BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U-338-E) to Recover O&M Costs Associated with the San Onofre Nuclear Generating Station Units Nos. 2 and 3 Ongoing Seismic Program, and New Seismic Research Projects and Analyses

Application 11-04-006

MOTION TO INTERVENE OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

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Dated: October 20, 2011

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Pursuant to Rule 1.4 of the Commission's Rules of Practice and Procedure, Pacific Gas and Electric Company files this motion to intervene in the above-captioned proceeding. In this Application, Southern California Edison Company ("Edison") requests authority to recover in customer rates the O&M costs associated with its on-going seismic program and new seismic research and analysis related to continued safe operation of those facilities and in response to recommendations made by the California Energy Commission ("CEC") that additional seismic studies be performed at the two operating nuclear facilities in California, SONGS and Diablo Canyon Power Plant.

PG&E submitted, and the Commission approved in Decision 10-08-003, a substantially similar Application, A.10-01-014 to the instant Application. Specifically, PG&E requested and received Commission approval of ratepayer funding to perform additional seismic studies recommended by the CEC. On September 23, 2011, PG&E filed a motion to re-open that proceeding and for the Commission to authorize funding in addition to that authorized in D.10-08-003.

PG&E supports the purpose and scope of Edison's proposals and requests the opportunity to raise issues and present evidence in this proceeding as may be necessary to defend PG&E's interests and the interests of PG&E's customers raised by the Application.

Wherefore, based upon the foregoing, PG&E moves to intervene in this matter and requests that it be granted status as an interested party, with all rights and privileges attendant thereto.

Respectfully Submitted,

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By: /s/ Jennifer K. Post
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