

Submission Description: (doc-less) Motion to Intervene of State Water Contractors

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Dockets

EL19-37-000 Complaint and Declaratory Order

Filing Party/Contacts:

Filing Party	Signer (Representative)
Other Contact (Principal)	

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Basis for Intervening:

State Water Contractors (âSWC â) is a non-profit, mutual benefit corporation organized under the laws of the State of California. SWC is comprised of 27 public agencies holding contracts with the State of California Department of Water Resources to purchase water delivered by the State Water Resources Development System, otherwise known as the State Water Project (âSWP â). Collectively, these public agencies supply water for drinking, commercial, industrial, and agricultural purposes to a population of more than 26 million and to over 750,000 acres of farmland and businesses in northern, central and southern California. SWC was formed to further the common interest of its members with respect to the operation and administration of the SWP. SWC represents the interests and views of their members regarding the SWP before state and federal legislative bodies and administrative agencies, including the Federal Energy Regulatory Commission.

The members of the SWC serve water to more than two-thirds of California's vast population. The SWC members contract for water supplies with California Department of Water Resources, which operates and administers the SWP. The SWP captures and stores run off in northern California and delivers the water to areas of need in northern, central and southern California. Delivering this water requires significant electric energy resources for the pumping load. Indeed, the SWP is the largest single consumer of electricity in the State of California. Among other operating costs incurred by SWP, the SWC members pay all energy costs of the SWP, including costs of transmission and related service stemming from the California Independent System Operator Corporation (âCAISO â)-Controlled Grid. SWC thus has a compelling interest in EDF Renewables, Inc.'s (âEDFR â) formal complaint and petition for declaratory order against Pacific Gas and Electric Company (âPG&E â).

For the above reasons, SWC will be affected directly by the outcome of this proceeding. SWC claims an interest in this proceeding and a right to intervene to protect its interests as they may appear. SWC's participation in this case is necessary and appropriate to the administration of the Federal Power Act and will be in the public interest. SWC's interests will not be adequately represented by any other party. SWC, therefore, requests the Commission grant its Motion to Intervene, pursuant to Rules 212 and 214 of FERC's Rules of

Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.214 (2018), and make SWC a party to this proceeding for all purposes.

The persons to whom correspondence, pleadings, and other papers in relation to this proceeding should be addressed and the persons whose names are to be placed on the Commission's official service list are designated as follows pursuant to Rule 203, 18 C.F.R. § 385.203 (2018):

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SWC reserves the right to posit and address any issue that it or others may identify or raise herein that are developed before or after discovery or during the course of any hearing or technical or settlement conference that may be conducted in this proceeding.