

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)

**OPENING COMMENTS
OF
SOUTHWEST GAS CORPORATION (U 905 G)
REGARDING THE REPORT OF THE INDEPENDENT REVIEW PANEL
ON THE SAN BRUNO INCIDENT**

Catherine M. Mazzeo
Senior Counsel
Southwest Gas Corporation
5241 Spring Mountain Road
Las Vegas, NV 89150-0002
Phone: (702) 876-7250
Fax: (702) 252-7283
Email: catherine.mazzeo@swgas.com

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

2 Order Instituting Rulemaking on the
3 Commission's Own Motion to Adopt New
4 Safety and Reliability Regulations for
5 Natural Gas Transmission and Distribution
6 Pipelines and Related Ratemaking
7 Mechanisms.

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

8 **OPENING COMMENTS**
9 **OF**
10 **SOUTHWEST GAS CORPORATION (U 905 G)**
11 **REGARDING THE REPORT OF THE INDEPENDENT REVIEW PANEL**
12 **ON THE SAN BRUNO INCIDENT**

13 On June 8, 2011, the Report of the Independent Review Panel (IRP) - San Bruno
14 Explosion (Report) that was prepared for the California Public Utilities Commission (CPUC
15 or Commission) was released. Through the Scoping Memo and Ruling of the Assigned
16 Commissioner issued on June 16, 2011, parties were advised of the opportunity to file
17 comments on or before July 15, 2011, regarding the IRP Report. Southwest Gas
18 Corporation (Southwest Gas or Company) has reviewed the IRP Report, and submits the
19 opening comments attached hereto as Exhibit A.

20 Southwest Gas appreciates the opportunity to provide comments on the IRP Report
21 and will continue to participate in this proceeding.

22 Dated this 15th day of July, 2011, at Las Vegas, Nevada.

23 **SOUTHWEST GAS CORPORATION**

24 /s/ Catherine M. Mazzeo

25 Catherine M. Mazzeo

26 Senior Counsel

27 Southwest Gas Corporation

28 5241 Spring Mountain Road

Las Vegas, Nevada 89150-0002

Phone: (702) 876-7250

Fax: (702) 252-7283

E-Mail: catherine.mazzeo@swgas.com

1 Current federal transmission integrity management regulations require operators to
2 continually review their programs for improvement, but provide flexibility in how the review is
3 conducted. Southwest Gas believes that a utility-initiated independent audit is but one
4 approach to address a continual review, but the audit should not be utilized as a tool for the
5 Commission. The Commission has existing tools for evaluating operator programs, namely
6 the training, protocols, forms, FAQs, and incident and leak data, provided by the Pipeline
7 and Hazardous Materials Administration (PHMSA). The Commission can utilize these
8 resources in conjunction with information obtained from its own inspections of operators'
9 integrity programs, to develop performance-based audits.

10 6.3.3.3 *The CPUC should consider requiring the major regulated utilities operating in*
11 *the State of California to submit the results of the independent integrity*
12 *management audits as part of their respective rate case processes.*

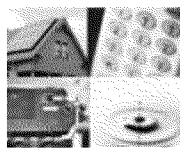
13 As mentioned in the comment to 6.3.3.1, the independent audit is but one approach to
14 address a continual review of an operator's integrity management program. Operators
15 should be allowed to allocate resources and conduct independent audits at intervals most
16 beneficial to ensuring the quality of their respective programs.

17 6.3.3.6 *To raise the profile of the audits among all the stakeholders, add the*
18 *following requirements to the safety and pipeline integrity audits of the*
19 *utilities that includes the following features: (1) posting of audit findings and*
20 *company responses on the CPUC's website; (2) use of a "plain English"*
21 *standard to be applied for both staff and operators in the development of*
22 *their findings and responses, respectively; and (3) a certification by senior*
23 *management of the operator that parallels that certification now required of*
24 *corporate financial statements pursuant to Sarbanes-Oxley.*

25 Regarding the certification in item (3), it is unclear as to what is being certified by senior
26 management. If it is certification that an audit has been conducted or that certain processes
27 were followed, then this can likely be supported. However, Southwest Gas notes that
28 existing federal integrity management regulations require that programs specify roles and
responsibilities for the implementation and oversight of the processes and procedures
involved. This recommendation appears to be redundant in light of the existing code
requirements.

1 6.7.3.1 *The CPUC should seek to align its pipeline enforcement authority with that*
2 *of the State Fire Marshal's by providing the CPSD staff with additional*
3 *enforcement tools modeled on those of the OSFM and the best from other*
4 *states.*

5 Based on the information provided, the potential impact of this change is unclear; therefore,
6 Southwest Gas cannot comment at this time. Southwest Gas suggests that if the
7 Commission seeks to adopt this recommendation, it should provide specific information as
8 to the "additional enforcement tools" to be implemented, and allow the parties an
9 opportunity for further comment.
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



California Public
Utilities Commission

CPUC Home

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: R1102019 - CPUC - OIR TO ADOPT

FILER: CPUC

LIST NAME: LIST

LAST CHANGED: JULY 11, 2011

[DOWNLOAD THE COMMA-DELIMITED FILE](#)
[ABOUT COMMA-DELIMITED FILES](#)

[Back to Service Lists Index](#)

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

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

FAITH BAUTISTA
PRESIDENT
NATIONAL ASIAN AMERICAN COALITION

ROSEMEAD, CA 91770
FOR: SO. CALIF. EDISON CO. (CATALINA ISLAND)

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

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

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

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

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

REBECCA WILLIFORD
LD ACCESS/Ryder FNDTN FELLOWSHIP ATTY.
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CA 94704-1204
FOR: 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

DAN L. CARROLL
ATTORNEY AT LAW
DOWNEY BRAND, LLP
621 CAPITOL MALL, 18TH FLOOR
SACRAMENTO, CA 95814

FOR: ALPINE NATURAL GAS

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

ART FRIAS
 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

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

MELISSA A. LAVINSON
 PACIFIC GAS & ELECTRIC COMPANY
 900 7TH ST., NW STE. 950
 WASHINGTON, DC 20001

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

NADIA AFTAB

SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, GT14D6
LOS ANGELES, CA 90013

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

GREGORY KLATT
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

LAURA SEMIK

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

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

JOE COMO
CALIF PUBLIC UTILITIES COMMISSION
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

JOHN J. DAVIS
DAVIS COWELL & BOWE, LLP
595 MARKET STREET, STE. 1400
SAN FRANCISCO, CA 94105

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

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

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 T. CRAGG
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME STREET, SUITE 900

JEANNE B. ARMSTRONG
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900

SAN FRANCISCO, CA 94111
 FOR: ENGINEERS AND SCIENTISTS OF
 CALIFORNIA, LOCAL 20

SAN FRANCISCO, CA 94111
 FOR: WILD GOOSE STORAGE,, LLC

MARTIN A. MATTES
 ATTORNEY
 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
 RELIABILITY ENGINEER / STATISTICIAN
 1573 ROSELLI DRIVE
 LIVERMORE, CA 94550

SEAN P. BEATTY
 DIR - WEST REGULATORY AFFAIRS
 GENON ENERGY, INC.
 PO BOX 192
 PITTSBURGH, CA 94565

BRITT STROTTMAN
 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

C. SUSIE BERLIN
 ATTORNEY AT LAW
 MC CARTHY & BERLIN, LLP
 100 W SAN FERNANDO ST., STE 501
 SAN JOSE, CA 95113

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

BETH ANN BURNS
 CAL. INDEPENDENT SYSTEM OPERATOR CORP.
 250 OUTCROPPING WAY
 FOLSOM, CA 95630
 FOR: CAISO

BREGORY VAN PELT
 CAL. INDEPENDENT SYSTEM OPERATOR
 250 OUTCROPPING WAY
 FOLSOM, CA 95630

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

ANN L. TROWBRIDGE
 DAY CARTER & MURPHY LLP

DIANA S. GENASCI
 ATTORNEY AT LAW

3620 AMERICAN RIVER DRIVE, SUITE 205
SACRAMENTO, CA 95864

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
MARKET STRUCTURE, COSTS AND NATURAL GAS
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
MARKET STRUCTURE, COSTS AND NATURAL GAS
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JULIE HALLIGAN
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
ROOM 2203
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

MARCELO POIRIER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5025
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

MATTHEW TISDALE
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5303
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

PAUL S. PHILLIPS
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 4-A
505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3214

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 A. MYERS
CALIF PUBLIC UTILITIES COMMISSION
MARKET STRUCTURE, COSTS AND NATURAL GAS
AREA 4-A
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

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

SARAH R. THOMAS
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5033
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

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

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

SYLVIA BENDER
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 29
SACRAMENTO, CA 95814

[TOP OF PAGE](#)
[BACK TO INDEX OF SERVICE LISTS](#)