

From: John Dutcher
Sent: 4/8/2011 12:24:47 PM
To: marzia.zafar@cpuc.ca.gov (marzia.zafar@cpuc.ca.gov);
RMNava@semprautilities.com (RMNava@semprautilities.com)
acaastro@ci.cypress.ca.us (acaastro@ci.cypress.ca.us); alex@laredolaw.net
(alex@laredolaw.net); 3rjp@citlink.net (3rjp@citlink.net); aahebert@paalp.com
(aahebert@paalp.com); andrew.mcallister@energycenter.org
(andrew.mcallister@energycenter.org); atrowbridge@daycartermurphy.com
(atrowbridge@daycartermurphy.com); anginc@goldrush.com
(anginc@goldrush.com); Ariel.Son@PacifiCorp.com (Ariel.Son@PacifiCorp.com);
ames_doug@yahoo.com (ames_doug@yahoo.com); andy@mpwmd.dst.ca.us
(andy@mpwmd.dst.ca.us); aua@bp.com (aua@bp.com); artief@ci.salinas.ca.us
(artief@ci.salinas.ca.us); brbarkovich@earthlink.net (brbarkovich@earthlink.net);
bfinkelstein@turn.org (bfinkelstein@turn.org); bcragg@goodinmacbride.com
(bcragg@goodinmacbride.com); blaising@braunlegal.com
(blaising@braunlegal.com); carl.wood@verizon.net (carl.wood@verizon.net);
bambauertowing@sbcglobal.net (bambauertowing@sbcglobal.net);
bobbkelly@bobbkelly.com (bobbkelly@bobbkelly.com); chris@ci.salinas.ca.us
(chris@ci.salinas.ca.us); Charity.Schiller@bbklaw.com
Cc: (Charity.Schiller@bbklaw.com); Bob.Dodds@CaliforniaPacificElectric.com
(Bob.Dodds@CaliforniaPacificElectric.com);
CHARLIE@WEEKSDRILLING.COM (CHARLIE@WEEKSDRILLING.COM);
Christopher.schindler@hoganlovells.com
(Christopher.schindler@hoganlovells.com); bobmac@qwest.net
(bobmac@qwest.net); Chantel.mosby@centurytel.com
(Chantel.mosby@centurytel.com); childerbrand@goldenhillssanitation.com
(childerbrand@goldenhillssanitation.com); bmarticorena@rutan.com
(bmarticorena@rutan.com); lmh@eslawfirm.com (lmh@eslawfirm.com);
dhuard@manatt.com (dhuard@manatt.com); douglass@energyattorney.com
(douglass@energyattorney.com); davidmorse9@gmail.com
(davidmorse9@gmail.com); marcie.milner@shell.com (marcie.milner@shell.com);
dbyers@landuselaw.com (dbyers@landuselaw.com); Lnalley@Tigernaturalgas.com
(Lnalley@Tigernaturalgas.com); mary.lynch@constellation.com
(mary.lynch@constellation.com); margo.ormiston@verizon.com
(margo.ormiston@verizon.com); dhall@wickland.com (dhall@wickland.com);
dclark@kermantelephone.com (dclark@kermantelephone.com);
egwolfe@ducortelco.com (egwolfe@ducortelco.com); cmailloux@turn.org
(cmailloux@turn.org); dobegi@nrdc.org (dobegi@nrdc.org);
Lorrie.bernstein@mossadams.com (Lorrie.bernstein@mossadams.com);
lwalexander@crimsonpl.com (lwalexander@crimsonpl.com);
colettecotton@yahoo.com (colettecotton@yahoo.com); Don.soderberg@swgas.com
(Don.soderberg@swgas.com); earlb@volcanotel.com (earlb@volcanotel.com);
dand@ponderosatel.com (dand@ponderosatel.com); luemers.martha@dorsey.com
(luemers.martha@dorsey.com); macollins@chevron.com
(macollins@chevron.com); dovedc@yahoo.com (dovedc@yahoo.com);

LOUIS@LOUISDEMARTINO.COM (LOUIS@LOUISDEMARTINO.COM);
ddferrari@paalp.com (ddferrari@paalp.com); llowrey@nheh.com
(llowrey@nheh.com); creisman@wkrklaw.com (creisman@wkrklaw.com);
dave@laredolaw.net (dave@laredolaw.net); mcdougaldbranch@yahoo.com
(mcdougaldbranch@yahoo.com); dgeis@dolphingroup.org
(dgeis@dolphingroup.org); danny@lukinswater.com (danny@lukinswater.com);
laura.tudisco@cpuc.ca.gov (laura.tudisco@cpuc.ca.gov); rmccann@umich.edu
(rmccann@umich.edu); filings@a-klaw.com (filings@a-klaw.com);
pk@utilitycostmanagement.com (pk@utilitycostmanagement.com);
hayley@turn.org (hayley@turn.org); mrw@mrwassoc.com (mrw@mrwassoc.com);
mdjoseph@adamsbroadwell.com (mdjoseph@adamsbroadwell.com);
jleslie@luce.com (jleslie@luce.com); PG&E Tariffs
(/O=PG&E/OU=Corporate/cn=Recipients/cn=PGETariffs); phanschen@mofocom
(phanschen@mofocom); rkoss@adamsbroadwell.com
(rkoss@adamsbroadwell.com); jason.dubchak@niskags.com
(jason.dubchak@niskags.com); robert.pettinato@ladwp.com
(robert.pettinato@ladwp.com); epoole@adplaw.com (epoole@adplaw.com);
palle_jensen@sjwater.com (palle_jensen@sjwater.com); mcultfa@sce.com
(mcultfa@sce.com); rochelle@a4nr.org (rochelle@a4nr.org); hydroesq@schat.net
(hydroesq@schat.net); gpdevelopment@earthlink.net
(gpdevelopment@earthlink.net); RJonesPE@aol.com (RJonesPE@aol.com);
jfarnkopf@hfh-consultants.com (jfarnkopf@hfh-consultants.com); ffarina@cox.net
(ffarina@cox.net); mpareas@gmail.com (mpareas@gmail.com);
rburkeii@prodigy.net (rburkeii@prodigy.net); rgu@cebridge.net
(rgu@cebridge.net); pine@littlebearwater.com (pine@littlebearwater.com);
Gail.long@tdstelecom.com (Gail.long@tdstelecom.com);
mgorman@agclawfirm.com (mgorman@agclawfirm.com); eosann@nrdc.org
(eosann@nrdc.org); h2o@sti.net (h2o@sti.net); mcwch2otim@aol.com
(mcwch2otim@aol.com); RegMgr@stcg.net (RegMgr@stcg.net);
rrlewish2o@aol.com (rrlewish2o@aol.com); mlwhitehead@sgvwater.com
(mlwhitehead@sgvwater.com); regclfp@gmail.com (regclfp@gmail.com);
mljones@paalp.com (mljones@paalp.com); jpross@sungevity.com
(jpross@sungevity.com); h2ocompany@earthlink.net (h2ocompany@earthlink.net);
JBFARRELL@YAHOO.COM (JBFARRELL@YAHOO.COM);
jay@adventurecat.com (jay@adventurecat.com); mortonswarmsprings@comcast.net
(mortonswarmsprings@comcast.net); rmdewante@sbcglobal.net
(rmdewante@sbcglobal.net); glen.stransky@loslaureleshoa.com
(glen.stransky@loslaureleshoa.com); repowers@venable.com
(repowers@venable.com); mgoldstein@goldstein-law.com (mgoldstein@goldstein-
law.com); gweber@glweberlaw.com (gweber@glweberlaw.com); regtss@att.com
(regtss@att.com); rsaunders@ci.santa-clara.ca.us (rsaunders@ci.santa-clara.ca.us);
mday@gmssr.com (mday@gmssr.com); rjames456@yahoo.com
(rjames456@yahoo.com); jensen.sophie@gmail.com (jensen.sophie@gmail.com);
pmantey@yahoo.com (pmantey@yahoo.com); rkmoore@scwater.com
(rkmoore@scwater.com); jffying@gmail.com (jffying@gmail.com);
rlam@agclawfirm.com (rlam@agclawfirm.com); jbouler@comcast.net

(jbouler@comcast.net); regulatory@surewest.com (regulatory@surewest.com);
jallen@elthlaw.com (jallen@elthlaw.com); heidi@laredolaw.net
(heidi@laredolaw.net); jeffbates1@comcast.net (jeffbates1@comcast.net);
ekgrubaugh@iid.com (ekgrubaugh@iid.com); michael@michaelmillsconstr.com
(michael@michaelmillsconstr.com); info@lakealpinewater.com
(info@lakealpinewater.com); erikson@snowcrest.net (erikson@snowcrest.net);
gdiallo@sempra.com (gdiallo@sempra.com); Cherry, Brian K
(/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=BKC7); kmills@cfbf.com
(kmills@cfbf.com); jweil@aglet.org (jweil@aglet.org); liddell@energyattorney.com
(liddell@energyattorney.com); wem@igc.org (wem@igc.org);
william.sanders@sfgov.org (william.sanders@sfgov.org);
keith.mccrea@sablaw.com (keith.mccrea@sablaw.com); kswitzer@scwater.com
(kswitzer@scwater.com); rschmidt@bartlewells.com (rschmidt@bartlewells.com);
klatt@energyattorney.com (klatt@energyattorney.com); kjsimonsen@ems-ca.com
(kjsimonsen@ems-ca.com); steven@iepa.com (steven@iepa.com);
Brian.Prusnek@sce.com (Brian.Prusnek@sce.com); dcarroll@downeybrand.com
(dcarroll@downeybrand.com); mmattes@nossaman.com
(mmattes@nossaman.com); westgas@aol.com (westgas@aol.com);
slins@ci.glendale.ca.us (slins@ci.glendale.ca.us); Yim@ZimmerLucas.com
(Yim@ZimmerLucas.com); KMelville@SempraUtilities.com
(KMelville@SempraUtilities.com); scittad@nicor.com (scittad@nicor.com);
wamer@kirkwood.com (wamer@kirkwood.com); tsmegal@calwater.com
(tsmegal@calwater.com); michael.peevey@cpuc.ca.gov
(michael.peevey@cpuc.ca.gov); catherine.sandoval@cpuc.ca.gov
(catherine.sandoval@cpuc.ca.gov); mark.ferron@cpuc.ca.gov
(mark.ferron@cpuc.ca.gov); frank.lindh@cpuc.ca.gov (frank.lindh@cpuc.ca.gov);
paul.clanon@cpuc.ca.gov (paul.clanon@cpuc.ca.gov); SHEILA@STI.NET
(SHEILA@STI.NET); kduran@ci.san-dimas.ca.us (kduran@ci.san-dimas.ca.us);
ysmythe@caltel.com (ysmythe@caltel.com); WWynder@AWAttorneys.com
(WWynder@AWAttorneys.com); jtflowers@sisqtel.net (jtflowers@sisqtel.net);
ruralwater@me.com (ruralwater@me.com); Sawymt@fusd.net (Sawymt@fusd.net);
jroeder@greatoakswater.com (jroeder@greatoakswater.com); waihun@cot.net
(waihun@cot.net); kabercrombie@valenciawater.com
(kabercrombie@valenciawater.com); wmpribyl@jps.net (wmpribyl@jps.net);
thay511@yahoo.com (thay511@yahoo.com); kgerber@barryswensonbuilder.com
(kgerber@barryswensonbuilder.com); ssalomon@ci.visalia.ca.us
(ssalomon@ci.visalia.ca.us); mschreiber@cwclaw.com (mschreiber@cwclaw.com);
tccprez@roadrunner.com (tccprez@roadrunner.com); jzischkelaw@charter.net
(jzischkelaw@charter.net); silva@amwater.com (silva@amwater.com);
waterco@hotmail.com (waterco@hotmail.com); jwrtee@earthlink.net
(jwrtee@earthlink.net); kstaples@verizon.net (kstaples@verizon.net);
jsluder@paalp.com (jsluder@paalp.com); sjmoore600@aol.com
(sjmoore600@aol.com); tkim@rwglaw.com (tkim@rwglaw.com);
tom.eastment@bakerbotts.com (tom.eastment@bakerbotts.com);
leigh@parkwater.com (leigh@parkwater.com); JW1832@yahoo.com
(JW1832@yahoo.com); tom@alcowater.com (tom@alcowater.com);

wshoefler@comcast.net (wshoefler@comcast.net); larry@epwater.com
(larry@epwater.com); kendall.macvey@bbklaw.com
(kendall.macvey@bbklaw.com); kaduran@chevron.com (kaduran@chevron.com);
saadducci@venable.com (saadducci@venable.com); stevev@basslakerealty.com
(stevev@basslakerealty.com); sailingwright2@yahoo.com
(sailingwright2@yahoo.com); unionmarti@yahoo.com (unionmarti@yahoo.com);
mjpg@cpuc.ca.gov (mjpg@cpuc.ca.gov); LSchaviren@SempraUtilities.com
(LSchaviren@SempraUtilities.com); karen.clopton@cpuc.ca.gov
(karen.clopton@cpuc.ca.gov); mike.florio@cpuc.ca.gov (mike.florio@cpuc.ca.gov);
philip.weismehl@cpuc.ca.gov (philip.weismehl@cpuc.ca.gov);
michael.galvin@cpuc.ca.gov (michael.galvin@cpuc.ca.gov);
raminder.kahlon@cpuc.ca.gov (raminder.kahlon@cpuc.ca.gov);
timothy.simon@cpuc.ca.gov (timothy.simon@cpuc.ca.gov);
joel.perlstein@cpuc.ca.gov (joel.perlstein@cpuc.ca.gov);
arocles.aguilar@cpuc.ca.gov (arocles.aguilar@cpuc.ca.gov)

Bcc:

Subject: Re: TURN Alternative Proposal on Draft Resolution L-411 (April 6, 2011)

Good afternoon Ms. Zafar and interested parties to Resolution L-411

Mountain Utilities (MU) appreciates this opportunity to comment on TURN's April 5, 2011 Alternative Approach (The Guideline Approach). MU has no position on the specifics of TURN's proposal, because the issues being addressed will affect the large utilities in ways that MU cannot even fathom. However, to the extent that TURN's proposal would reduce administrative complexity and the burden on small utilities to establish memorandum accounts, MU is supportive.

TURN does not address the exceptions to the memorandum account process contained in Revision 4 to the Draft Resolution, which MU does support (Mimeo, p. 4).

If the Commission decides to move in the direction set forth by TURN, MU requests that The

Guideline Approach be modified to incorporate the portions of Draft Resolution L-411 (Version 4) that recognize the administrative burdens of regulatory mandates on small utilities such as MU and therefore provide exemptions.

Thank you again for this opportunity to provide input to this process.

Regards

John Dutcher, V.P. - Reg. Affairs

Mountain Utilities

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Thank you.

-----Original Message-----

From: Zafar, Marzia <marzia.zafar@cpuc.ca.gov>

Sent: Wed, Apr 6, 2011 4:16 pm

Subject: RE: SDG&E/SoCalGas Letter on Draft Resolution L-411 (April 6, 2011)

Service List - Yesterday TURN submitted an alternative approach to the advice letter process. Attached is TURN's proposal for those who did not receive it. Please review the alternative approach and if you are interested, please provide your comments to us by this Friday, April 8th.

regards,

marzia

Marzia Zafar - Zaf@cpuc.ca.gov - 415-703-1997