

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

Order Instituting Investigation on the
Commission's Own Motion into the
Operations and Practices of Pacific Gas
and Electric Company with Respect to
Facilities Records for its Natural Gas
Transmission System Pipelines.

Investigation 11-02-016
(Filed February 24, 2011)

MOTION FOR PARTY STATUS OF THE CITY OF SAN BRUNO

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April 15, 2011

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I. CITY OF SAN BRUNO'S INTEREST IN THIS PROCEEDING

On February 24, 2011, the Commission instituted the above-named formal investigation to determine whether Pacific Gas & Electric ("PG&E") "violated any provision or provisions of the California Public Utilities Code, Commission general orders or decisions, or other applicable rules or requirements pertaining to safety recordkeeping" for PG&E's gas service and facilities.¹ The Order specifically pertains to "PG&E's safety recordkeeping" arising as a result of the tragic September 9, 2010 pipeline explosion in San Bruno, California. This Motion for Party Status is filed by the City of San Bruno (the "City") in order for the City to participate as an active party in this proceeding. As well, the City's interests are not represented by any party to this proceeding and the City's active participation will be directly relevant to any issues raised in this investigation.

¹ See "INTRODUCTION AND STATEMENT OF PURPOSE," Order Instituting Investigation I.11-02-016

The City has a vested and continuing interest on behalf of its residents in pipeline safety and recordkeeping issues arising from the devastating pipeline explosion and fire that took place on September 9, 2010, especially considering the fact that Line 132 continues to carry high pressure gas through residential areas of San Bruno and other parts of the Peninsula. Most tragic was the loss of eight lives that horrific evening and the process of this investigation must remain fixed to that deadly result. Sixty-six persons were reported burned and injured. Some of these victims have already endured, and will continue to face long and difficult recoveries. Thirty-eight homes were destroyed, 17 were rendered uninhabitable and another 53 suffered less serious damage. A quiet neighborhood was destroyed. The City's residents continue to deal with the impact and the loss they have experienced as a result of this tragedy.

It is the City's goal to restore a basic sense of safety and security for the residents in their homes and in their neighborhood that they once enjoyed and relied on. To this end, the City clearly understands that the City's success in achieving true long-term recovery means that the City must do everything possible, including participating in this investigation, to assure that the terrible tragedy never happens again, ever, anywhere.

As a party to the Commission's investigation in this matter at hand, the City supports any investigation of PG&E's safety and recordkeeping practices related to PG&E's gas services, facilities and pipelines in order to assure that residents' interests and concerns are addressed in this process and to help ensure that a full and accurate conclusion is reached. Similarly, the City supports the efforts being undertaken by the

Commission to complete the necessary fact finding and to impose the necessary and appropriate actions and oversight required to protect residents' safety and that of residents throughout the State of California. Specifically, the City looks to the Commission as the authority for regulation of utilities in California to achieve the City's goal of improved pipeline safety by enacting rules to protect the City's residents' safety.

II. NOTICE

Service of notices, orders, and communications and correspondence in this proceeding should be directed to the City of San Bruno City Manager Connie Jackson and the City's counsel Steven Meyers at the addresses as set forth below.

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III. CONCLUSION

The City's participation in this proceeding will not prejudice any party, will not delay the schedule, nor broaden the scope of the issues in the proceeding. For the reasons stated above, the City respectfully requests that the Commission grant this Motion for Party Status.

Respectfully submitted,

/s/ Steven R. Meyers

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