

**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 ) Investigation 12-01-007  
Determine Violations of Public Utilities Code Section 451, ) (Filed January 12, 2012)  
General Order 112, and Other Applicable Standards, ) **(NOT CONSOLIDATED)**  
Laws, Rules and Regulations in Connection with the )  
San Bruno Explosion and Fire on September 9, 2010. )

Order Instituting Investigation on the )  
Commission's Own Motion into the Operations ) Investigation 11-02-01  
and Practices of Pacific Gas and Electric Company ) (Filed February 24, 2011)  
with Respect to Facilities Records for its ) **(NOT CONSOLIDATED)**  
Natural Gas Transmission System Pipeline. )

Order Instituting Investigation on the )  
Commission's Own Motion into the Operations ) Investigation 11-11-009  
and Practices of Pacific Gas and Electric Company's ) (Filed November 10, 2011)  
Natural Gas Transmission Pipeline System in ) **(NOT CONSOLIDATED)**  
Locations with High Population Density. )

Order Instituting Rulemaking on the ) Rulemaking 11-02-019  
Commission's Own Motion to Adopt ) (Filed February 24, 2011)  
New Safety and Reliability Regulations for ) **(NOT CONSOLIDATED)**  
Natural Gas Transmission and Distribution Pipelines )  
and Related Ratemaking Mechanisms. )

**Comments of the Utility Workers Union of America (UWUA)**  
**on the Motion of CPSD to Suspend Proceedings,**  
**filed October 5, 2012**

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Carl Wood  
Regulatory Affairs Director  
Utility Workers Union of America  
10103 Live Oak Ave.  
Cherry Valley CA 92223  
Phone: (951) 567-1199  
E-mail: carl.wood@verizon.net

William Julian II  
43556 Almond Lane  
Davis CA 95618  
Phone: (530) 219-7638  
E-mail: billjulian@sbcglobal.net

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October 꺆꺆꺆10, 꺆꺆꺆2012

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Docket R.11-02-019 is the venue for implementing Senate Bill 705; for implementing the Commission's approach to facilitating employee communications including whistleblower protection; and for implementing an industry-wide safety culture for natural gas utilities in California. UWUA has participated actively in this docket with respect to Southern California Gas Company (SCG). These are matters which should not be suspended or deferred for negotiations without the active participation of UWUA. UWUA has not been made aware of or participated in any discussions or negotiations with CPSD or any other parties concerning any stipulation or agreement as to any of the on-going matters in R.11-02-019.

UWUA requests clarification on the scope of the proposed suspension and requests a directive to CPSD and other Commission staff and divisions concerning the matters in R.11-02-019. If the scope of the proposed suspension involves only matters related to PG&E and its responsibility in connection with the San Bruno explosion in the consolidated dockets that are the subject of current evidentiary proceedings, then UWUA does not object to the proposed suspension. However, if referenced negotiations directly or indirectly affect matters involving ongoing issues in R.11-02-019, then UWUA requests notice and the opportunity to participate in those discussions, and objects to any procedural suspension that would impede progress on the on-going issues in R.11-02-019.

Respectfully submitted,

/s/

Carl Wood  
Regulatory Affairs Director  
Utility Workers Union of America  
10103 Live Oak Ave.  
Cherry Valley CA 92223  
Phone: (951) 567-1199  
E-mail: carl.wood@verizon.net

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/s/

William Julian II  
43556 Almond Lane  
Davis CA 95618  
Phone: (530) 219-7638  
E-mail: billjulian@sbcglobal.net