

**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 Ratemaking Mechanisms

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

**PACIFIC GAS AND ELECTRIC COMPANY'S REPLY COMMENTS ON  
PROPOSED DECISION DETERMINING MAXIMUM ALLOWABLE  
OPERATING PRESSURE METHODOLOGY AND REQUIRING FILING  
OF NATURAL GAS TRANSMISSION PIPELINE REPLACEMENT OR  
TESTING IMPLEMENTATION PLANS**

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June 6, 2011

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Pacific Gas and Electric Company (PG&E) submits this reply to comment on one schedule issue raised by the "three-track" proposal by Southern California Gas Company and San Diego Gas & Electric Company.

As PG&E stated at the June 2, 2011 prehearing conference, the Implementation Plan it will be submitting following the Commission's adoption of Administrative Law Judge Bushey's proposed decision subsumes the safety measures in proposed Section 145 of GO 112-E.

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Accordingly, the Commission should defer action on the proposed rule while it considers PG&E's Implementation Plan.

Respectfully submitted,

/s/ William V. Manheim

/s/ Joseph M. Malkin

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