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PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

VIA ELECTRONIC MAIL ONLY

To: Karen V. Clopton at kvc@cpuc.ca.gov
Chief Administrative Law Judge
Myra J. Prestidge at tom@cpuc.ca.gov
Administrative Law Judge
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

**Re: COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E)
AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) ON THE
PUBLIC UTILITIES CODE SECTION 851 PILOT PROGRAM**

Dear Chief ALJ Clopton:

Pursuant to your letter of July 13, 2011, and Resolution ALJ-244 adopted on February 25, 2010, San Diego Gas & Electric (SDG&E) and Southern California Gas Company (SoCalGas) respectfully submit these comments on draft resolution ALJ-272.

SDG&E and SoCalGas commend the Commission for recognizing the clear public benefit conferred by Resolution ALJ-244, which updates the Commission's Advice Letter pilot program (the "Pilot Program") to expedite and simplify certain transfers of utility property that require advance approval pursuant to Public Utilities Code Section 851. SDG&E and SoCalGas are committed to continue working with the Commission to streamline its Section 851 approval process. Accordingly, SDG&E and SoCalGas support the important purpose of the Pilot Program and recommend adoption of the proposed resolution to extend the Pilot Program until August 23, 2012 without change.

Respectfully submitted,

By: /s/ Allen K. Trial
Allen K. Trial

Attorney for
SAN DIEGO GAS & ELECTRIC COMPANY
AND SOUTHERN CALIFORNIA GAS COMPANY

cc: Assistant Chief Administrative Law Judge Janet Econome at jjj@cpuc.ca.gov

Mr. Andrew Barnsdale, Energy Division at bca@cpuc.ca.gov

All parties on the official service lists for ALJ-244: R.98-07-038; R.04-09-003;
R.05-04-005; R.06-02-012; R.06-12-016; A.08-02-001; R.08-02-007; A.09-05-026;
R.09-06-019