

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)

MOTION OF THE UTILITY REFORM NETWORK  
FOR ACCEPTANCE OF A PROPOSED EXHIBIT INTO THE RECORD



April 27, 2012

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The Utility Reform Network (TURN) respectfully requests that the attached exhibit, a document obtained in supplemental discovery from Pacific Gas & Electric Company (“PG&E”) after the conclusion of the evidentiary hearings, be admitted into the record. PG&E has informed TURN that it does not oppose this request.

PG&E provided the attached document, a supplemental response to TURN data request (DR) 29-1, on April 9, 2012. As that response indicates, the supplemental response arises from the testimony of PG&E witness Nick Stavropoulos on March 19, 2012, in which he indicated that a final report by PriceWaterhouse Coopers (PwC) regarding PG&E’s record-keeping practices would be forthcoming and that PG&E would make that report public.<sup>1</sup> The bulk of the attached exhibit is the text of that final report (Attachment 7 to the response to DR 29-1). TURN notes that, although the footer on that report indicates that it is confidential, PG&E has indicated in its response to DR 29-1 that the version of the report in the attached proposed exhibit is a public version.

Given that the proposed exhibit is a document referenced in the oral testimony of Mr. Stavropoulos and its admission is unopposed by PG&E, TURN submits that the proposed exhibit should be admitted into the record.

Date: April 27, 2012

Respectfully submitted,

By: \_\_\_\_\_/s/\_\_\_\_\_  
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<sup>1</sup> Transcript, vol. 8, pp. 797:27 – 798:24.