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

Application of SOUTHERN CALIFORNIA
EDISON COMPANY (U 338-E) for Authority to,
Among Other Things, Increase Its Authorized
Revenues For Electric Service In 2012, And to
Reflect That Increase In Rates.

Application No. 10-11-015
(Filed November 23, 2010)

**PACIFIC GAS AND ELECTRIC COMPANY'S
RESPONSE TO THE MOTION OF SOUTHERN
CALIFORNIA EDISON COMPANY TO STRIKE PORTIONS
OF THE DIRECT TESTIMONY OF THE UTILITY REFORM
NETWORK, DIVISION OF RATEPAYER ADVOCATES,
AND DISABILITY RIGHTS ADVOCATES**

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June 17, 2011

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

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Pursuant to Rule 11.1(e) of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), Pacific Gas and Electric Company (PG&E) files this response to the "Motion of Southern California Edison Company to Strike Portions of the Direct Testimony of The Utility Reform Network, Division of Ratepayer Advocates and Disability Rights Advocates," filed on June 15, 2011.

PG&E agrees with, and supports, Southern California Edison Company's (SCE's) description of the non-precedential nature of the multi-party settlement of Phase 1 of PG&E's 2011 General Rate Case (GRC) (the Settlement Agreement) and the Memorandum of Understanding (MOU) with Disability Rights Advocates that were cited in SCE's Motion. In addition to Commission Rule 12.5 and Section II.C in the MOU (which paraphrases Rule 12.5), SCE could also have cited Section 4.2 of the Settlement Agreement itself. That provision explicitly states, "In accordance with Commission Rule 12.5, the Settling Parties agree that this Agreement does not constitute precedent regarding any principle or issue in this proceeding or any future proceeding."

In PG&E's opinion, SCE is right to construe the passages cited in its Motion as contravening Commission Rule 12.5, as well as violating Section 4.2 of the Settlement Agreement and Section II.C of the MOU with Disability Rights Advocates.

Respectfully submitted,

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By: _____ /s/
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