

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Citation of Pacific Gas and Electric
Company for Violations of Gas Safety Requirements
pursuant to Resolution ALJ-274.

Citation No. ALJ-274
2012-01-001
(Citation Date
January 27, 2012)

**REPLY COMMENTS OF
THE CONSUMER PROTECTION AND SAFETY DIVISION
ON DRAFT RESOLUTION ALJ-277**

TRACI BONE

Attorney for the Consumer Protection and Safety
Division

California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
Phone: (415) 703-2048
Email: tbo@cpuc.ca.gov

April 16, 2012

I. OVERVIEW

On March 19, 2012, the Administrative Law Judge (ALJ) Division of this Commission issued Draft Resolution ALJ-277 (Draft Resolution) denying Pacific Gas and Electric Company's (PG&E) appeal of Citation No. 2012-01-001, which orders PG&E to pay a fine of \$16,760,000 for various gas safety violations committed by PG&E over a 13 year period and a large geographic area. The Commission's Consumer Protection and Safety Division (CPSD) submits these Reply Comments in response to PG&E's Opening Comments on the Draft Resolution and its request for oral argument (Opening Comments).

PG&E's primary legal argument is that the appeal process used in this proceeding is flawed and that PG&E has therefore been denied due process. Opening Comments at 1 and 2. However, a review of the "flaws" listed by PG&E reveals that PG&E's real concern is that it does not have direct access to the decision makers – the Commissioners – in this proceeding. Instead, the procedures require that it make its case to an ALJ, who then prepares a draft resolution for the Commission's consideration.

PG&E's primary policy argument is that the Commission should "direct CPSD not to issue citations for self-reported violations until the Commission has had an opportunity to consider [self-reported violations'] appropriate place in its enforcement regime." PG&E Appeal at 5. PG&E willfully ignores the fact that this Commission already addressed this issue when it adopted the gas citation program last December, and that this policy complaint comes too late.

PG&E's insistence that it be heard directly by the Commission, and that the Commission suspend CPSD's citation authority for self-reported violations, culminates in PG&E's request for oral argument so that the Commission can "fully consider the implications of this precedent-setting case." Opening Comments at 4.

The Commission should carefully consider the import of PG&E's request for oral argument. The logical conclusion of PG&E's due process arguments regarding "being heard" by the Commission is that the Commission cannot delegate to the ALJ Division the ability to conduct a proceeding and prepare a draft resolution for Commission consideration of any gas citation appeal without a formal Commission proceeding with all of the formal processes (such as an assigned Commissioner and service through the Docket Office) that attach to those proceedings. PG&E implies that the Commission's review of a draft resolution, and its express authority to amend, modify, or set aside that draft, is not enough; a gas utility appealing a CPSD

citation for violations of state and federal gas regulations has the right to be heard directly by the Commission – through oral argument or a formal Commission proceeding – before a decision can be made on its appeal.

In support of its request for oral argument, PG&E argues that this is a precedent-setting case. Opening Comments at 4. While this case is the first challenge to the Commission’s new gas citation program established under Resolution ALJ-274 (ALJ-274), PG&E’s appeal does not raise new issues. See the discussion in Section II.D, below. This case will only be “precedent-setting” if the Commission grants PG&E’s request for oral argument, because it will send a message to the gas industry that the Commission is willing to reconsider the decisions it made in ALJ-274 less than six month ago.

PG&E’s efforts to undermine the enforcement program established in ALJ-274 should be rejected and its request for oral argument should be denied.

II. DISCUSSION

A. The Appeal Process Adopted By The Commission In ALJ-274 Is Legally Sound

As an initial matter, none of PG&E’s complaints regarding ALJ-274 raise new issues or facts that could not have been addressed in a rehearing application of ALJ-274. Consequently, PG&E’s complaints regarding the process established in ALJ-274 constitute a collateral attack of that order, contrary to § 1709 of the California Public Utilities Code.¹ Out of an abundance of caution, CPSD addresses the merits of PG&E’s due process arguments here.

In support of its claim that the citation appeal process is flawed, PG&E argues that ALJ-274:

did not spell out the appeal procedure in any detail. The ALJ Division has, therefore, had to improvise. The result is a procedure that is ‘below the radar’ of both the Commission and the public.

PG&E Opening Comments at 1.

There is nothing “improvised” or “below the radar” with regard to the citation and appeal processes established in ALJ-274. ALJ-274 was adopted by this Commission on December 1, 2011 – less than 6 months ago - in the wake of numerous gas safety violations

¹ Unless otherwise noted, all further section references are to the California Public Utilities Code.

revealed by the National Transportation Safety Board (NTSB) investigation of the San Bruno explosion, and recommendations contained in the NTSB and Independent Review Panel reports that followed that incident.² The NTSB's Report expressly recommended that the Governor expand CPSD enforcement authority to include staff authority to issue fines and penalties. ALJ-274 at 7; NTSB August 30, 2011 Report at 123. The NTSB made this recommendation in light of its observation that meaningful enforcement appeared to be lacking at both the state and federal levels:

Because of the lapses of oversight seen in this accident, the NTSB is concerned and has strong doubts about the quality and effectiveness of enforcement at both the Federal and state levels. Although the CPUC and PHMSA have authority to enforce pipeline safety regulations, the organizational failures of PG&E seen in this accident suggest that some operators are able to ignore certain standards without concern for meaningful enforcement action against them.

Therefore, the NTSB concludes that the ineffective enforcement posture of the CPUC permitted PG&E's organizational failures to continue over many years. The NTSB recommends that the governor of the state of California expeditiously evaluate the authority and ability of the pipeline safety division within the CPUC to effectively enforce state pipeline safety regulations, and, based on the results of this evaluation, grant the pipeline safety division within the CPUC the direct authority, including the assessment of fines and penalties, to correct noncompliance by state-regulated pipeline operators.

NTSB August 30, 2011 Report at 123. The Independent Review Panel made its recommendation in light of, among other things, the potentially "unwieldy" nature of using the Commission's formal enforcement process – the Order Instituting Investigation (OII) – for significant violations that do not warrant an OII or other formal process:

[T]he OII process has rarely been invoked in pipeline safety cases. Because the OII is a formal adjudicatory process that may involve administrative law judges, hearings, and pleadings, it is unwieldy for any but the most severe violations. As a result, the Staff has little flexibility to address significant violations that do not warrant an OII or judicial process.

² The NTSB and Independent Review Panel reports are available, respectively, at: <http://www.nts.gov/doclib/reports/2011/PAR1101.pdf> and <http://www.cpuc.ca.gov/NR/rdonlyres/85E17CDA-7CE2-4D2D-93BA-B95D25CF98B2/0/cpucfinalreportrevised62411.pdf>.

Independent Review Panel Report at 21; see also page 27. In adopting ALJ-274, the Commission consciously chose to adopt more streamlined enforcement proceedings, consistent with the NTSB and Independent Review Panel recommendations.

A review of Appendix A to ALJ-274, which explains the citation and appeal procedures, demonstrates that those procedures are not “improvised”. Section I at A.6 and A.7 of Appendix A require that the citation must explain to a utility how to submit an appeal and must include the form for submitting an appeal. Section II of Appendix A is devoted to the specifics of the appeal process. Section II.A identifies the Commission staff who must be notified of the appeal, including the Commission’s Executive Director, the Chief Administrative Law Judge, the General Counsel, the Director of CPSD, and the Director of the Division of Ratepayer Advocates. Section II of Appendix A also establishes, among other things, the process for designation of an ALJ to hear the appeal (II.B), the time frames for the appeal, the appellant’s rights to a hearing and transcript (II.C, D, E, and F),³ the burden of proof (II.G), rehearing rights (II.K), and the *ex parte* prohibitions on the proceeding (II.L).

The Commission’s jurisdiction to create citation programs is well-established. ALJ-274 at 4, note 6. The citation program established by ALJ-274 is one of many that operate following similar appellate processes. See, e.g. D.09-05-020 at 10. Consequently, there is nothing improvisational or “below the radar” with regard to ALJ-274’s appellate process. Rather, in making such allegations, PG&E reveals its own lack of familiarity with the Commission’s citation procedures.

PG&E elaborates on its “below the radar” theme with the following objections: (1) the citation and appellate processes are “adjudicatory”; (2) the appeal process is “opaque” because there is no formal proceeding and nothing is filed with the Docket Office or served on the Commissioners or their advisors; and (3) there is no assigned Commissioner. PG&E Opening Comments at 1 and 2. Rather than legally-based objections, this collection of complaints constitutes PG&E’s objection not communicating directly with – and therefore unduly influencing - the Commissioners and their staff. That complaint is not a legitimate due process challenge.

³ PG&E waived its right to a hearing, agreeing that there were no material facts in dispute that required a hearing to resolve. See, e.g., Administrative Law Judge’s Ruling Regarding Prehearing Conference, Evidence, Schedule and Issues, Dated February 10, 2012 (ALJ PHC Ruling).

The crux of PG&E’s first complaint – that the process is “adjudicatory” - is that a resolution cannot be used to adjudicate an individual utility’s rights. In support of its argument, PG&E notes that the draft resolution was not issued by a director of the Commission, and that “none of the other areas in which the Commission makes decisions by resolution is comparable to the appeal of a citation issued under ALJ-274, where potentially enormous fines are at issue.” PG&E Opening Comments at 2.

PG&E is mistaken on both counts. First, the draft resolution at issue here was proposed by Karen Clopton, the Chief Administrative Law Judge and the Director of the ALJ Division. Second, as described above, the ALJ Division follows the same resolution process to determine other citation appeals, and those appeal procedures are nearly identical to those set forth in ALJ-274. While the amounts of the fines vary given the enormous disparity between a company like PG&E, and other entities regulated by the Commission, the end result is the same.⁴ A resolution is voted on by the full Commission, has the same standing as a Commission decision, and is subject to rehearing and judicial review the same as a Commission decision. The primary difference between a resolution and a Commission decision is the process that results in the draft resolution as compared to the proposed decision. Thus, if we adopt PG&E’s argument that the Commission may not decide its appeal pursuant to a resolution, then we agree that the Commission may only act on such matters through its formal processes (or take no action at all). This is exactly the problem identified for correction in the Independent Review Panel Report and discussed above.

With regard to PG&E’s second and third complaints, PG&E is correct that the appeals process does not include the creation of a formal proceeding, the assignment of a commissioner to oversee the proceeding, or formal filings with the Docket Office. Again, in suggesting here that the Commission’s streamlined citation processes are inappropriate, PG&E implies that every Commission action against a utility must require an OII or other formal action. This is exactly what the Commission sought to avoid in adopting ALJ-274 and granting CPSD expanded citation authority. Finally, PG&E has no basis to complain that Commissioners were not served

⁴ Additionally, draft resolutions prepared by other CPUC divisions for Commission approval, and with no opportunity for hearing, often resolve issues or establish rules impacting hundreds of millions of dollars. Thus, PG&E’s suggestion that resolutions are reserved for issues of less consequence than its citation appeal is wrong.

in this proceeding given that nothing prohibits a party from serving its pleadings on the Commissioners. In this case, PG&E exercised that right and served its Opening Comments on the service list and all of the Commissioners. See Attachment A hereto, PG&E's Certificate of Service for its Opening Comments. CPSD will serve these Reply Comments on everyone PG&E has served, as well as the City and County of San Francisco, which filed Opening Comments.

In sum, in complaining about the differences between the Commission's formal proceedings and its citation procedures, PG&E fails to explain how the streamlined process has denied it due process. This is because there is no merit to PG&E's claims. PG&E was properly noticed regarding the citation, the consequences of the citation, its appeal rights, and its right to a hearing, which it waived. PG&E was consulted and agreed to the scope of issues to be addressed in the briefs.⁵ It filed opening and reply briefs on the legal and policy issues raised in its appeal. The ALJ Division issued the Draft Resolution, which considers PG&E's arguments and proposes a ruling for the Commission's consideration that upholds the CPSD citation. PG&E has had the opportunity to address, through Opening Comments, the legal and factual errors in the Draft Resolution, and it now complains it has been denied due process because the appeals process was "improvised" and "below the radar."

PG&E fails to acknowledge two fundamental safeguards in the ALJ-274 appeal process that ensure its due process: (1) no discretion is left to CPSD or ALJ Division because the Commission makes the ultimate decision on the appeal; and (2) the appeal is also subject to rehearing and judicial review. As explained in the cover letter accompanying the Draft Resolution:

When the Commission acts on the draft resolution, it may adopt all or part of it as written, amend or modify it, or set it aside and prepare its own order. Only when the Commission acts does the resolution become binding on the parties.

Further, Appendix A to ALJ-274 expressly states that PG&E has the right to rehearing and judicial review pursuant to §§ 1731 and 1756. See Appendix A, Section II.K.

⁵ ALJ PHC Ruling at 3. Notably, in listing its issues for appeal during the pre-hearing conference, PG&E did not suggest that the flaws in the appeal process required briefing.

Because of these procedural safeguards, PG&E has no standing to claim that its due process rights have been violated. Among other things, PG&E has not even been required to post the fine amount while its appeal is pending.

B. The Commission Has The Full Ability To Exercise Its Discretion

For the same reasons that the appeal process is legally sound, the Commission has the full ability to exercise its reserved discretion because it reserves the right to amend, modify, or set aside the Draft Resolution. To the extent it chooses to exercise such discretion, the record and pleadings from the proceeding are available to it. Nevertheless, PG&E argues that the requirement that it limit its comments on the Draft Resolution to factual, legal, or technical issues precludes the Commission from hearing from PG&E regarding how the Commission should exercise its policy discretion. Opening Comments at 4. PG&E ignores the fact that it made its policy arguments in its opening and reply briefs, which are available to the Commission. Notably, PG&E failed to include with its Opening Comments “a subject index listing the recommended changes to the draft resolution, a table of authorities, and an appendix setting forth the proposed findings of fact and conclusions of law” as required by the cover letter to the Draft Resolution. If PG&E is so concerned about being heard by the Commission, it is fair to ask why it did not provide this basic information in its Opening Comments, which would have provided the Commission with a roadmap for modifying the Draft Resolution in the fashion that PG&E desires.

PG&E similarly argues that “[t]he delegation of penalty authority to CPSD without full and adequate Commission review is tantamount to delegation of a final discretionary decision, contrary to D.09-05-020 at 3, citing D.02-02-049.” PG&E Opening Comments at 2. In fact, D.09-05-020, and the cases it relies upon, confirm that so long as the Commission retains the final decision-making authority, there is no improper delegation.

PG&E has had its opportunity to present its position to the Commission through its pleadings in this proceeding. Nothing further is needed for the Commission to exercise its discretion and act on the Draft Resolution.

C. The Draft Resolution Should Be Clarified to Further Address and Resolve PG&E’s Legal Arguments Regarding CPSD’s Authority To Count Violations

PG&E argues that the Draft Resolution “fails to resolve (or address) PG&E’s argument that CPSD cannot lawfully count violations any way it wants. Opening Comments at 3. PG&E claims that CPSD had only two options if it chose to penalize PG&E: (1) it could count each day as a separate violation; or (2) it could adopt PG&E’s proposal to count each violation as occurring every five years because the leak surveys only need to be performed every 5 years. Opening Comments at 2.

While the Draft Resolution properly disposes of PG&E’s argument, it should be clarified to specifically address PG&E’s argument that “CPSD cannot lawfully count violations any way it wants.” PG&E is correct, and CPSD agrees, that CPSD cannot count violations “any way it wants.” For example, CPSD cannot count a continuing violation as occurring every hour. The most it can count, pursuant to both § 2108 and ALJ-274, is a daily violation. The question then becomes whether ALJ-274 permits CPSD to count a continuing violation as something less than one per day – perhaps one per week, or one per month, one per year, or even one per every 5 years, as PG&E proposes. If PG&E is correct that CPSD has the discretion to count a continuing violation as one per every five years, then there is no logic to PG&E’s suggestion that CPSD “must” do so, and that it cannot do something more – such as one per week.

PG&E fails to acknowledge that ALJ-274 requires CPSD to consider other factors when it sets a penalty, and that those other factors limit CPSD’s discretion in how it can count violations. As the Draft Resolution recognizes, ALJ-274 directed CPSD to consider the factors delineated in § 2104.5, which are further discussed in D.98-12-075. Those factors include: the severity of the offense; the conduct of the utility before, during, and after the offense (including whether the violation was self-reported and self-corrected); the financial resources of the utility; the totality of the circumstances; and the amount of the fine in the context of prior Commission decisions. See Draft Resolution at 4. Thus, CPSD’s authority in setting a penalty is constrained by both the maximum number of violations that may be identified - only one per day – and specific factors that it must take into consideration, including those delineated in § 2104.5 and D.98-12-075.

Because ALJ-274 requires CPSD to impose the maximum penalty for an offense as provided by law,⁶ CPSD must use its ability to count violations on a per day or other basis as the mechanism to adjust a potentially unreasonably high fine to something lower, consistent with the other factors it must consider. Here, without this flexibility, CPSD would have been required to either not cite PG&E, or to fine PG&E over \$500 million, notwithstanding its obligation to take other factors into consideration. Significantly, CPSD's discretion is further limited because its penalty decision, including how it has counted violations, is subject to Commission review. As discussed above, the Commission makes the final decision on a penalty appeal, and it reserves to itself the right to amend, modify, or reject a draft resolution. Section 2104.5 further affirms the Commission's authority to make the final determination regarding a penalty. It provides:

Any penalty for violation of any provision of this act, or of any rule, regulation, general order, or order of the commission, involving safety standards for pipeline facilities or the transportation of gas in the State of California may be compromised by the commission.

While these points are implicit in the Draft Resolution's discussion of the number of violations at pages 3 and 4, CPSD believes it would be appropriate to clarify that discussion to acknowledge the manner in which CPSD's discretion to count violations is constrained, as described above.

D. PG&E's Request for Oral Argument Should Be Denied

PG&E argues that "[t]he way in which CPSD wields the citation power given it by Res. ALJ-274 will add to or detract from the Commission's intended policy." Opening Comments at 4. On this basis, PG&E concludes that "[t]he Commission should direct presentation of oral argument to fully consider the implication of this precedent-setting case." *Id.* PG&E is wrong. This is not a precedent-setting case because the Commission already decided PG&E's policy issue in ALJ-274.

PG&E argues the Commission should "direct CPSD not to issue citations for self-reported violations until the Commission has had an opportunity to consider [self-reported violations'] appropriate place in its enforcement regime." PG&E Appeal at 5. However, this issue was expressly addressed in ALJ-274. In that proceeding, one of the parties proposed that

⁶ ALJ-274, Finding and Conclusion 11.

fines should be waived or reduced in cases where violations are self-identified and self-corrected and no injury or damage has resulted from the violation. ALJ-274 at 12. The Commission decided in ALJ-274 that CPSD should consider the fact that a utility self-reported and self-corrected its violations “in determining whether a citation should be issued.” ALJ-274 at 15, Finding and Conclusion 19; see also Appendix A at I.F. Thus, the Commission has already considered the proper place of self-reporting in the ALJ-274 enforcement regime and has decided that CPSD may cite a self-reporting utility if it determines that is appropriate in light of the other factors CPSD must consider.

Rather than permitting PG&E oral argument to reiterate arguments raised in its pleadings, or to raise new scenarios or issues which CPSD will be at a disadvantage to respond to, the Commission should respect the process it established in ALJ-274 less than six months ago. If the Commission has concerns with the conclusions of the Draft Resolution, it should review the record and pleadings generated by the appeal process, and amend or reject the Draft Resolution accordingly. It should not, in any case, backtrack from its safety and streamlining goals by entertaining new procedures, like oral argument, not envisioned in ALJ-274. Such a decision would undermine CPSD and the citation process, and send a message to the gas industry that the Commission does not have confidence in its enforcement procedures. For all of these reasons, PG&E’s request for oral argument should be denied.

III. CONCLUSION

For all of the foregoing reasons, the Commission should reject PG&E’s arguments.

Respectfully submitted,

/s/ TRACI BONE

TRACI BONE
 Staff Counsel

Attorney for the Consumer Protection
 & Safety Division

California Public Utilities Commission
 505 Van Ness Ave.
 San Francisco, CA 94102
 Phone: (415) 703-2048
 Fax: (415) 703-2262

April 16, 2012

ATTACHMENT A

**CERTIFICATE OF SERVICE TO PG&E'S OPENING COMMENTS ON THE DRAFT
RESOLUTION**

Dated April 9, 2012

CERTIFICATE OF SERVICE

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department, B30A, 77 Beale Street, San Francisco, California 94105.

On April 9, 2012, I served a true copy of:

**“(1) OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY
ON DRAFT RESOLUTION ALJ-277 AND (2) REQUEST
FOR ORAL ARGUMENT”**

on the official service lists for **Citation No. ALJ-274 2012-01-001** by electronic mail for those who have provided an e-mail address and by U.S. mail for those who have not.

Copies were also enclosed in a sealed envelope and hand delivered to:

Karen Clopton
Chief Administrative Law Judge
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Mark J. Ferron, Commissioner
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Michel Peter Florio, Commissioner
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Frank Lindh, Esq.
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Burton W. Mattson, ALJ
Administrative Law Judge
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Michael R. Peevey, President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Catherine J.K. Sandoval, Commissioner
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Timothy Alan Simon, Commissioner
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 9, 2012.

/s/

Rene Anita Thomas

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served a copy of the **REPLY COMMENTS OF THE CONSUMER PROTECTION AND SAFETY DIVISION ON DRAFT RESOLUTION ALJ-277** by either United States mail or electronic mail, to the following:

1. Each party listed on the attached service list for Citation No. ALJ-274 2012-01-001;
2. Each party listed on PG&E's Certificate of Service in this proceeding dated April 9, 2012 and attached to the REPLY COMMENTS OF THE CONSUMER PROTECTION AND SAFETY DIVISION ON DRAFT RESOLUTION ALJ-277 as Attachment A; and
3. Theresa L. Mueller and Austin M. Yang of the City and County of San Francisco at Theresa.Mueller@sfgov.org and Austin.Yang@sfgov.org, respectively.

I also **hand-delivered** a hard copy to the assigned Administrative Law Judge Burton W. Mattson.

Executed on April 16, 2012 at San Francisco, California.

/s/ JOANNE LARK

JOANNE LARK

SERVICE LIST FOR CITATION ALJ-274 2012-01-001

Joseph M. Malkin
Attorney At Law
Orrick, Herrington & Suttcliffe LLP
405 Howard Street
San Francisco, CA 94105
415-773-5505
jmalkin@orrick.com
For: Pacific Gas and Electric Company

Traci Bone
Attorney At Law
California Public Utilities Commission
Legal Division
505 Van Ness Avenue, Room 5027
San Francisco, CA 94102
415-703-2048
E-mail: tbo@cpuc.ca.gov
For: Consumer Protection and Safety Division

Burton W. Mattson
Administrative Law Judge
California Public Utilities Commission
Administrative Law Judge Division
505 Van Ness Avenue
San Francisco, CA 94102
415-703-2504
E-mail: bwm@cpuc.ca.gov
(Assigned Administrative Law Judge)

Jane Yura
Vice President, Gas Operations
Standard and Policies
Pacific Gas and Electric Company
P.O. Box 770000, Mailcode N15F
San Francisco, CA 94177
E-mail: Jkyl@pge.com

Thomas E. Bottorff
Senior Vice President
Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105
E-mail: teb3@pge.com

Jason J. Zeller
California Public Utilities Commission
Legal Division
505 Van Ness Avenue, Room 5030
San Francisco, CA 94102
E-mail: jjz@cpuc.ca.gov

Karen Miller
California Public Utilities Commission
Public Advisor Office
505 Van Ness Avenue, Room 2103
San Francisco, CA 94102
E-mail: knr@cpuc.ca.gov

Lynn Stanghellini
California Public Utilities Commission
Chief Court Reporter
505 Van Ness Avenue, Room 2106
San Francisco, CA 94102
E-mail: las@cpuc.ca.gov

Ann Hoang
California Public Utilities Commission
Calendar Clerk
505 Van Ness Avenue, Suite 5013
San Francisco, CA 94102
Email: ahg@cpuc.ca.gov

Michelle Cooke, Interim Director
California Public Utilities Commission
Consumer Protection & Safety Division
505 Van Ness Avenue, Room 2205
San Francisco, CA 94102
Email: mle@cpuc.ca.gov

SERVICE LIST FOR CITATION ALJ-274 2012-01-001

Michelle L. Wilson
Pacific Gas and Electric Company
Law Department
77 Beale Street
San Francisco, CA 94105
Telephone: (415) 973-6655
Facsimile: (415) 973-0516
E-mail: mlw3@pge.com

Michael Robertson
California Public Utilities Commission
Consumer Protection & Safety Division
320 West 4th Street, Suite 500
Los Angeles, CA 90013
Email: mdr@cpuc.ca.gov

Julie Halligan, Deputy Director
California Public Utilities Commission
Consumer Protection & Safety Division
505 Van Ness Avenue, Room 2203
San Francisco, CA 94102
Email: jmh@cpuc.ca.gov

Sunil Shori
California Public Utilities Commission
Consumer Protection & Safety Division
505 Van Ness Avenue, Room 2203
San Francisco, CA 94102
Email: sks@cpuc.ca.gov