



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

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Order Instituting Rulemaking to Revise and Clarify Commission Regulations Relating to the Safety of Electric Utility and Communications Infrastructure Provider Facilities.

R.08-11-005
(Filed November 6, 2008)

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**REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC
COMPANY (U39E) ON THE SCOPE, SCHEDULE, AND
PROCEDURES TO BE USED IN R.08-11-005**

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I. INTRODUCTION

Pacific Gas and Electric Company (PG&E) replies to comments filed by California Municipal Utilities Association, San Diego Gas and Electric Company (SDG&E), Southern California Edison (SCE), Mussey Grade Road Alliance, Sacramento Municipal Utility District (SMUD), Los Angeles County, Small Local Exchange Carriers (LECs), CoxCom, Inc. and Cox California Telecom LLC (Cox), AT&T California and New Cingular Wireless PCS, LLC (AT&T), California Cable and Telecommunications Association/Comcast (CCTA), Sierra Pacific, Verizon, the Consumer Federation of California (CFC), CTIA-The Wireless Association, and PacifiCorp. These reply comments address the scope, schedule, and process for moving forward in this proceeding. PG&E expects to provide full responses to specific proposed rule changes during workshops and through other procedural avenues.

There appears to be consensus among almost all parties that before new rules are adopted, the Commission should ensure that the costs of implementing the rules are identified, and weighed against the benefits that the rules are intended to provide. PG&E continues to support this process. In addition, several parties, including PG&E, pointed out that the California Independent System Operator (CAISO) already oversees the maintenance activities that govern Electric Transmission facilities, and therefore, the Commission should not address

electric transmission maintenance processes in this proceeding. There also appears to be agreement among parties that the Commission's proposed schedule does not allow adequate time for parties to evaluate rule changes. PG&E's suggested schedule, while ambitious, provides more time for parties to develop, discuss, modify, and ultimately finalize new rule changes.

The following sections respond to parties' comments on the scope and process of this rulemaking proceeding.

II. REPLY COMMENTS REGARDING SCOPE OF THIS PROCEEDING

A. Evaluating the Inspection and Maintenance Practices of Communications Infrastructure Providers Is Appropriate Given The Public's Exposure to Their Facilities

Several of the Communications Companies expressed concern about the possibility of the Commission adopting inspection and maintenance requirements such as those contained in General Order 165 to apply to communications infrastructure providers (CIP). Indeed, AT&T suggested that requiring the CIPs to conduct inspection activities would be duplicative of what electric utilities are already doing to comply with GO 165. (AT&T Comments, p. 4) However, PG&E is not performing inspection or maintenance activities on communications companies' facilities. PG&E inspects its electric facilities to ensure safe and reliable service to its customers. It is not inspecting communications equipment for safety infractions. Communications companies have an obligation to ensure that their facilities are safe and appropriately maintained. For AT&T to rely on electric utilities such as PG&E to inspect its facilities is wholly inappropriate and inadequate to maintain public safety. Indeed, the fact that AT&T would suggest such a reliance points to the need for a review of the CPUC's safety rules as they apply to both electric supply and communications facilities.

In reviewing these safety rules, PG&E supports including in this proceeding a review of the process for communicating between electric supply and communications companies when safety concerns are identified by either party on the other parties' facilities. Clear

communications and accountability to take appropriate action would help to minimize potential public hazards from occurring.

B. In Reviewing Whether Additional Fire Incident Reporting Should Be Required, It is Important to Consider Recent Regulatory Changes in this Area

As SDG&E described in its Opening Comments, the Commission already requires electric utilities to report significant fire incidents as soon as possible. In 1998, the Commission adopted a requirement that electric utilities report incidents that “involve or allegedly involve trees or other vegetation in the vicinity of power lines and result in fire and/or personal injury whether or not in-patient hospitalization is required.” (D. 98-07-097, Appendix B) After five years of receiving incident reports pursuant to this criterion, the Commission determined that reporting of these relatively minor vegetation-related incidents was a waste of Commission staff and utility time. This experience should give us pause before embarking on adopting another fire incident reporting criteria.

In addition, PG&E supports the comments filed by SCE, reminding the Commission to consider the utilities’ rights to protect attorney/client and attorney work product privileged information in crafting a reporting requirement. (SCE Comments, pp. 7-8)

C. PG&E Supports the Review of Vegetation Management Regulations To Address Fire Risk Mitigation, As Long As the Review Includes Environmental Considerations, and Acknowledges the Limitations Placed on Utilities By Other Regulatory Bodies

PG&E supports the review of vegetation management rules to determine what, if anything, can be done to mitigate the risk of catastrophic fires. However, as Sierra Pacific points out in its comments, utilities are often hampered in their ability to perform necessary vegetation management work by governmental agency requirements and litigation by property owners. (Sierra Pacific Comments, p. 3) As new rules are considered, the Commission should invite input from other federal, state, and local agencies, such as CalTrans, U.S. Forest Service, Department of Fish and Game, U.S. Fish and Wildlife, the California Board of Forestry, and

CalFire. This would ensure that, before a regulation is adopted, all relevant regulatory agencies have an opportunity to provide their input on the regulation. Without such coordination, utilities will not be successful in implementing regulations that cut across regulatory agency boundaries.

While PG&E expects to provide detailed responses to SDG&E's proposed rule changes, a general comment on their approach is that, while it may be appropriate to adopt specific procedures for high and very high fire danger areas, increasing clearance requirements and requiring clear cutting is not feasible in light of environmental and customer concerns. Given that California already has the strictest vegetation management requirements in the country, it will require significant analysis to determine whether additional measures will reduce fire risk while addressing competing environmental and customer needs. PG&E looks forward to exploring these issues in a statewide forum with most, if not all, interests represented.

D. Mitigation Measures To Address High Speed Wind Dangers Require Detailed Review To Ensure Effectiveness

Given the unpredictable nature of high speed winds, it is difficult to identify actions that can be taken in advance of high speed winds that will result in mitigated risk. Mitigation of high speed wind dangers, if reviewed in this proceeding, needs to be focused on what is realistically in the utilities' control to result in actual mitigation.

E. L.A. County's Suggestion To Consider the Adequacy of Penalties Against Utilities For Failure to Comply with CPUC Rules Should Not Be Part of this Rulemaking Proceeding

L.A. County proposed in their Opening Comments that the Commission consider whether the penalties for noncompliance with Commission rules are adequate to maximize compliance. However, the adequacy of penalties is beyond the scope of this rulemaking proceeding. This proceeding is focused on evaluating the Commission's current rules and proposing new rules if necessary to better protect the public from hazards. The evaluation of the adequacy of penalties is not an appropriate subject for this kind of rulemaking proceeding.

Moreover, the Public Utilities Code has established penalty provisions for noncompliance with CPUC rules and regulations. Those provisions are adopted through a legislative process, and not through a CPUC rulemaking proceeding.

III. REPLY COMMENTS REGARDING PROCEDURAL ISSUES

A. This Proceeding Should Not be Bifurcated Into Electric and Communications Issues Since The Facilities at Issue Are Most Often Shared Between the Two Utilities

Verizon suggests in its comments that the Commission address electric and communications issues separately given the differences in the voltage contained in the respective facilities of each utility. (Verizon Comments, pp. 3-5) However, the facilities that the utilities have in common are the focus of this rulemaking proceeding, and should not be considered separately. Many of the proposed scope items address the adequacy of communications between the electric and communications companies. It would be counterproductive to split the discussions by utility type since both entities need to be present to address the adequacy of working together to ensure public safety.

B. This Rulemaking Proceeding Should Proceed Regardless of The Pending OII Proceedings Since It will Be Addressing Broader Issues Than Those In The OII

There is no reason to wait for the two OIIs to reach resolution before pursuing this rulemaking. While there are overlapping issues between the OIIs and this proceeding, there is no need to stop this rulemaking proceeding while the OIIs reach conclusion. This rulemaking will address a much wider scope of issues, and is intended to result in the adoption of rules that will result in mitigation of fire risk. The OIIs have a different scope, and are not intended to result in forward-looking rule changes.

C. This Rulemaking Proceeding Should Proceed In its Current Forum With a Facilitator, Rather Than Have The GO 95/128 Rules Committee Consider the Proposals

CMUA, along with SMUD, urges the Commission to refer this rulemaking to the GO 95/128 Rules Committee for resolution. (CMUA Comments, pp. 2-3; SMUD Comments, p. 2)

IV. CONCLUSION

PG&E looks forward to participating in this important rulemaking proceeding. PG&E urges the Commission to adopt a workable scope and process to allow parties to effectively participate, and to resolve the issues efficiently and effectively.

Respectfully Submitted,

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CERTIFICATE OF SERVICE BY ELECTRONIC OR FIRST CLASS MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department B30A, 77 Beale Street, San Francisco, California 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the say day it is submitted for mailing.

On the 17th day of December, 2008, I caused to be served a true copy of:

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[XX] By U.S. Mail – by placing it for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to all parties on the official service list for R.08-11-005 without an e-mail address.

[XX] By Electronic Mail – serving the enclosed via e-mail transmission to the service list for R.08-11-005.

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

Executed in San Francisco, California on the 17th day of December, 2008.

/s/

PAMELA TOM

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