

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



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In the Matter of the Application of Southern California
Gas Company (U 904 G) for Approval of Branch
Office Optimization Process.

Application 13-09-010

(Filed September 16, 2013)

**REPLY COMMENTS OF THE GREENLINING INSTITUTE ON THE PROPOSED
DECISION**

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1. Introduction

Pursuant to Rule 14.3 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure, the Greenlining Institute (Greenlining) submits its reply to the parties’ comments on the proposed decision (PD)of ALJ Colbert in the above-captioned proceeding, the Application of Southern California Gas Company (“SoCalGas”) for approval of the Branch Office Optimization Process (“Application”). Greenlining generally supports the PD. We limit our response to the SoCalGas’ comments regarding the appropriateness of filing an Advice Letter Tier 3 for the Palm Springs branch closing.

2. The Commission Should Clarify the Appropriate Advice Letter Tier that SoCalGas Must File

SoCalGas asserts that a Tier 3 Advice Letter is an inappropriate means to gain approval for the SoCalGas FACTA compliance implementation process. Without advocating for use of a particular Advice Letter process, Greenlining requests that the Commission clarify the appropriate Advice Letter process to use for approval of the Palm Springs Branch closing. The PD states that “SoCalGas’ request to close the Palm Springs branch office is **granted**, pending a Commission approval and implementation of a technological solution that eliminates the need for customers to present identify verification documentation in person.” The PD seems to say

that the Palm Springs branch closing request has been pre-approved unless a Tier 3 Advice Letter analysis shows that the FACTA compliance process and the implementation of the proposed technological solution do not warrant the branch's closure. Pursuant to General Order 96-B Industry Rule 5.3, matters appropriate to Tier 3 are those that require Commission approval. However, as stated above, the Commission has already issued an approval on the matter of closing the Palm Springs branch. Thus, since the Commission already approved the branch closing, there is no need for a Tier 3 Advice Letter. If the Commission wants to approve the Palm Springs branch closing through a Tier 3 Advice Letter filing, then it should delete the current language in the PD granting SoCalGas' request to close that branch and instead state that the approval for the Palm Springs branch closing can only be gained through a Tier 3 Advice Letter process.

3. Conclusion

Greenlining appreciates the opportunity to respond to SoCalGas' comments and hopes that the Commission provides further guidance and clarification on the matters discussed above.

Respectfully submitted,

Dated: June 17, 2016

/s/ Carmelita L. Miller
Carmelita L. Miller
Energy Counsel
The Greenlining Institute