

**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 to Determine Violations of Public Utilities Code Section 451, General Order 112, and Other Applicable Standards, Laws, Rules and Regulations in Connection with the San Bruno Explosion and Fire on September 9, 2010.	I.12-01-007 (Filed January 12, 2012) (Not Consolidated)
Order Instituting Investigation on the Commission's Own Motion into the Operations and Practices of Pacific Gas and Electric Company with Respect to Facilities Records for Its Natural Gas Transmission System Pipelines.	I.11-02-016 (Filed February 24, 2011) (Not Consolidated)
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.	I.11-11-009 (Filed November 10, 2011) (Not Consolidated)
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.	R. 11-02-019 (Filed February 24, 2011) (Not Consolidated)

**RESPONSE OF THE UTILITY REFORM NETWORK TO THE
MOTION OF THE CONSUMER PROTECTION AND SAFETY DIVISION
TO SUSPEND PROCEEDINGS**

The Utility Reform Network ("TURN") hereby responds to the Motion of the Consumer Protection and Safety Division to Suspend Proceedings, In Order to Facilitate Negotiations Toward a Stipulated Outcome ("CPSD Motion).

TURN takes a neutral position regarding the CPSD Motion for the following reasons.

On the one hand, TURN is not convinced that the negotiations referenced in the CPSD Motion have made sufficient progress to warrant a suspension of the proceedings at this time. In this respect, TURN believes the motion is premature.

On the other hand are two countervailing considerations. First, one reason the parties may not have made sufficient progress in negotiations is that they have been consumed with the preparation for and conduct of litigation and have not been able to devote time to intensive negotiations. Second, TURN believes that there is at least the possibility of a multi-party settlement of these cases.

While TURN neither endorses nor opposes the CPSD motion, if the motion is granted, TURN urges the Commission to prevent unnecessary delays in these proceedings in the event the negotiations do not appear to be leading to a settlement. To that end, TURN strongly recommends that the Commission direct the parties to appear at a Commission hearing no later than October 22, 2012 to report on the status of the negotiations. Unless the parties report that they are making progress toward a settlement, the Commission at that time should lift the suspension and set dates for the conclusion of hearings, briefing and other related events.

Date: October 10, 2012

Respectfully submitted,

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