

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)

**RESPONSE  
OF THE DIVISION OF RATEPAYER ADVOCATES TO MOTION OF  
THE UTILITY WORKERS OF AMERICA**

In accordance with Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), the Division of Ratepayer Advocates ("DRA") hereby submits its response in support of the Motion Of The UWUA For A Directive To Protect Employees Participating Directly As Witnesses Or Indirectly As Sources Of Information, filed by the Utility Workers of America ("UWUA") on September 22, 2011, in the above-captioned proceeding.

UWUA seeks a protective order directing Southern California Gas Company ("SCG") "to refrain from threatening or coercive behavior with respect to any SCG employees who may be involved in this proceeding as witnesses, advisors, or sources of information directly or indirectly on behalf of UWUA ... in this proceeding." UWUA Motion, p. 2.

DRA supports the motion of UWUA. DRA agrees that a protective order would assist in ensuring "a free flow of information to the Commission from utility employees" (UWUA Motion, p. 3) and facilitate building a robust record in this proceeding. DRA believes that UWUA's proposal is a reasonable first step to address the question the Commission posed in the Rulemaking regarding the necessity and practicality of adopting rules to "protect utility employees from management retaliation for bringing

information to the Commission regarding unreported utility public safety issues” (Rulemaking 11-02-019, pp. 14-15). Adopting a protective order at this stage in the proceeding is logical and practical.

Accordingly, DRA respectfully recommends that the Commission grant UWUA’s motion.

Respectfully submitted,

/s/ MARION PELEO

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