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

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)

## STIPULATION RE ORDER TO SHOW CAUSE

JONATHAN D. PENDLETON STEPHEN L. GARBER Law Department Pacific Gas and Electric Company 77 Beale Street San Francisco, CA 94105 Telephone: (415) 973-2916 Facsimile: (415) 973-5520 E-Mail: J1PC@pge.com JOSEPH M. MALKIN Orrick, Herrington, & Sutcliffe LLP The Orrick Building 405 Howard Street San Francisco, CA 94105 Telephone: (415) 773-5705 Facsimile: (415) 773-5759 Email:jmalkin@orrick.com

Attorneys for PACIFIC GAS AND ELECTRIC COMPANY

March 24, 2011

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

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)

## STIPULATION RE ORDER TO SHOW CAUSE

Pacific Gas and Electric Company ("PG&E") stipulates as follows with respect to the Order to Show Cause ("OSC") issued by the Commission on March 24, 2011:

1. In order to protect public safety and expedite PG&E's compliance with the National Transportation Safety Board's urgent safety recommendations as required by Commission Resolution L-410, PG&E and Commission Staff developed a Compliance Plan appended hereto as Attachment 1. The Compliance Plan, among other things, establishes milestones for completion of certain activities. This stipulation is presented as a resolution of the OSC and does not constitute an admission by PG&E of any fact alleged in the OSC or of any non-compliance or other violation of any order, rule, regulation or law.

2. PG&E shall carry out the Compliance Plan.

3. PG&E agrees to pay a penalty of \$6 million, as follows:

a) \$3 million will be paid to the State General Fund within ten (10) days of the Commission's approval of this stipulation without modification.

b) Payment of the remaining \$3 million will be suspended pending PG&E's completion of the Compliance Plan. Upon any unexcused failure of PG&E to meet a milestone set forth in the Compliance Plan, PG&E will pay such portion of the remaining \$3 million as the Commission may find to be appropriate to the State General Fund within ten (10) days of the Commission decision finding such unexcused failure. If PG&E successfully completes the Compliance Plan, the remaining \$3 million shall be forgiven.

c) The penalty specified above does not limit the Commission's authority to impose additional penalties for any violation of law or regulations with regard to the Commission's investigation into the San Bruno pipeline rupture not related to completion of the Compliance Plan.

d) PG&E agrees it will not seek to recover any portion of the penalty from customers in rates.

4. Upon Commission approval of this Stipulation, the OSC proceeding shall be closed.

Respectfully submitted,

THE CALIFORNIA PUBLIC UTILITIES	PACIFIC GAS AND ELECTRIC
COMMISSION	COMPANY
By Julie Halligan Deputy Director, Consumer Protection & Safety Division	By Jane Yura Vice President, Gas Engineering & Operations

Dated: March 24, 2011

# **ATTACHMENT 1**

SB\_GT&S\_0494334

## PG&E's Compliance Plan for NTSB Safety Recommendations

On January 3, 2011, the Commission directed PG&E to comply with two urgent safety recommendations from the NTSB, as follows:<sup>1</sup>

- 1. Aggressively and diligently search for all as-built drawings, alignment sheets, and specifications, and all design. construction, inspection, testing, maintenance and other related records, including those records in locations controlled by personnel or firms other than Pacific Gas and Electric Company, relating to pipeline system components such as pipe segments, valves, fittings, and weld seams for Pacific Gas and Electric Company natural gas transmission lines in class 3 and class 4 locations and class 1 and class 2 high consequence areas that have not had a maximum allowable operating pressure established through prior hydrostatic testing. These records should be traceable, verifiable, and complete. (P-10-2) (Urgent)
  - 2. Use the traceable, verifiable, and complete records located by implementation of Safety Recommendation P-I0-2 (Urgent) to determine the valid maximum allowable operating pressure, based on the weakest section of the pipeline or component to ensure safe operation, of Pacific Gas and Electric Company natural gas transmission lines in class 3 and class 4 locations and class I and class 2 high consequence areas that have not had a maximum allowable operating pressure established through prior hydrostatic testing. (P-I03) (Urgent) (emphasis added)

Safety is our highest responsibility and we intend to fully comply with, and exceed the scope of, the Commission's directives. Where the Commission's directives cover the HCA pipelines without pressure tests, we are validating the MAOPs for all 1,805 miles of HCA pipelines. We are doing so to provide assurance to the public, the Commission and ourselves that our pipelines are operating at safe MAOPs, and that our records accurately reflect the features of these pipelines. As we have said before, any record discrepancy is unacceptable to us.

To date, we have verified those HCA pipelines, as defined in the directives, which have been pressure tested, and we have aggressively and diligently searched for and collected a substantial quantity, but not all, of the records necessary to determine the valid MAOP based on the weakest section or component. To complete PG&E's compliance with these directives, we will proceed with the MAOP validation on the attached schedule.

**MAOP Validation Methodology:** For purposes of the MAOP validation, we have defined "traceable, verifiable and complete" records as original records containing information about the material properties of the mainline pipe and all pipeline appurtenances and components. Such records must be tied to the specific segment of pipe under examination and must contain information that is consistent with PG&E's procurement practices at the relevant time.

<sup>&</sup>lt;sup>1</sup> The Commission ratified these directives in Resolution L-410 (January 13, 2011).

For many of our older pipelines, we do not believe we will find "traceable, verifiable and complete" records of every component. Therefore, we are making assumptions about certain components, such as fittings and elbows, based on the material specifications at the time those materials were procured, sound engineering judgment, and conducting excavation and field testing of pipeline systems as appropriate. We will determine what field testing to use on a case-by-case basis from such techniques as X-ray or camera inspection of welds and meauring yield strength using Advanced Technology Corporation's Automated Ball Indentation technique.

We will consult with Commission staff about the assumptions we are making and the basis for those assumptions as well as any field testing we propose. We will consider any recommendations made by Commission staff. We will provide the Commission staff as much notice as practical of any field testing.

The information from PG&E's traceable, verifiable and complete documents is combined with engineering analysis and any necessary assumptions and field-testing, to create a Pipeline Features List (PFL). The PFL is a comprehensive reference of all necessary characteristics of the pipeline segment and appurtenances. The PFL will specify: (1) the weakest element of the segment of the pipeline as defined by the 49 CFR § 192.619(a)(1): (2) the criteria by which PG&E made this determination; and (3) whether this determination is based on traceable, verifiable and complete documents relating to the specific pipeline segment, or based on PG&E's assumptions. If the determination is based on assumptions, each must be identified. The PFL also will identify all source documents for the data in the PFL, including but not limited to asbuilt drawings. All such documents will be available in our electronic databases. We will provide the CPUC staff with access to these databases at its request.

The PFL information is then used in the MAOP calculation. This calculation shall be based on the weakest element of the pipeline segment. Any MAOP calculation based on assumptions will be identified as such, along with all assumptions. In no case will a MAOP increase as a result of this calculation.

We understand the Commission staff is reviewing both the draft MAOP validation report and the sample PFL we attached to our March 21<sup>st</sup> supplement, and will advise us within ten (10) days if they believe we should make any changes in our approach to the MAOP validation. If the staff recommends changes, implementation may require an adjustment to our work plan since we have already started the work with the approach outlined.

We understand that completion of this Compliance Plan does not preclude the Commission from adopting new or additional safety requirements in the future.

**<u>Reporting, Review and Authority to Reprioritize Work</u>:** Attachment A is PG&E's prioritization and work plan, identifying our priorities, and the schedule on which we plan to complete the MAOP validation. We will submit monthly reports to the Commission on our progress toward meeting the Commission's directives and completing Steps 1 and 2 in all Priorities 1 through 4, and will include, for the relevant priority pipeline segments and appurtenances, the following:

- Status of "traceable, verifiable and complete" documentation of "all as-built drawings, alignment sheets, and specifications, and all design. construction, inspection, testing, maintenance and other related records" (MAOP Validation Step 1)
- Status of compilation of the PFL (MAOP Validation Step 2)
  - o Identification of all assumptions made in completing the PFL
  - Identification of all field work planned, underway and executed in order to complete the PFL, and the results of all field work
- Status of PG&E's progress in using "the traceable, verifiable, and complete records ... to determine the valid maximum allowable operating pressure, based on the weakest section of the pipeline or component" (MAOP Validation Step 3)
- Summary of Quality Assurance/Quality Control recommendations and resulting process changes
- Discussion of any change PG&E makes to the transmission pipeline system as a result of any of the MAOP validation work.

We will meet with the Commission staff to review each monthly report. In addition, the Commission staff is encouraged to visit our MAOP validation headquarters in Walnut Creek at any time to review our operations and progress.

The need for reprioritization may be raised and discussed at any time by either the CPUC and its staff or PG&E. If PG&E believes it needs to reprioritize any of the work in the work plan, we will meet with the Commission staff to review necessary changes and the factors behind the changes. In order to efficiently change or add to Priorities 1 though 4, the Executive Director should be delegated authority by the Commission to authorize any necessary reprioritization to the work plan contained in this Compliance Plan.

**Safety Concerns:** The fundamental goal of this exhaustive exercise is to provide the public, the Commission and ourselves with as much information as possible to be assured of our gas pipeline system safety. As part of the MAOP validation process, it is our engineers' responsibility to raise any safety concerns they identify for appropriate immediate action. We will not wait until the MAOP validation process is complete to take any necessary action to ensure the safety of our pipelines. We have empowered our engineers to raise any issues they become aware of with their immediate supervisor, with the officer in charge of the MAOP validation work (Kirk Johnson) or through the Company's hot line. We have a team of engineers available who are qualified to assess any situation where an employee raises a safety concern and have empowered them to take direct action as a result. Depending on the circumstances, these actions may include: reprioritization of work, pressure reduction, pressure test or other inspection, replacement or abandonment of pipe.

PG&E shall promptly reimburse the Commission for any fees, expenses or costs for consultants or experts retained by the Commission for implementing, monitoring and enforcement of this Compliance Plan.

We will promptly notify the Commission's Executive Director and the Director of Consumer Protection and Safety in writing of any safety concern that is raised and keep the Commission staff informed of the result of our assessment of it, including any action taken in response to the concern.

Pacific Gas and Electric Company

By Bart 3-24-2011

Kirk Johnson Vice President, Gas Engineering & Operations

PG&E Completion Date	Activity	Milestone/ Report <sup>1</sup>	<b>Priority</b> Focus	Total Miles
June 10	Complete: <sup>2</sup> Search for all as-built drawings, alignment sheets, and specifications, and all design, construction, inspection, testing, maintenance and other related records, including those records in locations controlled by personnel or firms other than Pacific Gas and Electric Company, relating to pipeline system components such as pipe segments, valves, fittings, and weld seams for Pacific Gas and Electric Company natural gas transmission lines in class 3 and class 4 locations and class 1 and class 2 high consequence areas that have not had a maximum allowable operating pressure established through prior hydrostatic testing.		1) 152 Miles: DSAW pipe 24- 36" outside diameter and installed prior to 1962; Seamless pipe >24" outside diameter and installed prior to 1974	152
June 30	Complete: <sup>3</sup> Determination of the valid maximum allowable operating pressure, based on the weakest section of the pipeline or component to ensure safe operation, of Pacific Gas and Electric	Completion of Priority 1 MAOP Validation File Status Report in R.11-02-019	1) 152 Miles: DSAW pipe 24- 36" outside diameter and installed prior to 1962; Seamless pipe >24" outside diameter and installed prior to 1974	152

<sup>&</sup>lt;sup>1</sup> Monthly Reports, and meetings to Review Progress to Plan with Commission staff, will occur within 10 days of the end of each month

<sup>&</sup>lt;sup>2</sup> For the records search and collection, "complete" signifies that the vast majority of the records have been collected. As the process of completing the PFL proceeds, it is likely that the need for some additional records will be identified and those records will have to be located and collected.

<sup>&</sup>lt;sup>2</sup> Completion of the MAOP validation assumes limited field work. If more field work is needed, PG&E may ask the Executive Director to use his delegated authority to approve a modification of the schedule.

PG&E Completion Date	Activity	Milestone/ Report <sup>1</sup>	Priority Focus	Total Miles
	Company natural gas transmission lines in class 3 and class 4 locations and class 1 and class 2 high consequence areas that have not had a maximum allowable operating pressure established through prior hydrostatic testing.			
July 10	Complete: Search for all as-built drawings, alignment sheets, and specifications, and all design, construction, inspection, testing, maintenance and other related records, including those records in locations controlled by personnel or firms other than Pacific Gas and Electric Company, relating to pipeline system components such as pipe segments, valves, fittings, and weld seams for Pacific Gas and Electric Company natural gas transmission lines in class 3 and class 4 locations and class 1 and class 2 high consequence areas that have not had a maximum allowable operating pressure established through prior hydrostatic testing.		2) 295 Miles: ERW, SSAW, Flash and Lap Welded and all pipe with Joint Efficiency < 1 and installed prior to 1970	295
July 31	Complete: Determination of the valid maximum allowable operating pressure, based on the weakest section of the pipeline or component to	Completion of Priority 2 MAOP Validation File Status	2) 295 Miles: ERW, SSAW, Flash and Lap Welded and all pipe with Joint Efficiency < 1 and installed prior to 1970	295

PG&E Completion Date	Activity	Milestone/ Report <sup>1</sup>	<b>Priority Focus</b>	Total Miles
	ensure safe operation, of Pacific Gas and Electric Company natural gas transmission lines in class 3 and class 4 locations and class 1 and class 2 high consequence areas that have not had a maximum allowable operating pressure established through prior hydrostatic testing.	Report in R.11-02-019		
August 10	Complete: Search for all as-built drawings, alignment sheets, and specifications, and all design, construction, inspection, testing, maintenance and other related records, including those records in locations controlled by personnel or firms other than Pacific Gas and Electric Company, relating to pipeline system components such as pipe segments, valves, fittings, and weld seams for Pacific Gas and Electric Company natural gas transmission lines in class 3 and class 4 locations and class 1 and class 2 high consequence areas that have not had a maximum allowable operating pressure established through prior hydrostatic testing.		3) 206 Miles: All remaining 619(c) documented pipe and pipe installed prior to 7/1/1970 with records still under review 4) 52 Miles: All pipe installed after 7/1/1970 with records still under review	258
August 31	Complete: Determination of the valid maximum allowable operating pressure, based on the	Completion of Priority 3-4 MAOP Validation	<ul> <li>3) 206 Miles: All remaining</li> <li>619(c) documented pipe and</li> <li>pipe installed prior to 7/1/1970</li> <li>with records still under review</li> <li>4) 52 Miles: All pipe installed</li> </ul>	258

PG&E Completion Date	Activity	Milestone/ Report <sup>1</sup>	Priority Focus	Total Miles
	weakest section of the pipeline or component to ensure safe operation, of Pacific Gas and Electric Company natural gas transmission lines in class 3 and class 4 locations and class I and class 2 high consequence areas that have not had a maximum allowable operating pressure established through prior hydrostatic testing.	File Status Report in R.11-02-019	after 7/1/1970 with records still under review	

,

## CERTIFICATE OF SERVICE BY ELECTRONIC 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 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 same day it is submitted for mailing.

On March 24, 2011, I served a true copy of:

## STIPULATION RE ORDER TO SHOW CAUSE

[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for R.11-02-019 and I.11-02-016 with an e-mail address.

[XX] By U.S. Mail – by placing the enclosed 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 those parties listed on the official service list for R.11-02-019 and I.11-02-016 without an e-mail address.

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 March 24, 2011.

and the

TAUVELA V. U'U

Total number of addressees: 108

MELISSA A. KASNITZ ATTORNEY DISABILITY RIGHTS ADVOCATES 2001 CENTER ST, FOURTH FLR BERKELEY CA 94704-1204 (DisabRA) Disability Rights Advocates Email: pucservice@dralegal.org Status: PARTY

#### Redacted

PACIFIC GAS AND ELECTRIC COMPANY Redacted

CASE COORDINATION PACIFIC GAS AND ELECTRIC COMPANY PO BOX 770000; MC B9A SAN FRANCISCO CA 94177 Email: regrelcpuccases@pge.com Status: INFORMATION

#### Redacted

PACIFIC GAS AND ELECTRIC COMPANY EMAIL ONLY EMAIL ONLY CA 0 Email: AGL9@pge.com Status: INFORMATION

Redacted

PACIFIC GAS AND FLECTRIC COMPANY Redacted

BRIAN K. CHERRY PACIFIC GAS AND ELECTRIC COMPANY 77 BEALE ST, RM 1087 SAN FRANCISCO CA 94105 FOR: Pacific Gas and Electric Company Email: BKC7@pge.com Status: PARTY

LISE H. JORDAN PACIFIC GAS AND ELECTRIC COMPANY 77 BEALE ST, MC B30A SAN FRANCISCO CA 94105 FOR: Pacific Gas and Electric Company Email: Ihj2@pge.com Status: PARTY PACIFIC GAS AND ELECTRIC COMPANY EMAIL ONLY EMAIL ONLY CA 0 Email: regrelcpuccases@pge.com Status: INFORMATION

Redacted

PACIFIC GAS AND ELECTRIC COMPANY Redacted

Redacted

PACIFIC GAS AND ELECTRIC COMPANY Redacted

Redacted
PACIFIC GAS AND ELECTRIC COMPANY
Redacted

BRUCE T. SMITH CASE MANAGER PACIFIC GAS AND ELECTRIC COMPANY 77 BEALE ST, B9A SAN FRANCISCO CA 94105 Email: bts1@pge.com Status: INFORMATION

CHRISTOPHER P. JOHNS PACIFIC GAS AND ELECTRIC COMPANY 77 BEALE ST SAN FRANCISCO CA 94105 FOR: Pacific Gas and Electric Company Status: PARTY

JOSEPH M. MALKIN ORRICK HERRINGTON & SUTCLIFFE LLP THE ORRICK BUILDING 405 HOWARD ST SAN FRANCISCO CA 94105-2669 FOR: Pacific Gas and Electric Company Email: JMalkin@Orrick.com Status: PARTY

Total number of addressees: 108

WILLIAM V. MANHEIM ATTORNEY PACIFIC GAS AND ELECTRIC COMPANY 77 BEALE ST., MC B30A SAN FRANCISCO CA 94105 FOR: Pacific Gas and Electric Company Email: wvm3@pge.com Status: PARTY

Maribeth A. Bushey CALIF PUBLIC UTILITIES COMMISSION DIVISION OF ADMINISTRATIVE LAW JUDGES 505 VAN NESS AVE RM 5018 SAN FRANCISCO CA 94102-3214 Email: mab@cpuc.ca.gov Status: STATE-SERVICE

Michael Colvin CALIF PUBLIC UTILITIES COMMISSION POLICY & PLANNING DIVISION 505 VAN NESS AVE RM 5119 SAN FRANCISCO CA 94102-3214 Email: mc3@cpuc.ca.gov Status: STATE-SERVICE

Paul A. Penney CALIF PUBLIC UTILITIES COMMISSION SAFETY & RELIABILITY BRANCH 505 VAN NESS AVE AREA 2-D SAN FRANCISCO CA 94102-3214 Email: pap@cpuc.ca.gov Status: STATE-SERVICE

Jonathan J. Reiger CALIF PUBLIC UTILITIES COMMISSION LEGAL DIVISION 505 VAN NESS AVE RM 5035 SAN FRANCISCO CA 94102-3214 Email: jzr@cpuc.ca.gov Status: STATE-SERVICE

Matthew Tisdale CALIF PUBLIC UTILITIES COMMISSION EXECUTIVE DIVISION 505 VAN NESS AVE RM 5303 SAN FRANCISCO CA 94102-3214 Email: mwt@cpuc.ca.gov Status: STATE-SERVICE

JASON A. DUBCHAK WILD GOOSE STORAGE LLC 607 8TH AVE S.W., STE 400 CALGARY AB T2P OA7 CANADA FOR: Wild Goose Storage, LLC Email: jason.dubchak@niskags.com Status: PARTY Joyce Alfton CALIF PUBLIC UTILITIES COMMISSION ENERGY DIVISION 505 VAN NESS AVE AREA 4-A SAN FRANCISCO CA 94102-3214 Email: alf@cpuc.ca.gov Status: STATE-SERVICE

Aimee Cauguiran CALIF PUBLIC UTILITIES COMMISSION SAFETY & RELIABILITY BRANCH 505 VAN NESS AVE AREA SAN FRANCISCO CA 94102-3214 Email: aad@cpuc.ca.gov Status: STATE-SERVICE

Kelly C. Lee CALIF PUBLIC UTILITIES COMMISSION ENERGY COST OF SERVICE & NATURAL GAS BRANCH 505 VAN NESS AVE RM 4102 SAN FRANCISCO CA 94102-3214 Email: kcl@cpuc.ca.gov Status: STATE-SERVICE

Robert M. Pocta CALIF PUBLIC UTILITIES COMMISSION ENERGY COST OF SERVICE & NATURAL GAS BRANCH 505 VAN NESS AVE RM 4205 SAN FRANCISCO CA 94102-3214 Email: rmp@cpuc.ca.gov Status: STATE-SERVICE

Pearlie Sabino CALIF PUBLIC UTILITIES COMMISSION ENERGY COST OF SERVICE & NATURAL GAS BRANCH 505 VAN NESS AVE RM 4209 SAN FRANCISCO CA 94102-3214 Email: pzs@cpuc.ca.gov Status: STATE-SERVICE

Amy C. Yip-Kikugawa CALIF PUBLIC UTILITIES COMMISSION EXECUTIVE DIVISION 505 VAN NESS AVE RM 5102 SAN FRANCISCO CA 94102-3214 Email: ayk@cpuc.ca.gov Status: STATE-SERVICE

MARC D. JOSEPH ADAMS BROADWELL JOSEPH & CARDOZO 601 GATEWAY BLVD., STE. 1000 SOUTH SAN FRANCISCO CA 94080-7037 Email: mdjoseph@adamsbroadwell.com Status: INFORMATION

Total number of addressees: 108

DAVID MARCUS ADAMS BROADWELL & JOSEPH PO BOX 1287 BERKELEY CA 94701-1287 Email: dmarcus2@sbcglobal.net Status: INFORMATION

KAREN TERRANOVA ALCANTAR & KAHL, LLP 33 NEW MONTGOMERY ST, STE 1850 SAN FRANCISCO CA 94105 Email: filings@a-klaw.com Status: INFORMATION

EDWARD G. POOLE ANDERSON & POOLE 601 CALIFORNIA ST, STE 1300 SAN FRANCISCO CA 94108-2812 Email: epoole@adplaw.com Status: INFORMATION

CATHERINE M. ELDER ASPEN ENVIRONMENT GROUP 8801 FOLSOM BLVD., STE 290 SACRAMENTO CA 95826 Email: kelder@aspeneg.com Status: INFORMATION

CALIFORNIA ENERGY MARKETS 425 DIVISADERO ST. STE 303 SAN FRANCISCO CA 94117-2242 Email: cem@newsdata.com Status: INFORMATION

TRANSMISSION EVALUATION UNIT CALIFORNIA ENERGY COMMISSION 1516 NINTH ST, MS-46 SACRAMENTO CA 95814-5512 FOR: California Energy Commission Status: PARTY

MARTIN HOMEC EMAIL ONLY EMAIL ONLY CA 00000-0000 FOR: Californians for Renewable Energy Email: martinhomec@gmail.com Status: PARTY SEEMA SRINIVASAN ALCANTAR & KAHL, LLP 33 NEW MONTGOMERY ST, STE 1850 SAN FRANCISCO CA 94105 Email: sls@a-klaw.com Status: INFORMATION

MIKE LAMOND CHIEF FINANCIAL OFFICER ALPINE NATURAL GAS OPERATING CO. #1 LLC PO BOX 550, 15 ST. ANDREWS ROAD VALLEY SPRINGS CA 95252 FOR: Alpine Natural Gas Email: Mike@alpinenaturalgas.com Status: PARTY

ANDREW GAY ARC ASSET MANAGEMENT, LTD 237 PARK AVE, 9TH FLR NEW YORK NY 10017 Email: andrewgay@arcassetItd.com Status: INFORMATION

LEN CANTY CHAIRMAN BLACK ECONOMIC COUNCIL 484 LAKEPARK AVE. STE 338 OAKLAND CA 94610 FOR: Black Economic Council Email: lencanty@BlackEconomicCouncil.org Status: INFORMATION

CALIFORNIA ENERGY MARKETS 425 DIVISADERO ST. STE 303 SAN FRANCISCO CA 94117-2242 Email: cem@newsdata.com Status: INFORMATION

BOB GORHAM DIVISION CHIEF -PIPELINE SAFETY DIVISION CALIFORNIA STATE FIRE MARSHALL 3950 PARAMOUNT BLVD., NO. 210 LAKEWOOD CA 90712 FOR: California State Fire Marshall - Safety Division Email: bob.gorham@fire.ca.gov Status: PARTY

STEPHEN CITTADINE CENTRAL VALLEY GAS STORAGE, LLC 3333 WARRENVILLE ROAD, STE. 630 LISLE IL 60532 FOR: Central Valley Gas Storage, LLC Email: scittad@nicor.com Status: PARTY

Total number of addressees: 108

AUSTIN M. YANG CITY AND COUNTY OF SAN FRANCISCO OFFICE OF THE CITY ATTORNEY, RM. 234 1 DR. CARLTON B. GODDLETT PLACE SAN FRANCISCO CA 94102-4682 FOR: City and County of San Francisco Email: austin.yang@sfgov.org Status: PARTY

GRANT KNOLLING CITY OF PALO ALTO 250 HAMILTON AVE PALO ALTO CA 94303 Status: INFORMATION

KLARA A. FABRY DIRECTOR - DEPT. OF PUBLIC SERVICES CITY OF SAN BRUNO 567 EL CAMINO REAL SAN BRUNO CA 94066-4299 Email: kfabry@sanbruno.ca.gov Status: INFORMATION

RACHAEL E. KOSS ADAMS BROADWELL JOSEPH & CARDOZO 601 GATEWAY BLVD, STE 1000 SOUTH SAN FRANCISCO CA 94080 FOR: Coalition of California Utility Employees Email: rkoss@adamsbroadwell.com Status: PARTY

DIANA S. GENASCI ATTORNEY DAY CARTER & MURPHY LLP 3620 AMERICAN RIVER DRIVE, STE. 205 SACRAMENTO CA 95864 Email: dgenasci@DayCarterMurphy.com Status: INFORMATION

GREGORY KLATT DOUGLASS & LIDDELL 411 E. HUNTINGTON DR., NO. 107-356 ARCADIA CA 91006 Email: klatt@energyattorney.com Status: INFORMATION

Robert C. Cagen CALIF PUBLIC UTILITIES COMMISSION LEGAL DIVISION 505 VAN NESS AVE RM 5026 SAN FRANCISCO CA 94102-3214 FOR: DRA Email: rcc@cpuc.ca.gov Status: PARTY KARLA DAILEY CITY OF PALO ALTO UTILITIES DEPARTMENT BOX 10250 PALO ALTO CA 94303 Email: karla.Dailey@CityofPaloAlto.org Status: INFORMATION

GEOFF CALDWELL POLICE DEPT.- POLICE SERGEANT CITY OF SAN BRUNO 567 EL CAMINO REAL SAN BRUNO CA 94066-4299 Email: gcaldwell@sanbruno.ca.gov Status: INFORMATION

CONNIE JACKSON CITY MANAGER CITY OF SAN BRUNO 567 EL CAMINO REAL SAN BRUNO CA 94066-4299 FOR: City of San Bruno Email: cjackson@sanbruno.ca.gov Status: PARTY

THOMAS BEACH CROSSBORDER ENERGY 2560 9TH ST., STE 213A BERKELEY CA 94710-2557 Email: tomb@crossborderenergy.com Status: INFORMATION

ANN L. TROWBRIDGE DAY CARTER & MURPHY LLP 3620 AMERICAN RIVER DRIVE, STE 205 SACRAMENTO CA 95864 Email: atrowbridge@daycartermurphy.com Status: INFORMATION

Joe Como CALIF PUBLIC UTILITIES COMMISSION DRA - ADMINISTRATIVE BRANCH 505 VAN NESS AVE RM 4101 SAN FRANCISCO CA 94102-3214 FOR: DRA Email: joc@cpuc.ca.gov Status: INFORMATION

Marion Peleo CALIF PUBLIC UTILITIES COMMISSION LEGAL DIVISION 505 VAN NESS AVE RM 4107 SAN FRANCISCO CA 94102-3214 FOR: DRA Email: map@cpuc.ca.gov Status: PARTY

Total number of addressees: 108

ROBERT GNAIZDA OF COUNSEL 200 29TH ST, NO. 1 SAN FRANCISCO CA 94131 Email: RobertGnaizda@gmail.com Status: INFORMATION

RICHARD DANIEL GILL RANCH STORAGE, LLC 220 NW SECOND AVE PORTLAND OR 97209 FOR: Gill Ranch Storage, LLC Status: PARTY

JORGE CORRALEJO CHAIRMAN / PRESIDENT LAT. BUS. CHAMBER OF GREATER L.A. 634 S. SPRING ST, STE 600 LOS ANGELES CA 90014 FOR: Latino Business Chamber of Greater Los Angeles Email: jcorralejo@lbcgla.org Status: INFORMATION

SCOTT COLLIER LOCI GAS STORAGE, LLC EMAIL ONLY EMAIL ONLY CA 0 Email: tcollier@buckeye.com Status: INFORMATION

GREG CLARK COMPLIANCE MGR. LODI GAS STORAGE, LLC EMAIL ONLY EMAIL ONLY CA 0 Email: gclark@lodistorage.com Status: INFORMATION

PRISCILLA CASTILLO LOS ANGELES DEPT OF WATER & POWER 111 NORTH HOPE ST., RM. 340 LOS ANGELES CA 90012 Email: priscila.castillo@lawp.com Status: INFORMATION

JOHN W. LESLIE LUCE FORWARD HAMILTON & SCRIPPS LLP 600 WEST BROADWAY, STE 2600 SAN DIEGO CA 92101 Email: jleslie@luce.com Status: INFORMATION LAURA SEMIK PO BOX 1107 BELMONT CA 94002 Email: laura@messimer.com Status: INFORMATION

BRIAN T. CRAGG GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY 505 SANSOME ST, STE 900 SAN FRANCISCO CA 94111 Email: bcragg@goodinmacbride.com Status: INFORMATION

JAMES J. HECKLER LEVIN CAPITAL STRATEGIES EMAIL ONLY EMAIL ONLY NY 0 Email: jheckler@levincap.com Status: INFORMATION

WILLIAM H. SCHMIDT, JR LODI GAS STORAGE, LLC FIVE TEK PARK 9999 HAMILTON BLVD BREINIGSVILLE PA 18031 FOR: Lodi Gas Storage, LLC Email: wschmidt@buckeye.com Status: PARTY

ROBERT RUSSELL LODI GAS STORAGE, LLC EMAIL ONLY EMAIL ONLY CA 0 Email: rrussell@lodistorage.com Status: INFORMATION

ROBERT L. PETTINATO LOS ANGELES DEPT. OF WATER & POWER 111 NORTH HOPE ST., RM. 1150 LOS ANGELES CA 90012 Email: robert.pettinato@ladwp.com Status: INFORMATION

MARGARET C. FELTS M.C. FELTS COMPANY 8822 SHINER CT. ELK GROVE CA 95624 Email: margaret@mfelts.com Status: INFORMATION

Total number of addressees: 108

CLEO ZAGREAN MACQUARIE CAPITAL (USA) EMAIL ONLY EMAIL ONLY NY 0 Email: cleo.zagrean@macquarie.com Status: INFORMATION

BRITT STROTTMAN ATTORNEY MEYERS NAVE 555 12TH ST, STE. 1500 OAKLAND CA 94607 Email: bstrottman@meyersnave.com Status: INFORMATION

FAITH BAUTISTA PRESIDENT NATIONAL ASIAN AMERICAN COALITION 1758 EL CAMINO REAL SAN BRUNO CA 94066 FOR: National Asian American Coalition Email: faith.mabuhayalliance@gmail.com Status: INFORMATION

BARRY F. MCCARTHY ATTORNEY MCCARTHY & BERLIN, LLP 100 W. SAN FERNANDO ST., STE 501 SAN JOSE CA 95113 FOR: Northern California Generation Coalition (NCGC) Email: bmcc@mccarthylaw.com Status: PARTY

TIMOTHY TUTT SACRAMENTO MUNICIPAL UTILITY DISTRICT 6201 S ST, MS B404 / PO BOX 15830 SACRAMENTO CA 95817 Email: ttutt@smud.org Status: INFORMATION

SHARON L. TOMKINS **SOUTHERN CALIFORNIA GAS COMPANY** 555 WEST FIFTH ST, STE 1400 LOS ANGELES CA 90013-1034 FOR: San Diego Gas & Electric Company/Southern California Gas Company Email: STomkins@semprautilities.com Status: PARTY

MARCIE A. MILNER SHELL ENERGY NORTH AMERICA (US), L.P. 4445 EASTGATE MALL, STE. 100 SAN DIEGO CA 92121 Email: marcie.milner@shell.com Status: INFORMATION STEVEN R. MEYERS PRINCIPAL MEYERS NAVE 555 12TH ST, STE. 1500 OAKLAND CA 94607 Email: smeyers@meyersnave.com Status: INFORMATION

MRW & ASSOCIATES, LLC EMAIL ONLY EMAIL ONLY CA 0 Email: mrw@mrwassoc.com Status: INFORMATION

RAY WELCH ASSOCIATE DIRECTOR NAVIGANT CONSULTING, INC. ONE MARKET PLAZA, STE 1200 SAN FRANCISCO CA 94105 Email: ray.welch@navigantconsulting.com Status: INFORMATION

WILLIAM W. WESTERFIELD III SACRAMENTO MUNICIPAL UTILITY DISTRICT 6201 S ST., MS B406 / PO BOX 15830 SACRAMENTO CA 95852-1830 FOR: Sacramento Municipal Utility District Email: wwester@smud.org Status: PARTY

ALFRED F. JAHNS LAW OFFICE ALFRED F. JAHNS 3620 AMERICAN RIVER DRIVE, STE 105 SACRAMENTO CA 95864 FOR: Sacramento Natural Gas Storage, LLC Email: ajahns@jahnsatlaw.com Status: PARTY

CENTRAL FILES SDG&E AND SOCALGAS 8330 CENTURY PARK COURT, CP31-E SAN DIEGO CA 92123-1550 Email: CentralFiles@SempraUtilities.com Status: INFORMATION

DOUGLAS PORTER SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVE ROSEMEAD CA 91770 FOR: So. Calif. Edison Co. (Catalina Island) Email: douglas.porter@sce.com Status: PARTY

Total number of addressees: 108

CASE ADMINISTRATION SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVE, PO BOX 800 ROSEMEAD CA 91770 Email: case.admin@sce.com Status: INFORMATION

CENTRAL FILES SOUTHERN CALIFORNIA GAS COMPANY 555 W. FIFTH ST, GT14D6 LOS ANGELES CA 90013-1011 Email: centralfiles@semprautilities.com Status: INFORMATION

GLORIA ING ATTORNEY SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVE ROSEMEAD CA 91770 Email: gloria.ing@sce.com Status: INFORMATION

#### DEANA NG

SOUTHERN CALIFORNIA GAS COMPANY 555 WEST FIFTH ST, STE 1400 LOS ANGLELES CA 90013-1034 Email: DNg@semprautilities.com Status: INFORMATION

JEFFERY L. SALAZAR SOUTHERN CALIFORNIA GAS COMPANY 555 W. FIFTH ST, GT14D6 LOS ANGELES CA 90013 Email: JLsalazar@SempraUtilities.com Status: INFORMATION

DEANA MICHELLE NG SOUTHERN CALIFORNIA GAS COMPANY 555 W. 5TH ST, STE. 1400 LOS ANGELES CA 90013 FOR: Southern California Gas Company Email: dng@semprautilities.com Status: PARTY

CHRISTY BERGER MGR - STATE REG AFFAIRS SOUTHWEST GAS CORPORATION 5241 SPRING MOUNTAIN ROAD LAS VEGAS NV 89150-0002 Email: christy.berger@swgas.com Status: INFORMATION RONALD S. CAVALLERI SOUTHERN CALIFORNIA GAS COMPANY 555 W. FIFTH ST, GT14D6 LOS ANGELES CA 90013-1011 Email: RCavalleri@SempraUtilities.com Status: INFORMATION

GREG HEALY SOUTHERN CALIFORNIA GAS COMPANY 555 W. FIFTH ST., GT14D6 LOS ANGELES CA 90013 Email: GHealy@semprautilities.com Status: INFORMATION

ROBERT F. LEMOINE ATTORNEY SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVE. STE 346L ROSEMEAD CA 91770 Email: Robert.F.Lemoine@sce.com Status: INFORMATION

RASHA PRINCE SOUTHERN CALIFORNIA GAS COMPANY 555 WEST 5TH ST, GT14D6 LOS ANGELES CA 90013-1034 Email: RPrince@SempraUtilities.com Status: INFORMATION

JEFFREY L. SALAZAR SOUTHERN CALIFORNIA GAS COMPANY 555 WEST FIFTH ST, GT14D6 LOS ANGELES CA 90013 Email: JLSalazar@SempraUtilities.com Status: INFORMATION

NORMAN A. PEDERSEN ATTORNEY HANNA & MORTON 444 S. FLOWER ST, STE 1500 LOS ANGELES CA 90071 FOR: Southern California Generation Coalition Email: npedersen@hanmor.com Status: PARTY

GALEN DENIO MGR - ENGINEERING SOUTHWEST GAS CORPORATION 5241 SPRING MOUNTAIN ROAD LAS VEGAS NV 89150-0002 Email: galen.denio@swgas.com Status: INFORMATION

Total number of addressees: 108

JIM MATHEWS ADMIN - COMPLIANCE - ENGINEERING SOUTHWEST GAS CORPORATION 5241 SPRING MOUNTAIN ROAD LAS VEGAS NV 89150-0002

Email: jim.mathews@swgas.com Status: INFORMATION

MICHAEL ROCHMAN MANAGING DIRECTOR SPURR 1850 GATEWAY BLVD., STE 235 CONCORD CA 94520 Email: Service@spurr.org Status: INFORMATION

ENRIQUE GALLARDO THE GREENLINING INSTITUTE EMAIL ONLY EMAIL ONLY CA 0 Email: enriqueg@greenlining.org Status: INFORMATION

MARCEL HAWIGER THE UTILITY REFORM NETWORK 115 SANSOME ST, STE 900 SAN FRANCISCO CA 94104 FOR: The Utility Reform Network Email: marcel@turn.org Status: PARTY

MARCEL HAWIGER ENERGY ATTORNEY THE UTILITY REFORM NETWORK EMAIL ONLY EMAIL ONLY CA 00000-0000 FOR: TURN Email: marcel@turn.org Status: PARTY JUSTIN LEE BROWN ASSIST COUNSEL - LEGAL SOUTHWEST GAS CORPORATION 5241 SPRING MOUNTAIN ROAD LAS VEGAS NV 89150-0002 FOR: Southwest Gas Corporation Email: justin.brown@swgas.com Status: PARTY

STEPHANIE C. CHEN ATTORNEY THE GREENLINING INSTITUTE EMAIL ONLY EMAIL ONLY CA 0 FOR: The Greenlining Institute Email: stephaniec@greenlining.org Status: INFORMATION

ROBERT FINKELSTEIN LEGAL DIRECTOR THE UTILITY REFORM NETWORK 115 SANSOME ST, STE 900 SAN FRANCISCO CA 94104 Email: bfinkelstein@turn.org Status: INFORMATION

DANIEL W. DOUGLASS DOUGLASS & LIDDELL 21700 OXNARD ST., STE. 1030 WOODLAND HILLS CA 91367 FOR: Transwestern Pipeline Company Email: douglass@energyattorney.com Status: INFORMATION

RAYMOND J. CZAHAR CHIEF FINANCIAL OFFICER WEST COAST GAS CO., INC. 9203 BEATTY DR. SACRAMENTO CA 95826-9702 FOR: West Coast Gas Company, Inc. Email: westgas@aol.com Status: PARTY

# THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA EMAIL SERVICE LIST

Last Updated: March 23, 2011 CPUC DOCKET NO. R1102019 - I1102016

aad@cpuc.ca.gov;AGL9@pge.com;ajahns@jahnsatlaw.com;alf@cpuc.ca.gov;andrewgay@arcas setltd.com;atrowbridge@daycartermurphy.com;austin.yang@sfgov.org;ayk@cpuc.ca.gov;bcragg @goodinmacbride.com;bfinkelstein@turn.org;BKC7@pge.com;bmcc@mccarthylaw.com;bob.gor ham@fire.ca.gov;bstrottman@meversnave.com;bts1@pge.com;case.admin@sce.com;cem@ne wsdata.com;cem@newsdata.com;CentralFiles@SempraUtilities.com;centralfiles@semprautilities .com;christy.berger@swgas.com;cjackson@sanbruno.ca.gov;cleo.zagrean@macquarie.com;d1ct @pge.com;dgenasci@DavCarterMurphy.com;dmarcus2@sbcglobal.net;DNg@semprautilities.co m;dng@semprautilities.com;douglas.porter@sce.com;douglass@energyattorney.com;enrigueg@ greenlining.org;epoole@adplaw.com;faith.mabuhayalliance@gmail.com;filings@aklaw.com;galen.denio@swgas.com;gcaldweil@sanbruno.ca.gov;gclark@lodistorage.com;GHealy @semprautilities.com;gloria.ing@sce.com;j1pc@pge.com;J4LR@pge.com;jason.dubchak@niska gs.com;jcorratejo@lbcgla.org;jheckler@levincap.com;jim.mathews@swgas.com;jleslie@luce.com ;JLsalazar@SempraUtilities.com;JLSalazar@SempraUtilities.com;JMalkin@Orrick.com;joc@cpu c.ca.gov;justin.brown@swgas.com;jzr@cpuc.ca.gov;karla.Dailev@CityofPaloAlto.org;kck5@pge. com;kcl@cpuc.ca.gov;kelder@aspeneg.com;kfabry@sanbruno.ca.gov;klatt@energyattorney.com ;kmmj@pge.com;laura@messimer.com;lencanty@BlackEconomicCouncil.org;lhj2@pge.com;ma b@cpuc.ca.gov;map@cpuc.ca.gov;marcel@turn.org;marcel@turn.org;marcie.milner@shell.com; margaret@mfelts.com;martinhomec@gmail.com;mc3@cpuc.ca.gov;mdjoseph@adamsbroadwell. com;Mike@alpinenaturalgas.com;mrw@mrwassoc.com;mwt@cpuc.ca.gov;npedersen@hanmor. com;pap@cpuc.ca.gov;priscila.castillo@lawp.com;pucservice@dralegal.org;pzs@cpuc.ca.gov;ra v.welch@navigantconsulting.com;RCavalleri@SempraUtilities.com;rcc@cpuc.ca.gov;regrelcpucc ases@pge.com;regrelcpuccases@pge.com;rkoss@adamsbroadwell.com;rmp@cpuc.ca.gov;Rob ert.F.Lemoine@sce.com;robert.pettinato@ladwp.com;RobertGnaizda@gmail.com;RPrince@Sem praUtilities.com;rrussell@lodistorage.com;scittad@nicor.com;Service@spurr.org;sls@aklaw.com;smeyers@meyersnave.com;stephaniec@greenlining.org;STomkins@semprautilities.co m;tcollier@buckeye.com;tomb@crossborderenergy.com;ttutt@smud.org;westgas@aol.com;wsch midt@buckeye.com;wvm3@pge.com;wwester@smud.org;

# THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA EMAIL SERVICE LIST Last Updated: March 23, 2011

CPUC DOCKET NO. R1102019 - I1102016

aad@cpuc.ca.gov;AGL9@pge.com;ajahns@jahnsatlaw.com;alf@cpuc.ca.gov;andrewgay@arcas setltd.com;atrowbridge@daycartermurphy.com;austin.yang@sfgov.org;ayk@cpuc.ca.gov;bcragg @goodinmacbride.com;bfinkelstein@turn.org;BKC7@pge.com;bmcc@mccarthylaw.com;bob.gor ham@fire.ca.gov;bstrottman@meversnave.com;bts1@pge.com;case.admin@sce.com;cem@ne wsdata.com;cem@newsdata.com;CentralFiles@SempraUtilities.com;centralfiles@semprautilities .com;christy.berger@swgas.com;cjackson@sanbruno.ca.gov;cleo.zagrean@macquarie.com;d1ct @pge.com;dgenasci@DayCarterMurphy.com;dmarcus2@sbcglobal.net;DNg@semprautilities.co m;dng@semprautilities.com;douglas.porter@sce.com;douglass@energyattorney.com;enriqueg@ greenlining.org;epoole@adplaw.com;faith.mabuhayalliance@gmail.com;filings@aklaw.com;galen.denio@swgas.com;gcaldwell@sanbruno.ca.gov;gclark@lodistorage.com;GHealy @semprautilities.com;gloria.ing@sce.com;j1pc@pge.com;J4LR@pge.com;jason.dubchak@niska gs.com;jcorralejo@lbcgla.org;jheckler@levincap.com;jim.mathews@swgas.com;jleslie@luce.com ;JLsalazar@SempraUtilities.com;JLSalazar@SempraUtilities.com;JMalkin@Orrick.com;joc@cpu c.ca.gov;justin.brown@swgas.com;jzr@cpuc.ca.gov;karla.Dailey@CityofPaloAlto.org;kck5@pge. com;kcl@cpuc.ca.gov;kelder@aspeneg.com;kfabry@sanbruno.ca.gov;klatt@energyattorney.com ;kmmj@pge.com;laura@messimer.com;lencanty@BlackEconomicCouncil.org;lhj2@pge.com;ma b@cpuc.ca.gov;map@cpuc.ca.gov;marcel@turn.org;marcel@turn.org;marcie.milner@shell.com; margaret@mfelts.com;martinhomec@gmail.com;mc3@cpuc.ca.gov;mdjoseph@adamsbroadwell. com:Mike@alpinenaturalgas.com:mrw@mrwassoc.com;mwt@cpuc.ca.gov;npedersen@hanmor. com;pap@cpuc.ca.gov;priscila.castillo@lawp.com;pucservice@dralegal.org;pzs@cpuc.ca.gov;ra y.welch@navigantconsulting.com;RCavalleri@SempraUtilities.com;rcc@cpuc.ca.gov;regrelcpucc ases@pge.com;regreicpuccases@pge.com;rkoss@adamsbroadwell.com;rmp@cpuc.ca.gov;Rob ert.F.Lemoine@sce.com;robert.pettinato@ladwp.com;RobertGnaizda@gmail.com;RPrince@Sem praUtilities.com;rrussell@lodistorage.com;scittad@nicor.com;Service@spurr.org;sls@aklaw.com;smeyers@meyersnave.com;stephaniec@greenlining.org;STomkins@semprautilities.co m;tcollier@buckeye.com;tomb@crossborderenergy.com;ttutt@smud.org;westgas@aol.com;wsch midt@buckeve.com;wvm3@pge.com;wwester@smud.org;