish a
Framework and Processes for Assessing the
Affordability of Utility Service

Rulemaking. 18-07-006
(Filed July 12, 2018)

**MOTION FOR PARTY STATUS OF THE UTILITY CONSUMERS' ACTION
NETWORK**



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Date: November 2, 2018

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

Order Instituting Rulemaking to Establish a
Framework and Processes for Assessing the
Affordability of Utility Service

Rulemaking. 18-07-006
(Filed July 12, 2018)

**MOTION FOR PARTY STATUS OF THE UTILITY CONSUMERS' ACTION
NETWORK**

I. INTRODUCTION

The Utility Consumers' Action Network (UCAN) respectfully moves for party status in this proceeding in accordance with Rule 1.4 of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure.

II. UCAN's INTEREST IN THIS PROCEEDING

UCAN is a charitable nonprofit 501(c) (3) corporation. UCAN is a consumer advocacy organization dedicated to protecting and representing the interests of residential and small business customers of San Diego Gas and Electric. UCAN has a thirty-four year history of intervening in CPUC proceedings on behalf of SDG&E customers. UCAN believes the issue of affordability is important to the ratepayers of San Diego and is concerned about the cumulative impact of rate requests and special program costs. A recent study by The Utility Reform Network (TURN) determined that even though unemployment had decreased in California for the years 2010-2016, total shutoffs increased during that same period.¹ In SDG&E's service territory during this same period, the number of shutoffs per total number of customers nearly doubled

¹ http://www.turn.org/wp-content/uploads/2018/05/2018_TURN_Shut-Off-Report_FINAL.pdf "...California's unemployment rate fell from 13% in 2010 to 6.5% in 2016. During that same time period, when shutoffs were increasing from 585,672 to 884,380, California's median income increased by over \$4,000." p.19

from 1.7% in 2010 to 3.0% in 2016.² This fact is counter-intuitive and indicates that there are other factors behind the affordability of electricity in California including the possibility that the price of electricity is rising faster than household incomes. As noted in the Order Instituting Rulemaking (OIR) for this proceeding, “the Commission...lacks a working definition of what is meant by ‘affordable,’ as well as a framework to consistently and comprehensively analyze affordability issues across individual proceedings and utility services.”³ UCAN supports the goal of this proceeding to develop a range of metrics that can help guide decision-makers in assessing affordability issues and wishes to participate in this proceeding to help determine these metrics.

III. ISSUES UCAN ANTICIPATES PARTICIPATING IN

The issues UCAN intends to address in this proceeding are:

- help determine a working definition of what is meant by “affordable.”
- assist in developing a framework to consistently and comprehensively analyze affordability issues across individual proceedings and utility services.
- support the development of a range of metrics to guide decision makers in assessing affordability issues.
- any additional issues within the scope of this proceeding.

No parties to the proceeding will be prejudiced by UCAN’s request for party status. UCAN’s work as an advocate for SDG&E ratepayers will benefit the Commission in its development of a record to consider in this Rulemaking.

² *Ibid.* p. 18

³ R.18-07-006, Order Instituting Rulemaking to Develop Methods to Assess the Affordability Impacts of Utility Rate Requests and Commission Proceedings (OIR), (July 12, 2018) p. 4.

IV. NOTICE

UCAN respectfully request that service of notices, orders and other correspondence in this proceeding be directed to:

PARTY

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PARTY

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V. CONCLUSION

For the reasons stated above, UCAN respectfully requests that the Commission grant this Motion for Party Status.

Dated: November 2, 2018

Respectfully submitted,
/s/ Jane Krikorian
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