

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA



FILED

04-13-11
04:59 PM

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

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

OPENING COMMENTS OF DISABILITY RIGHTS ADVOCATES

DISABILITY RIGHTS ADVOCATES
MELISSA W. KASNITZ
KEVIN KNESTRICK
2001 Center Street, Fourth Floor
Berkeley, California 94704-1204
Telephone: 510-665-8644
Fax: 510-665-8511
TTY: 510-665-8716
pucservice@dralegal.org

April 13, 2011

TABLE OF CONTENTS

I.	Introduction.....	1
II.	Overview.....	1
III.	Input On Proposed Immediate Changes To Commission Regulations (Attachment A to OIR and Additional Items In March 24 ACR).....	3
	A. Proposed New Rule 145 Re: Strength Test Requirements	4
	B. Proposed Revisions to Rule 122.2 Re: Reporting Requirements	4
	C. Proposed Revised Rule 125 Re: Installation Reports	5
	D. Proposed New Rule Requiring Inspection of Certain Types of Pipe.....	5
IV.	Input on Additional Items Under Consideration.....	5
	A. Installing Automatic or Remote Valves.....	6
	B. Strengthening Emergency Response Procedures.....	7
	C. Conducting a Comprehensive Catastrophic Risk Assessment, Including “Dig-In” Issues.....	7
	D. Enhancing Threat Mitigation Planning.....	8
	E. Adopting Rules for Enhanced Penalties for Life-Threatening Violations and Using Existing Enforcement Authority Earlier or More Aggressively for Safety-Related Violations	8
	F. Using Ratemaking Incentives to Enhance Safety	8
V.	The Scope of the Proceeding Should be Expanded to Include Direct Public Concerns	9
	A. The Scope of the Proceeding Should Be Expanded to Address Public Involvement with Emergency Preparation and Emergency Response	9
	B. The Scope of the Proceeding Should be Expanded To Address Other Customer Safety Issues	11
VI.	Procedural Issues	12
	A. DisabRA’s Interest in the Pending Proceeding.....	12
	B. The Proceeding is Properly Categorized as Ratesetting	13
	C. DisabRA Believes Hearings Will Be Necessary	14
	1. Evidentiary Hearings Will Likely Be Necessary	14

2.	Additional Opportunities for Public Input, Including Additional Public Participation Hearings, Will Be Necessary	14
VII.	Conclusion	15

I. INTRODUCTION

In accordance with Rule 6.2 of the Commission’s Rules of Practice and Procedure and the schedule set in the Order Instituting Rulemaking, as modified first by the Assigned Commissioner’s Ruling issued on March 24, 2011,¹ and subsequently by the additional Assigned Commissioner’s Ruling issued on April 7, 2011,² Disability Rights Advocates (“DisabRA”) submits these comments. In these comments, we address the issues identified for immediate consideration by the Commission (including those set forth in Attachment A to the OIR and the clarifications and additions set forth in the March 24 ACR); we briefly comment on the additional items raised in the OIR, including the items specifically identified for near-term consideration (Attachment B to the OIR); we raise additional items to be considered as part of the scope of this proceeding, and we address the procedural issues identified in the OIR.

II. OVERVIEW

The OIR initiating this proceeding identifies a number of primary objectives while it characterizes the rulemaking as “a forward-looking effort to establish a new model of natural gas pipeline safety regulation applicable to all California pipelines.”³ The various objectives are described in detail in the OIR and include public input, expert review, safety improvements, risk assessment, ratemaking incentives for safety, transparency, whistleblower protection, and disaster planning.⁴ As set forth in greater detail below, Disability Rights Advocates is participating in this proceeding in order to

¹ Assigned Commissioner’s Ruling Adding Items to Previously-Scheduled Comment Cycle, Addressing Ex Parte Contacts, Scheduling Public Participation Hearings, Setting Prehearing Conference and Encouraging Participation by Pipeline and Hazardous Materials Safety Administration, issued on March 24, 2011 (hereafter “March 24 ACR”).

² Assigned Commissioner’s Ruling Requesting Comment on Proposal from Congresswoman Speier, Adding Topic to Report from Pacific Gas and Electric Company, and Revising schedule for Filing Comments on Order Instituting Rulemaking, issued on April 7, 2011 (hereafter April 7 ACR”)

³ OIR at p. 1.

⁴ OIR at pp. 4-5.

protect the interests of people with disabilities, who are particularly vulnerable in emergency situations, and who also are disproportionately low income. People with disabilities are also present in every geographic community in California. Because of the specific factors defining this community, DisabRA is particularly interested in those aspects of this proceeding that address community safety, emergency preparation, public involvement and understanding of natural gas issues, and rate impacts.

In particular, DisabRA has a strong interest in supporting this Rulemaking's efforts to develop a "culture of safety" to enhance safe utility operations for PG&E and all other pipeline operators. The OIR rightly contemplates a number of mechanisms to move in this direction, including anticipated reliance on a number of sources of feedback regarding the San Bruno explosion, plans to align ratemaking reviews with support for safety, consideration of targeted "feedback loops" to ensure that safety spending is completed prudently and effectively, and an effort to seriously consider the challenges of aging infrastructure and deferred investment in the pipeline system.⁵

The catastrophic system failure that took place in San Bruno and the information coming to light in its wake illustrate the historic strains on the existing natural gas system, both physical and regulatory, that will need to be addressed in a broad way to improve conditions going forward. The Commission has conveyed to the public that this proceeding will be a forum for meaningful change and not an endorsement of business as usual. It must make good on this promise. For many years, PG&E has made substantial and ever-increasing profits while failing to upgrade and invest in safety and infrastructure. At the same time, rates for PG&E's residential customers have steadily increased, and the rates paid by low income and low use customers are about to take a

⁵ See generally OIR at pp. 11-13. DisabRA expects to actively participate in this proceeding concerning various safety issues, including those identified above as well as reviews of catastrophic risk assessment (see OIR at § 7) and dig-in issues (see OIR at § 7, noting that these threats are far more common than any catastrophic events such as the San Bruno explosion).

substantial leap,⁶ while the state economy remains in crisis and many people do not have the ability to pay more. To truly change business as usual, this proceeding will have to make an honest assessment about costs and sources of funding, along with safety and community impacts. In addition, it will have to truly provide an accounting, both of utility behavior and of the Commission's own actions, to the public, while enhancing public planning, increasing transparency, and ensuring that accurate information is available both about this Rulemaking and about its impacts on public safety. In proceedings before this Commission, public input is too often only given lip-service, and is ignored in actual policy-making. For people to have faith that the Commission can make change for the better at PG&E and other pipeline operators, as well as within its own culture, this proceeding will need to be more than a technical review and revision to rules that few people will ever read and even fewer understand. DisabRA hopes that the noble statements made by this Commission in describing its plans for this docket come to pass, and we intend to participate actively to support this effort.

III. INPUT ON PROPOSED IMMEDIATE CHANGES TO COMMISSION REGULATIONS (ATTACHMENT A TO OIR AND ADDITIONAL ITEMS IN MARCH 24 ACR)

In this first set of comments to be filed in this proceeding, the OIR and subsequent rulings request that the parties address in detail certain proposed rule changes that would go into effect promptly while the other items raised in the proceeding continue through the rulemaking process. These proposed rule changes were identified in Attachment A to the OIR, and expanded upon in the March 24 ACR. DisabRA does not have the technical expertise to address in detail these proposed rule changes. However, DisabRA notes the following general matters as relevant to the consideration of these immediate rule changes:

⁶ This is addressed in greater detail at § VI.C.2, below; briefly substantial rate increases seem likely based on the currently pending Proposed Decision and Proposed Alternate Decision now out for comment in A.10-03-014.

A. Proposed New Rule 145 Re: Strength Test Requirements

While DisabRA does not have the technical expertise to address the specific pipeline characteristics identified in proposed new Rule 145, it stands to reason that any pipeline characteristics identified as potential safety risks would be the same regardless of which operator is responsible for the pipeline. As such, any pipeline that meets any finally adopted list of characteristics determining potential safety risks should be treated the same. In order to achieve this, any adopted rule should be extended to all California pipeline operators and should not be limited only to PG&E.

B. Proposed Revisions to Rule 122.2 Re: Reporting Requirements

The proposed revisions to Rule 122.2 set forth in Attachment A to the OIR and clarified in the March 24 ACR⁷ would address reporting standards and requirements. The March 24 ACR notes specifically that the proposed modifications to Rule 122.2(a) would create two reporting standards for notifying the Commission regarding various incidents concerning gas pipelines: most incidents would need to be identified in written quarterly reports, while certain more severe incidents would be required to be reported almost immediately upon occurrence. The March 24 ACR then specifically asks parties to address reporting for incidents where pipeline pressures exceed MAOP by less than 10% (with new suggested language) and to suggest appropriate reporting protocols. The March 24 ACR further notes that the proposed language for Rule 122.2(d) would exempt certain incidents from reporting requirements if the condition is corrected before the deadline for filing a report.

Because the stated goals of this proceeding include increasing transparency in pipeline operations and enhancing public confidence in our pipeline system, pipeline operators, and the Commission itself, DisabRA believes that rules should provide for expansive and timely disclosure of pipeline incidents. Thus, DisabRA agrees with the

⁷ Attachment A to the OIR includes proposed changes to both § 122.2(a) and § 122.2(d) of G.O. 112-E; these provisions are treated separately in the March 24 OIR.

comments submitted early by the utility workers arguing that “transparency principles would suggest that these incidents – near misses where risk increased but damage did not ensue – be reported, be subjected to root cause analysis and result in actions to eliminate or mitigate the hazards identified.”⁸ DisabRA further agrees with the utility workers that immediate notification of any situation that may require an emergency response should be provided to potentially affected agencies so that response efforts can be initiated and coordinated.⁹

C. Proposed Revised Rule 125 Re: Installation Reports

DisabRA has no comments on proposed revised Rule 125.

D. Proposed New Rule Requiring Inspection of Certain Types of Pipe

While DisabRA does not have the technical expertise to assess the specific proposals set forth in the March 24 ACR and determine whether they would be effective to negate any existing incentive to increase natural gas pipeline pressure to MAOP for certain types of pipe, DisabRA strongly supports the intent of this provision. While no conclusions have yet been reached, it is clear from information provided to the public that PG&E’s past practice of spiking the pressure on certain gas lines, including the line in San Bruno that ruptured on September 9, 2010, is a cause of grave concern. The Commission should take all appropriate steps to reduce the incentives that any pipeline operators may perceive from increasing pressure beyond that required to safely and effectively serve their customers.

IV. INPUT ON ADDITIONAL ITEMS UNDER CONSIDERATION

In addition to the proposed rule changes issued for immediate comment and action, the OIR also sets forth a list of topics that are under consideration for development of additional rules to be implemented in the near term and identifies issues

⁸ Response of the Utility Workers Union of America (UWUA), Locals 132, 483, 522, Representing Employees at Southern California Gas Company, to R.11-02-019, Gas Safety Rulemaking (Worker Comments), filed on April 11, 2011, at p. 12.

⁹ *Id.* at pp. 12-13.

to be addressed in the context of these proposed topics for rulemaking.¹⁰ The specific topics to be considered for additional rulemaking are set forth in Attachment B to the OIR. In addition, the OIR identifies a number of questions and issues that will inform the development of additional Commission action, including questions concerning the Commission's use of enhanced penalties for life-threatening violations and the Commission's use of its existing enforcement authority as a means to address safety-related violations.¹¹ Further, the OIR raises issues of its ratemaking authority as a way to provide incentives for prudent utility operations.¹²

While the OIR does not specifically ask parties to address these topics at this time, DisabRA is using these comments as an opportunity to flesh out some of these items and the surrounding issues, and to identify nuances that should be given consideration as the process moves forward.

A. Installing Automatic or Remote Valves

DisabRA supports development of a rule that would require utilities to install automatic or remotely controlled valves located in appropriate areas. This is an important factor to improve community safety. Information provided to the public since the San Bruno explosion indicates that PG&E has resisted installing automatic or remote valves due to its belief that the damage from a pipeline incident would take place immediately, not over time. The events in San Bruno show this to be untrue: people were injured and homes were destroyed while first responders were unable to approach the disaster due to ongoing fires fueled by natural gas which was not shut off until long after the initial explosion. As noted above, the constituency represented by DisabRA is particularly at risk during emergency situations because people with disabilities are more likely than average to need assistance and they are more difficult to reach using standard forms of

¹⁰ OIR at pp. 7-10.

¹¹ OIR at pp. 8-9.

¹² OIR at pp. 11-13.

communication. Because of this, it is important to the disability community that all appropriate steps be taken to minimize risk of ongoing disasters such as that in San Bruno by installing automatic or remote shut-off valves.

B. Strengthening Emergency Response Procedures

DisabRA supports development of a rule that would improve the existing, non-specific requirements for incident responses that are “prompt and effective.” Such a rule will need to take into account the most effective ways of reaching different communities and different individuals within communities who may not be easy to reach with either assistance or information. Additionally, such a rule will need to take into account the various levels of need within a community that must be met in order to provide an effective response. Some specific concerns about how to promptly and effectively provide information and assistance to people with disabilities are addressed below as additional issues that should be considered within the scope of this proceeding.

C. Conducting a Comprehensive Catastrophic Risk Assessment, Including “Dig-In” Issues

DisabRA supports the use of this Rulemaking to initiate a comprehensive catastrophic risk assessment process for all natural gas pipelines, and to address in a broad way concerns due to aging infrastructure and lack of understanding about the system as it exists today. This marks a key commitment to addressing overall safety concerns that the public may face. In particular, DisabRA supports the use of this proceeding to reduce risks of safety hazards such as those created by “dig-in” damage to pipelines, which are much more common than catastrophic failure.

While the overall hazards of excavation damage are less grave for any individual incident than those of a catastrophic event, the overall risk of harm to individuals and property is likely greater from a small occurrence. Thus, DisabRA supports efforts to improve procedures to reduce these risks, including incorporating the one-call law into the Commission’s general orders and requiring accurate markings by pipeline operators. DisabRA also supports enhanced public education targeting anyone who might be

conducting excavation activities (including homeowners) of the need to identify subsurface facilities before any excavation takes place, including efforts to ensure that educational materials are provided in appropriate formats for people who cannot use standard print materials or materials in English.

D. Enhancing Threat Mitigation Planning

DisabRA supports development of a rule that would improve planning to address mitigation efforts in response to pipeline threats. In particular, DisabRA believes that disclosure of detailed mitigation techniques furthers development of a heightened culture of safety and improved oversight. Additionally, DisabRA supports threat mitigation based on additional response training and drills, and additional inspection and maintenance programs.

E. Adopting Rules for Enhanced Penalties for Life-Threatening Violations and Using Existing Enforcement Authority Earlier or More Aggressively for Safety-Related Violations

DisabRA supports development of rules to apply enhanced penalties to utilities if life-threatening violations are found and use of existing authority earlier or more aggressively for safety-related violations. Together, these actions would provide important incentives to pipeline operators to prioritize safety and enhance development of a culture of safety. In addition, such actions would help restore public confidence in Commission oversight of regulated activities. Based on the public response in the wake of the San Bruno disaster, it is clear that a substantial number of people believe that the Commission is unwilling or unable to strongly discipline regulated utilities, even in the face of clear system failures. By developing and applying rules that include strong penalties for actions harming public safety, this perception will be reduced, and regulatory authority over regulated utilities will be reinforced.

F. Using Ratemaking Incentives to Enhance Safety

The OIR properly raises the issue of using the Commission's ratemaking authority to support a culture of commitment to safe utility operations, including targeted

responses to PG&E in light of San Bruno as well as broader concerns about increased investment in utility infrastructure.¹³ DisabRA supports all efforts to ensure that ratepayers are not unduly burdened because of past failures by PG&E or any other pipeline operator to maintain adequate safety measures. To this end, DisabRA believes that the proposal put forward by the utility workers in their early filing is a good start in balancing responsibility.¹⁴ DisabRA also recognizes the current pressures on residential customers who face substantial utility affordability issues even before any additional expenditures on infrastructure are addressed. DisabRA expects to be actively involved in discussions of rate impacts of infrastructure improvements and the need to ensure that ratepayers (particularly vulnerable ratepayers) are not inappropriately obligated to pay for necessary upgrades to the pipeline system. This is particularly true in light of a long pattern of deferred infrastructure upgrades, even during times of increasing record profits among utilities.

V. THE SCOPE OF THE PROCEEDING SHOULD BE EXPANDED TO INCLUDE DIRECT PUBLIC CONCERNS

Section 13.2 of the OIR invites parties to identify additional substantive issues “that should be included in the scope of this proceeding but are not stated in this order.”¹⁵ DisabRA suggests expanding the scope to include the following two issues of direct concern to the public.

A. The Scope of the Proceeding Should Be Expanded to Address Public Involvement with Emergency Preparation and Emergency Response

DisabRA recommends that the scope of the proceeding be expanded to include emergency preparation and emergency response planning involving the public, including those members of the public that are difficult to reach. The OIR identifies as one of its

¹³ OIR at pp. 11-13.

¹⁴ See Workers Comments at pp. 17-19 (arguing that “the commission should prevent ratepayers from directly or indirectly subsidizing unreasonable or imprudent actions by gas corporations” and providing specific examples of potential past problematic behavior).

¹⁵ OIR at p.16

primary objectives the need to “expand our emergency and disaster planning coordination with local officials.”¹⁶ While DisabRA strongly supports enhanced preparation and coordination between pipeline operators and local emergency authorities, we also believe that it is vital for the public to be directly educated about pipeline safety before any specific incident occurs, and for both pipeline operators and local emergency responders to have a plan for communicating directly to the public during an emergency. The Commission should expand the scope of this proceeding to develop mechanisms to require pipeline operators to engage in appropriate education and preparation for emergency communication with the public; it should also consider methods to encourage coordination on these issues between pipeline operators and local authorities.

In an emergency situation, members of the public should be prepared to take steps to maximize their own safety even before local first responders are able to take action. This means that emergency planning prior to any actual incident must routinely involve members of the public, and public education about pipeline safety must be ongoing. Pipeline operators and first responders must develop plans to provide emergency information to the public as a vital part of their safety efforts, not as an afterthought. In addition, specific plans must be developed and implemented to ensure that safety education is provided to those members of the public who are difficult to reach.

One example of enhanced emergency preparation would involve maximizing the likelihood of effective communication at the time of an incident with people who are difficult to reach through standard channels, such as people who are blind or deaf.¹⁷ DisabRA is aware that many local governments and other local emergency responders maintain databases that contain information regarding the most effective way to reach

¹⁶ OIR at p. 5, *see also* OIR at p. 15.

¹⁷ DisabRA also notes the need to effectively develop and implement a plan to educate people who do not speak English as their primary language. While DisabRA has no specific recommendations for reaching these populations, it is self-evident from any review of demographic information in the state that emergency planning in English only is not sufficient.

people in an emergency situation Similarly, in response to agreements reached between each of IOUs and DisabRA, the utilities have begun to collect information on the most effective way to reach certain customers, including those on the Medical Baseline program and other customers with disabilities.¹⁸

These sources of information provide a starting point for targeting appropriate educational materials to a difficult-to-reach population. In addition, they provide instructions for effective emergency communications; by using a customer's preferred means of communication in an emergency situation, both pipeline operators and local emergency personnel improve the likelihood that the customer will receive the information and act accordingly to protect his or her own safety. Thus, one example of a safety enhancement that the Commission should consider would be to encourage pipeline operators and local emergency personal to develop protocols to share information about customer communication preferences and to ensure their use when emergency information is provided.

B. The Scope of the Proceeding Should be Expanded To Address Other Customer Safety Issues

In addition to the risks to public safety stemming from catastrophic incidents such as San Bruno, the OIR makes clear that it wants to evaluate and respond to less sensational, but no less real threats to pipeline integrity and public safety. In order to best evaluate areas for improvement, this proceeding should address other customer safety

¹⁸ PG&E has agreed to "conduct outreach in the form of a targeted mailing to current medical baseline/life support customers to identify those customers who would prefer alternative means of contact...PG&E agrees to revise its process for customer enrollment in the emergency notification program to allow new medical baseline/life support customers to specify their preferred means of contact for emergency notifications at the time of enrollment." Memorandum of Understanding between Disability Rights Advocates and Pacific Gas and Electric Company, in A.09-12-020, currently submitted and pending approval by the Commission, at §§ VII(E)(1)-(2). The Sempra Utilities have agreed to conduct outreach to customers classified as medical baseline/life support customers...to determine their preferred means of contact." Memorandum of Understanding between Disability Rights Advocates, San Diego Gas & Electric Company and Southern California Gas Company, adopted in A.06-12-009 and A.06-12-010 via D.08-07-046, at § 5.1. Southern California Edison, which does not operate any gas pipelines, has a similar agreement in place for emergency communications. Memorandum of Understanding between Disability Rights Advocates and Southern California Edison, adopted in A.07-11-011 via D.09-03-025, at §§ 6.1, 6.2.

issues such as responses to customer complaints about leaks or hazards, responses to customer requests for repairs, pilot relights and other customer service calls, and any additional service work that might involve hazards in customer premises.

VI. PROCEDURAL ISSUES

As requested at § 13.2 of the OIR, DisabRA addresses certain procedural issues concerning this docket.

A. DisabRA's Interest in the Pending Proceeding

Disability Rights Advocates has routinely intervened in proceedings before the Commission that directly affect our constituency, which consists of disabled utility customers throughout California. This proceeding will directly impact all Californians in multiple ways, including the most important consideration of public safety as well as the concerns, noted in multiple places in the OIR regarding the costs of necessary infrastructure improvements. While all consumers are impacted by these issues, and DisabRA looks forward to broad consumer participation in this docket, Californians with disabilities have particular concerns and interests that require direct consideration.

First, Californians with disabilities are particularly vulnerable to safety hazards stemming from unsafe pipeline infrastructure. This is because people with disabilities are more likely than the average utility customer to require assistance in an emergency, and evacuations are both more difficult and more risky for many of these customers. These customers have a direct interest in ensuring that hazards are minimized and that the gas pipeline system is operated safely. As described above, customers with disabilities that affect their ability to use standard forms of communications (primarily vision and hearing disabilities) are also more difficult to reach with information about safety risks, emergency plans, or other public safety materials. The needs of these customers must be given particular attention when developing improved emergency planning.

Second, people with disabilities are disproportionately low-income, and thus are at risk of seeing their already high energy burden¹⁹ skyrocket further if too much of the costs of safety improvements are allocated to ratepayers. PG&E's disabled customers are likely facing substantial rate increases in the near term, as PG&E's pending residential rate design application (A.10-03-014) appears likely to impose substantial new costs on low-income and low-use customers.²⁰ Customers of the other major IOUs that control natural gas distribution, the Southern California Gas Company and San Diego Gas and Electric Company, also face substantial potential rate increases if the proposed revenue requirements requested from these utilities are adopted in their pending consolidated general rate case applications.²¹ If these rate increases are then followed by substantial additional increases in order to improve pipeline safety, many people with disabilities (as well as other low income utility customers) are likely to simply be unable to afford necessary energy use to support health and safety. As described above, the Commission must be alert to the risks that over-reliance on ratepayer funding will create for these customers.

B. The Proceeding is Properly Categorized as Ratesetting

DisabRA believes that this proceeding is appropriately classified as ratesetting.

¹⁹ See "Final Report on Phase 2 Low Income Needs Assessment," Prepared by KEMA, Inc. for the California Public Utilities Commission, September 7, 2007, at p. 5-15, Table 5-10 (stating that 56% of households including a person with a disability fall into the "high energy burden category" because these households spend more than 5% of their income on energy).

²⁰ At this time, both a Proposed Decision and an Alternate Proposed Decision on the PG&E Application have been released, and comments are due on April 25, 2011. This item will likely appear for a vote before the full Commission a short time after the comment cycle is complete. Both the proposed decision and the alternate would adopt various changes to PG&E's residential rate design that will substantially increase costs to low-use and low-income customers, including changes in the baseline allocation, the addition of a third tier for CARE customers, and a reduction in the price differential between tier 3 and tier 4 for non-CARE customers. The alternate decision would also impose a new customer charge on all customers.

²¹ See A.10-12-005/A.10-12-006 (consolidated). In its protest to the applications, DRA calculates that residential gas rates would increase by 7.7% for SCG customers and 6.7% for SDG&E customers (who would also see an increase of 4.5% in electricity rates) if the entire revenue request is adopted and current allocation formulas remain in place. Protest of the Division of Ratepayer Advocates, filed January 18, 2011, at p. 3.

C. DisabRA Believes Hearings Will Be Necessary

1. Evidentiary Hearings Will Likely Be Necessary

Given the broad range of issues identified in the OIR and the expectation that additional issues will be identified by parties prior to the issuance of a formal scoping memo, it is not possible at this time to identify the specific evidentiary issues that will require hearings. However, DisabRA expects that there will be multiple areas of factual dispute, including disputes regarding the use of ratemaking authority to appropriately address safety investments²² and the consideration of enhanced penalties or other increased scope of enforcement for various violations.²³ More issues of factual dispute will likely arise as the scope of the proceeding develops.

2. Additional Opportunities for Public Input, Including Additional Public Participation Hearings, Will Be Necessary

In addition to the need for evidentiary hearings, DisabRA believes that additional opportunities for public input will be crucial if this proceeding is to succeed in its goal of culture change for the utilities and for the Commission itself.²⁴ As an established practitioner before the Commission, DisabRA recognizes how easy it is for people absorbed in the area of utility regulation to become focused on arcane terminology and procedural minutia, and to dismiss the concerns of the general public as unsophisticated or otherwise unworthy of consideration. The public participation hearings that do take place in various proceedings often fail to effectively provide the public with information about the specifics under consideration by regulated utilities or the Commission, and the results of these hearings are rarely even addressed by the Commission in their policy-

²² See OIR at pp. 11-13; in particular, DisabRA expects PG&E and other pipeline operators to contest any effort to reduce rate of return on plant investments or impose cost-sharing requirements on shareholders.

²³ The OIR identifies the issue of increased enforcement authority as something that will be developed over the course of the proceeding, though it is not addressed in detail in this initial document. See the list of issues that are preliminarily identified at page 8 of the OIR.

²⁴ At this time, one public hearing has been held in San Bruno and additional hearings are scheduled shortly in Santa Rosa and Los Angeles. There has been no discussion of further opportunities for public input.

making decisions.²⁵ For this proceeding to meet one of its primary objectives of enhancing public trust in both the regulated utilities and the regulatory process, its processes for collecting public input and its response to such input both need substantial improvement.

VII. CONCLUSION

DisabRA respectfully requests that the Commission move forward in the proceeding in accordance with the proposals set forth above. In doing so, the Commission would demonstrate its intent to meaningfully address pipeline safety throughout the natural gas transmission and distribution systems in California as well as its intent to initiate culture change for pipeline operators and for itself.

Signed: April 13, 2011

Respectfully Submitted,

_____/s/
MELISSA W. KASNITZ
KEVIN KNESTRICK
Disability Rights Advocates
2001 Center Street, Fourth Floor
Berkeley, CA 94704

²⁵ To provide just two recent examples, public participation hearings were held in PG&E's residential rate design proceeding (Phase 2 of its pending general rate case), A.10-03-014. While the public was given assurances that input provided at these hearings would be taken into account by the Commission in its final decision, neither the proposed decision nor the alternate decision now pending address public input at all, and the testimony provided by DisabRA at hearing which incorporated this public input was attacked as "unverified". Similarly, in recently-concluded public participation hearings regarding the definition of basic telephone service at issue in R.09-06-019, the information put out to the public to invite their input was virtually indecipherable to those who are not well-versed in telecommunications jargon, and the "explanations" provided at the beginning of each hearing did little to clarify the issues. If these examples of public input represent the limit of what the Commission will pursue in this proceeding, there is little hope that any final action taken will change the distrust that much of the public feels for both the IOUs and the Commission at this time.

CERTIFICATE OF SERVICE

I certify that I have, by electronic mail to the parties to which an electronic mail address has been provided, served a true copy of “Opening Comments of Disability Rights Advocates” on all known parties to R.11-02-019

Dated April 13, 2011, at Berkeley, California.

_____/s/_____

Raziya Brumfield

Service List

STEPHANIE C. CHEN
ATTORNEY
THE GREENLINING INSTITUTE
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: THE GREENLINING INSTITUTE

WILLIAM H. SCHMIDT, JR
LODI GAS STORAGE, LLC
FIVE TEK PARK
9999 HAMILTON BOULEVARD
BREINIGSVILLE, PA 18031
FOR: LODI GAS STORAGE, LLC

STEPHEN CITTADINE
CENTRAL VALLEY GAS STORAGE, LLC
3333 WARRENVILLE ROAD, STE. 630
LISLE, IL 60532
FOR: CENTRAL VALLEY GAS STORAGE, LLC

JUSTIN LEE BROWN
ASSIST COUNSEL - LEGAL
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150-0002
FOR: SOUTHWEST GAS CORPORATION

SHARON L. TOMKINS
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, SUITE 1400
LOS ANGELES, CA 90013-1034
FOR: SAN DIEGO GAS & ELECTRIC
COMPANY/SOUTHERN CALIFORNIA GAS COMPANY

NORMAN A. PEDERSEN
ATTORNEY AT LAW
HANNA & MORTON
444 S. FLOWER STREET, SUITE 1500
LOS ANGELES, CA 90071
FOR: SOUTHERN CALIFORNIA GENERATION
COALITION

BOB GORHAM
DIVISION CHIEF -PIPELINE SAFETY DIVISION
CALIFORNIA STATE FIRE MARSHALL
3950 PARAMOUNT BLVD., NO. 210
LAKEWOOD, CA 90712
FOR: CALIFORNIA STATE FIRE MARSHALL -
SAFETY DIVISION

DOUGLAS PORTER
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
FOR: SO. CALIF. EDISON CO. (CATALINA
ISLAND)

CONNIE JACKSON
CITY MANAGER
CITY OF SAN BRUNO
567 EL CAMINO REAL
SAN BRUNO, CA 94066-4299
FOR: CITY OF SAN BRUNO

RACHAEL E. KOSS
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080
FOR: COALITION OF CALIFORNIA UTILITY
EMPLOYEES

GREGORY HEIDEN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5039
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: CPSD

MARION PELEO
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

AUSTIN M. YANG
CITY AND COUNTY OF SAN FRANCISCO
OFFICE OF THE CITY ATTORNEY, RM. 234
1 DR. CARLTON B. GODDLETT PLACE
SAN FRANCISCO, CA 94102-4682
FOR: CITY AND COUNTY OF SAN FRANCISCO

MARCEL HAWIGER
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104
FOR: THE UTILITY REFORM NETWORK

CHRISTOPHER P. JOHNS
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

JONATHAN D. PENDLETON
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

JOSEPH M. MALKIN
ATTORNEY AT LAW
ORRICK, HERRINGTON & SUTCLIFFE LLP
405 HOWARD STREET
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

STEVEN GARBER
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

WILLIAM V. MANHEIM
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B30A
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

BRIAN K. CHERRY
VP - REGULATORY RELATIONS
PACIFIC GAS & ELECTRIC COMPANY
77 BEALE ST., MC B10C, PO BOX 770000
SAN FRANCISCO, CA 94177
FOR: PACIFIC GAS AND ELECTRIC COMPANY

STEVEN R. MEYERS
PRINCIPAL
MEYERS NAVE
555 12TH STREET, STE. 1500
OAKLAND, CA 94607
FOR: CITY OF SAN BRUNO

MELISSA A. KASNITZ
ATTORNEY AT LAW
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, FOURTH FLOOR
BERKELEY, CA 94704-1204
FOR: (DISABRA) DISABILITY RIGHTS
ADVOCATES

BARRY F. MCCARTHY
ATTORNEY
MCCARTHY & BERLIN, LLP
100 W. SAN FERNANDO ST., SUITE 501
SAN JOSE, CA 95113
FOR: NORTHERN CALIFORNIA GENERATION
COALITION (NCGC)

MIKE LAMOND
CHIEF FINANCIAL OFFICER
ALPINE NATURAL GAS OPERATING CO. #1 LLC
PO BOX 550, 15 ST. ANDREWS ROAD
VALLEY SPRINGS, CA 95252
FOR: ALPINE NATURAL GAS

DAN L. CARROLL
ATTORNEY AT LAW
DOWNEY BRAND, LLP
621 CAPITOL MALL, 18TH FLOOR
SACRAMENTO, CA 95814
FOR: LODI GAS STORAGE, LLC

TRANSMISSION EVALUATION UNIT
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-46
SACRAMENTO, CA 95814-5512
FOR: CALIFORNIA ENERGY COMMISSION

RAYMOND J. CZAHAR
CHIEF FINANCIAL OFFICER
WEST COAST GAS CO., INC.
9203 BEATTY DR.
SACRAMENTO, CA 95826-9702
FOR: WEST COAST GAS COMPANY, INC.

WILLIAM W. WESTERFIELD III
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S ST., MS B406 / PO BOX 15830
SACRAMENTO, CA 95852-1830
FOR: SACRAMENTO MUNICIPAL UTILITY
DISTRICT

ALFRED F. JAHNS
LAW OFFICE ALFRED F. JAHNS
3620 AMERICAN RIVER DRIVE, SUITE 105
SACRAMENTO, CA 95864
FOR: SACRAMENTO NATURAL GAS STORAGE, LLC

RICHARD DANIEL
GILL RANCH STORAGE, LLC
220 NW SECOND AVENUE
PORTLAND, OR 97209
FOR: GILL RANCH STORAGE, LLC

JASON A. DUBCHAK
WILD GOOSE STORAGE LLC
607 8TH AVENUE S.W., SUITE 400
CALGARY, AB T2P OA7
CANADA
FOR: WILD GOOSE STORAGE, LLC

ANTHEA LEE
PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000

CLEO ZAGREAN
MACQUARIE CAPITAL (USA)
EMAIL ONLY
EMAIL ONLY, NY 00000

ENRIQUE GALLARDO
THE GREENLINING INSTITUTE
EMAIL ONLY
EMAIL ONLY, CA 00000

GRANT KOLLING
CITY OF PALO ALTO
EMAIL ONLY
EMAIL ONLY, CA 00000

GREG CLARK
COMPLIANCE MGR.
LODI GAS STORAGE, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

JAMES J. HECKLER
LEVIN CAPITAL STRATEGIES
EMAIL ONLY
EMAIL ONLY, NY 00000

KARLA DAILEY
CITY OF PALO ALTO
EMAIL ONLY
EMAIL ONLY, CA 00000

RAY WELCH
ASSOCIATE DIRECTOR
NAVIGANT CONSULTING, INC.
EMAIL ONLY
EMAIL ONLY, CA 00000

ROBERT RUSSELL
LODI GAS STORAGE, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

SCOTT COLLIER
LODI GAS STORAGE, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000

MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

BILL BOYCE
SACRAMENTO MUNICIPAL UTILITY DISTRICT
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

CARL WOOD
UTILITY WORKERS UNION OF AMERICA
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

ANDREW GAY
ARC ASSET MANAGEMENT, LTD
237 PARK AVENUE, 9TH FLOOR
NEW YORK, NY 10017

DANIEL J. BRINK
COUNSEL
EXXON MOBIL CORP.
800 BELL ST., RM. 3497-0
HOUSTON, TX 77002

KRISTINA M. CASTRENCE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B10A
SAN FRANCISCO, CA 84105

CHRISTY BERGER
MGR - STATE REG AFFAIRS
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150-0002

JIM MATHEWS
ADMIN - COMPLIANCE - ENGINEERING
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150-0002

PRISCILLA CASTILLO
LOS ANGELES DEPT OF WATER & POWER
111 NORTH HOPE ST., RM. 340
LOS ANGELES, CA 90012

ROBERT L. PETTINATO
LOS ANGELES DEPT. OF WATER & POWER
111 NORTH HOPE ST., RM. 1150
LOS ANGELES, CA 90012

GREG HEALY
SOUTHERN CALIFORNIA GAS COMPANY
555 W. FIFTH ST., GT14D6
LOS ANGELES, CA 90013

JEFFREY L. SALAZAR
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, GT14D6
LOS ANGELES, CA 90013

NADIA AFTAB
SOCALGAS/SDG&E
555 W. FIFTH STREET (GT14D6)
LOS ANGELES, CA 90013

RONALD S. CAVALLERI

DEANA NG

SOUTHERN CALIFORNIA GAS COMPANY
555 W. FIFTH STREET, GT14D6
LOS ANGELES, CA 90013-1011

SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, SUITE 1400
LOS ANGELES, CA 90013-1034

RASHA PRINCE
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST 5TH STREET, GT14D6
LOS ANGELES, CA 90013-1034

JORGE CORRALEJO
CHAIRMAN / PRESIDENT
LAT. BUS. CHAMBER OF GREATER L.A.
634 S. SPRING STREET, STE 600
LOS ANGELES, CA 90014
FOR: LATINO BUSINESS CHAMBER OF GREATER
LOS ANGELES

GREGORY KLATT
DOUGLASS & LIDDELL
411 E. HUNTINGTON DR., NO. 107-356
ARCADIA, CA 91006

DANIEL W. DOUGLASS
DOUGLASS & LIDDELL
21700 OXNARD ST., STE. 1030
WOODLAND HILLS, CA 91367
FOR: TRANSWESTERN PIPELINE COMPANY

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, PO BOX 800
ROSEMEAD, CA 91770

GLORIA ING
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

JANET COMBS
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

ROBERT F. LEMOINE
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. SUITE 346L
ROSEMEAD, CA 91770

JOHN W. LESLIE
LUCE FORWARD HAMILTON & SCRIPPS LLP
600 WEST BROADWAY, SUITE 2600
SAN DIEGO, CA 92101

MARCIE A. MILNER
SHELL ENERGY NORTH AMERICA (US), L.P.
4445 EASTGATE MALL, STE. 100
SAN DIEGO, CA 92121

CENTRAL FILES
SDG&E AND SOCALGAS
8330 CENTURY PARK COURT, CP31-E
SAN DIEGO, CA 92123-1550

JASON HUNTER
RIVERSIDE PUBLIC UTILITIES
3435 14TH STREET
RIVERSIDE, CA 92501

LAURA SEMIK
PO BOX 1107
BELMONT, CA 94002

FAITH BAUTISTA
PRESIDENT
NATIONAL ASIAN AMERICAN COALITION
1758 EL CAMINO REAL
SAN BRUNO, CA 94066
FOR: NATIONAL ASIAN AMERICAN COALITION

GEOFF CALDWELL
POLICE SERGEANT - POLICE DEPT.
CITY OF SAN BRUNO
567 EL CAMINO REAL
SAN BRUNO, CA 94066-4299

KLARA A. FABRY
DIR. - DEPT. OF PUBLIC SERVICES
CITY OF SAN BRUNO
567 EL CAMINO REAL
SAN BRUNO, CA 94066-4299
FOR: CITY OF SAN BRUNO

ROCHELLE ALEXANDER
445 VALVERDE DRIVE
SOUTH SAN FRANCISCO, CA 94080

MARC D. JOSEPH
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080-7037

JOE COMO
CALIF PUBLIC UTILITIES COMMISSION

THERESA L. MUELLER
CITY AND COUNTY OF SAN FRANCISCO

DRA - ADMINISTRATIVE BRANCH
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

CITY HALL, ROOM 234
1 DR. CARLTON B. GOODLETT PLACE
SAN FRANCISCO, CA 94102-4682

ROBERT FINKELSTEIN
LEGAL DIRECTOR
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104

DAREN CHAN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B10C
SAN FRANCISCO, CA 94105

KAREN TERRANOVA
ALCANTAR & KAHL
33 NEW MONTGOMERY ST., STE. 1850
SAN FRANCISCO, CA 94105

KERRY C. KLEIN
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B30A
SAN FRANCISCO, CA 94105

SEEMA SRINIVASAN
ALCANTAR & KAHL
33 NEW MONTGOMERY ST., SUITE 1850
SAN FRANCISCO, CA 94105

BRIAN T. CRAGG
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

JEANNE B. ARMSTRONG
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: WILD GOOSE STORAGE,, LLC

MARTIN A. MATTES
COUNSEL
NOSSAMAN, LLP
50 CALIFORNIA STREET, 34TH FLOOR
SAN FRANCISCO, CA 94111-4799

AARON J. LEWIS
UC-HASTINGS COLLEGE OF LAW
721 BAKER STREET
SAN FRANCISCO, CA 94115

CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST. STE 303
SAN FRANCISCO, CA 94117-2242

ROBERT GNAIZDA
OF COUNSEL
200 29TH STREET, NO. 1
SAN FRANCISCO, CA 94131

ALLIE MCMAHON
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, RM. 1056
SAN FRANCISCO, CA 94177

JANET LIU
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000; MC B9A
SAN FRANCISCO, CA 94177

SUSAN DURBIN
CALIFORNIA STATE DEPARTMENT OF JUSTICE
1300 I STREET, PO BOX 944255
SACRAMENTO, CA 94244-2550

MICHAEL ROCHMAN
MANAGING DIRECTOR
SPURR
1850 GATEWAY BLVD., SUITE 235
CONCORD, CA 94520

LAURENCE L. GEORGE
RELIABILITY ENGINEER / STATISTICIAN
1573 ROSELLI DRIVE
LIVERMORE, CA 94550

BRITT STROTTMAN
ATTORNEY AT LAW
MEYERS NAVE
555 12TH STREET, STE. 1500
OAKLAND, CA 94607
FOR: CITY OF SAN BRUNO

LEN CANTY
CHAIRMAN
BLACK ECONOMIC COUNCIL
484 LAKEPARK AVE. SUITE 338
OAKLAND, CA 94610
FOR: BLACK ECONOMIC COUNCIL

DAVID MARCUS
ADAMS BROADWELL & JOSEPH
PO BOX 1287
BERKELEY, CA 94701-1287

THOMAS BEACH
CROSSBORDER ENERGY
2560 9TH ST., SUITE 213A
BERKELEY, CA 94710-2557

MICHAEL E. BOYD
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
5439 SOQUEL DRIVE
SOQUEL, CA 95073
FOR: CALIFORNIANS FOR RENEWABLE ENERGY,
INC.

TIMOTHY TUTT
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET, MS B404 / PO BOX 15830
SACRAMENTO, CA 95817

CATHERINE M. ELDER
ASPEN ENVIRONMENT GROUP
8801 FOLSOM BLVD., SUITE 290
SACRAMENTO, CA 95826

ANN L. TROWBRIDGE
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, SUITE 205
SACRAMENTO, CA 95864

DIANA S. GENASCI
ATTORNEY AT LAW
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, STE. 205
SACRAMENTO, CA 95864

MIKE CADE
ALCANTAR & KAHL, LLP
1300 SW 5TH AVE, SUITE 1750
PORTLAND, OR 97201

AIMEE CAUGUIRAN
CALIF PUBLIC UTILITIES COMMISSION
SAFETY & RELIABILITY BRANCH
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANGELA K. MINKIN
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5017
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ELIZABETH M. MCQUILLAN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

EUGENE CADENASSO
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JONATHAN J. REIGER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5035
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOYCE ALFTON
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JULIE HALLIGAN
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
ROOM 2203
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KELLY C. LEE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARIBETH A. BUSHEY
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5018
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MATTHEW TISDALE
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5303
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PAUL A. PENNEY
CALIF PUBLIC UTILITIES COMMISSION
SAFETY & RELIABILITY BRANCH
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PEARLIE SABINO
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT M. POCTA
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JANILL RICHARDS
DEPUTY ATTORNEY GENERAL
CALIFORNIA ATTORNEY GENERAL'S OFFICE
1515 CLAY STREET, 20TH FLOOR
OAKLAND, CA 94702
FOR: DEPARTMENT OF JUSTICE

GEOFFREY LESH
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-46
SACRAMENTO, CA 95814

ROBERT KENNEDY
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-20
SACRAMENTO, CA 95814

StephanieC@greenlining.org
wschmidt@buckeye.com
scittad@nicor.com
justin.brown@swgas.com
STomkins@semprautilities.com
npedersen@hanmor.com
bob.gorham@fire.ca.gov
douglas.porter@sce.com
cjackson@sanbruno.ca.gov
rkoss@adamsbroadwell.com
gxh@cpuc.ca.gov
map@cpuc.ca.gov
austin.yang@sfgov.org
marcel@turn.org
cpj@pge.com
j1pc@pge.com
jmalkin@orrick.com
wvm3@pge.com
bkc7@pge.com
smeyers@meyersnave.com
pucservice@dralegal.org
bmcc@mccarthyllaw.com
Mike@alpinenaturalgas.com
dcarroll@downeybrand.com
westgas@aol.com
wwester@smud.org
ajahns@jahnsatlaw.com
jason.dubchak@niskags.com
AGL9@pge.com
cleo.zagrean@macquarie.com
enriqueg@greenlining.org
grant.kolling@cityofpaloalto.org
gclark@lodistorage.com
jheckler@levincap.com
karla.Dailey@CityofPaloAlto.org
ray.welch@navigantconsulting.com
russell@lodistorage.com
tcollier@buckeye.com
regrelcpuccases@pge.com
mrw@mrwassoc.com

bboyce@smud.org
carl.wood@verizon.net
andrewgay@arcassetltd.com
daniel.j.brink@exxonmobil.com
kmmj@pge.com
christy.berger@swgas.com
jim.mathews@swgas.com
priscila.castillo@lawp.com
robert.pettinato@ladwp.com
GHealy@semprautilities.com
JLSalazar@SempraUtilities.com
Naftab@semprautilities.com
RCavalleri@SempraUtilities.com
DNg@semprautilities.com
RPrince@SempraUtilities.com
jcorralejo@lbcgla.org
klatt@energyattorney.com
douglass@energyattorney.com
case.admin@sce.com
gloria.ing@sce.com
janet.combs@sce.com
Robert.F.Lemoine@sce.com
jleslie@luce.com
marcie.milner@shell.com
CentralFiles@SempraUtilities.com
jhunter@riversideca.gov
laura@messimer.com
Faith.Mabuhayalliance@gmail.com
gcaldwell@sanbruno.ca.gov
kfabry@sanbruno.ca.gov
mdjoseph@adamsbroadwell.com
joc@cpuc.ca.gov
theresa.mueller@sfgov.org
bfinkelstein@turn.org
d1ct@pge.com
filings@a-klaw.com
kck5@pge.com
sls@a-klaw.com
bcragg@goodinmacbride.com
jarmstrong@goodinmacbride.com
mmattes@nossaman.com
aaron.joseph.lewis@gmail.com
cem@newsdata.com
RobertGnaizda@gmail.com
a2mx@pge.com
J4LR@pge.com
Susan.Durbin@doj.ca.gov
Service@spurr.org
PstLarry@comcast.net
bstrottman@meyersnave.com

lencanty@BlackEconomicCouncil.org
dmarcus2@sbcglobal.net
tomb@crossborderenergy.com
michaelboyd@sbcglobal.net
ttutt@smud.org
kelder@aspenerg.com
atrowbridge@daycartermurphy.com
dgenasci@DayCarterMurphy.com
wmc@a-klaw.com
aad@cpuc.ca.gov
ang@cpuc.ca.gov
emm@cpuc.ca.gov
cpe@cpuc.ca.gov
jzr@cpuc.ca.gov
alf@cpuc.ca.gov
jmh@cpuc.ca.gov
kcl@cpuc.ca.gov
mab@cpuc.ca.gov
mwt@cpuc.ca.gov
pap@cpuc.ca.gov
pzs@cpuc.ca.gov
rmp@cpuc.ca.gov
janill.richards@doj.ca.gov
glesh@energy.state.ca.us
rkennedy@energy.state.ca.us