

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



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12-16-09
04:59 PM

Order Instituting Rulemaking to Revise and)
Clarify Commission Regulations Relating to the)
Safety of Electric Utility and Communications)
Infrastructure Provider Facilities.)

R.08-11-005
(Filed November 6, 2008)

**PROPOSED RULE CHANGES INDIVIDUALLY SUBMITTED BY SAN DIEGO GAS &
ELECTRIC COMPANY (U902E)**

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December 16, 2009

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ELECTRIC COMPANY (U902E)**

Pursuant to the November 5, 2009 Assigned Commissioner’s Ruling and Scoping Memo for Phase 2 of This Proceeding (“Phase 2 Scoping Memo”), San Diego Gas & Electric Company (“SDG&E”) hereby individually submits three proposed rule changes (“PRCs”) for consideration during the Phase 2 workshops.¹ These proposed changes are in addition to, and separate from, the PRCs that SDG&E is jointly submitting with Southern California Edison Company and Pacific Gas and Electric Company today.

The three individual PRCs presented by SDG&E are set forth in Attachment A, in the format specified in the Phase 2 Scoping Memo. SDG&E looks forward to a full and thoughtful consideration of these PRCs during the Phase 2 workshops.

Respectfully submitted,

By: /s/ Michael R. Thorp
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December 16, 2009

¹ On November 23, 2009, ALJ Kenney issued a Ruling Revising Workshop Schedule for Phase 2. Pursuant to this Ruling, December 16, 2009 is the date for parties to file and serve proposed rule changes.

ATTACHMENT A

PROPOSED RULE CHANGES
INDIVIDUALLY SUBMITTED BY SDG&E

Proposed Rule or Rule Change

Party: SDG&E PRC No. 1

Short Title: Replacement of Overhead with Underground Electric Facilities -- New Rule 20D

Proposed Rule Change Rationale:

Converting overhead lines to underground lines in very high and extreme fire threat zones is a means of enhancing public and worker safety and protecting the electric system from fire damage. The proposed rule would allow undergrounding specifically in such zones and provides assurance that funds are allocated based on fire risk and that other planned undergrounding work is not deferred. SDG&E strongly recommends that such programs be available in very high and extreme fire threat zones.

Proposed Rule or Rule Change:

[New] (Tariff) Rule 20 D

Replacement of Overhead with Underground Electric Facilities

RULE 20 D.

The Utility will replace its existing overhead lines with underground lines along public streets and roads, and on public lands and private property across which rights-of-way satisfactory to the Utility have been obtained by the Utility, provided that:

1. The governing body of the city or county in which such electric facilities are and will be located has:
 - a. Determined, after consultation with the Utility and after holding public hearings on the subject, that such undergrounding is in the general public interest based upon the fact that such undergrounding will occur in a very high or extreme fire threat zone as defined by the California Department of Forestry and Fire Protection with the boundaries adjusted as appropriate based on Utility judgment and expertise and;
 - b. Adopted an ordinance creating an underground district in the area in which both the existing and new electric facilities are and will be located, requiring, among other things:
 - (i) that all existing overhead electric facilities in such district shall be removed;
 - (ii) that, where practical and economically feasible, each property served from such electric overhead facilities shall have installed, in accordance with the Utility's rules for underground service, all electrical facility changes on the premises necessary to receive service from the underground facilities of the Utility as soon as it is available;

(iii) that the Utility shall discontinue its overhead service.

2. The undergrounding extends for a minimum distance of one block or 600 feet, whichever is the lesser.

Upon request of the governing body, the Utility will pay from existing funds allocated to that governing body for the purpose of undergrounding, for:

a. The installation of no more than 100 feet of each customer's underground electric service lateral occasioned by the undergrounding; and/or

b. The conversion of a customer's meter panel to accept underground service occasioned by the undergrounding, excluding permit fees.

The Utility or the governing body may establish a lesser allowance, or may otherwise limit the amount of money to be expended on a single customer's electric service, or the total amount to be expended on all electric service installations in a particular project.

3. The Utility's total annual budgeted amount for undergrounding shall be as approved by the California Public Utilities Commission for Rule 20 D implementation. The amount allocated to each city and county annually shall be in the same ratio that the number of high voltage overhead miles of lines located in the Utility-defined very high and extreme fire threat zones in such city or unincorporated area of any county bears to the total system overhead miles of high voltage lines located in very high and extreme fire threat zones.

The Rule 20 D program shall be administered by the Utility consistent with existing reporting, engineering, accounting and management practices, consistent with those in place for Rule 20 A.

Final Proposed Rule or Rule Change:

[New] **(Tariff) Rule 20 D**

Replacement of Overhead with Underground Electric Facilities

RULE 20 D.

The Utility will replace its existing overhead lines with underground lines along public streets and roads, and on public lands and private property across which rights-of-way satisfactory to the Utility have been obtained by the Utility, provided that:

1. The governing body of the city or county in which such electric facilities are and will be located has:
 - a. Determined, after consultation with the Utility and after holding public hearings on the subject, that such undergrounding is in the general public interest based upon the fact that such undergrounding will occur in a very high or extreme fire threat zone as defined by the California Department of Forestry and Fire Protection with the boundaries adjusted as appropriate based on Utility judgment and expertise and;

b. Adopted an ordinance creating an underground district in the area in which both the existing and new electric facilities are and will be located, requiring, among other things:

(i) that all existing overhead electric facilities in such district shall be removed;

(ii) that, where practical and economically feasible, each property served from such electric overhead facilities shall have installed, in accordance with the Utility's rules for underground service, all electrical facility changes on the premises necessary to receive service from the underground facilities of the Utility as soon as it is available;

(iii) that the Utility shall discontinue its overhead service.

2. The undergrounding extends for a minimum distance of one block or 600 feet, whichever is the lesser.

Upon request of the governing body, the Utility will pay from existing funds allocated to that governing body for the purpose of undergrounding, for:

- a. The installation of no more than 100 feet of each customer's underground electric service lateral occasioned by the undergrounding; and/or
- b. The conversion of a customer's meter panel to accept underground service occasioned by the undergrounding, excluding permit fees.

The Utility or the governing body may establish a lesser allowance, or may otherwise limit the amount of money to be expended on a single customer's electric service, or the total amount to be expended on all electric service installations in a particular project.

3. The Utility's total annual budgeted amount for undergrounding shall be as approved by the California Public Utilities Commission for Rule 20 D implementation. The amount allocated to each city and county annually shall be in the same ratio that the number of high voltage overhead miles of lines located in the Utility-defined very high and extreme fire threat zones in such city or unincorporated area of any county bears to the total system overhead miles of high voltage lines located in very high and extreme fire threat zones.

The Rule 20 D program shall be administered by the Utility consistent with existing reporting, engineering, accounting and management practices, consistent with those in place for Rule 20 A.

In Scope:

Phase 2 Scoping Memo Issue 4 (mitigating hazards posed by high wind speeds).

Justifications:

Item:	Justification:
1. The specific electric utilities, CIPs, and others affected by the proposed rule.	As with the Commission's other undergrounding rules (e.g. Rule 20A) when a series of poles is undergrounded, the affected utilities will be those owning facilities on those poles, whether electric or communications. The Commission could allow undergrounding of electric lines only, with poles being "topped" above the communications level.
2. Why the PRC is within the scope of Phase 2.	See above.
3. New and / or revised text for the affected General Order(s), if applicable.	See above.
4. The specific fire hazard(s) addressed by the PRC and/or other reason(s) for the PRC.	Risk of fire in very high and extreme fire threat zones.
5. How the proposed rule reduces or otherwise addresses the identified fire hazard(s) and/or achieves other intended purposes.	By placing electric facilities underground they are not subject to wind damage, poles cannot be burned, etc.
6. The anticipated costs and benefits of the PRC.	This depends upon funding approved by the CPUC. At the present time no funding is approved for this purpose, so the rate impact and the benefits gained both depend upon how aggressive a program the Commission might authorize.
7. Whether and how costs will be recovered from customers.	SDG&E proposes that these costs would be recovered from customers in general rates; alternatively, they could be partially funded by cities, counties, or local government transferring funds from other sources (<i>per County of Los Angeles suggestion in Phase I</i>).

<p>8. Whether and how costs will be shared among electric utilities, CIPs, and others.</p>	<p>Costs would be shared among electric utilities and communications providers (similar to other Rule 20 costs) unless the facilities being undergrounded were all of one type.</p>
<p>9. Why it is in the public interest to adopt the PRC.</p>	<p>Managing the risk of wildfire in California is in the public interest.</p>
<p>10. If the PRC applies to electric transmission, why the PRC does not duplicate or conflict with other federal or state regulations.</p>	<p>This rule is similar to Rule 20 A, which has been used for transmission in the past, and similarly does not conflict with other federal and state regulations.</p>
<p>11. Whether the adoption and implementation of the PRC is exempt from the California Environmental Quality Act (CEQA) and/or the National Environmental Policy Act (NEPA) and, if so, why. If not, what steps need to occur under CEQA or NEPA before the PRC can be adopted.</p>	<p>Nothing in this proposal will trigger CEQA or NEPA review. Adoption of the proposed rule does not constitute a “project” under CEQA or a “proposed action” under NEPA. Implementation activities will be analyzed under CEQA review (and NEPA, if applicable) on a case-by-case basis and either undergo environmental review or be determined categorically and/or statutorily exempt, as applicable.</p>

Proposed Rule or Rule Change

Party: SDG&E PRC No. 2
Short Title: GO 95, Section I, Rule 12.7

Proposed Rule Change Rationale:

Electric utilities are required to operate a safe and reliable transmission and distribution system. The increasing volume of cables, wires, antennas, equipment and other facilities attached to SDG&E poles has generated serious concerns regarding the safety and maintenance of such attachments to SDG&E's system, in light of the catastrophic fires that have swept through San Diego County and Southern California generally in recent years. Minimum insurance requirements for contractors working on electric facilities and for third parties attaching to electric poles should be increased to address such risks (to utility infrastructure and the public), especially the risk of catastrophic fires. Requiring such minimum insurance should lead to safer attachments and contractor work practices, and should also result in more thorough inspections. Moreover, the public is not protected if third parties and contractors have inadequate insurance. Public interest must be protected by ensuring that insurance coverage is sufficient to cover potential catastrophic losses.

Proposed Rule or Rule Change:

GO 95, Section I, Rule 12.7

Contractors working on or near electric facilities shall be required to maintain adequate levels of liability insurance, commensurate with the risks of catastrophic fires. Third parties attaching to electric poles shall also be required to maintain adequate levels of liability insurance, commensurate with the risks of catastrophic fires. The level of liability insurance for contractors and third parties shall be up to five hundred million dollars (\$500,000,000).

Final Proposed Rule or Rule Change:

Contractors working on or near electric facilities shall be required to maintain adequate levels of liability insurance, commensurate with the risks of catastrophic fires. Third parties attaching to electric poles shall also be required to maintain adequate levels of liability insurance, commensurate with the risks of catastrophic fires. The level of liability insurance for contractors and third parties shall be up to five hundred million dollars (\$500,000,000).

In Scope:

Phase 2 Scoping Memo Issue 3 (overloaded utility poles); Phase 2 Scoping Memo Issue 4 (mitigating hazards posed by high wind speeds).

Justifications:

Item:	Justification:
1. The specific electric utilities, CIPs, and others affected by the proposed rule.	Contractors performing maintenance on and third parties attaching to electric poles.
2. New and / or revised text for the affected General Order(s), if applicable.	See above.
3. The specific hazard(s) addressed by the proposed rule.	Ensuring that contractors working on electric facilities and third parties attaching to electric poles have safe attachments and contractor work practices, and thorough inspections, thereby helping to reduce the risk of catastrophic fires.
4. How the proposed rule reduces or otherwise addresses the hazard(s).	The proposed rule would ensure that contractors working on electric facilities and third parties attaching to electric poles would be covered by liability insurance sufficient to cover potential catastrophic liability losses. Requiring such minimum insurance should lead to safer attachments and contractor work practices, and should also result in more thorough inspections.
5. The anticipated costs and benefits of the proposed rule.	Costs to affected contractors and third parties would depend on their current liability insurance program and how much additional insurance they must obtain to reach the \$500 million proposed limit. The proposed rule would promote a safe and reliable electric system, to the benefit of public welfare.
6. Whether and how costs will be recovered from customers.	N/A
7. Whether and how costs will be shared among electric utilities, CIPs, and others.	Costs would be assumed by contractors performing work related to the overhead electric system and third parties attaching to electric poles.
8. Why it is in the public interest to adopt the proposed rule.	A contractor or third party attaching to electric poles that refuses to carry adequate insurance commensurate with catastrophic fire risk places the entire community in jeopardy of assuming said contractor or third party's risk of catastrophic fire loss. The proposed rule requires contractors performing work related to the overhead electric system and third parties attaching to electric poles to insure their activities commensurate with such risk.
9. If the proposed rule applies to electric transmission, why the rule does not conflict with other federal or state regulations.	The CPUC has jurisdiction over public safety and service reliability concerns related to overhead electric system integrity.
10. Whether the adoption and implementation of the proposed rule is exempt from the California Environmental Quality Act (CEQA) and, if so, why. If not, what steps need to occur under CEQA	Nothing in this proposal will trigger CEQA or NEPA review.

Proposed Rule or Rule Change

Party: SDG&E PRC No. 3

Short Title: [New] GO 95 Rule 91.5 Identification of Telecommunication Overhead Facilities

Proposed Rule Change Rationale:

Currently General Order 128 requires the identification of Supply and Communication underground facilities. There is no similar requirement for identification of communication facilities on overhead structures. Due to the proliferation of telecommunication attachments, a means to identify the owner of each telecommunication facility on jointly used overhead structures is necessary. Identification of communication facilities will facilitate the timely exchange of pole loading data and timely notification and the resolution of safety hazard and General Order 95 infractions as required in Extreme and High Fire Threat Zones.

In addition, marking is already a requirement in the Northern and Southern JPAs, section 15, Identification of Pole and Facilities for Recorded Data (which are quoted below):

15.2 Marking Pole and Communications Circuits

Poles may be marked with standard nails to denote length and year set. Marking nails, if used, shall be placed immediately below pole number or approximately 5 1/2' above ground line, the length nail on the left and the year nail on the right.

15.2 A

To promote the easy identification of "C" circuits for engineering, construction, and in the case of emergencies, cables will be marked with a Member or Tenant identifier at each pole and should be attached directly to the cable of the cable hardware. The cable tag shall consist of a material that is weather and corrosion resistant and should be capable of lasting the life of the cable.

Original, Strikeout/Underline, and Final Proposed Rule Change:

Final Proposed Rule or Rule Change

[New] Rule 91.5 Marking

Communication cables and conductors shall be marked as to ownership to facilitate identification.

In Scope:

Phase 2 Scoping Memo Issue 4 (prompt reporting and resolution of hazards/violations that one pole occupant observes in another pole occupant's facilities); Phase 2 Scoping Memo Issue 3 (overloaded utility poles); Phase 2 Scoping Memo Issue 13 ("meritorious issues" raised by CPSD in Phase 1). This issue was originally the subject of CPSD proposed Rule 31.7 in Phase 1. CPSD withdrew this proposal with the following statement: "While SDG&E's proposal regarding the marking of communications facilities as to ownership is meritorious, CPSD agrees with various parties' comments that there are certain practical concerns that deserve further consideration and clarification in Phase 2. Therefore CPSD is withdrawing its proposed Rule 31.7 for consideration in Phase 1." CPSD April 8, 2009 Reply Comments at 11.

Justifications:

Item:	Justification:
1. The specific electric utilities, CIPs, and others affected by the proposed PRC.	All CIPs attached to joint use poles.
2. Why the PRC is within the scope of Phase 2.	See above.
3. New and/or revised text for the affected General Order(s), if applicable.	See above.
4. The specific fire hazard(s) addressed by the PRC and/or other reason(s) for the PRC.	Telecommunication lines and or equipment shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.
5. How the PRC reduces or otherwise addresses the identified fire hazard(s) and /or achieves other intended purposes.	See rationale.
6. The anticipated costs and benefits of the PRC.	See rationale for benefits. Additional costs of this proposed rule are anticipated to be minimal due to the ease of tagging poles during routine inspection and maintenance.
7. Whether and how the costs will be recovered from customers.	To be determined by the marking entity.
8. Whether and how costs will be shared among electric utilities, CIPs, and others.	The marking entity would bear the costs of marking their own facilities.
9. Why it is in the public interest to adopt the PRC.	Marking facilities aids in the safe and reliable operation and maintenance of facilities attaching to joint use poles. Marking facilitates identification and notification of each attaching facility, such that any safety hazards may be timely resolved.
10. If the proposed rule applies to electric transmission, why the PRC does not duplicate or conflict with other federal or state regulations.	N/A
11. Whether the adoption and implementation of the PRC is exempt from CEQA and/or the National Environmental Policy Act (NEPA) and, if so, why. If not, what steps need to occur under CEQA and/or NEPA before the PRC can be adopted.	Nothing in this proposal will trigger CEQA or NEPA review.

Proposed Rule or Rule Change

Party: SDG&E PRC No. 4

Short Title: GO 95, Rule 18 A

Proposed Rule Change Rationale:

The proposed rule change would add the wire-to-wire clearances in Rule 38 Table 2 Cases 8-13 to Rule 18 A Part 4, such that violations of these wire-to-wire clearance requirements would need to be corrected within 30 days, just like violations of the ground clearance requirements already referenced in Rule 18 A Part 4. Violations of wire-to-wire clearance requirements have at least as much potential to create fire safety hazards as violations of ground clearance requirements. Both types of clearance violations should be repaired within 30 days. The term "Rule 37" is added to the existing ground clearance requirement reference to clarify which Table 1 is being referenced.

Original, Strikeout/Underline, and Final Proposed Rule Change:

Original Rule with Strikeout / Underline

General Order 95 Rule 18 A: Resolution of Safety Hazards and General Order 95 Violations

(4) The company shall prioritize implementing this maintenance plan within the Extreme and Very High Fire Threat Zones of Southern California. With the exception of a safety hazard or violation requiring immediate correction, a company must correct a violation or safety hazard within 30 days of discovering or being notified of a violation or safety hazard, if the violation or safety hazard violates a clearance requirement listed in columns E, F, or G of Rule 37 Table 1 and Rule 38 Table 2 Cases 8–13 in this General Order, or violates a pole overloading requirement in Rule 44.2 of this General Order, and is located in an Extreme and Very High Fire Threat Zone in Southern California.

Final Proposed Rule or Rule Change

(4) The company shall prioritize implementing this maintenance plan within the Extreme and Very High Fire Threat Zones of Southern California. With the exception of a safety hazard or violation requiring immediate correction, a company must correct a violation or safety hazard within 30 days of discovering or being notified of a violation or safety hazard, if the violation or safety hazard violates a clearance requirement listed in columns E, F, or G of Rule 37 Table 1 and Rule 38 Table 2 Cases 8–13 in this General Order, or violates a pole overloading requirement in Rule 44.2 of this General Order, and is located in an Extreme and Very High Fire Threat Zone in Southern California.

In Scope:

Phase 2 Scoping Memo Issue 4 (mitigating hazards posed by high wind speeds).

Justifications:

Item:	Justification:
1. The specific electric utilities, CIPs, and others affected by the proposed rule.	Electric utilities and communication entities subject to CPUC jurisdiction.
2. Why the PRC is within the scope of Phase 2.	See above.
3. New and/or revised text for the affected General Order(s), if applicable.	See above.
4. The specific fire hazard(s) addressed by the PRC and/or other reason(s) for the PRC.	Fire hazards caused by wire-to-wire clearance violations.
5. How the proposed rule reduces or otherwise addresses the identified fire hazard(s) and/or achieves other intended purposes.	The proposed rule would require correction of a wire-to-wire clearance violation or safety hazard within 30 days of discovering or being notified of such violation or safety hazard.
6. The anticipated costs and benefits of the PRC.	The only anticipated costs would be the additional costs, if any, of correcting wire-to-wire clearance violations more quickly than might otherwise be the case. The benefits would be an increase in fire safety as a result of faster corrections of wire-to-wire clearance violations.
7. Whether and how costs will be recovered from customers.	N/A
8. Whether and how costs will be shared among electric utilities, CIPs, and others.	The additional costs, if any, of correcting wire-to-wire clearance violations more quickly would be incurred by the entity responsible for making the correction.
9. Why it is in the public interest to adopt the PRC.	See rationale.
10. If the PRC applies to electric transmission, why the PRC does not duplicate or conflict with other federal or state regulations.	N/A
11. Whether the adoption and implementation of the PRC is exempt from the California Environmental Quality Act (CEQA) and/or the National Environmental Policy Act (NEPA) and, if so, why. If not, what steps need to occur under CEQA or NEPA before the PRC can be adopted	Nothing in this proposal will trigger CEQA or NEPA review.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **PROPOSED RULE CHANGES INDIVIDUALLY SUBMITTED BY SAN DIEGO GAS & ELECTRIC COMPANY (U902E)** on all parties of record in this proceeding by electronic mail, by U.S. Mail to those without an email address, and by Federal Express to Commissioner Simon and ALJ Kenney.

Dated at Los Angeles, California, this 16th day of December, 2009.

/s/ Rose Mary Ruiz

Rose Mary Ruiz

CALIFORNIA PUBLIC UTILITIES COMMISSION
Proceeding: R.08-11-005 - Last update: December 7, 2009

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