



From: don@ucan.org [mailto:don@ucan.org]
Sent: Thursday, May 26, 2016 10:00 PM
To: don@ucan.org
Subject: FW: A.15-09-010; UCAN's request to respond to SDG&E's accusations of factual misrepresentations

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-----Original Message-----

From: don@ucan.org
Sent: Thursday, May 26, 2016 9:58pm
To: "Norin, Jenny" <JNorin@semprautilities.com>
Cc: "Atkinson, Stacie" <satkinson@semprautilities.com>, "CEM@newsdata.com" <cem@newsdata.com>, "dj0conklin@earthlink.net" <dj0conklin@earthlink.net>, "dot@cpuc.ca.gov" <dot@cpuc.ca.gov>, "ec2@cpuc.ca.gov" <ec2@cpuc.ca.gov>, "edm@cpuc.ca.gov" <edm@cpuc.ca.gov>, "engberg@smwlaw.com" <engberg@smwlaw.com>, "ixg8@pge.com" <ixg8@pge.com>, "jane@ucan.org" <jane@ucan.org>, "jennifer@jenniferbetts.com" <jennifer@jenniferbetts.com>, "jmo@cpuc.ca.gov" <jmo@cpuc.ca.gov>, "jwalsh@albblaw.com" <jwalsh@albblaw.com>, "jwmitchell@mbartek.com" <jwmitchell@mbartek.com>, "kimalcolm@gmail.com" <kimalcolm@gmail.com>, "Lim, Christa" <clim@semprautilities.com>, "lt3@cpuc.ca.gov" <lt3@cpuc.ca.gov>, "Lyons, Christopher M" <clyons@semprautilities.com>, "MAguirre@amslawyers.com" <maquirre@amslawyers.com>, "michael@SanDiegoCAN.org" <michael@sandiegocan.org>, "mrw@mrwassoc.com" <mrw@mrwassoc.com>, "MSeverson@amslawyers.com" <mseverson@amslawyers.com>, "nils.stannik@cpuc.ca.gov" <nils.stannik@cpuc.ca.gov>, "nlr@cpuc.ca.gov" <nlr@cpuc.ca.gov>, "RegRelCPUCCases@pge.com" <regrelcpucases@pge.com>, "rmp@cpuc.ca.gov" <rmp@cpuc.ca.gov>, "scott.logan@cpuc.ca.gov" <scott.logan@cpuc.ca.gov>, "service@cforat.org" <service@cforat.org>, "Sidhar, Shivani N" <ssidhar@semprautilities.com>, "ssm3@pge.com" <ssm3@pge.com>, "tlong@turn.org" <tlong@turn.org>, "txb@cpuc.ca.gov" <txb@cpuc.ca.gov>
Subject: A.15-09-010; UCAN's request to respond to SDG&E's accusations of factual misrepresentations

Hello Judge McKinney, UCAN respectfully requests permission to file a response to SDG&E's reply brief where they accuse the Joint Intervenors of misrepresenting facts surrounding the 2007 wildfires.

Specifically, in their reply brief, SDG&E claims that:

"Joint Intervenors' assignment of all blame for the 2007 Wildfires and related damages and evacuations to SDG&E is simply a misrepresentation of facts and cannot support dismissal of the Application."

and:

"Joint Intervenors attribute the air pollution and other hardships citizens suffered in October 2007 wholly to SDG&E's equipment."

and:

"Joint Intervenors have wrongly sought to blame SDG&E for all of the damage caused by the October 2007 wildfires in their attempt to have the Application dismissed."

Despite the fact that the Joint Intervenors never assigned "all the blame" for the evacuation of 515,000 people to the 3 fires ignited by SDG&E equipment, and that we never claimed that the all the air pollution and other hardships suffered was "wholly" due to fires ignited by SDG&E equipment, and despite the fact that we never wrongly sought to blame SDG&E for "all of the damage caused by the October 2007 wildfires", and that we included a link in our opening brief to the source documents we cite to so they could be easily referenced by all parties, SDG&E decides to express indignation on how the Joint Intervenors "misrepresented" the facts.

Given that the Joint Intervenors were accused by SDG&E of misrepresentations of the facts in our filing, UCAN seeks to file a response so we can answer SDG&E's spin on what they want the parties and the Commission to believe the Joint Intervenors said in our brief. UCAN would like the opportunity to clear the record that the Joint Intervenors did not "misrepresent" anything.

Thank you,
Donald Kelly
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-----Original Message-----

From: "Norin, Jenny" <JNorin@semprautilities.com>
Sent: Thursday, May 26, 2016 3:08pm
To: "Atkinson, Stacie" <SAtkinson@semprautilities.com>, "CEM@newsdata.com" <CEM@newsdata.com>, "dj0conklin@earthlink.net" <dj0conklin@earthlink.net>, "don@ucan.org" <don@ucan.org>, "dot@cpuc.ca.gov" <dot@cpuc.ca.gov>, "ec2@cpuc.ca.gov" <ec2@cpuc.ca.gov>, "edm@cpuc.ca.gov" <edm@cpuc.ca.gov>, "engberg@smwlaw.com" <engberg@smwlaw.com>, "ixg8@pge.com" <ixg8@pge.com>, "jane@ucan.org" <jane@ucan.org>, "jennifer@jenniferbetts.com" <jennifer@jenniferbetts.com>, "jmo@cpuc.ca.gov" <jmo@cpuc.ca.gov>, "jwalsh@albblaw.com" <jwalsh@albblaw.com>, "jwmitchell@mbartek.com" <jwmitchell@mbartek.com>, "klmalcolm@gmail.com" <klmalcolm@gmail.com>, "Lim, Christa" <CLim@semprautilities.com>, "lt3@cpuc.ca.gov" <lt3@cpuc.ca.gov>, "Lyons, Christopher M" <CLyons@semprautilities.com>, "MAguirre@amslawyers.com" <MAguirre@amslawyers.com>, "michael@SanDiegoCAN.org" <michael@SanDiegoCAN.org>, "mrw@mrwassoc.com" <mrw@mrwassoc.com>, "MSeverson@amslawyers.com" <MSeverson@amslawyers.com>, "nils.stannik@cpuc.ca.gov" <nils.stannik@cpuc.ca.gov>, "nlr@cpuc.ca.gov" <nlr@cpuc.ca.gov>, "RegRelCPUCCases@pge.com" <RegRelCPUCCases@pge.com>, "rmp@cpuc.ca.gov" <rmp@cpuc.ca.gov>, "scott.logan@cpuc.ca.gov" <scott.logan@cpuc.ca.gov>, "service@cforat.org" <service@cforat.org>, "Sidhar, Shivani N" <SSidhar@semprautilities.com>, "ssm3@pge.com" <ssm3@pge.com>, "tlong@turn.org" <tlong@turn.org>, "txb@cpuc.ca.gov" <txb@cpuc.ca.gov>
Subject: A.15-09-010: SDG&E Reply

To Interested Parties of A.15-09-010:

Attached herewith please find **SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 E) REPLY BRIEF ON THRESHOLD ISSUES**. This document is being served by electronic mail in a word-searchable PDF format, and has been electronically filed with the CPUC Docket Office.

Thank you,

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