

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric)
Company to Report Assessments of) A.98-05-022
Inventory Balances and to Address) (Filed May 1, 1998)
Appraisal of Retained Generation Assets)

MOTION OF
THE REGIONAL COUNCIL OF RURAL COUNTIES
FOR LEAVE TO FILE LATE COMMENTS
ON PACIFIC GAS AND ELECTRIC COMPANY'S PROPOSED SCOPING
MEMO AND RULING OF ASSIGNED COMMISSIONER

Pursuant to Rules 45 and 48 of the California Public Utilities Commission (CPUC) Rules of Practice and Procedure, the Regional Council of Rural Counties (RCRC) moves for leave to file late comments on the Proposed Scoping Memo and Ruling of Assigned Commissioner prepared by Pacific Gas and Electric Company (PG&E) in Application 98-05-022, dated October 20, 1998.

Given the early stage of this proceeding and the potential significance of the outcome of this proceeding, it is important for the CPUC to hear from the parties directly affected by the outcome. We believe that the existing service list is far too limited in scope to capture those parties who will be so directly affected. For example, the list did not include RCRC. We represent some twenty seven rural California Counties. It is within our membership area that these facilities are physically located. It is within our membership area that these projects place a responsibility upon our Counties for public services including police, fire and emergency response. The RCRC member Counties also are responsible for appraising and taxing these facilities as a base of revenues for local services. Many of these facilities also provide, or could provide local water supplies to residents of our member Counties. A water secure water supply in California is critical

RCRC Motion Comments on PG&E Scoping Memo, Page of 7

to a healthy community and economy.

Unfortunately, RCRC was unaware that this proceeding was the one regarding the disposition of the hydroelectric facilities, improvements and lands and we therefore did not submit comments in time for the November 3, 1998 deadline. However, given the early phase of this proceeding, the enormity of the assets at stake, the significant potential for harm to our members constituents and the relevance of this proceeding to basic human needs within our membership area RCRC requests that the Commission accept this motion. It is our assertion that no parties will suffer harm or prejudice if the Commission accepts these comments.