STATE OF CALIFORNIA EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

F I L E D
04-08-13
02:42 PM

April 8, 2013

Agenda ID #12059
Ratesetting

TO PARTIES OF RECORD IN RULEMAKING 11-02-019.

This is the proposed decision of Administrative Law Judge (ALJ) Maribeth A. Bushey, previously designated as the presiding officer in this proceeding. It will not appear on the Commission's agenda sooner than 30 days from the date it is mailed. This matter was categorized as ratesetting and is subject to Pub. Util. Code § 1701.3(c). Upon the request of any Commissioner, a Ratesetting Deliberative Meeting (RDM) may be held. If that occurs, the Commission will prepare and publish an agenda for the RDM 10 days beforehand. When the RDM is held, there is a related ex parte communications prohibition period. (See Rule 8.3(c)(4).)

When the Commission acts on the proposed decision, it may adopt all or part of it as written, amend or modify it, or set it aside and prepare its own decision. Only when the Commission acts does the decision become binding on the parties.

Parties to the proceeding may file comments on the proposed decision as provided in Article 14 of the Commission's Rules of Practice and Procedure (Rules), accessible on the Commission's website at www.cpuc.ca.gov. Pursuant to Rule 14.3, opening comments shall not exceed 15 pages.

Comments must be filed pursuant to Rule 1.13 either electronically or in hard copy. Comments should be served on parties to this proceeding in accordance with Rules 1.9 and 1.10. Electronic and hard copies of comments should be sent to ALJ Bushey at mab@cpuc.ca.gov and assigned Commissioner. The current service list for this proceeding is available on the Commission's website at www.cpuc.ca.gov.

/s/ MARYAM EBKE for
Karen V. Clopton, Chief
Administrative Law Judge

KVC:lil

Attachment

Decision **PROPOSED DECISION OF ALJ BUSHEY** (Mailed 4/8/2013)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's Own Motion to Adopt New Safety and Reliability Regulations for Natural Gas Transmission and Distribution Pipelines and Related Ratemaking Mechanisms.	Rulemaking 11-02-019 (Filed February 24, 2011)

DECISION MANDATING PIPELINE SAFETY IMPLEMENTATION PLAN, DISALLOWING COSTS, AND AUTHORIZING MEMORANDUM ACCOUNT

TABLE OF CONTENTS

Title Page

DECISION MANDATING PIPELINE SAFETY IMPLEMENTATION PLAN, DISALLOWING COSTS, AND AUTHORIZING MEMORANDUM ACCOUNT 1
Summary 2
1. Background 2
2. Description of the Proposed Natural Gas Transmission Pipeline Pressure Testing Implementation Plan of Southwest Gas 6
3. Evaluation of Consumer Protection and Safety Division (CPSD) 9
4. Position of Division of Ratepayer Advocates (DRA) 9
5. Burden and Standard of Proof 10
6. Discussion 11
7. Assignment of Proceeding 14
8. Comments on Proposed Decision 14
Findings of Fact 15
Conclusions of Law 15
ORDER 17

ATTACHMENT A - Appearances

DECISION MANDATING PIPELINE SAFETY IMPLEMENTATION PLAN, DISALLOWING COSTS, AND AUTHORIZING MEMORANDUM ACCOUNT

Summary

This decision requires Southwest Gas Corporation to enact its Natural Gas Transmission Pipeline Comprehensive Pressure Testing Implementation Plan, to replace 7.1 miles of natural gas pipeline in its Victor Valley natural gas transmission system and add a remote controlled shut-off valve to its Harper Lake natural gas transmission system. The cost of the pipeline replacements will be shared between ratepayers and shareholders, and the costs of the shut-off valve will be included in revenue requirement.

1. Background

Pursuant to Pub. Util. Code § 451, each public utility in California must "furnish and maintain such adequate, efficient, just and reasonable service, instrumentalities, equipment, and facilities, . . . as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public." Ensuring that the management of investor-owned gas utility systems fully performs its duty of safe operations is a top priority of this Commission, and the California Legislature has recently confirmed this critical function of the Commission.[1]

To meet this obligation with added urgency after the tragic and catastrophic San Bruno events, the Commission expanded its safety efforts in the

---

1 Pub. Util. Code § 963(b)(3) finds that: It is the policy of the state that the commission and each gas corporation place safety of the public and gas corporation employees as the top priority. The commission shall take all reasonable and appropriate actions necessary to carry out the safety priority policy of this paragraph consistent with the principle of just and reasonable cost-based rates.

following areas: (1) natural gas rate cases, (2) this Rulemaking, and (3) enforcement proceedings.

We initiated this Rulemaking to consolidate and coordinate our efforts, obtain public input, and propose rule and policy changes as necessary.

Since opening this rulemaking, our primary efforts have been focused on ensuring that California's natural gas transmission system operators are properly calculating the Maximum Allowable Operating Pressure for each segment of the natural gas transmission system.

In Decision (D.) 11-06-017, this Commission declared an end to historic exemptions from pressure testing for natural gas transmission pipeline and ordered all California natural gas transmission pipeline operators to prepare Natural Gas Transmission Pipeline Comprehensive Pressure Testing Implementation Plans (Implementation Plans) to either pressure test or replace all segments of natural gas pipelines which were not pressure tested or lack sufficient details related to performance of any such test.[2] As set forth in that decision, the Commission found that 1970 federal and 1961 California requirements for pressure testing natural gas transmission pipeline applied only to new pipeline and exempted all existing in-service pipeline from the pressure test requirement. Accordingly, all pipeline installed after those dates were pressure tested, with the result that some of the oldest in-service natural gas

[2] The Commission's General Order 112, which became effective on July 1, 1961, mandated pressure test requirements for new transmission pipelines (operating at 20% or more of Specified Minimum Yield Strength (SMYS) installed in California after the effective date. Similar federal regulations followed in 1970, but exempted pipeline installed prior to that time from the pressure test requirement. Such pipeline is often referred to as "grandfathered" pipeline, because pursuant to 47 CFR 192. 619(c), pressure testing was not mandated.

pipeline has not been subjected to pressure testing to determine its Maximum Allowable Operating Pressure. Instead, the Maximum Allowable Operating Pressure for these untested pipeline segments is set by the highest recorded operating pressure on the segment.[3] Consequently, the operational records for the exempted pipeline segments are critical to determining Maximum Allowable Operating Pressure.

After review of the detailed record both in this proceeding and before the National Transportation Safety Board regarding the records and vintage pipeline, the Commission concluded that the historic exemption and the utilities' record-keeping deficiencies had resulted in circumstances inconsistent with the safety, health, comfort, and convenience of utility patrons, employees, and the public. The Commission ordered all natural gas transmission pipelines in service in California to be brought into compliance with modern standards for safety, and all California natural system operators to file and serve a proposed Implementation Plan to comply with the requirement that all in-service natural gas transmission pipeline in California has been pressure tested in accord with 49 CFR 192.619, excluding subsection 49 CFR 192.619 (c).

The Commission required that the Implementation Plans include interim safety enhancement measures, and that the analytical focus be a list of all transmission pipeline segments that have not been previously pressure tested, with pipeline that must run at or near operating pressures that result in hoop stress levels at or above 30% SMYS to receive prioritized designations for replacement or pressure testing. The Commission required the operators to also

[3] 47 CFR 192.619(c).

give high priority to pipeline segments located in Class 3 and Class 4 locations and Class 1 and Class 2 high consequence areas, with pipeline segments in other locations given lower priority for pressure testing.[4] The operators were required to set forth the criteria on which pipeline segments were identified for replacement instead of pressure testing.

The Commission also required each operator to include in the Implementation Plan a priority-ranked schedule for pressure testing all pipeline not previously so tested, and to provide for pressure reductions where necessary. The Implementation Plan also must address retrofitting pipeline to allow for in-line inspection tools and, where appropriate, automated or remote-controlled shut-off valves.

While emphasizing the importance and need to make these safety improvements in California's natural gas transmission systems, the Commission also stressed that it will closely scrutinize the costs to be imposed on ratepayers. In D.11-06-017, the Commission required that the Implementation Plans explicitly analyze cost and demonstrate that the proposed expenditures obtain the greatest safety valve for ratepayers. The Commission stated its commitment to ensuring that California's working families and businesses pay only for necessary safety improvements, and encouraged customers to participate in the process for reviewing the Implementation Plans.

---

[4] The Pipeline and Hazardous Materials Safety Administration (PHMSA) regulations define the four class locations by number of human-occupied buildings located within 220 yards of the pipeline: Class 1, 10 or fewer buildings; Class 2, 10 to 45 buildings; Class 3, 46 or more buildings, or with a place of public assembly; and, Class 4, where buildings with four or more stories are prevalent. (49 CFR § 192.5.)

In today's decision, we only consider Southwest Gas Company's (Southwest Gas) Implementation Plan.[5]

2. Description of the Proposed Natural Gas Transmission Pipeline Pressure Testing Implementation Plan of Southwest Gas

On August 26, 2011, Southwest Gas filed and served its Implementation Plan. The Implementation Plan showed that Southwest Gas proposed the following safety improvements for its two natural gas transmission systems in California:

	Miles	**Install Date**	**Pressure Test Records?**	**Proposed Actions & Cost**
Victor Valley Transmission System	7.1	1957, 1965	No	Cost for pressure testing = $3.75 million, cost for replacement = $7.1 million
Harper Lake Transmission System	8.3	1989	Yes	Install remote shut-off valve, cost=$250,000

Southwest Gas proposes to replace the Victor Valley system despite the higher cost due to the risk that pressure testing will cause leaks that will drive up costs, but because new pipe will offer the greatest improvement in pipeline integrity and public safety. The Commission's Division of Consumer Protection

[5] In D.12-04-021, the Commission transferred consideration of Southern California Gas Company's and San Diego Gas & Electric Company's Implementation Plans to Application (A.) 11-11-002, and in D.12-12-030 the Commission addressed Pacific Gas and Electric Company's Implementation Plan.

and Safety supported Southwest Gas' proposal to replace the Victor Valley pipeline.

Southwest Gas explained that due to proximity its staff will be able to manually shut down the Victor Valley system in about 25 minutes but the distance to the Harper Lake system would result in an approximately 60 minute time for manual shut down. Accordingly, Southwest Gas proposes to add a remote controlled shut off valve for the Harper Lake system.

In its Implementation Plan, Southwest Gas sets out its multi-step decision analysis. The company began by establishing the objectives for evaluating alternatives; the alternatives must meet the requirements of D.11-06-017, improve the integrity and safety of the pipe, be capable of accepting in-line inspection tolls, minimize service interruptions, and be cost effective.

Southwest Gas next identified and evaluated three primary alternatives for achieving these objectives: (1) pressure testing the pipe, (2) replace the existing pipe with new pipe, and (3) reduce system pressure. Southwest Gas immediately eliminated alternative 3 as reducing system pressure would undermine Southwest Gas' ability to meet customer demand.

In evaluating alternative 1, pressure testing, Southwest Gas found that unknown material specifications of the pipe as well as unknown fittings and lateral pipelines created risk of increased costs. In addition, certain pipeline segments would require modification to ensure that water from the pressure test can be removed completely. Southwest Gas also noted that pressure testing would not enable in-line inspection tools to be used. The primary benefit of pressure testing was its lower cost, as compared to replacement.

Pipeline replacement, the second alternative, had the highest cost at $7.1 million, and also numerous benefits: fewer unknowns, new pipeline would

be capable of in-line inspection and would be constructed to modern standards, with resulting traceable, verifiable, and complete records. In addition from a customer perspective, replacement would be more desirable as no service outages would be required.

Based on the risk of additional costs caused by the unknown elements, as well as the customer impacts of option 1, Southwest Gas determined that, option 2, replacement would be the preferable alternative.

Southwest Gas developed its replacement schedule by selecting the segments with the greatest percentage of population as the first priority. Southwest Gas proposes to replace 1.33 miles of pipe located in High Consequence Areas as part of its Priority One schedule which will include a total of 3.1 miles. Then, the Priority Two schedule will replace 4.0 miles of pipeline in Class 3 and Class 1 areas without High Consequence Areas. Southwest Gas provided system maps to show the exact location of the areas scheduled in the two priority scheme.

For interim safety measures, Southwest Gas considered but rejected pressure reductions. Due to customer impacts of reduced gas flow and the fact that the system operates well below 30% hoop stress, Southwest Gas instead proposes to double the frequency of leak surveys and patrols.

Southwest Gas proposes to set up a memorandum account for Implementation Plan expenditures pending its 2014 test year general rate case. Southwest Gas estimates a total annual increase in revenue requirement of approximately $1.5 million, with residential ratepayers having a monthly bill impact of $0.72 for primary and $0.56 for secondary service.

3. Evaluation of Consumer Protection and Safety Division (CPSD)[6]

On January 3, 2012, the Commission's CPSD filed and served its technical report evaluating Southwest Gas' Implementation Plan and generally supporting the proposals in the Plan. The technical report found that replacement of the Victor Valley Transmission System pipeline is reasonable when considering all factors, but that pressure testing is also feasible. CPSD also suggested that air/nitrogen mixtures as a testing medium in Class 3 locations, rather than water as a medium might be feasible. On the issue of pressure test records, CPSD explained that part of the Victor Valley system was constructed in 1965, when CPUC General Order 112 required pipeline segments operating at or above 20% of SMYS in Class 1 locations to be pressure tested when installed. Due to Southwest Gas' inability to provide these records, CPSD recommended that shareholders bear the cost of replacement or testing.

4. Position of Division of Ratepayer Advocates (DRA)

DRA recommends that the Commission disallow ratemaking recovery for any of the costs associated with the Implementation Plan.

Turning to specific costs in the Implementation Plan, DRA argues that Southwest Gas shareholders should be responsible for the costs of pressure testing all pipeline installed after 1935. DRA argues that pressure testing pipeline prior to placing it in service has been industry standard practice since 1935, and that Southwest Gas should have complied with this practice and retained the records of such tests. DRA contends that even though the 1961 Commission and 1970 federal pressure testing directives did not require testing

---

[6] This division of the Commission is now known as Safety and Enforcement Division.

of pipe already in service, this exclusion did not override the industry practice of testing. Consequently, DRA recommends that where pipeline installed prior to 1955 must be replaced due to absent pressure test documentation, the shareholders should bear the costs of such replacement.

DRA next turns to the remote controlled shut off valve proposed by Southwest Gas for the Harper Lake system. DRA agrees that the valve should be installed, but recommends that it be treated for ratemaking purposes as a capital investment made between general rate cases and be excluded from rate base until the next plant in service update in the next general rate case.

5. Burden and Standard of Proof

Pursuant to Pub. Util. Code § 451 all rates and charges collected by a public utility must be "just and reasonable," and a public utility may not change any rate "except upon a showing before the commission and a finding by the commission that the new rate is justified." (§ 454.) The Commission requires that the public utility demonstrate with admissible evidence that the costs which it seeks to include in revenue requirement are reasonable and prudent. The Commission is charged with the responsibility of ensuring that all rates demanded or received by a public utility are just and reasonable.

Southwest Gas must meet the burden of proving that it is entitled to the relief sought in this proceeding, and has the burden of affirmatively establishing the reasonableness of all aspects of the application.[7]

---

[7] See generally Application of Southern California Edison Company for Authority to, Among Other Things, Increase Its Authorized Revenues For Electric Service in 2009, And to Reflect That Increase In Rates (Decision 09-03-025, *mimeo*. at 8) (March 12, 2009) and Decisions cited therein.

With the burden of proof placed on Southwest Gas, the Commission has held that the standard of proof Southwest Gas must meet is that of a preponderance of evidence. Preponderance of the evidence usually is defined "in terms of probability of truth, e.g., 'such evidence as, when weighed with that opposed to it, has more convincing force and the greater probability of truth'"[8]

Pursuant to the schedule adopted at the prehearing conference on May 23, 2012, Southwest Gas field a motion to have its testimony included in the record. On June 8, 2012, DRA filed and served its brief on June 15, 2012, with the reply of Southwest Gas following on June 29, 2012. With the filing of the reply brief the proceeding was submitted. We have analyzed the record presented by Southwest Gas in this proceeding within these parameters.

6. Discussion

As set forth above, no party opposes the Southwest Gas' Proposed Implementation Plan. We have reviewed it and find that complete replacement of the Victor Valley system and the addition of a remote-controlled shut-off valve to the Harper Valley system is consistent with the safety objectives we adopted in D.11-06-017. Accordingly, we approve the Implementation Plan and order Southwest Gas to proceed with these system improvements.

The only dispute regarding the Southwest Gas Implementation Plan is whether shareholders should bear some of the costs associated with the Implementation Plan. DRA recommends that the shareholders fund all of the

---

[8] In the Matter of the Application of San Diego Gas & Electric Company for a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Transmission Project, Decision 08-12-058, *citing* Witkin, Calif. Evidence, 4th Edition, Vol. 1, 184.

pipeline replacement and remote controlled valve. As explained below, we allocate Implementation Plan costs between ratepayers and shareholders.

Replacing the Victor Valley System

As CPSD noted, portions of this system were installed after the Commission's regulations required pressure testing prior to placing a new natural gas transmission line in service. Southwest Gas is unable to provide records of these required tests. In D.12-12-030, we found that industry practices commencing no later than 1955 required pre-serivce pressure testing. Here, Southwest Gas installed the earliest portions of the Victor Valley system in 1957 and, thus, should have pressure tested the pipe prior to placing it in service. Now, Southwest Gas cannot locate these records. Also in D.12-12-030, we found that where a natural gas system operator was required to conduct pre-service pressure tests but is unable to provide records of such a test in the past, the operator will be required to perform such tests at the expense of its shareholders.[9]

Southwest Gas proposes to replace, rather than pressure test the Victor Valley system. CPSD and DRA recommend that shareholders also bear the costs of replacement due to the imprudent absence of pressure test from the records. We considered this same issue in D.12-12-030 and determined that where missing but required pressure test records require that pipe be pressure tested, shareholders must bear these costs. However, where sound engineering or economic reasons support replacing the pipeline, ratepayers should be allocated the difference between the cost of pressure testing and the cost of replacement.

---

[9] D.12-12-030 at 58-59.

In other words, the cost of pressure testing should be deducted from the cost of replacement pipe and only the difference recorded in plant in service. Therefore, we conclude that shareholders are responsible for the $3.75 million in estimated pressure testing costs, which must be deducted from the $7.1 million in replacement costs, leaving approximately $3.4 million to be recorded in plant in service for inclusion in revenue requirement.

To enable Southwest Gas to commence work on its Implementation Plan immediately, we will authorize a memorandum account until its 2014 test year.

Adding Valve in Harper Valley System

As set forth above, we approve the addition of a remote controlled shut-off valve in the Harper Valley System. DRA's request that shareholder's fund this addition is not persuasive because the need for this valve arose outside of the rate case cycle. Therefore, we will authorize Southwest Gas to record any 2013 costs in its memorandum account and to include 2014 costs in the 2014 test year.

Safety and Enforcement Division (SED) Oversight

Southwest Gas must keep SED fully informed of all changes it proposes to make to the program, and must obtain SED's concurrence in any proposed change to the Implementation Plan. We delegate authority to SED to exercise oversight of all Southwest Gas' activities, including those conducted by contractors, pursuant to the Implementation Plan. SED is authorized to inspect, inquire, review, examine and participate in all activities of any kind related to the Implementation Plan. Such request need not be in writing. Southwest Gas and its contractors shall immediately produce any document, analysis, test result, or plan, of any kind, related to the Implementation Plan as requested by SED.

The Director of SED is authorized to order Southwest Gas to take such actions as may be necessary to protect immediate public safety. The Director of SED is specifically authorized to issue immediate stop work orders to Southwest Gas and all its contractors when necessary to protect public safety. The Director of SED, the Commission's Executive Director, and the Chief Administrative Law Judge shall offer Southwest Gas, parties to this proceeding, and the public such procedural opportunities as may be feasible under the specific circumstances of any instance in which SED is required to exercise its delegated authority.

7. Assignment of Proceeding

Michel Peter Florio is the assigned Commissioner and Maribeth A. Bushey is the assigned Administrative Law Judge (ALJ) in this proceeding.

8. Comments on Proposed Decision

The proposed decision of ALJ in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were

allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on ____, and reply comments were filed on_____ by _____.

Findings of Fact

1. In D.11-06-017, the Commission declared an end to historic exemptions from pressure testing for natural gas pipeline and ordered all California natural gas system operators to file Natural Gas Transmission Pipeline Testing Implementation Plans.

2. On August 26, 2011, Southwest Gas filed and served its Implementation Plan required by D.11-06-017.

3. The Implementation Plan is comprised of replacing the Victor Valley transmission system and adding an automatic shut-off valve to the Harper Lake system.

4. Southwest Gas' Implementation Plan identifies and prioritizes pipeline replacement and addresses interim safety improvements and in-line inspection.

5. In D.12-12-030, the Commission determined that, adopted in 1955, the American Standard Association Code for Pressure Pipeline (ASA B31.8) required pre-service pressure testing for natural gas pipelines.

6. The lack of pressure test records for pipeline placed into service after January 1, 1956, reflect an error in Southwest Gas' operation of its natural gas system.

Conclusions of Law

1. As required by § 451 all rates and charges collected by a public utility must be "just and reasonable," and a public utility may not change any rate "except upon a showing before the commission and a finding by the commission that the new rate is justified," as provided in § 454.

2. The burden of proof is on Southwest Gas to demonstrate that it is entitled to the relief sought in this proceeding, including affirmatively establishing the reasonableness of all aspects of the application.

3. The Implementation Plan of Southwest Gas should be approved.

4. Southwest Gas' proposal to replace 7.1 miles of the Victor Valley natural gas transmission pipeline system should be approved.

5. Southwest Gas' proposal for a remote controlled shut-off valve in the Harper Lake natural gas transmission pipeline system should be approved.

6. It is reasonable for the shareholders of Southwest Gas to absorb the cost of pressure testing the Victor Valley natural gas transmission pipeline because the absence of pressure test records was caused by imprudent management.

7. It is reasonable to impose an equitable adjustment to the replacement cost of the Victor Valley natural gas transmission pipeline for which pressure test records are not available, but which require replacement rather than pressure testing. Such an equitable adjustment shall be equal to the forecasted cost of pressure testing the pipeline, $3.75 million, and shall reduce the cost of the pipeline replacement included in rate base and revenue requirement.

8. Authority should be delegated to the Director of SED, or designee, to oversee all Southwest Gas' work performed pursuant to the Implementation Plan, including:

A. SED shall review all changes to the Implementation Plan proposed by Southwest Gas shall require such modifications as are necessary to ensure public safety, and may concur in such proposals.

B. SED may inspect, inquire, review, examine and participate in all activities of any kind related to the Implementation Plan. Southwest Gas and its contractors shall immediately produce any document, analysis, test result, plan, of any kind related to

the Implementation Plan as requested by SED, and such request need not be in writing.

C. SED may take and order Southwest Gas to take such actions as may be necessary to protect immediate public safety.

D. SED may issue immediate stop work orders to Southwest Gas and all its contractors when necessary to protect public safety, and Southwest Gas must comply immediately and consistent with any needed safety protocols.

E. The Director of SED, the Commission's Executive Director, and the Chief Administrative Law Judge shall offer Southwest Gas, parties to this proceeding, and the public such procedural opportunities as may be feasible under the specific circumstances of any instance in which SED is required to exercise its delegated authority.

9. A memorandum account should be approved for all Implementation Plan projects prior to the 2014 test year.

10. Testimony of Southwest Gas witnesses Malloy and Gieseking should be accepted into the record.

O R D E R

IT IS ORDERED that:

1. The Natural Gas Transmission Pipeline Comprehensive Pressure Testing Implementation Plan of Southwest Gas Company is approved.

2. Southwest Gas Company is authorized to file a Tier 1 Advice Letter to create a memorandum account in which to record expenditures pursuant to the Implementation Plan from the effective date of today's decision through December 31, 2013. Any accumulated balance on December 31, 2013, plus interest, will be amortized in the 2014 test year general rate case.

3. Southwest Gas Company must limit the amounts recorded in the memorandum account authorized in Ordering Paragraph 2 to $250,000 for the remote controlled shut-off valve in the Harper Lake system, and the actual capital cost and expense of replacing the Victor Valley system, less $3.75 million.

4. The Director of the Commission's Consumer Safety and Enforcement Division (SED), or designee, SED is delegated the following authority:

A. SED shall review all changes to the Implementation Plan proposed by Southwest Gas Company (Southwest Gas), shall require such modifications as are necessary to ensure public safety, and may concur in such proposals.

B. SED may inspect, inquire, review, examine and participate in all activities of any kind related to the Implementation Plan. Southwest Gas and its contractors shall immediately produce any document, analysis, test result, plan, of any kind related to the Implementation Plan as requested by SED, and such request need not be in writing.

C. SED may take and order Southwest Gas to take such actions as may be necessary to protect immediate public safety.

D. SED may issue immediate stop work orders to Southwest Gas and all its contractors when necessary to protect public safety, and Southwest Gas must comply immediately and consistent with any needed safety protocols.

E. The Director of SED, the Commission's Executive Director, and the Chief Administrative Law Judge shall offer Southwest Gas, parties to this proceeding, and the public such procedural opportunities as may be feasible under the specific circumstances of any instance in which SED is required to exercise its delegated authority.

5. Southwest Gas Company must submit Tier 1 compliance advice letter containing a statement and accounting when it has completed the work authorized in today's decision.

6. Testimony of Southwest Gas Company witnesses Malloy and Gieseking is accepted into the record.

This order is effective today.

Dated _____, at San Francisco, California.

Attachment A : Appearances

********** PARTIES **********

********** SERVICE LIST ********
Last Updated on 10-OCT-2012 by: JVG
R1102019 LIST

Rachael E. Koss
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO CA 94080
(650) 589-1660 X20
rkoss@adamsbroadwell.com
For: Coalition of California Utility Employees

Michael J. Aguirre, Esq.
AGUIRRE MORRIS & SEVERSON LLP
444 WEST C STREET, SUITE 210
SAN DIEGO CA 92101

maguirre@amslawyers.com (619) 876-5364
For: Ruth Henricks

Evelyn Kahl
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO CA 94015
(415) 403-5542
ek@a-klaw.com
For: Northern California Indicated Producers (NCIP)/Southern California Indicated Producers (SCIP)

Mike Lamond
Chief Financial Officer
ALPINE NATURAL GAS OPERATING CO. #1 LLC
EMAIL ONLY CA 00000
(209) 772-3006
anginc@goldrush.com
For: Alpine Natural Gas

Len Canty
Chairman
BLACK ECONOMIC COUNCIL
484 LAKE PARK AVE., SUITE 338
OAKLAND CA 94610
(510) 452-1337
lencanty@BlackEconomicCouncil.org
For: Black Economic Council

Bob Gorham
Division Chief -Pipeline Safety Division
CALIFORNIA STATE FIRE MARSHALL
3950 PARAMOUNT BLVD., NO. 210
LAKEWOOD CA 90712
(562) 497-9102
bob.gorham@fire.ca.gov
For: California State Fire Marshall - Safety Division

Michael E. Boyd
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
5439 SOQUEL DRIVE
SOQUEL CA 95073
(408) 891-9677
michaelboyd@sbcglobal.net
For: Californians for Renewable Energy, Inc.

Melissa Kasnitz
Attorney
CENTER FOR ACCESSIBLE TECHNOLOGY
3075 ADELINE STREET, STE. 220
BERKELEY CA 94703
(510) 841-3224 X2019
service@cforat.org
For: Center for Accessible Techology

John Boehme
Compliance Manager
CENTRAL VALLEY GAS STORAGE, LLC
3333 WARRENVILLE ROAD, STE. 630
LISLE IL 60532
(630) 245-7845
jboehme@nicor.com
For: Central Valley Gas Storage, LLC

Austin M. Yang
DENNIS J. HERRERA/THERESA L. MUELLER
CITY AND COUNTY OF SAN FRANCISCO
OFFICE OF THE CITY ATTORNEY, RM. 234
1 DR. CARLTON B. GODDLETT PLACE
SAN FRANCISCO CA 94102-4682
(415) 554-6761
austin.yang@sfgov.org
For: City and County of San Francisco

Transmission Evaluation Unit
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-46
SACRAMENTO CA 95814-5512
For: California Energy Commission

Connie Jackson
City Manager
CITY OF SAN BRUNO
567 EL CAMINO REAL
SAN BRUNO CA 94066-4299
(650) 616-7056
cjackson@sanbruno.ca.gov
For: City of San Bruno

Ryan Kohut
CITY OF SAN DIEGO
1200 THIRD AVE., 11TH FLOOR
SAN DIEGO CA 92101
rkohut@sandiego.gov
For: City of San Diego

Sarah Grossman-Swenson
JOHN DAVIS, JR.
DAVIS, COWELL & BOWE, LLP
595 MARKET STREET, STE. 1400
SAN FRANCISCO CA 94105
(415) 977-7200
sgs@dcbsf.com
For: Plumbers & Steamfitters Union Local Nos. 246 & 342

DISABILITY RIGHTS ADVOCATES
EMAIL ONLY
EMAIL ONLY CA 00000
pucservice@dralegal.org
For: Disability Rights Advocates

Dan L. Carroll
Attorney At Law
DOWNEY BRAND, LLP
621 CAPITOL MALL, 18TH FLOOR
SACRAMENTO CA 95814
(916) 520-5239
dcarroll@downeybrand.com
For: Lodi Gas Storage, LLC

Michelle D. Grant
Corporate Counsel - Regulatory

Dave Weber
GILL RANCH STORAGE, LLC
220 NW SECOND AVENUE
PORTLAND OR 97209
(503) 220-2405
Dave.Weber@nwnatural.com
For: Gill Ranch Storage, LLC

Brian T. Cragg
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94111
(415) 392-7900
bcragg@goodinmacbride.com
For: Engineers and Scientists of California, Local 20; Int'l Fed. of Prof. & Tech. Engrs.; AFL-CIO & CLC (ESC)

Norman A. Pedersen
Attorney At Law
HANNA & MORTON
444 S. FLOWER STREET, SUITE 1500
LOS ANGELES CA 90071-2916
(213) 430-2510
npedersen@hanmor.com
For: Southern California Generation Coalition

Gregory Heiden
Legal Division
RM. 5039
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 355-5539
gxh@cpuc.ca.gov
For: CPSD

Jorge Corralejo
Chairman / President
LAT. BUS. CHAMBER OF GREATER L.A.
634 S. SPRING STREET, STE 600
LOS ANGELES CA 90014
(213) 347-0008
JCorralejo@LBCgla.org
For: Latino Business Chamber of Greater Los Angeles

DYNEGY, INC.
601 TRAVIS, STE. 1400
HOUSTON TX 77002
(713) 767-0387
michelle.d.grant@dynegy.com
For: Dynegy, Inc.

Barry F. Mccarthy
Attorney
MCCARTHY & BERLIN, LLP
100 W. SAN FERNANDO ST., SUITE 501
SAN JOSE CA 95113
(408) 288-2080
bmcc@mccarthylaw.com
For: Northern California Generation Coalition (NCGC)

Steven R. Meyers
Principal
MEYERS NAVE
555 12TH STREET, STE. 1500
OAKLAND CA 94607
(510) 808-2000
smeyers@meyersnave.com
For: City of San Bruno

Faith Bautista
President
NATIONAL ASIAN AMERICAN COALITION
1758 EL CAMINO REAL
SAN BRUNO CA 94066
(650) 953-0522
Faith.MabuhayAlliance@gmail.com
For: National Asian American Coalition

Brian K. Cherry
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B10C, PO BOX 770000
SAN FRANCISCO CA 94177
(415) 973-4977
bkc7@pge.com
For: Pacific Gas and Electric Company

Christopher P. Johns
President
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO CA 94105
cpj2@pge.com
For: Pacific Gas and Electric Company

Alfred F. Jahns
LAW OFFICE ALFRED F. JAHNS
3620 AMERICAN RIVER DRIVE, SUITE 105
SACRAMENTO CA 95864
(916) 483-5000
ajahns@jahnsatlaw.com
For: Sacramento Natural Gas Storage, LLC

Marion Peleo
Legal Division
RM. 4107
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-2130
map@cpuc.ca.gov
For: DRA

William W. Westerfield Iii
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S ST., MS B406 / PO BOX 15830
SACRAMENTO CA 95852-1830
(916) 732-7107
wwester@smud.org
For: Sacramento Municipal Utility District

Douglas Porter
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE./PO BOX 800
ROSEMEAD CA 91770
(626) 302-3964
douglas.porter@sce.com
For: So. Calif. Edison Co. (Catalina Island)

Sharon L. Tomkins
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, SUITE 1400
LOS ANGELES CA 90013-1034
(213) 244-2955
STomkins@semprautilities.com
For: San Diego Gas & Electric Company/Southern California Gas Company

---

Justin Lee Brown
Assist Counsel - Legal
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS NV 89150-0002
(702) 876-7183
justin.brown@swgas.com
For: Southwest Gas Corporation

Stephanie C. Chen

Steven Garber
PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY CA 00000
(415) 973-2916
SLG0@pge.com
For: Pacific Gas and Electric Company

Marcel Hawiger
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94104
(415) 929-8876
marcel@turn.org
For: The Utility Reform Network

Carl Wood
UTILITY WORKERS UNION OF AMERICA
EMAIL ONLY CA 00000-0000
(951) 567-1199
carlwood@uwua.net
For: Utility Workers Union of America

Ethan A. Jones
Assistant Counsel
VALERO SERVICES, INC.
ONE VALERO WAY
SAN ANTONIO TX 78249
(210) 345-2706
Ethan.Jones@Valero.com
For: Valero Services, Inc.

Raymond J. Czahar
Chief Financial Officer
WEST COAST GAS CO., INC.
9203 BEATTY DR.
SACRAMENTO CA 95826-9702
(916) 364-4100
westgas@aol.com
For: West Coast Gas Company, Inc.

Jason A. Dubchak
WILD GOOSE STORAGE LLC
607 8TH AVENUE S.W., SUITE 400
CALGARY AB T2P 047
CANADA
(403) 513-8647
jason.dubchak@niskags.com
For: Niska Gas Storage Company, formerly known as Wild Goose Storage, LLC

Sr. Legal Counsel
THE GREENLINING INSTITUTE
EMAIL ONLY
EMAIL ONLY CA 00000
(510) 898-0506
StephanieC@greenlining.org
For: The Greenlining Institute

********** **STATE EMPLOYEE** **********

Sheri Inouye Boles
Executive Division
AREA 2-B
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1182
sni@cpuc.ca.gov

Traci Bone
Legal Division
RM. 5027
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-2048
tbo@cpuc.ca.gov

Kenneth Bruno
Consumer Protection & Safety Division
AREA 2-D
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-5265
kab@cpuc.ca.gov

Maribeth A. Bushey
Administrative Law Judge Division
RM. 5017
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-3362
mab@cpuc.ca.gov

Janill Richards
Deputy Attorney General
CALIFORNIA ATTORNEY GENERAL'S OFFICE
1515 CLAY STREET, 20TH FLOOR
OAKLAND CA 94702
(510) 622-2130
janill.richards@doj.ca.gov

Robert Kennedy
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-20
SACRAMENTO CA 95814
(916) 654-5061

Noelle R. Formosa
WINSTON & STRAWN, LLP
101 CALIFORNIA STREET, 39TH FLOOR
SAN FRANCISCO CA 94111-5894
(415) 591-1000
nformosa@winston.com
For: Calpine Corporation

Sharon Randle
San Bruno Gas Safety Team
CPUC
ROOM. 2-D
SAN FRANCISCO CA 94102
(415) 703-1056
SanBrunoGasSafety@cpuc.ca.gov

Eugene Cadenasso
Energy Division
AREA 4-A
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1214
cpe@cpuc.ca.gov

Aimee Cauguiran
Consumer Protection & Safety Division
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-2055
aad@cpuc.ca.gov

Elizabeth Dorman
Legal Division
RM. 4300
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1415
edd@cpuc.ca.gov

Travis Foss
Legal Division
RM. 5026
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1998
ttf@cpuc.ca.gov
For: CPSD

Alula Gebremedhin
Consumer Protection & Safety Division
180 Promenade Circle, Suite 115
Sacramento CA 95834 2939
(916) 928-2553
ag5@cpuc.ca.gov

rkennedy@energy.state.ca.us

Sylvia Bender
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 29
SACRAMENTO CA 95814
sbender@energy.state.ca.us

Julie Halligan
Consumer Protection & Safety Division
RM. 2203
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1587
jmh@cpuc.ca.gov

Matthew A. Karle
Division of Ratepayer Advocates
RM. 4108
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1850
mk3@cpuc.ca.gov

Sepideh Khosrowjah
Executive Division
RM. 5202
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1190
skh@cpuc.ca.gov

Andrew Kotch
Executive Division
RM. 5301
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1072
ako@cpuc.ca.gov

Kelly C. Lee
Division of Ratepayer Advocates
RM. 4108
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1795
kcl@cpuc.ca.gov

Elizabeth M. McQuillan
Legal Division
RM. 4107
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1471

Darryl J. Gruen
Legal Division
RM. 5133
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1973
djg@cpuc.ca.gov

Harvey Y. Morris
Legal Division
RM. 5036
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1086
hym@cpuc.ca.gov

Richard A. Myers
Energy Division
AREA 4-A
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1228
ram@cpuc.ca.gov

Karen P. Paull
Division of Ratepayer Advocates
RM. 4300
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-2630
kpp@cpuc.ca.gov

David Peck
Division of Ratepayer Advocates
RM. 4108
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1213
dbp@cpuc.ca.gov

Paul A. Penney
Consumer Protection & Safety Division
AREA 2-D
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1817
pap@cpuc.ca.gov

Robert M. Pocta
Division of Ratepayer Advocates
RM. 4205
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-2871
emm@cpuc.ca.gov

Angela K. Minkin
Executive Division
RM. 2106
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1573
ang@cpuc.ca.gov

Jonathan J. Reiger
Legal Division
RM. 5035
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 355-5596
jzr@cpuc.ca.gov

Thomas Roberts
Division of Ratepayer Advocates
RM. 4108
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-5278
tcr@cpuc.ca.gov

Pearlie Sabino
Division of Ratepayer Advocates
RM. 4108
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1883
pzs@cpuc.ca.gov

Laura J. Rosen
Legal Division
RM. 5032
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-2164
ljt@cpuc.ca.gov

********** INFORMATION ONLY ************

Richard Kuprewicz
ACCUFACTS, INC.
4643 - 192ND DR., NE
REDMOND WA 98074-4641
(425) 836-4041
kuprewicz@comcast.net

David Marcus
ADAMS BROADWELL & JOSEPH
PO BOX 1287
BERKELEY CA 94701-1287
(510) 528-0728
dmarcus2@sbcglobal.net

rmp@cpuc.ca.gov

Marcelo Poirier
Legal Division
RM. 5025
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-2913
mpo@cpuc.ca.gov

Karen Terranova
ALCANTAR & KAHL
33 NEW MONTGOMERY ST., STE. 1850
SAN FRANCISCO CA 94105
(415) 403-5542
filings@a-klaw.com

Nora Sheriff
ALCANTAR & KAHL
EMAIL ONLY
EMAIL ONLY CA 00000
(415) 403-5542
nes@a-klaw.com

Ross Van Ness
ALCANTAR & KAHL
1300 SW FIFTH AVE., STE. 1750
PORTLAND OR 97209
(503) 402-9900
rvn@a-klaw.com

Seema Srinivasan
EVELYN KAHL
ALCANTAR & KAHL
33 NEW MONTGOMERY ST., SUITE 1850
SAN FRANCISCO CA 94105
(415) 403-5542
sls@a-klaw.com
For: Northern California Indicated Producers / Southern California Indicated Producers

---

Mike Cade
ALCANTAR & KAHL, LLP
1300 SW 5TH AVE, SUITE 1750
PORTLAND OR 97201
(503) 402-8711
wmc@a-klaw.com

Rochelle Alexander
445 VALVERDE DRIVE
SOUTH SAN FRANCISCO CA 94080
(650) 588-3702

Andrew Gay
ARC ASSET MANAGEMENT, LTD

Marc D. Joseph
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO CA 94080-7037
(650) 589-1660
mdjoseph@adamsbroadwell.com

Ellen Isaacs
Trans. Deputy
ASM MIKE FEUER
9200 SUNSET BLVD., STE. 1212
WEST HOLLYWOOD CA 90069
(610) 285-5490
ellen.isaacs@asm.ca.gov

Catherine M. Elder
ASPEN ENVIRONMENT GROUP
8801 FOLSOM BLVD., SUITE 290
SACRAMENTO CA 95826
(916) 397-0350
kelder@aspeneg.com

Naaz Khumawala
BANK OF AMERICA, MERRILL LYNCH
700 LOUISIANA, SUITE 401
HOUSTON TX 77002
(713) 247-7313
naaz.khumawala@baml.com

Catherine E. Yap
BARKOVICH & YAP, INC.
PO BOX 11031
OAKLAND CA 94611
(510) 450-1270
ceyap@earthlink.net

Mark Chediak
Energy Reporter
BLOOMBERG NEWS
EMAIL ONLY CA 00000
(415) 617-7233
mchediak@bloomberg.net

Patricia Borchmann
1141 CARROTWOOD GLEN
ESCONDIDO CA 92026
(760) 580-7046
patricia.borchmann@yahoo.com

Bruno Jeider
BURBANK WATER & POWER
164 WEST MAGNOLIA BLVD.
BURBANK CA 91502

237 PARK AVENUE, 9TH FLOOR
NEW YORK NY 10017
(212) 231-4960
andrewgay@arcassetltd.com

Bregory Van Pelt
CAL. INDEPENDENT SYSTEM OPERATOR
250 OUTCROPPING WAY
FOLSOM CA 95630
(916) 351-2190
gvanpelt@caiso.com

Beth Ann Burns
CAL. INDEPENDENT SYSTEM OPERATOR CORP.
250 OUTCROPPING WAY
FOLSOM CA 95630
(916) 608-7146
bburns@caiso.com

CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST. STE 303
SAN FRANCISCO CA 94117-2242
(415) 936-4439
cem@newsdata.com

John Larrea
CALIFORNIA LEAGUE OF FOOD PROCESSORS
1755 CREEKSIDE OAKS DRIVE, STE 250
SACRAMENTO CA 95833
(916) 640-8150
john@clfp.com

Susan Durbin
CALIFORNIA STATE DEPARTMENT OF JUSTICE
1300 I STREET, PO BOX 944255
SACRAMENTO CA 94244-2550
(916) 324-5475
Susan.Durbin@doj.ca.gov

Avis Kowalewski
CALPINE CORPORATION
4160 DUBLIN BLVD, SUITE 100
DUBLIN CA 94568
(925) 557-2284
kowalewskia@calpine.com

Leslie Carney
4804 LAUREL CANYON BLVD., NO. 399
VALLEY VILLAGE CA 91607
(818) 404-4034
carneycomic@sbcglobal.net

Jack D'Angelo
CATAPULT CAPITAL MANAGEMENT LLC
666 5TH AVENUE, 9TH FLOOR
NEW YORK NY 10019

(818) 238-3700
bjeider@ci.burbank.ca.us

John Apgar
Electric Utilities
CITI - INVESTMENTS RESEARCH
388 GREENWICH STREET, 28TH FL
NEW YORK NY 10013
(212) 816-3366
John.A.Apgar@Citi.com

Theresa L. Mueller
CITY AND COUNTY OF SAN FRANCISCO
CITY HALL, ROOM 234
1 DR. CARLTON B. GOODLETT PLACE
SAN FRANCISCO CA 94102-4682
(415) 554-4640
theresa.mueller@sfgov.org

Charles Guss
CITY OF ANAHEIM
200 SOUTH ANAHEIM BLVD.
ANAHEIM CA 92805
(415) 765-4242
cguss@anaheim.net

Steven Sciortino
CITY OF ANAHEIM
200 SOUTH ANAHEIM BOULEVARD
ANAHEIM CA 92805
(714) 765-5177
ssciortino@anaheim.net

Grant Kolling
Senior Assistant City Attorney
CITY OF PALO ALTO
250 HAMILTON AVENUE, 8TH FLOOR
PALO ALTO CA 94301
(650) 329-2171
grant.kolling@cityofpaloalto.org

Karla Dailey
Sr. Resource Planner
CITY OF PALO ALTO
EMAIL ONLY CA 00000
(650) 329-2523
karla.Dailey@CityofPaloAlto.org

Christine Tam
CITY OF PALO ALTO - UTILITIES
EMAIL ONLY
EMAIL ONLY CA 00000
(650) 329-2289
christine.tam@cityofpaloalto.org

(212) 320-1059
jdangelo@catapult-llc.com

Geoff Caldwell
Police Sergeant - Police Dept.
CITY OF SAN BRUNO
567 EL CAMINO REAL
SAN BRUNO CA 94066-4299
(650) 616-7100
gcaldwell@sanbruno.ca.gov

Klara A. Fabry
Dir. - Dept. Of Public Services
CITY OF SAN BRUNO
567 EL CAMINO REAL
SAN BRUNO CA 94066-4247
(650) 616-7065
kfabry@sanbruno.ca.gov

David E. Torres
Field Operation Manager
CITY OF SOUTHGATE
4244 SANTA ANA ST.
SOUTHGATE CA 90280
(323) 563-5784
dtorres@sogate.org

Wisam Altowaiji
Public Works Manager
CITY OF TUSTIN
300 CENTENNIAL WAY
TUSTIN CA 92780
waltowaiji@tustinca.org

Nicole Blake
CONSUMER FEDERATION OF CALIFORNIA
1107 9TH STREET, STE. 625
SACRAMENTO CA 95814
(916) 498-9608
blake@consumercal.org

R. Thomas Beach
CROSSBORDER ENERGY
2560 9TH ST., SUITE 213A
BERKELEY CA 94710-2557
(510) 549-6922
tomb@crossborderenergy.com

Joe Como
Division of Ratepayer Advocates
RM. 4101
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-2381
joc@cpuc.ca.gov

John J. Davis
DAVIS COWELL & BOWE, LLP
595 MARKET STREET, STE. 1400
SAN FRANCISCO CA 94105
(415) 597-7200
jjdavis@dcbsf.com

DAVIS WRIGHT TREMAINE LLP
EMAIL ONLY CA 00000
(415) 276-6500
dwtcpucdockets@dwt.com

Ann L. Trowbridge
Attorney
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DR., STE. 205
SACRAMENTO CA 95864
(916) 570-2500 X103
atrowbridge@daycartermurphy.com

Scott Senchak
DECADE CAPITAL
EMAIL ONLY NY 00000-0000
(212) 320-1933
scott.senchak@decade-llc.com

Anjani Vedula
DEUTSCHE BANK
60 WALL STREET
NEW YORK NY 10005
(215) 300-3328
anjani.vedula@db.com

Jonathan Arnold
DEUTSCHE BANK
60 WALL STREET
NEW YORK NY 10005
(212) 250-3182
jonathan.arnold@db.com

Lauren Duke
DEUTSCHE BANK SECURITIES INC.
EMAIL ONLY NY 00000
(212) 250-8204
lauren.duke@db.com

Daniel W. Douglass
Attorney
DOUGLASS & LIDDELL
21700 OXNARD ST., STE. 1030
WOODLAND HILLS CA 91367
(818) 961-3001
douglass@energyattorney.com

Gregory Klatt
DOUGLASS & LIDDELL
411 E. HUNTINGTON DR., STE. 107-356
ARCADIA CA 91006
(818) 961-3002
klatt@energyattorney.com

Cassandra Sweet
DOW JONES NEWSWIRES
EMAIL ONLY CA 00000
(415) 439-6468
cassandra.sweet@dowjones.com

Daniel J. Brink
Counsel
EXXON MOBIL CORP.
800 BELL ST., RM. 3497-0
HOUSTON TX 77002
(713) 656-4418
daniel.j.brink@exxonmobil.com

Sean P. Beatty
Dir - West Regulatory Affairs
GENON ENERGY, INC.
PO BOX 192
PITTSBURGH CA 94565
(925) 427-3483
sean.beatty@genon.com

Steven G. Lins
Chief Assistant General Manager
GLENDALE WATER AND POWER
141 N. GLENDALE AVENUE, LEVEL 4
GLENDALE CA 91206-4394
(818) 548-2136
slins@ci.glendale.ca.us

Paul Patterson
GLENROCK ASSOCIATES LLC
EMAIL ONLY NY 00000
(212) 246-3318
ppatterson2@nyc.rr.com

Robert Gnaizda
Of Counsel
200 29TH STREET, NO. 1
SAN FRANCISCO CA 94131
(415) 307-3320
RobertGnaizda@gmail.com

Scott Collier
LOCI GAS STORAGE, LLC

For: Transwestern Pipeline Company

Jeanne B. Armstrong
Attorney
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94111
(415) 392-7900
jarmstrong@goodinmacbride.com
For: Wild Goose Storage,, LLC

Stephen J. Keene
Asst. General Counsel
IMPERIAL IRRGATION DISTRICT
333 EAST BARIONI BLVD.
IMPERIAL CA 92251
(760) 339-9574
sjkeene@iid.com

Kirby Bosley
JP MORGAN VENTURES ENERGY CORP.
700 LOUISIANA ST. STE 1000, 10TH FLR
HOUSTON TX 77002
(713) 236-3383
kirby.bosley@jpmorgan.com

Paul Tramonte
JP MORGAN VENTURES ENERGY CORP.
700 LOUISIANA ST., STE 1000, 10TH FLR
HOUSTON TX 77002
(713) 236-3079
Paul.Tramonte@jpmorgan.com

Paul Gendron
JP MORGAN VENTURES ENERGYCORP.
700 LOUISIANA STREET SUITE 1000
HOUSTON TX 77002
(925) 708-4994
paul.gendron@JPMorgan.com

Carrie A. Downey
LAW OFFICES OF CARRIE ANNE DOWNEY
EMAIL ONLY CA 00000
(619) 522-2040
cadowney@cadowneylaw.com

James J. Heckler
LEVIN CAPITAL STRATEGIES
EMAIL ONLY
EMAIL ONLY NY 00000
(212) 259-0851
jheckler@levincap.com

C. Susie Berlin
Attorney At Law

EMAIL ONLY CA 00000
tcollier@buckeye.com

Greg Clark
Compliance Mgr.
LODI GAS STORAGE, LLC
EMAIL ONLY CA 00000
(209) 368-9277 X21
gclark@lodistorage.com

Robert Russell
LODI GAS STORAGE, LLC
PO BOX 230
ACAMPO CA 95220
rrussell@lodistorage.com

William H. Schmidt, Jr
LODI GAS STORAGE, LLC
FIVE TEK PARK
9999 HAMILTON BOULEVARD
BREINIGSVILLE PA 18031
(832) 615-8610
wschmidt@buckeye.com

Priscila Castillo
LOS ANGELES DEPT OF WATER & POWER
111 NORTH HOPE ST., RM. 340
LOS ANGELES CA 90012
(213) 367-2850
priscila.castillo@ladwp.com

Robert L. Pettinato
LOS ANGELES DEPT. OF WATER & POWER
111 NORTH HOPE ST., RM. 1150
LOS ANGELES CA 90012
(213) 367-1735
robert.pettinato@ladwp.com

Michael Goldenberg
LUMINUS MANAGEMENT
1700 BROADWAY, 38TH FLOOR
NEW YORK NY 10019
(212) 615-3427
mgoldenberg@luminusmgmt.com

Cleo Zagrean
MACQUARIE CAPITAL (USA)
EMAIL ONLY NY 00000
(212) 231-1749
cleo.zagrean@macquarie.com

Martin A. Mattes
Attorney
NOSSAMAN, LLP
50 CALIFORNIA STREET, 34TH FLOOR

MC CARTHY & BERLIN, LLP
100 W SAN FERNANDO ST., STE 501
SAN JOSE CA 95113
(408) 288-2080
sberlin@mccarthylaw.com

John W. Leslie
MCKENNA LONG & ELDRIDGE LLP
EMAIL ONLY CA 00000
(619) 699-2536
jleslie@McKennaLong.com

Jim Mcquiston
MCQUISTON ASSOCIATES
6212 YUCCA STREET
LOS ANGELES CA 90028-5223

Britt Strottman
Attorney At Law
MEYERS NAVE
555 12TH STREET, STE. 1500
OAKLAND CA 94607
(510) 808-2000
bstrottman@meyersnave.com
For: City of San Bruno

Jessica Mullan
MEYERS NAVE
555 12TH STREET, SUITE 1500
OAKLAND CA 94607
(510) 808-2000
jmullan@meyersnave.com

Richard J. Morillo
PO BOX 6459
BURBANK CA 91510-6459
(818) 238-5702
rmorillo@ci.burbank.ca.us

MRW & ASSOCIATES, LLC
EMAIL ONLY CA 00000
(510) 834-1999
mrw@mrwassoc.com

Shalini Swaroop
Sr. Staff Attorney
NATIONAL ASIAN AMERICAN COALITION
1758 EL CAMINO REAL
SAN BRUNO CA 94066
(650) 953-0522 X-231
sswaroop@naacoalition.org

Rosa Duenas
PACIFIC GAS & ELECTRIC COMPANY
EMAIL ONLY CA 00000
R1DJ@pge.com

SAN FRANCISCO CA 94111-4799
(415) 398-7273
mmattes@nossaman.com

Jeff Cardenas
OFFICE OF THE ASSEMBLYMAN JERRY HILL
1528 EL CAMINO REAL, STE. 302
SAN MATEO CA 94402
(650) 349-1900
Jeff.cardenas@asm.ca.gov

Joseph M. Malkin
Attorney At Law
ORRICK, HERRINGTON & SUTCLIFFE LLP
405 HOWARD STREET
SAN FRANCISCO CA 94105
(415) 773-5705
jmalkin@orrick.com
For: Pacific Gas and Electric Company

Allie Mcmahon
PACIFIC GAS & ELECTRIC COMPANY
EMAIL ONLY CA 00000
(415) 973-0107
a2mx@pge.com

Jessica Tsang
PACIFIC GAS & ELECTRIC COMPANY
EMAIL ONLY CA 00000
j2ti@pge.com

Melissa A. Lavinson
PACIFIC GAS & ELECTRIC COMPANY
900 7TH ST., NW STE. 950
WASHINGTON DC 20001
(202) 638-1958
malp@pge.com

Olivia Brown
PACIFIC GAS & ELECTRIC COMPANY
245 MARKET STREET
SAN FRANCISCO CA 94105
(415) 973-2578
oxb4@pge.com

Trina Horner
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B10C
SAN FRANCISCO CA 94105
tnhc@pge.com

William V. Manheim
Attorney At Law
PACIFIC GAS AND ELECTRIC COMPANY
PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY CA 00000
regrelcpuccases@pge.com

Chuck Marre
PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY CA 00000
CMM6@pge.com

Daren Chan
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B10C
SAN FRANCISCO CA 94105
(415) 973-5361
d1ct@pge.com

Jonathan D. Pendleton
Attorney At Law
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO CA 94105
(415) 973-2916
j1pc@pge.com

Kerry C. Klein
Attorney At Law
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B30A
SAN FRANCISCO CA 94105
(415) 973-3251
kck5@pge.com

Kristina M. Castrence
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B10A
SAN FRANCISOC CA 84105
(415) 973-1479
kmmj@pge.com

Maybelline Dizon
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B10A
SAN FRANCISCO CA 94105
(415) 973-1670
M1D1@pge.com

Jason Hunter
RIVERSIDE PUBLIC UTILITIES
3435 14TH STREET
RIVERSIDE CA 92501
(951) 715-2637
jhunter@riversideca.gov

Tom Roth
ROTH ENERGY COMPANY

77 BEALE ST., MC B30A
SAN FRANCISCO CA 94105
(415) 973-6628
wvm3@pge.com

Susan Skillman
PARSONS CORPORATION
2121 N CALIFORNIA BLVD., SUITE 500
WALNUT CREEK CA 94596
(925) 360-0622
Susan.Skillman@Parsons.com

Steven Endo
PASADENA DEPARTMENT OF WATER & POWER
150 S. LOS ROBLES, SUITE 200
PASADENA CA 91101
(626) 744-7599
sendo@cityofpasadena.net

Eric Klinkner
PASADENA DEPARTMENT OF WATER AND POWER
150 SOUTH LOS ROBLES AVENUE, SUITE 200
PASADENA CA 91101-2437
(626) 744-4478
eklinkner@cityofpasadena.net

Vincent Rogers
PHILLIPS ENTERPRISES, INC.
1805 TRIBUTE ROAD, STE. B
SACRAMENTO CA 95815
(916) 922-3192
Vrogers1994@yahoo.com

Edward Heyn
POINTSTATE CAPITAL
40 WEST 57TH STREET, 25TH FL.
NEW YORK NY 10019
(212) 830-7061
ted@PointState.com

Timothy Rea
EMAIL ONLY CA 00000
(650) 454-6400
timothyrea@hotmail.com

Nadia Aftab
SOCALGAS/SDG&E
555 W. FIFTH STREET (GT14D6)
LOS ANGELES CA 90013
(213) 244-4843
Naftab@semprautilities.com

Janet Combs
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
545 S. FIGUEROA STREET, SUITE 1235
LOS ANGELES CA 90071
(213) 622-6700
rothenergy@sbcglobal.net

Timothy Tutt
SACRAMENTO MUNICIPAL UTILITY DISTRICT
EMAIL ONLY CA 00000
(916) 732-5038
ttutt@smud.org

Central Files
SDG&E AND SOCALGAS
8330 CENTURY PARK COURT, CP31-E
SAN DIEGO CA 92123-1550
(858) 654-1148
CentralFiles@SempraUtilities.com

Laura Semik
PO BOX 1107
BELMONT CA 94002
(650) 678-1610
laura@messimer.com

Marcie A. Milner
SHELL ENERGY NORTH AMERICA (US), L.P.
4445 EASTGATE MALL, STE. 100
SAN DIEGO CA 92121
(858) 526-2106
marcie.milner@shell.com

Christina Scarborough
Regional Conservation Organizer
SIERRA CLUB
8125 MORSE AVE.
NORTH HOLLYWOOD CA 91605
ssc.chrissy@gmail.com

Kevin Fallon
SIR CAPITAL MANAGEMENT
620 EIGHTH AVENUE, 22ND FLOOR
NEW YORK NY 10018
(212) 993-7104
kfallon@sirfunds.com

Robert F. Lemoine
Attorney At Law
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. SUITE 346L
ROSEMEAD CA 91770
(626) 302-4182
Robert.F.Lemoine@sce.com

Deana M. Ng
SOUTHERN CALIFORNIA GAS COMPANY

ROSEMEAD CA 91770
(626) 302-1524
janet.combs@sce.com

Michael S. Alexander
Energy Supplly And Management
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE
ROSEMEAD CA 91006
(626) 302-2029
michael.alexander@sce.com

Angelica Morales
Attorney
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE / PO BOX 800
ROSEMEAD CA 91770
(626) 302-6160
angelica.morales@sce.com

Case Administration
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE / PO BOX 800
ROSEMEAD CA 91770
(626) 302-1063
case.admin@sce.com

Francis Mcnulty
Attorney At Law
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD CA 91770
(626) 302-1499
Francis.McNulty@sce.com

Gloria Ing
Attorney At Law
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE./PO BOX 800
ROSEMEAD CA 91770
(626) 302-1999
gloria.ing@sce.com

555 WEST FIFTH STREET, SUITE 1400
LOS ANGLELES CA 90013-1034
(213) 244-3013
DNg@SempraUtilities.com

Greg Healy
SOUTHERN CALIFORNIA GAS COMPANY
555 W. FIFTH ST., GT14D6
LOS ANGELES CA 90013
(213) 244-3314
GHealy@semprautilities.com

Jeffrey L. Salazar
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, GT14D6
LOS ANGELES CA 90013
JLSalazar@SempraUtilities.com

Michael Franco
Regulatory Case Manager
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, GT14D6
LOS ANGELES CA 90013-1011
(213) 244-5839
MFranco@SempraUtilities.com

Rasha Prince
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST 5TH STREET, GT14D6
LOS ANGELES CA 90013-1034
(213) 244-5141
RPrince@SempraUtilities.com

Steven Hruby
SOUTHERN CALIFORNIA GAS COMPANY
555 W. FIFTH ST., GT14D6
LOS ANGELES CA 90013
SHruby@semprautilities.com

Christy Berger
Mgr - State Reg Affairs
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS NV 89150-0002
(702) 364-3267
christy.berger@swgas.com

Jim Mathews
Admin - Compliance - Engineering
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS NV 89150-0002
(702) 364-3550
jim.mathews@swgas.com

Michael Rochman

Thomas J. Long
Attorney At Law
TURN
115 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94104
(415) 929-8876
tlong@turn.org

Aaron J. Lewis

Managing Director
SPURR
1850 GATEWAY BLVD., SUITE 235
CONCORD CA 94520
(925) 743-1292
Service@spurr.org

Pat Jackson
Branch Manager
TEAM INDUSTRIAL SERVICES, INC.
14909 GWENCHRIS COURT
PARAMOUNT CA 90723
(562) 531-0797
pat.jackson@teaminc.com

Garance Burke
Reporter
THE ASSOCIATED PRESS
303 2ND ST., STE. 680N
SAN FRANCISCO CA 94107
(415) 495-1708
gburke@ap.org

Enrique Gallardo
THE GREENLINING INSTITUTE
EMAIL ONLY
EMAIL ONLY CA 00000
(510) 926-4017
enriqueg@greenlining.org

Nina Suetake
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94104
(415) 929-8876 X 308
nsuetake@turn.org

Robert Finkelstein
General Counsel
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94104
(415) 929-8876 X-307
bfinkelstein@turn.org

UC-HASTINGS COLLEGE OF LAW
1472 FILBERT ST., APT. 408
SAN FRANCISCO CA 94109
(530) 400-9136
aaron.joseph.lewis@gmail.com

William Julian
UTILITY WORKERS UNION OF AMERICA
43556 ALMOND LANE
DAVIS CA 95618
(530) 219-7638
billjulian@sbcglobal.net

Art Frias
UWUA LOCAL 132
EMAIL ONLY CA 00000
(562) 696-0142
artfrias@uwua.net

Nancy Logan
UWUA LOCAL 132
EMAIL ONLY CA 00000
(562) 696-0142
unionnancy@gmail.com

Joseph M. Karp
Attorney
WINSTON & STRAWN LLP
101 CALIFORNIA STREET, STE. 3900
SAN FRANCISCO CA 94111-5894
(415) 591-1000
jkarp@winston.com

Randall Li
ZIMMER LUCAS PARTNERS
7 WEST 54TH STREET
NEW YORK NY 10019
(212) 440-0760
li@zimmerlucas.com

(END OF APPENDIX A)