

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

Order Instituting Investigation on the
Commission's Own Motion into the
Operations and Practices of Pacific Gas
and Electric Company's Natural Gas
Transmission Pipeline System in
Locations with Higher Population
Density.

Investigation 11-11-009
(Filed November 10, 2011)

MOTION FOR PARTY STATUS OF THE CITY OF SAN BRUNO

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February 13, 2012

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I. CITY OF SAN BRUNO'S INTEREST IN THIS PROCEEDING

On November 10, 2011, the Commission instituted the above-named formal investigation to determine whether Pacific Gas & Electric ("PG&E") and its officers, directors, and managers, violated any provisions of the (1) California Public Utilities Code; (2) Commission rules; (3) general orders; or (4) decisions, federal regulations, or other applicable rules or requirements "pertaining to the operation of its natural gas transmission pipeline system in or near locations of higher population density."¹

This Motion for Party Status is filed by the City of San Bruno (the "City") in order for the City to participate as an active party in this proceeding. As well, the City's interests are not represented by any party to this proceeding and the City's active participation will be directly relevant to any issues raised in this investigation.

¹ See "INTRODUCTION," Order Instituting Investigation I.11-11-009

The City has a vested and continuing interest on behalf of its residents in pipeline safety issues arising from the devastating pipeline explosion and fire that took place on September 9, 2010, especially considering the fact that Line 132 continues to carry high pressure gas through residential areas of San Bruno and other parts of the Peninsula. Most tragic was the loss of eight lives that horrific evening and the process of this investigation must remain fixed to that deadly result. Sixty-six persons were reported burned and injured. Some of these victims have already endured, and are continuing to face, long and difficult recoveries. Thirty-eight homes were destroyed, 17 were rendered uninhabitable and another 53 suffered less serious damage. A quiet neighborhood was destroyed. The City's residents continue to deal with the impact and the loss they have experienced as a result of this tragedy.

It is the City's goal to restore a basic sense of safety and security for the residents in their homes and in their neighborhood that they once enjoyed and relied on. To this end, the City clearly understands that the City's success in achieving true long-term recovery means that the City must do everything possible, including participating in this investigation, to assure that the terrible tragedy never happens again, ever, anywhere.

As an indispensable party to the Commission's investigation in this matter at hand, the City supports any investigation of PG&E's systemic operational failures, relating to PG&E's gas services, facilities and pipelines, including the misidentification of class locations, in order to assure that residents' interests and concerns are addressed in this process and to help ensure that a full and accurate conclusion is reached. Similarly, the

City supports the efforts being undertaken by the Commission to complete the necessary fact-finding and to impose the necessary and appropriate actions and oversight required to protect residents' safety and that of residents throughout the State of California.

The City looks to the Commission as the authority for regulation of utilities in California to achieve the City's goal of improved pipeline safety by enacting rules to protect the City's residents' safety and to hold the party responsible for this explosion accountable. To that end, the City respectfully requests that it be an active party in any potential settlement negotiations between PG&E and CPSD. The community of San Bruno has been irreparably harmed as a result of the accident and will continue to indefinitely feel the impact of the horrific explosion. As the representative of the community, the City has a legitimate right to be a full participant in settlement negotiations especially considering that the worst natural gas explosion in the United States occurred in the City's own backyard. The community of San Bruno will be inextricably and forever linked to this terrible tragedy. The City believes that there is every rational argument that the City of San Bruno is a victim of PG&E's negligence and is an indispensable party to these proceedings and settlement.

The City is participating in the Commission's rulemaking process and the additional OIIs relating to the explosion. It is the City's responsibility to play a leadership role to ensure that the community has a voice and that this terrible tragedy never happens again. The City desires to be in lockstep with the CPSD and PG&E

throughout the entire negotiation process and to confirm that the end result, including fines levied against PG&E, includes the City's input and perspective.

II. NOTICE

Service of notices, orders, and communications and correspondence in this proceeding should be directed to the City of San Bruno City Manager Connie Jackson and the City's counsel Steven Meyers at the addresses as set forth below.

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III. CONCLUSION

The City's participation in this proceeding will not prejudice any party, will not delay the schedule, nor broaden the scope of the issues in the proceeding. For the reasons stated above, the City respectfully requests that the Commission grant this Motion for Party Status.

Respectfully submitted,

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