

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

Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2011.

Application 09-12-020  
(Filed December 21, 2009)

Order Instituting Investigation on the Commission's Own Motion into the Rates, Operations, Practices, Service and Facilities of Pacific Gas and Electric Company.

Investigation 10-07-027  
(Filed July 29, 2010)

**MOTION OF THE UTILITY REFORM NETWORK  
AND CONSUMER FEDERATION OF CALIFORNIA FOR A  
COORDINATED AND PUBLIC INVESTIGATION OF FACTORS LEADING TO  
THE SAN BRUNO AND SIMILAR CATASTROPHES AND APPROPRIATE  
PREVENTIVE AND REMEDIAL MEASURES**

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**I. Introduction**

Pursuant to Rules 11.1 and 1.2<sup>1</sup> of the Commission's Rules of Practice and Procedure, The Utility Reform Network (TURN) and the Consumer Federation of California (CFC) request that the California Public Utilities Commission declare that this existing investigation proceeding will serve as the forum for a consolidated, coordinated and public investigation of the various issues associated with the safety and reliability of Pacific Gas and Electric Company's gas system in the face of the San Bruno gas line explosion tragedy and similar incidents implicating gas line safety and reliability.

On September 9, 2010, a horrible tragedy befell the residents of San Bruno, California, when a Pacific Gas and Electric Company (PG&E) natural gas pipeline exploded, killing eight individuals, injuring many more, and destroying dozens of homes. In the aftermath of this catastrophe, a number of other facts have emerged that leave PG&E's customers and the California public concerned about the state of the safety of the natural gas system that PG&E operates, as well as the Commission's oversight of that system. Among those facts are the following:

- PG&E has not performed pipeline maintenance projects included in the utility's rate applications.<sup>2</sup>

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<sup>1</sup> Rule 1.2 provides: "These rules shall be liberally construed to secure just, speedy, and inexpensive determination of the issues presented."

<sup>2</sup> See, i.e., PG&E News Release, *PG&E Statement Responding to TURN Press Release on Scheduled Gas Pipeline Repairs*, Sept. 15, 2010, available at [http://www.pge.com/about/newsroom/newsreleases/20100915/pgampe\\_statement\\_responding\\_to\\_turn\\_press\\_release\\_on\\_scheduled\\_gas\\_pipeline\\_repairs.shtml](http://www.pge.com/about/newsroom/newsreleases/20100915/pgampe_statement_responding_to_turn_press_release_on_scheduled_gas_pipeline_repairs.shtml).

- An audit conducted in May 2010 by four Commission inspectors at the behest of the federal Pipeline and Hazardous Materials Safety Administration raised questions about PG&E's compliance with a 2002 federal law requiring inspections of all natural gas transmission pipelines in urban areas, specifically with regard to PG&E's reliance on direct assessment pipeline tests.<sup>3</sup>
- After the Natural Transportation Safety Board revealed that PG&E had incorrectly told its investigators that the section of the 1956 pipeline that ruptured in San Bruno had no seams, and that PG&E's records indicating which company made some sections of the pipe may be incorrect, PG&E officials have admitted to "unacceptable" flaws in records that indicate the San Bruno line was seamless.<sup>4</sup>
- Until very recently, the Commission has had on staff only nine inspectors responsible for a gas pipeline system of more than 100,000 miles, a staffing level that does not meet federal minimum standards.<sup>5</sup>
- California is just now learning of the results of the official investigations of a disturbingly similar event from 2008, when an explosion in a PG&E gas line killed a Rancho Cordova man, injured five others, and damaged several homes.<sup>6</sup>

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<sup>3</sup> Jaxon Van Derbeken and Eric Nalder, *PG&E Inspection Methods Questioned in May Audit*, SAN FRANCISCO CHRONICLE, Dec. 19, 2010, at A1.

<sup>4</sup> Jaxon Van Derbeken, *San Bruno Blast: Feds Urge PG&E to Verify Records*, SAN FRANCISCO CHRONICLE, Jan. 4, 2011, at A1

<sup>5</sup> Jaxon Van Derbeken, *Legislators Want More Gas Pipeline Inspectors*, SAN FRANCISCO CHRONICLE, Nov. 22, 2010, at A1 ("The Chronicle reported earlier this month that mile for mile, California's regulators devote the least time to pipeline inspections of any state. Federal officials have withheld a portion of funding for inspections for seven years in a row because the state has not met Washington's enforcement targets. Officials with the California Public Utilities Commission admit they've fallen short of the targets, but defend the efforts by the current staff of nine inspectors as 'aggressive and effective.'"). However, according to a Letter to the Editor from Commission President Michael R. Peevey, printed in the January 6, 2011, SAN FRANCISCO CHRONICLE, the Commission has now hired four additional pipeline inspectors.

<sup>6</sup> *Order Instituting Investigation on the Commission's Own Motion into the Operations and Practices of Pacific Gas and Electric Company, Regarding the Gas Explosion and Fire on December 24, 2008 in Rancho Cordova, California*, Investigation (I.) 10-11-013, issued Nov. 19, 2010. See also Jaxon Van Derbeken, *State Faults PG&E in '08 Rancho Cordova Pipe Blast*, SAN FRANCISCO CHRONICLE, Nov. 20, 2010, at C2.

The Commission has initiated several efforts in response to the San Bruno disaster, as well as to further investigate the 2008 Rancho Cordova event.

- On September 23, 2010, the Commission issued Resolution L-403, initiating a fact-finding investigation into the San Bruno explosion and the general safety risks associated with PG&E's other gas transmission lines in the State. The Commission also created an "Independent Review Panel" to gather and review facts and to make recommendations to the Commission at some future point. The five panel members were announced on October 14, 2010.
- On October 15, 2010, Commissioner Timothy Simon issued a *Revised Scoping Memo and Ruling Adding an Additional Phase* in Application (A.) 09-09-013, the PG&E Gas Transmission and Storage (GT&S) proceeding. The ruling added a phase to this existing proceeding for purposes of addressing certain specified pipeline safety measures and emergency response procedures, which ranged from the very narrow (how frequently are shut-off valves tested) to the broad (what safety-related protocols or procedures should the Commission require of PG&E during the next several year period).
- On November 19, 2010, the Commission initiated Investigation (I.) 10-11-013 to determine whether PG&E violated any state laws, regulations or other applicable rules or requirements with regard to the gas explosion and fire that occurred in Rancho Cordova nearly two years before. This investigation references the investigations already conducted by The National Transportation Safety Board (NTSB) and the Commission's Consumer Protection and Safety Division (CPSD). NTSB issued a "Pipeline Accident Brief" (PAB) on May 18, 2010.<sup>7</sup> CPSD's report, discussed in I.10-11-013, has not been publicly issued, and I.10-11-013 does not provide its date of preparation. However, the Commission puts PG&E on notice in I.10-11-013 that "CPSD alleges violations that CPSD appears to assert are daily violations that occurred over long periods of time, and that CPSD asserts caused or contributed to a person's death" in Rancho Cordova.<sup>8</sup>
- And on January 13, 2011, the Commission adopted Resolution No. L-410, *Emergency Authorization to Ensure the Safety of Certain Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Gas Company, and Southwest Gas Corporation Natural Gas Pipelines*. Resolution No. L-410, among other things, orders PG&E to take all actions contained within the Executive Director's Letters of December 16, 2010, January 3, 2011, and as described within the resolution, pertaining to their natural gas pipeline systems, including an "aggressive and diligent" search for records related to pipeline system components, in an effort to determine the valid maximum allowable operating

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<sup>7</sup> I.10-11-013, p. 3.

<sup>8</sup> I.10-11-013, p. 2.

pressure, or ensure the accuracy of the established maximum allowable operating pressure, for these systems, to be completed by March 15, 2011.

The Commission faces no small challenge here. Its response to the Rancho Cordova and San Bruno tragedies needs to carefully consider a wide array of factors, many of which are likely to be technical in nature, all while California's citizens and elected officials are giving the agency closer-than-normal scrutiny as they seek assurances that these two events are isolated exceptions rather than signs of problems in northern California's natural gas system. As a result, the Commission should proceed in a manner that permits the greatest amount of public participation as is feasible under the circumstances, and that achieves the most efficient and effective review, so that the public's faith in the safety of the state's natural gas pipeline system is restored. The Commission will best serve this end by designating a single forum for a consolidated, coordinated and public investigation of the various issues associated with the safety and reliability of Pacific Gas and Electric Company's gas system, in light of San Bruno and Rancho Cordova.

## **II. Basis for Requested Relief**

While the Commission has acted promptly in response to the San Bruno tragedy, the Commission's approach taken thus far does not achieve the important objectives of maximizing transparency and the opportunity for public input, while addressing the complex and interrelated issues of fact, law and policy in the most efficient and organized way possible. It appears thus far that the Commission will pursue a number of lines of inquiry in several related but separate proceedings, without any clear indication of how these efforts will be coordinated. Indeed, the ruling in A.09-09-013 captures the piecemeal nature of the current approach:

This new safety phase is to be distinguished from the National Transportation and Safety Board's investigation into the cause of the [San Bruno] explosion, this Commission's fact finding investigation and panel recommendations, any proceedings that may be opened as a result of the Commission's investigation and panel recommendations, and any federal or state legislation that may be adopted.<sup>9</sup>

Thus the ruling identifies at least four separate ongoing efforts, with the possibility that more might follow. At this point it is not clear how the Commission intends to coordinate these efforts.

To date the Commission has also identified related issues in a piecemeal fashion. The initial correspondence between the agency and PG&E identified a relatively few specific issues that warranted immediate response in the Commission's mind. For example, the Commission's Executive Director ordered PG&E to perform certain duties in a letter dated September 13, 2010, including the following:

- 1) Reduce the operating pressure on PG&E's Line 132 to a pressure level of 20% below the operating pressure at the time of the failure and retain that lower pressure level until such time as the Commission allows PG&E to return to Line 132's normal operating pressure;
- 2) Ensure that there are no additional risks to the residents of San Bruno by conducting an integrity assessment of all gas facilities in the impacted area;
- 3) Conduct an accelerated leak survey of all transmission lines in PG&E's service territory, giving priority to segments in class 3 and class 4 locations, within one month of the date of this letter and take corrective action as required and report the results to the Executive Director on or before October 12, 2010;
- 4) Evaluate records of customer leak-complaint response times and response effectiveness system-wide, take immediate mitigation measures if deficiencies are found, and report the results to the Executive Director;
- 5) Prepare a plan for a complete safety inspection of PG&E's entire natural gas transmission pipeline system and provide the plan to the Commission no later than September 23, 2010;

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<sup>9</sup> *Revised Scoping Memo and Ruling Adding an Additional Phase in Application (A.) 09-09-013*, p. 7.

- 6) Make all employees and contractors available for interviews with federal and state investigators, including if requested, examinations under oath;
- 7) Preserve all records related to the incident, including work at the Milpitas Terminal during the month of September 2010;
- 8) Preserve all records related to the maintenance or modification of Line 132 by PG&E and/or its contractors performed within the City of San Bruno over the past ten (10) years;
- 9) Review the classification of natural gas transmission lines and determine if the classification has changed since the initial designation and report the results to the Executive Director;
- 10) Investigate and report to the Executive Director PG&E's forecasted versus actual levels of spending on pipeline safety and pipeline replacements from 2005 to the present; and
- 11) Conduct a review of all gas transmission line valve locations in order to determine locations where it would be prudent to replace manually operated valves with automated valves and report the results to the Executive Director.<sup>10</sup>

Just four days later, the Commission's Executive Director sent PG&E another letter, directing the utility to provide the Commission with certain information regarding the identity and status of high priority pipeline projects, as well as information pertaining to replacing manual valves on PG&E's gas transmission system with remotely-operated or automatic valves.<sup>11</sup>

The charter for the Independent Review Panel included a different (albeit related) set of issues, including the following:

- 1) What happened on September 9, 2010?
- 2) What are the root causes of the incident?
- 3) Was the accident indicative of broader management challenges and problems at PG&E in discharging its obligations in the area of public safety?

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<sup>10</sup> Resolution L-403, Sept. 23, 2010, pp. 3-4.

<sup>11</sup> Letter from Commission Executive Director Paul Clanon to PG&E President Christopher Johns, Sept. 17, 2010, available online at <http://www.cpuc.ca.gov/PUC/events/sanbruno.htm>.

- 4) Are the Commission's current permitting, inspection, ratemaking, and enforcement procedures as applied to natural gas transmission lines adequate?
- 5) What corrective actions should the Commission take immediately?
- 6) What additional corrective actions should the Commission take?
- 7) What is the public's right to information concerning the location of natural gas transmission and distribution facilities in populated areas?<sup>12</sup>

The Revised Scoping Memo in the GT&S proceeding includes a third set of identified issues. As the Commission explained,

The opening of this new "safety phase" is to focus on ensuring the safe operation of PG&E's gas transmission and storage operations, to monitor the pipeline integrity activities and pipeline safety and reliability efforts, and to ensure that safety and emergency protocols are in place so that PG&E and first responders can react quickly to similar events over this four-year rate cycle and in the future. This phase will address the straightforward protocols and procedures that PG&E should be ordered to take in the coming months in order to prevent a repeat of this kind of catastrophe.<sup>13</sup>

More specifically, the GT&S investigation will encompass the following issues:

- 1) PG&E's disaster and emergency response plan. On October 12, 2010, PG&E announced its Pipeline 2020 Program. As part of this program, PG&E plans to expand the use of automatic or remotely operated shut-off valves, and to work with local communities, public officials, and first responders over pipeline safety. Pending the implementation of these Pipeline 2020 Program elements, what steps are in place, or what does PG&E plan to do to ensure that PG&E personnel can be rapidly deployed and transported to incident areas in the event of gas leaks or gas explosions? What type of coordination exists between PG&E and city, county and state emergency personnel? Are PG&E emergency contact numbers updated and provided to emergency personnel on a regular basis? Can these procedures be improved upon in light of the San Bruno explosion and fire?
- 2) On or about October 5, 2010 PG&E announced it would provide to fire departments, upon request, location information about PG&E's gas transmission lines and the shut-off valves. What steps has PG&E taken to inform city, county, and state emergency personnel about the availability of this type of information?

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<sup>12</sup> Resolution L-403, Sept. 23, 2010, Attachment "Charter of the Independent Review Panel," pp. 1-2.

<sup>13</sup> *Revised Scoping Memo and Ruling Adding an Additional Phase*, A.09-09-013, p. 6.



Should additional information or steps be taken to ensure that emergency personnel have the type of information that they need to assess and manage situations involving PG&E's gas transmission lines?

- 3) How frequently are gas transmission and gas storage shut-off valves tested or monitored to ensure that they are in operating order?
- 4) What procedures should PG&E have in place to ensure that it timely notifies the Commission of its reprioritization of its capital expenditures associated with its gas transmission lines, and what procedures should the Commission staff adopt to review and monitor the reprioritization of these capital expenditures[?]
- 5) Other safety-related protocols or procedures that the Commission should require of PG&E during the rate cycle.
- 6) Are workshops and/or evidentiary hearings needed to determine the protocols and procedures PG&E should be required to have in place during the upcoming rate cycle?<sup>14</sup>

The Commission's approach to considering this interrelated set of issues presents a risk of overlapping efforts between the various informal and formal proceedings.<sup>15</sup>

Moreover, this approach increases the risk that certain issues will fall through the cracks. For example, TURN recommends that the Commission's investigation of the San Bruno explosion include issues such as the following, which have not been explicitly addressed in sufficient detail by prior Commission directives, rulings or resolutions:

Spending Forecasts, Authorized Spending, and Actual Recorded Results

- 1) For each year beginning in 2003, what has been PG&E's: i) forecast for ratemaking purposes and ii) actual recorded results, for each of the following:
  - a) Capital costs and O&M expenses for pipeline safety and reliability (MWC 75)

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<sup>14</sup> *Revised Scoping Memo and Ruling Adding an Additional Phase*, A.09-09-013, pp. 7-8.

<sup>15</sup> To cite just one example, the Independent Review Panel's charter includes questions regarding whether the San Bruno incident is "indicative of broader management challenges and problems at PG&E" with regard to public safety, while the Revised Scoping Memo in the GT&S proceeding asks about PG&E's management practices of regarding reprioritization of capital expenditures with regard to the gas transmission lines, a subset of such "management challenges and problems."

- b) Capital costs and O&M expenses for pipeline integrity management (MWC 98)?
- 2) For each year beginning in 2003, what has been PG&E's: i) forecast for ratemaking purposes and ii) actual recorded results, for each of the following:
    - a) Miles of transmission pipeline inspected via Direct Assessment
    - b) O&M expenses for Direct Assessment
    - c) Capital expenditures related to or resulting from Direct Assessment
    - d) Miles of transmission pipeline inspected via In-Line Inspection ("smart pigging")
    - e) O&M expenses for In-Line Inspection
    - f) Capital expenditures related to or resulting from In-Line Inspection?
  - 3) Has it been PG&E's policy since 2003 to spend what is required on safety-related pipeline maintenance to assure public safety, regardless of rate case authorizations, or is the policy to limit spending to what is approved in rate cases?
  - 4) Since 2003, has the CPUC ever significantly cut PG&E's proposed spending on pipeline safety-related work, or have rate case authorizations largely approved PG&E's proposed spending?

Pipeline Classification and Inspection Practices

- 5) What are the factors that affect PG&E's classification of pipeline segments in High Consequence Areas (HCA)? For what percentage of the miles of pipeline in High Consequence Areas (HCA) has PG&E actually completed the federally-mandated initial inspections via i) Direct Assessment or ii) In-Line Inspection? How does PG&E classify inspection results and determine if a pipeline segment needs to be repaired or replaced? How does PG&E determine the need for In-Line Inspection? Does PG&E believe that Direct Assessment provides sufficient information to assure public safety, and why or why not?
- 6) What inspections were performed of the section of pipeline that exploded in San Bruno in the last three years? Please provide dates, a detailed description of the nature of the inspection, and the results of such inspections.
- 7) Approximately how much would it cost to retrofit all of the PG&E pipelines in High Consequence Areas to allow "smart pigging"? Does PG&E believe that such expenditures would be cost-effective?

### Manual vs. Automatic Shut-off Valves

- 8) In considering potential legislation that might mandate conversion of manual shut-off valves and/or retrofitting of older pipelines to allow smart pigging, how would PG&E recommend that the legislature weigh the costs versus the potential benefits in terms of improved public safety?
- 9) What documents, if any, has PG&E submitted in rate case testimony or workpapers that discuss plans or cost estimates for installing automated valves?

### Deferred or Re-Prioritized Maintenance, Earnings and Management

- 10) What is the Gas Effectiveness Evaluation and Mitigation (GEEM) program? How much, if any, of the cost of the GEEM program was included in PG&E's rate case requests, and what was PG&E's actual spending on GEEM for each year of its existence? Did PG&E defer or re-prioritize other gas or electric system maintenance activities in order to provide funding for the GEEM program, and if so, what were the amounts deferred in each category of gas and electric maintenance?
- 11) What was the Business Transformation (BT) initiative? How much, if any, of the cost of the BT program was included in PG&E's rate case requests, and what was PG&E's actual spending on, and estimated cost savings resulting from, BT activities for each year of the program's existence? Did PG&E defer or re-prioritize gas or electric system maintenance activities in order to provide funding for the BT program? If so, what were the amounts deferred in each category of maintenance, both gas and electric?
- 12) For each year from 2003 through 2009, what was PG&E's initial target for payouts, versus actual payouts, in the Short Term Incentive Program (STIP), PG&E's management and employee incentive pay program that provides annual "bonuses" for meeting certain established corporate goals? Did PG&E defer or re-prioritize gas or electric system maintenance activities in order to provide funding for the STIP program? If so, please provide the amounts deferred in each category of maintenance, both gas and electric.
- 13) What has been PG&E's authorized return on equity (ROE) for each year from 2003 to the present? What has been PG&E's actual realized return on equity for each year compared to the authorized?
- 14) For each member of PG&E's senior management team, what are her/his i) years of experience with PG&E prior to assuming the current position and ii) years of experience in the natural gas or electric industry prior to assuming the current position? Has the composition of the senior management team impacted employee morale and actual performance to the detriment of the safety of PG&E's natural gas pipeline system?

This list is not intended to be exhaustive of all pertinent lines of inquiry, but rather illustrative of the types of issues not explicitly identified in any of the various Commission orders, rulings and correspondence with PG&E.

Furthermore, despite the Commission's effort to be transparent (for example, through the release of correspondence between the agency and PG&E), much of the process to date is impenetrable to the general public. Members of the public who wish to monitor the agency's and utility's activities with regard to these matters are faced with partial satisfaction at best. Even if they get on the separate service lists for A.09-09-013 and I.10-11-013, they could still be left in the dark about the progress of the fact-finding performed by the independent panel, or the NTSB, or other efforts underway but not the subject of a specific Commission proceeding.

As an important step toward mitigating these concerns, the Commission should designate a single proceeding as the forum for its efforts related to the San Bruno and Rancho Cordova events. This would achieve a more efficient process for both the agency and interested parties seeking to participate in that process, as compared to a more piecemeal review spread over a number of different formal proceedings. While some of that review may need to remain in a separate proceeding for various reasons, designating one proceeding as the focal point would allow the Commission to use that single forum to provide regular updates regarding the full range of review, even if some of it is not in that particular proceeding. Furthermore, the Commission would serve the public interest by providing a forum that will permit interested parties and the public at large to identify and pursue other important issues related to the San Bruno and Rancho Cordova incidents. Designating a single proceeding

would help ensure that parties do not find themselves stymied in such efforts due to having sought to raise such issues in the “wrong” proceeding.

This motion asks the Commission to designate the existing investigation in PG&E’s 2011 GRC as the vehicle for these coordinated and consolidated efforts. However, TURN and CFC readily admit that the Commission could just as easily select a different proceeding or create a new proceeding for this purpose and still meet the goals of this motion. It is not so critical that the coordination and consolidation occur in this particular PG&E GRC docket. Instead, the far more critical point is that the Commission take action now to establish that such coordination and consolidation will occur, and to designate the proceeding where it will occur.

### **III. Conclusion**

Issues of serious public safety, such as those presented here, warrant especially sensitive handling by the Commission. The residents of San Bruno, PG&E’s ratepayers, and all Californians deserve the opportunity to understand and participate in the Commission’s investigation into the root causes of the tragic explosions in PG&E’s natural gas pipeline system, as well as the related issues of remedies and prospective regulatory changes. Accordingly, the Commission should pursue, or at least coordinate, its investigation through a single public process, one which will increase the accountability of the utility and its regulator and help to restore public trust in the safety of natural gas pipelines in California. For these reasons, the Commission should grant the motion of TURN and CFC and declare that this existing investigation proceeding will serve as the forum for a consolidated, coordinated and public investigation of the various issues associated with the safety and reliability of Pacific Gas

and Electric Company's gas system in the face of the San Bruno gas line explosion tragedy and similar incidents implicating gas line safety and reliability.

Date: January 26, 2011

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