

**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

(U 39 G)

Rulemaking 11-02-019

**RESPONSE OF PACIFIC GAS AND ELECTRIC COMPANY
TO JOINT PARTIES MOTION**

WILLIAM V. MANHEIM
KERRY C. KLEIN

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-6628
Facsimile: (415) 973-5520
E-Mail: WVM3@pge.com
KCK5@pge.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: October 18, 2011

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Pursuant to Rule 11.1(e) of the California Public Utilities Commission's (CPUC or Commission) Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) hereby responds to the Joint Motion filed by the Black Economic Council, Latino Business Chamber of Greater Los Angeles and the National Asian American Coalition ("Joint Parties") on October 4, 2011. The Joint Parties request that the Commission establish an upfront fund of up to one million dollars to pay for technical experts to participate in the proceeding.

Under the Intervenor Compensation Program, qualified customer representatives facing significant financial hardship from participating in a CPUC proceeding are entitled to reimbursement of their reasonable costs, including expert witness fees, to the extent that the Commission determines that the party has made a substantial contribution to the decision adopted by the Commission in the proceeding. This determination is made by the Commission after the proceeding has been completed and the party has submitted necessary documentation. (Public Utilities Code Sections 1801 – 1812.)

The Joint Parties' request to establish a fund of up to \$1 million for expert witnesses does not include any of these provisions, which are designed to ensure that California's utility customers pay for the costs incurred by qualified customer representatives when they make a substantial contribution to the proceeding and they submit necessary documentation. In the absence of any of these protections and because programs already exist to provide funding to qualified customer representatives, PG&E requests that the Commission deny the Joint Parties' motion.

Respectfully submitted,

By: /s/ William V. Manheim
 WILLIAM V. MANHEIM

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KERRY C. KLEIN
Pacific Gas and Electric Company
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San Francisco, CA 94105
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