

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.

Rulemaking 11-02-019
(Filed February 24, 2011)

**REPLY COMMENTS OF
SOUTHWEST GAS CORPORATION
(U 905 G)
TO THE COMMISSION'S
PROPOSED DECISION DETERMINING MAXIMUM ALLOWABLE OPERATING
PRESSURE METHODOLOGY AND REQUIRING FILING OF NATURAL GAS
TRANSMISSION PIPELINE REPLACEMENT OR TESTING IMPLEMENTATION PLANS**

Justin Lee Brown
Assistant General Counsel
Southwest Gas Corporation
5241 Spring Mountain Road
Las Vegas, NV 89150-0002
Phone: (702) 876-7183
Fax: (702) 252-7283
Email: justin.brown@swgas.com

1
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5 Regulations for Natural Gas Transmission and
6 Distribution Pipelines and Related Ratemaking
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Rulemaking 11-02-019
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8 **REPLY COMMENTS**
9 **OF**
10 **SOUTHWEST GAS CORPORATION (U 905 G)**
11 **ON THE PROPOSED DECISION**

12 Southwest Gas Corporation hereby submits the following reply comments to the
13 Proposed Decision of the California Public Utilities Commission ("Commission").

14 Southwest Gas is a natural gas local distribution company that serves over 182,000
15 customers in California. The Company owns and operates approximately 15 miles of
16 intrastate transmission pipelines, 3,114 miles of distribution mains and 2,452 miles of
17 services in California. Southwest Gas has completed a thorough review of MAOP records
18 for the 15 miles of intrastate transmission pipelines, as indicated in our response dated
19 January 21, 2011, to the Commission's request regarding the implementation of the NTSB's
20 Recommendation P-10-7. Based upon that review, Southwest Gas estimates that
21 approximately seven miles of transmission pipelines would be subject to the Proposed
22 Decision's requirement for a Natural Gas Transmission Pipeline Comprehensive Pressure
23 Testing Plan ("Implementation Plan").

24 Southwest Gas fully supports the Commission's interest in maintaining and carefully
25 monitoring the pipeline infrastructure to ensure safe and reliable delivery. Southwest Gas
26 also supports smart modernization, new technologies and sharing information among
27 operators, emergency responders, the public and the Commission to enhance pipeline
28 safety. Southwest Gas offers the following in response to the comments that were filed in
response to the Proposed Decision.

1 **Prioritization and Track Process**

2 Southwest Gas supports the proposal to prioritize the initiatives identified in the
3 January 24, 2011 OIR. Specifically, Southwest Gas supports the proposed schedule
4 discussing at the June 2, 2011 Pre-Hearing Conference to establish separate tracks in this
5 proceeding – beginning with the development of implementation plans solely responsive to
6 the National Transportation Safety Board (“NTSB”) safety recommendations. Southwest
7 Gas is also supportive of conducting a separate prehearing conference for Track 2
8 following the release of the final NTSB report.

9 **Alternatives to Pressure Testing**

10 Southwest Gas supports the proposal to allow utilities to include in their
11 Implementation Plans requests for authorization to utilize other alternatives to pressure
12 testing. Southwest Gas understands that such alternatives will be explored and discussed
13 in further detail during the technical workshops tentatively scheduled for June 22-23, 2011.
14 The use of alternative inspection technologies, if feasible, may provide an equal or greater
15 level of integrity assessment as compared to pressure testing for certain threats. In
16 addition, the use of such tools may be more economical for the benefit of natural gas
17 customers.

18 **Ratemaking Consideration**

19 Southwest Gas appreciates the Commission’s recognition and interest in pursuing
20 both interim changes, by permitting utilities to include rate proposals in their respective
21 Implementation Plans, and the pursuit of broader policy changes in this OIR to align
22 ratemaking policies, practices, and incentives to better reflect safety concerns and ensure
23 ongoing commitments to public safety.

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**III.
CONCLUSION**

Southwest Gas appreciates the opportunity to provide reply comments and continues to look forward to actively working with the Commission and the other utilities in addressing the issues posed in this proceeding.

Dated this 6th day of June, 2011, at Las Vegas, Nevada.

SOUTHWEST GAS CORPORATION

/s/ Justin Lee Brown

Justin Lee Brown
Assistant General Counsel
Southwest Gas Corporation
5241 Spring Mountain Road
Las Vegas, Nevada 89150-0002
Phone: (702) 876-7183
Fax: (702) 252-7283
E-Mail: justin.brown@swgas.com

1 CERTIFICATE OF SERVICE

2 I hereby certify that I have this day served the foregoing REPLY COMMENTS OF
3 SOUTHWEST GAS CORPORATION (U 905 G) upon the individuals on the established
4 service list in proceeding R.11-02-019 by electronic mail (email) service. Those individuals
5 without an email address were served by regular, first-class mail.

6 Dated this 6th day of June, 2011 at Las Vegas, Nevada.

7
8 /s/ Kristien M. Tary
9 Kristien M. Tary
10 State Regulatory Affairs
11 Southwest Gas Corporation
12 5241 Spring Mountain Road
13 Las Vegas, Nevada 89150-0002
14 Phone: (702) 876-7253
15 E-mail: kristien.tary@swgas.com
16
17
18
19
20
21
22
23
24
25
26
27
28



California Public
Utilities Commission

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Parties

STEPHANIE C. CHEN
ATTORNEY
THE GREENLINING INSTITUTE
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: THE GREENLINING INSTITUTE

STEVEN GARBER
PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: PACIFIC GAS AND ELECTRIC COMPANY

CARL WOOD
UTILITY WORKERS UNION OF AMERICA
EMAIL ONLY
EMAIL ONLY, CA 00000-0000
FOR: UTILITY WORKERS UNION OF AMERICA

WILLIAM H. SCHMIDT, JR
LODI GAS STORAGE, LLC
FIVE TEK PARK
9999 HAMILTON BOULEVARD
BREINIGSVILLE, PA 18031
FOR: LODI GAS STORAGE, LLC

STEPHEN CITTADINE
CENTRAL VALLEY GAS STORAGE, LLC
3333 WARRENVILLE ROAD, STE. 630
LISLE, IL 60532
FOR: CENTRAL VALLEY GAS STORAGE, LLC

JUSTIN LEE BROWN
ASSIST COUNSEL - LEGAL
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150-0002
FOR: SOUTHWEST GAS CORPORATION

SHARON L. TOMKINS
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, SUITE 1400
LOS ANGELES, CA 90013-1034
FOR: SAN DIEGO GAS & ELECTRIC
COMPANY/SOUTHERN CALIFORNIA GAS COMPANY

NORMAN A. PEDERSEN
ATTORNEY AT LAW
HANNA & MORTON
444 S. FLOWER STREET, SUITE 1500
LOS ANGELES, CA 90071
FOR: SOUTHERN CALIFORNIA GENERATION

COALITION

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

DOUGLAS PORTER
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
FOR: SO. CALIF. EDISON CO. (CATALINA
ISLAND)

FAITH BAUTISTA
PRESIDENT
NATIONAL ASIAN AMERICAN COALITION
1758 EL CAMINO REAL
SAN BRUNO, CA 94066
FOR: NATIONAL ASIAN AMERICAN COALITION

CONNIE JACKSON
CITY MANAGER
CITY OF SAN BRUNO
567 EL CAMINO REAL
SAN BRUNO, CA 94066-4299
FOR: CITY OF SAN BRUNO

RACHAEL E. KOSS
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080
FOR: COALITION OF CALIFORNIA UTILITY
EMPLOYEES

GREGORY HEIDEN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5039
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: CPSD

MARION PELEO
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

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

MARCEL HAWIGER
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104
FOR: THE UTILITY REFORM NETWORK

CHRISTOPHER P. JOHNS
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

JONATHAN D. PENDLETON
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

JOSEPH M. MALKIN
ATTORNEY AT LAW
ORRICK, HERRINGTON & SUTCLIFFE LLP
405 HOWARD STREET
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

SARAH GROSSMAN-SWENSON
DAVIS, COWELL & BOWE, LLP
595 MARKET STREET, STE. 1400
SAN FRANCISCO, CA 94105
FOR: PLUMBERS & STEAMFITTERS UNION
LOCAL NOS. 246 & 342

WILLIAM V. MANHEIM
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B30A
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

BRIAN K. CHERRY

STEVEN R. MEYERS

PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B10C, PO BOX 770000
SAN FRANCISCO, CA 94177
FOR: PACIFIC GAS AND ELECTRIC COMPANY

PRINCIPAL
MEYERS NAVE
555 12TH STREET, STE. 1500
OAKLAND, CA 94607
FOR: CITY OF SAN BRUNO

LEN CANTY
CHAIRMAN
BLACK ECONOMIC COUNCIL
484 LAKEPARK AVE. SUITE 338
OAKLAND, CA 94610
FOR: BLACK ECONOMIC COUNCIL

MELISSA A. KASNITZ
ATTORNEY AT LAW
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, FOURTH FLOOR
BERKELEY, CA 94704-1204
FOR: (DISABRA) DISABILITY RIGHTS
ADVOCATES

MICHAEL E. BOYD
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
5439 SOQUEL DRIVE
SOQUEL, CA 95073
FOR: CALIFORNIANS FOR RENEWABLE ENERGY,
INC.

BARRY F. MCCARTHY
ATTORNEY
MCCARTHY & BERLIN, LLP
100 W. SAN FERNANDO ST., SUITE 501
SAN JOSE, CA 95113
FOR: NORTHERN CALIFORNIA GENERATION
COALITION (NCGC)

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

DAN L. CARROLL
ATTORNEY AT LAW
DOWNEY BRAND, LLP
621 CAPITOL MALL, 18TH FLOOR
SACRAMENTO, CA 95814
FOR: LODI GAS STORAGE, LLC

TRANSMISSION EVALUATION UNIT
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-46
SACRAMENTO, CA 95814-5512
FOR: CALIFORNIA ENERGY COMMISSION

RAYMOND J. CZAHAR
CHIEF FINANCIAL OFFICER
WEST COAST GAS CO., INC.
9203 BEATTY DR.
SACRAMENTO, CA 95826-9702
FOR: WEST COAST GAS COMPANY, INC.

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

ALFRED F. JAHNS
LAW OFFICE ALFRED F. JAHNS
3620 AMERICAN RIVER DRIVE, SUITE 105
SACRAMENTO, CA 95864
FOR: SACRAMENTO NATURAL GAS STORAGE, LLC

DAVE WEBER
GILL RANCH STORAGE, LLC
220 NW SECOND AVENUE
PORTLAND, OR 97209
FOR: GILL RANCH STORAGE, LLC

JASON A. DUBCHAK
WILD GOOSE STORAGE LLC
607 8TH AVENUE S.W., SUITE 400
CALGARY, AB T2P 047
CANADA
FOR: WILD GOOSE STORAGE, LLC

Information Only

ANTHEA LEE

ART FRIAS

PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000

UWUA LOCAL 132
EMAIL ONLY
EMAIL ONLY, CA 00000

CASSANDRA SWEET
DOW JONES NEWSWIRES
EMAIL ONLY
EMAIL ONLY, CA 00000

CHRISTINE TAM
CITY OF PALO ALTO - UTILITIES
EMAIL ONLY
EMAIL ONLY, CA 00000

CHUCK MARRE
PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000

CLEO ZAGREAN
MACQUARIE CAPITAL (USA)
EMAIL ONLY
EMAIL ONLY, NY 00000

ENRIQUE GALLARDO
THE GREENLINING INSTITUTE
EMAIL ONLY
EMAIL ONLY, CA 00000

GRANT KOLLING
CITY OF PALO ALTO
EMAIL ONLY
EMAIL ONLY, CA 00000

GREG CLARK
COMPLIANCE MGR.
LODI GAS STORAGE, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

JAMES J. HECKLER
LEVIN CAPITAL STRATEGIES
EMAIL ONLY
EMAIL ONLY, NY 00000

JOHN W. LESLIE
LUCE FORWARD HAMILTON & SCRIPPS LLP
EMAIL ONLY
EMAIL ONLY, CA 00000

KARLA DAILEY
SR. RESOURCE PLANNER
CITY OF PALO ALTO
EMAIL ONLY
EMAIL ONLY, CA 00000

LAUREN DUKE
DEUTSCHE BANK SECURITIES INC.
EMAIL ONLY
EMAIL ONLY, NY 00000

NANCY LOGAN
UWUA LOCAL 132
EMAIL ONLY
EMAIL ONLY, CA 00000

RAY WELCH
ASSOCIATE DIRECTOR
NAVIGANT CONSULTING, INC.
EMAIL ONLY
EMAIL ONLY, CA 00000

ROBERT RUSSELL
LODI GAS STORAGE, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

SCOTT COLLIER
LOCI GAS STORAGE, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

TIMOTHY REA
EMAIL ONLY
EMAIL ONLY, CA 00000

TIMOTHY TUTT
SACRAMENTO MUNICIPAL UTILITY DISTRICT
EMAIL ONLY
EMAIL ONLY, CA 00000

MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000

SCOTT SENCHAK
DECADE CAPITAL
EMAIL ONLY
EMAIL ONLY, NY 00000-0000

ANDREW GAY
ARC ASSET MANAGEMENT, LTD
237 PARK AVENUE, 9TH FLOOR
NEW YORK, NY 10017

DANIEL J. BRINK
COUNSEL
EXXON MOBIL CORP.
800 BELL ST., RM. 3497-0
HOUSTON, TX 77002

KRISTINA M. CASTRENCE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B10A
SAN FRANCISCO, CA 84105

CHRISTY BERGER
MGR - STATE REG AFFAIRS
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150-0002

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

PRISCILA CASTILLO
LOS ANGELES DEPT OF WATER & POWER
111 NORTH HOPE ST., RM. 340
LOS ANGELES, CA 90012

ROBERT L. PETTINATO
LOS ANGELES DEPT. OF WATER & POWER
111 NORTH HOPE ST., RM. 1150
LOS ANGELES, CA 90012

GREG HEALY
SOUTHERN CALIFORNIA GAS COMPANY
555 W. FIFTH ST., GT14D6
LOS ANGELES, CA 90013

JEFFREY L. SALAZAR
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, GT14D6
LOS ANGELES, CA 90013

NADIA AFTAB
SOCALGAS/SDG&E
555 W. FIFTH STREET (GT14D6)
LOS ANGELES, CA 90013

DEANA NG
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, SUITE 1400
LOS ANGELES, CA 90013-1034

RASHA PRINCE
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST 5TH STREET, GT14D6
LOS ANGELES, CA 90013-1034

JORGE CORRALEJO
CHAIRMAN / PRESIDENT
LAT. BUS. CHAMBER OF GREATER L.A.
634 S. SPRING STREET, STE 600
LOS ANGELES, CA 90014
FOR: LATINO BUSINESS CHAMBER OF GREATER
LOS ANGELES

JIM MCQUISTON
MCQUISTON ASSOCIATES
6212 YUCCA STREET
LOS ANGELES, CA 90028-5223

ELLEN ISAACS
TRANS. DEPUTY
ASM MIKE FEUER
9200 SUNSET BLVD., STE. 1212
WEST HOLLYWOOD, CA 90069

DAVID E. TORRES
FIELD OPERATION MANAGER
CITY OF SOUTHGATE
4244 SANTA ANA ST.
SOUTHGATE, CA 90280

PAT JACKSON

GREGORY KLATT

BRANCH MANAGER
TEAM INDUSTRIAL SERVICES, INC.
14909 GWENCHRIS COURT
PARAMOUNT, CA 90723

DOUGLASS & LIDDELL
411 E. HUNTINGTON DR., STE. 107-356
ARCADIA, CA 91006

DANIEL W. DOUGLASS
DOUGLASS & LIDDELL
21700 OXNARD ST., STE. 1030
WOODLAND HILLS, CA 91367
FOR: TRANSWESTERN PIPELINE COMPANY

CHRISTINA SCARBOROUGH
REGIONAL CONSERVATION ORGANIZER
SIERRA CLUB
8125 MORSE AVE.
NORTH HOLLYWOOD, CA 91605

LESLIE CARNEY
4804 LAUREL CANYON BLVD., NO. 399
VALLEY VILLAGE, CA 91607

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, PO BOX 800
ROSEMEAD, CA 91770

GLORIA ING
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

JANET COMBS
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

ROBERT F. LEMOINE
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. SUITE 346L
ROSEMEAD, CA 91770

MARCIE A. MILNER
SHELL ENERGY NORTH AMERICA (US), L.P.
4445 EASTGATE MALL, STE. 100
SAN DIEGO, CA 92121

CENTRAL FILES
SDG&E AND SOCALGAS
8330 CENTURY PARK COURT, CP31-E
SAN DIEGO, CA 92123-1550

JASON HUNTER
RIVERSIDE PUBLIC UTILITIES
3435 14TH STREET
RIVERSIDE, CA 92501

WISAM ALTOWAIJI
PUBLIC WORKS MANAGER
CITY OF TUSTIN
300 CENTENNIAL WAY
TUSTIN, CA 92780

LAURA SEMIK
PO BOX 1107
BELMONT, CA 94002

KLARA A. FABRY
DIR. - DEPT. OF PUBLIC SERVICES
CITY OF SAN BRUNO
567 EL CAMINO REAL
SAN BRUNO, CA 94066-4247
FOR: CITY OF SAN BRUNO

GEOFF CALDWELL
POLICE SERGEANT - POLICE DEPT.
CITY OF SAN BRUNO
567 EL CAMINO REAL
SAN BRUNO, CA 94066-4299

ROCHELLE ALEXANDER
445 VALVERDE DRIVE
SOUTH SAN FRANCISCO, CA 94080

MARC D. JOSEPH
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080-7037

SHARON RANDLE
SAN BRUNO GAS SAFETY TEAM

JOE COMO
CALIF PUBLIC UTILITIES COMMISSION

505 VAN NESS AVE., RM. 2-D
SAN FRANCISCO, CA 94102

DRA - ADMINISTRATIVE BRANCH
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

THERESA L. MUELLER
CITY AND COUNTY OF SAN FRANCISCO
CITY HALL, ROOM 234
1 DR. CARLTON B. GOODLETT PLACE
SAN FRANCISCO, CA 94102-4682

ROBERT FINKELSTEIN
LEGAL DIRECTOR
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104

DAREN CHAN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B10C
SAN FRANCISCO, CA 94105

KAREN TERRANOVA
ALCANTAR & KAHL
33 NEW MONTGOMERY ST., STE. 1850
SAN FRANCISCO, CA 94105

KERRY C. KLEIN
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MC B30A
SAN FRANCISCO, CA 94105

SEEMA SRINIVASAN
ALCANTAR & KAHL
33 NEW MONTGOMERY ST., SUITE 1850
SAN FRANCISCO, CA 94105

BRIAN T. CRAGG
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: ENGINEERS AND SCIENTISTS OF
CALIFORNIA, LOCAL 20

JEANNE B. ARMSTRONG
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: WILD GOOSE STORAGE,, LLC

MARTIN A. MATTES
COUNSEL
NOSSAMAN, LLP
50 CALIFORNIA STREET, 34TH FLOOR
SAN FRANCISCO, CA 94111-4799

AARON J. LEWIS
UC-HASTINGS COLLEGE OF LAW
721 BAKER STREET
SAN FRANCISCO, CA 94115

CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST. STE 303
SAN FRANCISCO, CA 94117-2242

ROBERT GNAIZDA
OF COUNSEL
200 29TH STREET, NO. 1
SAN FRANCISCO, CA 94131

ALLIE MCMAHON
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, RM. 1056
SAN FRANCISCO, CA 94177

JANET LIU
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000; MC B9A
SAN FRANCISCO, CA 94177

SUSAN DURBIN
CALIFORNIA STATE DEPARTMENT OF JUSTICE
1300 I STREET, PO BOX 944255
SACRAMENTO, CA 94244-2550

MICHAEL ROCHMAN
MANAGING DIRECTOR
SPURR
1850 GATEWAY BLVD., SUITE 235
CONCORD, CA 94520

LAURENCE L. GEORGE

BRITT STROTTMAN

RELIABILITY ENGINEER / STATISTICIAN
1573 ROSELLI DRIVE
LIVERMORE, CA 94550

ATTORNEY AT LAW
MEYERS NAVE
555 12TH STREET, STE. 1500
OAKLAND, CA 94607
FOR: CITY OF SAN BRUNO

DAVID MARCUS
ADAMS BROADWELL & JOSEPH
PO BOX 1287
BERKELEY, CA 94701-1287

THOMAS BEACH
CROSSBORDER ENERGY
2560 9TH ST., SUITE 213A
BERKELEY, CA 94710-2557

WILLIAM JULIAN
UTILITY WORKERS UNION OF AMERICA
43556 ALMOND LANE
DAVIS, CA 95618

CATHERINE M. ELDER
ASPEN ENVIRONMENT GROUP
8801 FOLSOM BLVD., SUITE 290
SACRAMENTO, CA 95826

ANN L. TROWBRIDGE
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, SUITE 205
SACRAMENTO, CA 95864

DIANA S. GENASCI
ATTORNEY AT LAW
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, STE. 205
SACRAMENTO, CA 95864

MIKE CADE
ALCANTAR & KAHL, LLP
1300 SW 5TH AVE, SUITE 1750
PORTLAND, OR 97201

State Service

AIMEE CAUGUIRAN
CALIF PUBLIC UTILITIES COMMISSION
SAFETY & RELIABILITY BRANCH
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANGELA K. MINKIN
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5017
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ELIZABETH M. MCQUILLAN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

EUGENE CADENASSO
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

HARVEY Y. MORRIS
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5036
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JONATHAN J. REIGER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5035
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOYCE ALFTON
CALIF PUBLIC UTILITIES COMMISSION

JULIE HALLIGAN
CALIF PUBLIC UTILITIES COMMISSION

ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KELLY C. LEE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARIBETH A. BUSHEY
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5018
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PAUL A. PENNEY
CALIF PUBLIC UTILITIES COMMISSION
SAFETY & RELIABILITY BRANCH
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PEARLIE SABINO
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RICHARD CLARK
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
ROOM 2205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SARAH R. THOMAS
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5033
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

GEOFFREY LESH
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-46
SACRAMENTO, CA 95814

SYLVIA BENDER
CALIFORNIA ENERGY COMMISSION

CONSUMER PROTECTION AND SAFETY DIVISION
ROOM 2203
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARCELO POIRIER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5025
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MATTHEW TISDALE
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5303
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PAUL S. PHILLIPS
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5206
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RICHARD A. MYERS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT M. POCTA
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JANILL RICHARDS
DEPUTY ATTORNEY GENERAL
CALIFORNIA ATTORNEY GENERAL'S OFFICE
1515 CLAY STREET, 20TH FLOOR
OAKLAND, CA 94702
FOR: DEPARTMENT OF JUSTICE

ROBERT KENNEDY
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-20
SACRAMENTO, CA 95814

1516 NINTH STREET, MS 29
SACRAMENTO, CA 95814

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