

**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)

JOINT PARTIES' COMMENTS ON PROPOSED DECISION

Faith Bautista, President
National Asian American Coalition

Jorge Corralejo, Chairman and President
Latino Business Chamber of Greater Los Angeles

Len Canty, Chairman,
Black Economic Council

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September 30, 2011

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Pursuant to Rule 14.3 of the California Public Utilities Commission's (CPUC's) Rules of Practice and Procedure, the Black Economic Council, Latino Business Chamber of Greater Los Angeles and the National Asian American Coalition (cumulatively "Joint Parties") hereby submit comments on the proposed Decision 11-09-006.

The Joint Parties have confidence in the technical analyses of The Utility Reform Network (TURN) and the Division of Ratepayer Advocates (DRA) as to the complex technical matters set forth relating to pressure test results. However, as the Joint Parties noted to this Commission in its opening filings,¹ complex technical matters are generally beyond the province of virtually all non-profit groups that participate in CPUC or general Pacific Gas & Electric (PG&E) rate cases and customer service issues. We note that TURN had the opportunity to hire an independent pipeline safety consultant who was recently quoted in the San Francisco Chronicle indicating, "the odds of not having another defect like the one that destroyed the San

¹ Opening Comments From the Black Economic Council, the Latino Business Chamber of Greater LA and the National Asian American Coalition, Joint Parties, R.11-02-019 (May 25, 2011).

Bruno pipe „are about 1 in a trillion“². Each party, including smaller non -profits without TURN’s ample resources, should have the opportunity to hire an independent expert or joint independent expert to both analyze PG&E’s record and to educate on the technical intricacies of the case.

We therefore requested that up to one million dollars be set aside and administered by the CPUC to allow parties to apply for funds to hire experts to compliment, supplement and/or disagree with the experts hired by the limited number of parties herein, who are participating in the technical aspects of this case. Fortunately, we have one public interest expert who has the technical knowledge who belongs to all of us, Commissioner Florio.

However, we again urge the CPUC, if it wishes, to reconsider our earlier proposal in order to secure valuable input on technical issues in this case from non-profit parties.

Should the Commission inform the parties that it is interested in such a proposal, the Joint Parties will submit an appropriate motion. Such a fund is likely to be of long-term benefit to PG&E given the lack of public confidence in its actions relating to the primary issues herein . We also note that this Commission made it a high priority in initiating this case to secure full public confidence and ensure that this “never happens again.”³

Dated: September 30, 2011

Respectfully submitted,

/s/ Len Canty

Len Canty, Chairman
Black Economic Council

/s/ Faith Bautista

Faith Bautista, President and CEO
National Asian American Coalition

² Jaxon Van Derbeken, *Alarm Over Threat From PG&E’s Gas System*, S.F. Chron., Sept. 27, 2011 at A1.

³ Order Instituting Rulemaking, California Public Utilities Commission, R.11-02-019 (Feb. 25, 2011).

/s/ Jorge Corralejo

Jorge Corralejo, Chairman

Latino Business Chamber of Greater Los Angeles

/s/Robert Gnaizda

Robert Gnaizda, Of Counsel

/s/ Shalini Swaroop

Shalini Swaroop, Senior Staff Attorney