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**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

September 30, 2021

Agenda ID #19923

**TO PARTIES OF RECORD IN DRAFT RESOLUTION ALJ-408:**

This is the draft Resolution of Administrative Law Judge (ALJ) Susan Lee resolving the Appeal K.20-09-011 of Citation No. F-5707 of Eskindir Ghebremedhin and Cristobal Javier Castro, dba Egg Ride Services. It will not appear on the Commission's agenda sooner than 30 days from the date it is mailed. The Commission may act then, or it may postpone action until later.

When the Commission acts on the draft resolution, it may adopt all or part of it as written, amend or modify it, or set it aside and prepare its own order. Only when the Commission acts does the resolution become binding on the parties.

You may serve comments on the draft resolution. Comments shall be served (but not filed) within 20 days of the date that the draft Resolution was mailed and published on the Commission's website [link], as provided in Rule 14.5 of the Commission's Rules of Practice and Procedure. Comments shall be served upon all persons on this proceeding's service list and on ALJ Lee at [sne@cpuc.ca.gov](mailto:sne@cpuc.ca.gov).

/s/ ANNE E. SIMON

Anne E. Simon

Chief Administrative Law Judge

AES:gp2/sgu

Attachment

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

Resolution ALJ-408  
Administrative Law Judge Division  
[Date]

**RESOLUTION**

RESOLUTION ALJ-408. Resolves K.20-09-011 the Appeal of Citation No. F-5707 of Eskindir Ghebremedhin and Cristobal Javier Castro, dba Egg Ride Services.

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**SUMMARY**

This resolution resolves the appeal of Citation No. F-5707 issued on August 28, 2020 to Eskindir Ghebrehiwet Ghebremedhin and Cristobal Javier Castro, dba, Egg Ride Services, by the California Public Utilities Commission's Consumer Protection and Enforcement Division. Citation No. F-5707 issued a fine of \$3,000 for violations of three sections of the Public Utilities Code and Commission's General Orders.

Citation No. F-5707 is reversed in part and sustained in part. The fine is reduced to \$2,200.

**BACKGROUND**

The California Public Utilities Commission (Commission) regulates charter-party carriers of passengers primarily pursuant to the Passenger Charter-Party Carriers' Act.<sup>1</sup> Pursuant to Resolution ALJ-187, issued by the California Public Utilities Commission (Commission) on September 22, 2005, Consumer Protection and Enforcement Division (CPED) is authorized to issue citations to various classes of transportation carriers for violation of the Public Utilities (Pub. Util.) Code and/or Commission orders. In turn, a

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<sup>1</sup> Pub. Util. Code § 5351, *et seq.*

carrier issued such citation may accept the fine or contest it through a process of appeal under Resolution ALJ-377.<sup>2</sup>

On August 28, 2020, the Transportation Enforcement Branch (TEB) of CPED issued Citation No. F-5707 to Eskindir Ghebremedhin, and Cristobal Javier Castro, doing business as (dba) Egg Ride Services (Appellant) for violations of the Public Utilities Code and the Commission's General Order. Egg Ride is a charter-party carrier, operating under TCP 26381. The underlying investigation covered the period of June 1, 2019 through August 31, 2019 (Investigation Period). The citation was issued for the following violations, a total of seven counts:

- Operation as a charter-party carrier after suspension and expiration of authority, in violation of Pub. Util. Code § 5379 **[5 counts]**;
- Engaging one driver without evidence of Workers' Compensation (WKCP) Insurance coverage in effect and on file with the Commission, in violation of Pub. Util. Code § 5378.1 **[1 count]**;
- Engaging one driver prior to enrollment in the Department of Motor Vehicles (DMV) Employer Pull Notice (EPN) Program in violation of Pub. Util. Code §§ 5374(a)(1)(D) and 5381 and General Order (G.O.) 157-E, Part 5.02 **[1 count]**.

Appellant filed an appeal on September 18, 2020.

CPED filed a compliance filing on October 1, 2020, which included a Case Summary the following attachments:

Attachment 1:	Order of Suspension and Notice of Expiration Letters
Attachment 2:	Administrative Citation from San Francisco Police Department (SFPD) on July 17, 2019
Attachment 3:	Waybills provided by Uber
Attachment 4:	Workers' Compensation Declaration Form
Attachment 5:	Driver Statement of Applicant Form
Attachment 6:	Waybill provided by Uber showing Hagos Mezgebe as the driver
Attachment 7:	A DMV printout of EPN request code, AR951

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<sup>2</sup> Resolution ALJ-377 became effective as of July 1, 2020 and is available here: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M335/K392/335392171.PDF>

## RESOLUTION OF APPEAL

The Commission held an appeal hearing on February 26, 2021. Both parties appeared at the hearing represented by legal counsel. At the hearing, both parties were informed of the right to call, examine, and cross-examine witnesses and offer exhibits.

Under ALJ- 377, CPED bears the burden to prove, by a preponderance of the evidence, that the citation was issued in compliance with the law and Commission rules, and that the penalty amount is just and reasonable. The burden then shifts to the Appellant to prove, by a preponderance of the evidence, that a violation did not occur or that the amount of the penalty is inappropriate.

CPED provided evidence<sup>3</sup> at the hearing in support of its position that the citations were properly issued and that the amount of the fine is reasonable. Mr. Aaron Pete the CPED Investigator assigned to Appellant's case, testified on behalf of CPED at the hearing. CPED's evidence included:

- A Worker's Compensation Declaration Form that signed by the Appellant, attesting they do not have employees.
- Appellant did not have Personal Liability and Property Damage insurance on file with the Commission and in effect during the Investigation Period.
- The Citation from the San Francisco Airport Police shows the license plate of the vehicle driven by driver (Hagos Mezegbe) has the name of the company and TCP number assigned to the company belongs to the Appellant and not Hagos Mezegbe.
- The DMV EPN System lists only the two owners<sup>4</sup> of Egg Ride as drivers.
- Waybills that show driver Hagos Mezegbe operated 67 days out of about 600 trips for Egg Ride.

Appellant's representative argued that CPED did not meet its burden to prove the following facts underlying the citation:

- Whether Appellant operated as a charter-party carrier after suspension and expiration of authority during the Investigation Period.

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<sup>3</sup> See Appendix A for a complete list of the exhibits received into evidence.

<sup>4</sup> Egg Ride's owners are Eskindir Ghebremedhin and Cristobal Castro.

- Whether Appellant engaged one driver without Worker's Compensation Insurance coverage in effect and on file with the Commission.
- Whether Appellant engaged one driver prior to enrollment in the DMV EPN Program.

### **First Violation in Citation No. F-5707**

To uphold the first five violations in Citation No. F-5707, the Commission would be required to find that, as a matter of fact, Appellant operated as a charter-party carrier during the Investigation Period with a suspended license. To uphold the 6<sup>th</sup> and 7<sup>th</sup> violations, the Commission would be required to find as a matter-of-fact that Appellant had employees/drivers during the Investigation Period.

At the hearing, CPED's witness Mr. Pete testified to the following:

- On July 17, 2019, Appellant was mailed an Order of Suspension for failure to pay fees for the first quarter of 2019.
- On July 19, 2019, Egg Ride's authority was reinstated.
- On August 19, 2019, a second Order of Suspension notice was mailed to the Appellant, for failure to maintain adequate insurance.
- On August 20, 2019, Egg Ride's authority was reinstated.
- On August 27, 2019, Appellant was mailed a Notice of Expiration, stating Egg Ride's operating authority expired on August 27, 2019.

During the hearing Appellant-ried to establish that Egg Ride was not required to pay quarterly fees because Egg Ride's revenue was less than \$100,000 in 2018. Charter-party carriers with annual revenues over \$100,000 pay fees on a quarterly basis.<sup>5</sup> The Commission's Transportation Management Information System (TMIS) automatically updates the carrier's payment frequency from an annual to a quarterly basis once a carrier reports annual revenues for a given year that exceed \$100,000.<sup>6</sup> Further, carriers who are on a quarterly fee schedule can use Form PL708 to request a change from filing quarterly to annually.<sup>7</sup> As part of its request, the carrier must show that it earned

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<sup>5</sup> CPED Brief at A-1.

<sup>6</sup> CPED Brief at A-1.

<sup>7</sup> CPED Brief at 2.

\$100,000 or less in gross revenue in the prior calendar year.<sup>8</sup> Form PL708 is easily accessible on the Commission's website.

According to CPED, Egg Ride was converted from an annual to a quarterly fee schedule in 2018 because Appellant reported an annual revenue of \$103,628.00 from January to December 2017. Accordingly, Egg Ride commenced paying fees on a quarterly basis beginning April 4, 2018. Further, the table below illustrates the annual revenue amounts found by CPED during the Investigation Period.

**Appellant's Annual Revenues:**

YEAR	REVENUE
2019	\$77,985
2018	\$95,582
2017	\$103,628

In reviewing the Annual CPUC Transportation Reimbursement Account (PUCTRA) fees, Appellant reported Egg Ride earned \$72,474.40 in 2018. While the 2018 revenue reported in the PUCTRA does not match the number reported in CPED's investigation, both amounts are under \$100,000. Although the Appellant should have been on an annual fee schedule, we find that Appellant's exhibits showing returned checks for PUCTRA and renewal fees illustrate Appellant's confusion with the process.

During the course of the investigation, Egg Ride submitted its revenue amounts to the Commission's Fiscal Services, used to calculate the company's Quarterly or Annual PUCTRA fees.

The \$15,000.00 recorded by Appellant for calculation of its 2019 PUCTRA varies from the other revenue amounts, which were reported down to the penny in prior years. We find that Egg Ride provided its 2019 estimated revenue and paid what it believed to be the annual fee. Egg Ride's assertion that it had paid the 2019 annual fees is credible. We further find that Egg Ride was not properly informed that it was on an annual fee payment basis for 2019. Consequently, Egg Ride should not have been suspended for failing to pay 2019 quarterly fees in July of 2019, and neither driver conducted passenger trips without authority on July 17, 2019 and July 18 2019. Therefore, we reduce the fine by \$600.

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<sup>8</sup> CPED Brief at 2.

On August 19, 2019, Egg Ride was suspended for failing to maintain adequate insurance but was immediately reinstated effective August 19, 2019, by letter from the Commission on August 20, 2019. Therefore, we find that Egg Ride did not lose its authority to operate on August 19, 2019, and that neither driver illegally conducted passenger trips. Therefore, the fine will be reduced by an additional \$200.

Lastly, Egg Ride offered no explanation as to why it allowed its charter-party authority to expire on August 27, 2019, when it carried a permit entitled "Class P Charter-Party Permit Expires on August 27, 2019 - See Paragraph (10)." Paragraph (10) states, in part, "This renewal application should be submitted 90-days prior to the expiration date." On August 27, 2019, Mr. Gebremedhin conducted at least three passenger trips while its authority to operate had expired. Egg Ride made no attempts to renew its permit until after it expired. Therefore, we sustain the violation that Egg Ride operated with an expired permit on August 27, 2019 and affirm the \$200 fine.

In summary, the violations under code § 5379 are decreased from five counts to one count, and the fine reduced by \$800.

### **Second Violation in Citation No. F-5707**

To uphold the second violation in Citation No. F-5707, the Commission would be required to find that Appellant operated as a charter-party carrier during the Investigation Period with a suspended license. Pub. Util. Code § 5378.1 requires every charter-party carrier to have either a certificate of workers' compensation coverage for its employees or a certification of consent to self-insure issued by the Director of Industrial Relations.

During the course of the investigation, TEB discovered that Egg Ride had engaged the services of one employee-driver without evidence of workers' compensation coverage. For at least 67 days, Driver Mezgebe shuttled passengers with no workers' compensation insurance coverage.

Egg Ride does not dispute that one driver performed services during the period in question without workers' compensation insurance. Egg Ride contends that Uber failed to inform Egg Ride that it had an obligation to provide workers' compensation coverage for drivers when engaging in services with Uber. Had Egg Ride been instructed by Uber to do so, Egg Ride contends that it would have complied.

We find Egg Ride's justification is an unreasonable defense. Egg Ride has a duty to understand all of its regulatory obligations under the Commission rules and regulations as a charter-party carrier. Egg Ride's failure to obtain workers' compensation insurance

jeopardized the safety of its employee. The evidence establishes that Egg Ride violated Pub. Util. Code § 5378.1 by failing to have either a certificate of workers' compensation coverage for its employees or a certification of consent to self-insure. Therefore, the fine of \$1000 is appropriate.

**Third Violation in Citation No. F-5707**

To uphold the third violation in Citation No. F-5707, the Commission must find as a matter of fact that Appellant had driver(s) working prior to enrollment in the DMV's EPN Program in violation of Pub. Util. Code §5374(a)(1)(D) and 5381 and G.O. 157-E, Part 5.02.

During the investigation, TEB discovered Driver Mezgebe worked for Appellant for 67 days without workers' compensation insurance coverage. During the same 67 days, Driver Mezgebe was also not properly registered with the DMV as an employee.

During the hearing, TEB presented evidence documenting the number of trips Driver Mezgebe completed using Appellant's vehicle:

Dates of Operation Without Authority	Number of Trips
7/17/19	9
7/18/19	11
8/19/19	15
8/27/19	3
Total <sup>9</sup>	38

Throughout the hearing, Appellant contended it was unaware of any responsibility to enroll drivers in the DMV's EPN program or the requirement to carry requisite worker's compensation insurance. We find that "unaware" fails as a defense, since Appellant was aware it was operating as a charter-party carrier under Commission jurisdiction. Accordingly, the third violation in Citation No. 5707 stands and we conclude Appellant violated Pub. Util. Code §§ 5374(a)(1)(d) and 5381 and General Order 157-E, Part 5.02. Therefore, a \$1000 fine is appropriate.

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<sup>9</sup> This Total is different than the Total in the Compliance Filing due to an addition error.

## ASSESSMENT OF FINE

In assessing the reasonableness of the \$2,200 fine, several factors must be considered. Decision (D.) 98-12-075 sets forth the criteria for determining the reasonableness of a fine. Specifically, it is important to consider the following: (1) severity of the economic or physical harm resulting from the violation; (2) the conduct to prevent, detect, disclose, and rectify the violation; (3) the financial resources of the party involved; (4) the totality of the circumstances in furtherance of the public interest; and (5) Commission precedents.

As set forth in D. 98-12-075, the Commission should evaluate the reasonableness of the \$2,200 fine. The purpose of the fine is to “effectively deter future violations”.

First, we consider the severity of the offense. The severity of the offense is determined by the nature and extent of physical harm, economic harm, harm to the regulatory process, and the number and scope of the violations. There was no evidence of physical or economic harm. The harm to the regulatory process is severe to moderate since the lack of workers’ compensation insurance jeopardized the safety of Egg Ride’s employee. The original seven counts imposed are not extreme and were reduced by four counts. In light of these facts, the modified penalty is appropriate.

Second, we consider the entity’s efforts to prevent, detect and rectify the violation. Egg Ride immediately paid the quarterly payment for Quarter 1 of 2019 when the July 17, 2019 Order of Suspension was issued. It cooperated with the TEB during the investigation. Thus, we find that Egg Ride’s quick compliance to a communication by the Commission and overall cooperation as mitigating factors to the charter-party carrier’s behavior, further supporting the \$2,200 fine.

Third, we consider the utility’s financial resources. There is no evidence that Egg Ride would experience a financial hardship by paying this fine for the violations, and the modified fine is reasonable in light of Egg Ride’s annual revenues for the past three years.

Fourth, we consider the totality of the circumstances in furtherance of the public interest. According to Pub. Util. Code § 5352, the purpose of the Charter-party Carriers’ Act is “... to secure to the people adequate and dependable transportation by carriers operating upon the highways...” and “...promote carrier and public safety through its safety enforcement regulations...” among other things. The safety of Driver Mezgebe was compromised when Egg Ride failed to obtain workers’ compensation insurance for this employee. Moreover, Egg Ride overlooked an obvious obligation to register Driver Mezgebe with the DMV, and shifted blame to Uber for failing to advise Egg Ride of its obligation. Additionally, Egg Ride operated for one day with an expired permit. Although there was no direct harm to the public, it is in the public interest to ensure

that Egg Ride meets all its regulatory obligations in the future. Therefore, we conclude that a \$2,200 fine will serve as incentive for Egg Ride to pay closer attention to its obligation as a charter-party carrier licensed and certified to operate by the Commission and the DMV.

Lastly, we consider Commission precedent. Fines should serve to prevent future violations. The seven-count total violations are reduced to three counts after determining that Egg Ride did not operate “without authority” under Pub. Util. Code § 5379 on July 17, 2019, July 18, 2019 and August 19, 2019 as alleged. The fine is consistent with Commission precedent in previous decisions.<sup>10</sup> The reduction of \$800, while still imposing a fine of \$2,200, is also consistent with Commission precedent.<sup>11</sup>

### **SAFETY**

The Commission has broad authority to regulate charter-party carrier of passengers, particularly with regard to safety concerns. Enforcing Citation No. F-5707 is consistent with the Commission’s authority to ensure charter-party carriers of passengers are meeting their regulatory obligations.

### **COMMENTS**

Pub. Util. Code § 311(g)(1) requires that a draft resolution be served on all parties and be subject to a public review and comment period of 30 days or more, prior to a vote of the Commission on the resolution. A draft of today’s resolution was distributed for comment to the interested parties.

### **ASSIGNMENT OF PROCEEDING**

Susan Lee is the assigned ALJ for this citation appeal.

### **FINDINGS**

1. Egg Ride is a charter-party carrier, operating under TCP 26381. On July 17, 2019, CPED’s License Section issued an Order of Suspension to operate to Egg Ride for failing to pay quarterly fees.
2. On January 3, 2019, Egg Ride timely completed submission of its 2018 PUCTRA reports showing its revenues for 2018 to be less than \$100,000. Based on its

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<sup>10</sup> See Resolution ALJ-365, affirming a fine of \$2,000.

<sup>11</sup> See Resolution ALJ-399, reducing a fine to \$500.

2018 revenue of less than \$100,000, Egg Ride should have paid an annual fee, and not quarterly fees, in 2019.

3. The refund for Quarter 4 2018 quarterly fees on January 7, 2019, caused a delay in the fee schedule update for Egg Ride.
4. Egg Ride did not operate “without authority” on July 17, 2019 or July 18, 2019.
5. Egg Ride was suspended on August 19, 2019 and reinstated on the same day.
6. Egg Ride operated with an expired permit on August 27, 2019, in violation of Pub. Util. Code §5379.
7. Egg Ride engaged one driver without evidence of workers’ compensation insurance coverage from approximately June of 2019 to at least August 19, 2019, in violation of Pub. Util. Code § 5378.1.
8. Egg Ride engaged one driver without enrollment in the Department of Motor Vehicle Employer Pull Notice Program from approximately June of 2019 to at least August 19, 2019, in violation of Pub. Util. Code §§ 5374(a)(1)(D) and 5381, and G.O. 157-E, Part 5.02.

**THEREFORE, IT IS ORDERED** that:

1. The violations and penalties in Citation F-5707 are affirmed in part and reversed in part.
2. The violations and penalties under Public Utilities Code Section 5379 are reduced from five counts to one count, and the fine is decreased by \$800.
3. The violations and penalties under Public Utilities Code Section 5378.1 are affirmed.
4. The violations and penalties under Public Utilities Code Sections 5374(a)(1)(D) and 5381 and General Order 157-E, Part 5.02 are affirmed.
5. The total fines and penalties shall be \$2,200 under Public Utilities Code Section 5378.
6. Eskindir Ghebremedhin and Cristobal Javier Castro, dba Egg Ride Services, must pay the \$2,200 penalty within thirty (30) days of the effective date of this order. Payment shall be made by check or money order payable to the California Public Utilities Commission and mailed or delivered to the Commission’s Fiscal Office at 505 Van Ness Avenue, San Francisco, California 94102. Write on the face of the check or money order, “ For deposit to the General Fund pursuant to Resolution ALJ-408.”

7. This proceeding is closed.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on \_\_\_\_\_, the following Commissioners voting favorably thereon:

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RACHEL PETERSON  
Executive Director

**APPENDIX A**

TEB offered the following Exhibits into evidence as TEB-1 through TEB-3:

1. Citation No. F-5707 issued on August 28, 2020 (4 pages)
2. Case Summary with Attachments
3. Class P Charter-Party Permit, Expires on August 27, 2019 (1 page)

Exhibits TEB-1, TEB-2 and TEB-3 were entered into evidence.

Egg Ride offered the following Exhibits into evidence as Egg Ride-1 through Egg Ride-13:

1. Certificate of Liability Insurance for Egg Ride Service, August 16, 2018 (1 page)
2. Certificate of Liability Insurance for City and County of San Francisco Airport Commission, August 16, 2018 (1 page)
3. Revenue Report for 2019 (1 page)
4. Class B Charter-Party Certificate, Expires on November 1, 2022 (1 page)
5. Class P Charter-Party Permit, Expires on August 27, 2019 (1 page)
6. Certificate of Liability Insurance for the City and County of San Francisco Airport Commission, August 19, 2019 (1 page)
7. Certificate of Liability Insurance for Egg Ride Service, August 16, 2018 (1 page)
8. California Insurance Identification Card, Effective August 19, 2019 to August 19, 2020 (1 page)
9. California Insurance Identification Card, Effective August 19, 2018 to August 19, 2019 (1 page)
10. Revenue Report, for 2019 (1 page)
11. PUC letter dated January 7, 2019, extending due date for PUCTRA payment to January 29, 2019 due to system error (1 page)

12. PUC statement re: Overpayment of quarterly/annual fees for Period 184 due to system error (1 page)

13. PUC letter dated September 9, 2019 from License Section returning Check no. 686 for \$100.00 due to previously received renewal payment (1 page)

Exhibits Egg Ride-2, Egg Ride-3, Egg-Ride-7, EggRide-10, Egg Ride-11, Egg Ride-12 and Egg Ride-13 were entered into evidence. Egg Ride's exhibits marked at the hearing but not entered were outside the dates of the period of investigation.

(End Appendix A)



**N O T I C E**

Persons should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address to ensure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

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The Commission's policy is to schedule hearings (meetings, workshops, etc.) in locations that are accessible to people with disabilities. To verify that a particular location is accessible, call: Calendar Clerk (415) 703-1203.

If specialized accommodations for the disabled are needed, e.g., sign language interpreters, those making the arrangements must call the Public Advisor at (415) 703-2074 or TDD# (415) 703-2032 five working days in advance of the event.

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Updated on 30-SEP-2021 by: KB3  
K2009011 LIST

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