

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

*Order Instituting Rulemaking to Consider  
Revisions to Electric Rule 20 and Related  
Matters.*

Rulemaking 17-05-010  
(Filed May 11, 2017)

**MOTION FOR PARTY STATUS OF RURAL COUNTY  
REPRESENTATIVES OF CALIFORNIA**

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April 13, 2021

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**I. Introduction**

Rural County Representatives of California (RCRC) respectfully moves for party status in this proceeding in accordance with Section 1.4 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure.

**II. Interest in this Proceeding**

RCRC is an association of thirty-seven rural California counties, and its Board of Directors is comprised of elected supervisors from those member counties. RCRC member counties contain much of California’s forested lands, including more than 70 percent of the State’s national forest lands, as well as high fire hazard severity zones. As such, our communities have borne the lion’s share of destruction caused by wildfires and have experienced most of the state’s Public Safety Power Shut-off (PSPS) events. While some of our member counties have undertaken Rule 20 projects, many have been unable to participate for a variety of reasons. RCRC has advocated for the expansion of the Rule 20 program before the Legislature and is very interested in the issues contemplated in this proceeding, specifically as it relates to the future of this proceeding which will contemplate promoting wildfire safety and emergency-related undergrounding in Phase 2.<sup>1</sup>

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<sup>1</sup> As discussed throughout the Assigned Commissioner Proposed Decision, dated April 7, 2021 (Agenda ID #19398).

### **III. Factual and Legal Contentions**

RCRC will provide input based on its knowledge of California's rural counties, their populations and resources, experience with the Rule 20 program, and the pressing need to increase safety and resiliency of utility infrastructure. Undergrounding electric utility facilities will have a direct impact, and improved safety outcome, on the well-being of the areas we represent. There are large differences in costs and other consideration to underground electric facilities in a rural setting that are not necessarily present in an urban or suburban setting. For instance, rural and disadvantaged communities have limited economies of scale, placing Rule 20 projects out of reach in areas that could benefit the most from increased public safety and reliability.

RCRC is a party to R.12-11-005, *Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues (and the subsequent R.20-05-012 Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the Self-Generation Incentive Program and Related Issues)*; R.18-12-005, *Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions*; R.18-10-007, *Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018)*; R.18-03-011, *Order Instituting Rulemaking Regarding Emergency Disaster Relief Program*; and R.19-09-009, *Order Instituting Rulemaking Regarding Microgrids Pursuant to Senate Bill 1339 and Resiliency Strategies*.

### **IV. Notice**

Service of notices, orders, and other correspondence in this proceeding should be directed to RCRC at the address set forth below:

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1215 K Street, Suite 1650  
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### **IV. Conclusion**

RCRC's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, RCRC respectfully requests that the CPUC grant this Motion for Party Status filing.

Dated: April 13, 2021

Respectfully submitted,

/s/ John Kennedy

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