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

Application of Pacific Gas and Electric Company (U 39 E) to Recover Pumped Storage Study Costs	Application No. 10-08-011 (Filed August 20, 2010)
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**MOTION OF CALIFORNIA SPORTFISHING PROTECTION ALLIANCE FOR
PARTY STATUS**

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Date: September 23, 2010

Pursuant to Rule 1.4(a)(4) of the Commission's Rules of Practice and Procedure, the California Sportfishing Protection Alliance ("CSPA") respectfully submits this motion for party status in the application of the Pacific Gas and Electric Company ("PG&E") to recover from ratepayers its costs for studying a number of potential pumped storage projects.

1. BACKGROUND

CSPA is a Section 501(c)(3) California nonprofit organization based in San Joaquin County, California, with members who are customers of PG&E and who reside and recreate in the Mokelumne River watershed. CSPA has had a long engagement in the Mokelumne River watershed, including engagement in the FERC relicensing of the Lower Mokelumne Project (EBMUD, Pardee and Camanche dams). CSPA prevailed in a lawsuit against EBMUD regarding Penn Mine in the late 1990's, leading to the cleanup of the Penn Mine site. CSPA has numerous active water rights protests in the Mokelumne watershed. CSPA is also active as a member of the steering committee of the California Hydropower Reform Coalition, and is engaged in numerous proceedings relating to hydropower operations in California.

Much of CSPA's engagement on the Mokelumne has been centered on protecting the anadromous fisheries downstream of Camanche Dam. As a long-term goal, CSPA seeks the restoration of anadromous salmonids to their historic habitat upstream of Pardee Reservoir.

PG&E's proposed project will affect cold water resources in the Mokelumne River, both upstream of Pardee Reservoir and potentially downstream of Camanche Dam. PG&E's proposal will directly affect the CSPA members who use and enjoy the

Mokelumne River and its reservoirs, as well as others who are PG&E ratepayers.

2. MOTION FOR PARTY STATUS

Pursuant to Rule 1.4 of the Commission's Rules, CSPA wishes to become a party to this proceeding. CSPA's position and interest are as set forth in this filing.

3. SERVICE

All pleadings and other communication in connection with this proceeding should be served as follows:

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4. FACTUAL AND LEGAL CONTENTIONS

In its application, PG&E summarizes its point of view regarding the importance of pumped storage to California's renewable energy future. CSPA does not challenge the overall concept of pumped storage, but opposes this attempt by PG&E to create a pumped storage project on the Mokelumne River system, and to initiate a proceeding before the Federal Energy Regulatory Commission, without adequate preliminary research and investigation which would be reasonable and prudent prior to the ratepayer expense and the stakeholder expense and engagement which such a proceeding will require.

The Mokelumne River has been heavily utilized for power generation and water supply since the 1920s. For decades, nongovernmental entities including CSPA and state and local government agencies have sought to restore the ecological health of the Mokelumne and its fisheries while providing regional recreational opportunities and local economic benefit. CSPA has participated in preliminary discussions conducted by PG&E

regarding proposed pumped storage projects in the Mokelumne River and elsewhere, and has clearly and consistently articulated its concerns with the proposed pumped storage projects in the Mokelumne watershed.

PG&E's proposed Mokelumne watershed pumped storage project has potential adverse impacts on the affected reservoirs and rivers. It could damage the recreational, environmental and economic resources in and around the affected reservoirs, and could harm the fisheries of the lower Mokelumne River and Sacramento-San Joaquin River Delta.

The cold water resources of the Mokelumne River in particular are threatened by PG&E's proposed pumped storage project. Irreversible harm to cold water availability in the Mokelumne River downstream of Salt Springs Reservoir could result from operation of PG&E's proposed pumped storage project. Such impacts could negatively affect existing trout populations, and effectively preclude reintroduction of anadromous salmon and steelhead to the Mokelumne River upstream of Pardee Dam. These impacts on cold water could also extend to impacts on existing steelhead resources in the lower Mokelumne River downstream of Camanche Dam; these steelhead are listed as threatened under the Endangered Species Act. In addition, fall-run Chinook salmon in the lower Mokelumne River could be also be significantly affected by the proposed project.

Prior to initiation of a costly and intensive FERC proceeding, PG&E should first construct water balance and water temperature models of the affected resources, from the proposed project locations to the lower Mokelumne River downstream of Camanche Dam. Such an effort would cost approximately one tenth of the cost of a full-blown FERC proceeding; would be needed within a FERC proceeding in any case and would inform such a proceeding should one subsequently be undertaken; and would allow

reasonable and prudent front-end consideration of the aspect of the project that is most likely to present an environmental fatal flaw.

5. CONCLUSION

Wherefore, CSPA respectfully requests that the Commission grant this motion for party status.

Dated September 23, 2010, at Berkeley, California.

/s/ _____
Christopher R. Shutes
for the California Sportfishing
Protection Alliance

CERTIFICATE OF SERVICE

I certify that I have this day by electronic mail served a true copy of the original attached "Motion of the California Sportfishing Protection Alliance for Party Status" on all parties of record in this proceeding or their attorneys of record. I will serve paper copies of the pleading on Commissioner Nancy Ryan and Administrative Law Judge Jeffrey O'Donnell.

Dated September 23, 2010, at Berkeley, California.

/s/

Christopher R. Shutes
for the California Sportfishing
Protection Alliance