



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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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 Rate-making Mechanisms

R.11-02-019
(Filed February 24, 2011)

**COMMENTS OF THE CITY AND COUNTY OF SAN FRANCISCO
IN RESPONSE TO THE MOTIONS TO APPROVE THE
"STIPULATION RE ORDER TO SHOW CAUSE"**

Pursuant to the Assigned Commissioner's Ruling dated March 30, 2011, and the direction of the Administrative Law Judge at the March 28, 2011, hearing, the City and County of San Francisco (San Francisco) submits these comments on the March 30, 2011 motions of Pacific Gas & Electric Company (PG&E) and the Consumer Protection and Safety Division (CPSD) seeking Commission approval of the Stipulation Re Order to Show Cause, which was filed on March 24, 2011.

The Commission should modify the Stipulation proposed by PG&E and CPSD to facilitate PG&E's timely compliance with Commission and National Transportation Safety Board (NTSB) orders addressing urgent public safety issues. The Stipulation adopts an insignificant penalty and grants a substantial extension of time for PG&E to comply with urgent recommendations issued in January. If the Stipulation is adopted, PG&E will not even complete its records search for another five months.

Further, and most importantly, the Commission, either in the Stipulation or by separate order, should require PG&E to undertake immediately the testing and replacement work on the 152 miles of transmission lines in high consequence areas (HCA) that may be most similar to the line that failed in San Bruno. PG&E has stated it intends to do this work. If the Commission believes that this work is not appropriate, it should work with PG&E and industry experts to immediately determine what steps are appropriate and order those steps. Even though more than seven months have passed since the San Bruno explosion, no actual safety improvements have

been made to PG&E's gas pipeline system. The Commission should ensure that such steps are taken immediately.

1. The Commission's Resolution of the Order to Show Cause is Important.

PG&E and CPSD note the narrow scope of the Stipulation urging the Commission to adopt it, resolve the OSC and move on.¹ It is true that resolution of the OSC is only one small part of the Commission's work in this proceeding—it does not resolve, for instance, the investigation into whether PG&E's record-keeping practices were adequate to protect public safety. Nor does it even begin to address the causes of the San Bruno explosion and PG&E's responsibility for that event. It seems likely that the Commission will consider other, and much larger, penalties and disallowances in the course of investigating the San Bruno explosion. The Commission's resolution of the OSC is still important, however, for several reasons. One obvious reason is that having accurate records is important to safety, as is clear from the NTSB and Commission orders and as both CPSD and PG&E acknowledged in the hearing. Without such records, the Commission and the public lack essential information to assess the reliability - and potential danger—posed by PG&E's gas lines.

Another reason is that the public needs to see that the Commission will aggressively enforce its orders. The public must rely on the Commission to ensure safe and reliable gas service. The OSC is the first public testing of the Commission's resolve to follow through on its promises and obligations. The Commission's initial actions in response to PG&E's March 15 filing (the Executive Director's letter of March 16, 2011 and the draft OSC) were strong and appropriate to the gravity of the issues in this proceeding and the Commission's role as an independent agency established by the California Constitution. But before the ink was dry on the Commission's adoption of the OSC, the Commission announced that it was entertaining this Stipulation, a Stipulation that would undermine the Commission's efforts to bolster its regulatory credibility because it reflects neither the seriousness of this proceeding nor the Commission's obligations. The Commission should not be deterred by PG&E's suggestions that it will drag out this proceeding unless the Commission approves the stipulation.² It is not appropriate for PG&E

¹ See, e.g., CPSD Motion at pp. 6-7.

² See, e.g., PG&E's Motion at page 8.

to dictate to the Commission the terms it will accept. The Commission should adopt terms that provide for compliance with urgent recommendations, impose an appropriate penalty, and ensure that PG&E takes immediate steps to improve pipeline safety. Faced with such an appropriate order, PG&E would need to decide whether to spend its resources litigating this issue with the Commission rather than improving its gas safety and service.

2. The Stipulation does not Require Timely Compliance.

The Commission required PG&E's March 15 report in order to comply with "urgent" recommendations issued by the NTSB on January 3, 2011. The Commission already granted PG&E one extension from February 1 to March 15. The Stipulation would grant another, more lengthy extension. The Stipulation treats PG&E's submission of a "Compliance Plan" as actual compliance. Both CPSD and PG&E note that PG&E "complied" with the order by filing the plan— which is simply not true.

In addition to granting a lengthy extension of time for compliance, the Compliance Plan grants PG&E too much discretion to determine how it will comply with the Commission's orders, particularly in view of the substantial body of public information that raises serious questions about how PG&E has used its discretion in the past.

3. The Penalty Adopted by the Stipulation Is Not Appropriate

Neither CPSD nor PG&E attempts to justify the penalty of \$3 million, with a potential for another \$3 million if PG&E does not comply with the extended deadline, as consistent with the guidelines established by the Commission for assessing penalties. The parties to the Stipulation provide little rationale beyond the broad discretion granted to the Commission by Public Utilities Code Sections 2107 and 2108. Nor do they explain how it is reasonable to assess a \$3 million penalty for the failure to comply on March 15 and then assess only another \$3 million if PG&E fails to comply with the five-month extension granted by the Compliance Plan. Assuming the first \$3 million was a reasonable penalty (which, as discussed below, it is not), in a rational scheme the failure to comply after a five-month extension should be met with a much larger penalty.

In a number of cases, the Commission has set forth factors that should be considered in determining the size of a penalty. The Commission considers the number of violations as well as

the magnitude of the offense, including whether it has caused physical harm, economic harm, or harm to the regulatory process. The Commission has noted that a high level of severity will be accorded to violations of statutory or Commission directives, including violations of reporting or compliance requirements. The Commission also considers the conduct of the utility, including actions taken by the utility to prevent, detect, and disclose violations. The Commission also considers the financial resources of the utility, including the need for deterrence and the constitutional limits on excessive fines. In all cases, the Commission also considers the totality of the circumstances, which includes the degree of wrongdoing and facts that tend to mitigate or exacerbate the degree of wrongdoing. Finally, the Commission will evaluate the harm from the perspective of the public interest. (See, e.g., D. 04-09-005, D. 98-12-075, pp. 51-61, D. 97-12-115.)

While the Commission threatened significant penalties when it issued the OSC³, the stipulation adopts penalties that are too small to provide an appropriate incentive for a company with PG&E's financial assets. PG&E's financial resources are vast. The Company's 2010 annual report states that it earned \$1.3 billion from its operations, a \$100 million increase from the previous year. A \$3 million penalty, even with the threat of another \$3 million in five months, cannot reasonably be considered a significant penalty to PG&E.

The Commission should also note that PG&E's willful non-compliance further undermines public confidence in the regulatory process. The March 15 report relied extensively upon historical MAOP despite the Commission's clear directives.⁴ Despite the fact that PG&E claims to have submitted this information to "provide added assurance that these MAOP had been properly set" PG&E's maps group pipelines with adequate records and historical MAOP together. If PG&E truly wanted to comply with the NTSB recommendations, then it should have separated these two categories. PG&E's March 15 filing was a clear violation of a Commission directive and should be met with a severe punishment.

PG&E's conduct in this instance does not mitigate its violation. In January, PG&E asked for an extension of time to February 1. The Commission granted the extension that PG&E requested. PG&E certainly knew before March 15 that it would have difficulty complying with the Commission order. At any time prior to March 15, it could have sought an additional

³ In its press announcement on March 16, 2011, the Commission stated that "multiple instances of wrongdoing could result in fines of \$1 million a day or more."

⁴ The March 16, 2011 letter from Paul Clanon makes this clear.

extension or explained these difficulties to the Commission. Instead, PG&E waited until March 15 to submit a document that failed to comply with the Commission's order. PG&E took no action to prevent this violation, detect this violation, or disclose and rectify the violation until after the Commission responded sternly to the March 15 report.

Given the context in which the Commission ordered the March 15 report—the tragic consequences of the San Bruno explosion and PG&E's inability to provide accurate records following that event—the Commission should find that PG&E's failure to comply on March 15 was a serious threat to public safety. Moreover, the Commission must take steps to ensure public confidence that the gas system is being operated safely.

4. The Stipulation Does Not Require Any Actual Safety Improvements

The hearing on March 28, 2011, made clear that PG&E has not completed any actual safety improvements in its gas pipeline system in the 7 months since the San Bruno explosion. (Reporter's Transcript (RT), p. 70, line 21- p.71 and pp. 112-114.) PG&E has also made clear that it is almost ready to begin testing and replacement of 152 miles of transmission pipelines in HCAs that may be most similar to the line that failed in San Bruno. In both its March 15 report and March 21 supplemental report and at the hearing, PG&E has stated it intends to take those actions. (*See, e.g.*, RT p. 9, lines 11-22 and pp. 163-164.)

If PG&E believes this testing and replacement program is the best way to ensure public safety, then it should take those steps now, unless there is some countervailing safety concern. Testimony at the hearing also suggested that there may be some disagreement between PG&E, the NTSB, and CPSD about the appropriateness of this work. (RT pp. 156-157 and p. 170, line 21 – p. 172.) The Commission and PG&E, in consultation with the appropriate federal authorities, should determine what steps are necessary and the Commission should require PG&E to implement now safety improvements it has admitted are necessary, rather than putting those off while it continues to search for records that it has already said it may not have.

5. Conclusion

The OSC noted that the most disturbing shortcoming of PG&E's March 15 report is that it did not respond to the NTSB's public safety concerns. While the OSC appropriately responds to this failing, the Stipulation and Compliance Plan do not. Rather than facilitating the expeditious completion of the "urgent" measures identified by the NTSB and the CPUC in

January, the Stipulation would provide PG&E another, even longer extension of time. In addition, the Stipulation adopts a penalty amount that seems to bear no relationship to the circumstances of this case. Most importantly, the Stipulation and Compliance Plan do not ensure the timely completion of any actual improvements to PG&E's gas pipelines.

The Commission should not approve the Stipulation unless it (i) requires PG&E to immediately take steps to protect public safety, (ii) adopts a schedule that ensures timely completion of urgent recommendations, and (iii) imposes a penalty structure that incentivizes PG&E's timely compliance.

Respectfully submitted,

Dated: April 8, 2011

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CERTIFICATE OF SERVICE

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

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

On April 8, 2011, I served **COMMENTS OF THE CITY AND COUNTY OF SAN FRANCISCO IN RESPONSE TO THE MOTIONS TO APPROVE THE "STIPULATION RE ORDER TO SHOW CAUSE"** by electronic mail on Proceeding R11-02-019.

The following addressees without an email address were served:

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

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

Executed April 8, 2011, at San Francisco, California.

/s/

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