

**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 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 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)

**MOTION OF PACIFIC GAS AND ELECTRIC COMPANY AND CITY AND COUNTY
OF SAN FRANCISCO TO ADOPT STIPULATION FOR A PROTECTIVE ORDER FOR
THE NON-PUBLIC VERSION OF THE FINANCIAL
RESOURCES TESTIMONY**

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October 3, 2012

**BEFORE THE PUBLIC UTILITIES COMMISSION
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NON-PUBLIC VERSION OF THE FINANCIAL RESOURCES TESTIMONY**

Pacific Gas and Electric Company (PG&E) and City and County of San Francisco (CCSF) request that the assigned Administrative Law Judges (ALJs) adopt a stipulation between the parties and issue a protective order for the non-public version of the Consumer Protection and Safety Division's (CPSD's) Financial Resources testimony under which PG&E would provide the material to CCSF. The stipulated Protective Order is included in Attachment A to this Motion.

On September 14, 2012, the assigned ALJs approved CPSD's request to file testimony on PG&E's financial resources. This testimony, prepared by Overland Consulting, Inc. contains

confidential material provided to CPSD (through Overland). In approving CPSD's request, the ALJs also provided that: "[o]ther parties, subject to appropriate nondisclosure agreements, may receive unredacted confidential copies." (E-Ruling of ALJs Wetzell and Yip-Kikugawa.) PG&E has reached agreements with the City of San Bruno and TURN, but has been unable to do so with CCSF.

Under these circumstances, PG&E is willing to provide the confidential material pursuant to a protective order issued by the ALJs in this proceeding.

The parties seek expedited treatment of this motion so that the non-public testimony can be provided to CCSF. We believe this will cause no harm to other parties because they all already have copies of the unredacted testimony.

For the reasons set forth above, PG&E and CCSF respectfully request that the Assigned ALJs adopt the parties' stipulation and issue a protective order in this matter.

Respectfully submitted,

/s/
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