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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Own Motion to Address the
Issue of Customers' Electric and Natural Gas
Service Disconnection

RULEMAKING 10-02-005
(Filed February 4, 2010)

**REPLY COMMENTS OF THE CITY AND COUNTY OF
SAN FRANCISCO ON OPENING COMMENTS FILED IN RESPONSE
TO ADMINISTRATIVE LAW JUDGE'S RULING
ON PHASE II ISSUES**

I. INTRODUCTION

The City and County of San Francisco (“the City”) submits these reply comments to the comments filed in response to the Administrative Law Judge’s Ruling Providing Opportunity to Comment on Phase II Issues (“Phase II Ruling”).

II. COMMENTS

The City supports the comments filed by TURN, the Division of Ratepayer Advocates, the Greenlining Institute, the National Consumer Law Center, and the Disability Rights Advocates (the “Consumer Advocates”). The Consumer Advocates’ responses to the Phase II Ruling provide workable suggestions aimed at decreasing disconnections in California. The City supports those proposals and encourages the Commission to extend the sunset date for the residential disconnection practices for PG&E and SCE to at least December 31, 2013.

The Commission has already adopted important consumer protections in D.10-07-048. The issues being considered here will provide additional safeguards for utility customers, and will especially assist low-income customers.

III. CONCLUSION

The Commission's efforts in implementing policies to reduce disconnection rates will have a real impact on ratepayers within the City and County of San Francisco. The City urges the Commission to move forward expeditiously with developing the rules to implement these policies.

Respectfully submitted,

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_____/S/
By: Austin Yang

ATTORNEYS FOR THE CITY AND COUNTY
OF SAN FRANCISCO

May 31, 2011

CERTIFICATE OF SERVICE

I, **PAULA FERNANDEZ**, declare that:

I am employed in the City and County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is City Attorney’s Office, City Hall, Room 234, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102; telephone (415) 554-4623.

On May 31, 2011, I served **REPLY COMMENTS OF THE CITY AND COUNTY OF SAN FRANCISCO ON OPENING COMMENTS FILED IN RESPONSE TO ADMINISTRATIVE LAW JUDGE’S RULING ON PHASE II ISSUES** by electronic mail on Proceeding R.10-02-005.

The following addressees without an email address were served:



BY UNITED STATES MAIL: Following ordinary business practices, I sealed true and correct copies of the above documents in addressed envelope(s) and placed them at my workplace for collection and mailing with the United States Postal Service. I am readily familiar with the practices of the San Francisco City Attorney's Office for collecting and processing mail. In the ordinary course of business, the sealed envelope(s) that I placed for collection would be deposited, postage prepaid, with the United States Postal Service that same day.

Debra Bosley
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I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed May 31, 2011, at San Francisco, California.

/s/

PAULA FERNANDEZ