

From: Roberts, Becky J.

Sent: 11/16/2012 4:00:44 PM

'StephanieC@greenlining.org' (StephanieC@greenlining.org);  
'anginc@goldrush.com' (anginc@goldrush.com); Garber, Stephen (Law  
(/o=PG&E/ou=Corporate/cn=Recipients/cn=SLG0); 'pucservice@dralegal.org'  
(pucservice@dralegal.org); Tomkins, Sharon (STomkins@semprautilities.com);  
'michelle.d.grant@dynegy.com' (michelle.d.grant@dynegy.com);  
'carlwood@uwua.net' (carlwood@uwua.net); 'justin.brown@swgas.com'  
(justin.brown@swgas.com); 'Ethan.Jones@Valero.com' (Ethan.Jones@Valero.com);  
'jboehme@nicor.com' (jboehme@nicor.com); Johns, Christopher  
(/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=CPJ2);  
'austin.yang@sfgov.org' (austin.yang@sfgov.org); 'jcorralejo@lbcgla.org'  
(jcorralejo@lbcgla.org); 'marcel@turn.org' (marcel@turn.org);  
'rkoss@adamsbroadwell.com' (rkoss@adamsbroadwell.com);  
'douglas.porter@sce.com' (douglas.porter@sce.com); 'sgs@dcbsf.com'  
(sgs@dcbsf.com); 'npedersen@hanmor.com' (npedersen@hanmor.com); 'ek@a-  
klaw.com' (ek@a-klaw.com); 'gxh@cpuc.ca.gov' (gxh@cpuc.ca.gov);  
'faith.mabuhayalliance@gmail.com' (faith.mabuhayalliance@gmail.com);  
To: 'bob.gorham@fire.ca.gov' (bob.gorham@fire.ca.gov); 'cjackson@sanbruno.ca.gov'  
(cjackson@sanbruno.ca.gov); 'rkohut@sandiego.gov' (rkohut@sandiego.gov);  
'maguirre@amslawyers.com' (maguirre@amslawyers.com); 'map@cpuc.ca.gov'  
(map@cpuc.ca.gov); Cherry, Brian K  
(/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=BKC7); Castrence, Kristina  
(/o=PG&E/ou=Corporate/cn=Recipients/cn=KMMj); 'smeyers@meyersnave.com'  
(smeyers@meyersnave.com); McMahon, Allie  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=A2MX); Dizon, Maybelline  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=M1D1); Tsang, Jessica  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=J2TI); Marre, Charles  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=CMM6);  
'dcarroll@downeybrand.com' (dcarroll@downeybrand.com); Arturo Frias  
(artfrias@uwua.net); 'cassandra.sweet@dowjones.com'  
(cassandra.sweet@dowjones.com); 'mchediak@bloomberg.net'  
(mchediak@bloomberg.net); 'BCragg@GoodinMacbride.com'  
(BCragg@GoodinMacbride.com); 'service@cforat.org' (service@cforat.org);  
'ESelmon@Jemzar.com' (ESelmon@Jemzar.com); 'enriqueg@greenlining.org'  
(enriqueg@greenlining.org); 'wwester@smud.org' (wwester@smud.org);  
'lauren.duke@db.com' (lauren.duke@db.com); 'westgas@aol.com'  
(westgas@aol.com); 'michaelboyd@sbcglobal.net' (michaelboyd@sbcglobal.net);  
'jheckler@levincap.com' (jheckler@levincap.com); 'cadowney@cadowneylaw.com'  
(cadowney@cadowneylaw.com); 'lencanty@BlackEconomicCouncil.org'  
(lencanty@BlackEconomicCouncil.org); 'jleslie@McKennaLong.com'  
(jleslie@McKennaLong.com); 'bmcc@mccarthylaw.com'  
(bmcc@mccarthylaw.com); 'Dave.Weber@nwnatural.com'  
(Dave.Weber@nwnatural.com); 'ajahns@jahnsatlaw.com'  
(ajahns@jahnsatlaw.com); 'karla.Dailey@CityofPaloAlto.org'

(karla.Dailey@CityofPaloAlto.org); 'gclark@lodistorage.com'  
(gclark@lodistorage.com); 'jason.dubchak@niskapartners.com'  
(jason.dubchak@niskapartners.com); 'nformosa@winston.com'  
(nformosa@winston.com); 'christine.tam@cityofpaloalto.org'  
(christine.tam@cityofpaloalto.org); 'cleo.zagrean@macquarie.com'  
(cleo.zagrean@macquarie.com); Lavinson, Melissa A  
(/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=MALP45107730);  
RegRelCPUCCases  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=RegRelCPUCCases);  
unionnancy@gmail.com (unionnancy@gmail.com); 'mrw@mrwassoc.com'  
(mrw@mrwassoc.com); 'case.admin@sce.com' (case.admin@sce.com); 'nes@a-  
klaw.com' (nes@a-klaw.com); 'douglass@energyattorney.com'  
(douglass@energyattorney.com); 'Gloria.Ing@sce.com' (Gloria.Ing@sce.com);  
'janet.combs@sce.com' (janet.combs@sce.com); 'klatt@energyattorney.com'  
(klatt@energyattorney.com); 'scott.senchak@decade-llc.com'  
(scott.senchak@decade-llc.com); 'angelica.morales@sce.com'  
(angelica.morales@sce.com); 'catherine.mazzeo@swgas.com'  
(catherine.mazzeo@swgas.com); 'ted@PointState.com' (ted@PointState.com);  
'Francis.McNulty@sce.com' (Francis.McNulty@sce.com); 'jdangelo@catapult-  
llc.com' (jdangelo@catapult-llc.com); 'mgoldenberg@luminusmgmt.com'  
(mgoldenberg@luminusmgmt.com); 'naaz.khumawala@baml.com'  
(naaz.khumawala@baml.com); 'kfallon@sirfunds.com' (kfallon@sirfunds.com);  
'jonathan.arnold@db.com' (jonathan.arnold@db.com); Prince, Rasha  
(RPrince@semprautilities.com); Central Files (CentralFiles@semprautilities.com);  
'DWTCPUCDOCKETS@dwt.com' (DWTCPUCDOCKETS@dwt.com);  
'paul.gendron@JPMorgan.com' (paul.gendron@JPMorgan.com);  
'bjeider@ci.burbank.ca.us' (bjeider@ci.burbank.ca.us);  
'robert.pettinato@ladwp.com' (robert.pettinato@ladwp.com);  
'Paul.Tramonte@jpmorgan.com' (Paul.Tramonte@jpmorgan.com);  
'eklinkner@cityofpasadena.net' (eklinkner@cityofpasadena.net);  
'kirby.bosley@jpmorgan.com' (kirby.bosley@jpmorgan.com); 'sjkeene@iid.com'  
(sjkeene@iid.com); 'rmorillo@ci.burbank.ca.us' (rmorillo@ci.burbank.ca.us);  
'slins@ci.glendale.ca.us' (slins@ci.glendale.ca.us); 'rothenergy@sbcglobal.net'  
(rothenergy@sbcglobal.net); 'marcie.milner@shell.com' (marcie.milner@shell.com);  
'sendo@cityofpasadena.net' (sendo@cityofpasadena.net); 'jim.mathews@swgas.com'  
(jim.mathews@swgas.com); 'christy.berger@swgas.com'  
(christy.berger@swgas.com); 'pat.jackson@teaminc.com'  
(pat.jackson@teaminc.com); 'rajeev.lalwani@morganstanley.com'  
(rajeev.lalwani@morganstanley.com); 'ttutt@smud.org' (ttutt@smud.org);  
'daniel.j.brink@exxonmobil.com' (daniel.j.brink@exxonmobil.com);  
'carneycomic@sbcglobal.net' (carneycomic@sbcglobal.net); 'dtorres@sogate.org'  
(dtorres@sogate.org); 'ellen.isaacs@asm.ca.gov' (ellen.isaacs@asm.ca.gov);  
'michael.alexander@sce.com' (michael.alexander@sce.com);  
'wschmidt@buckeye.com' (wschmidt@buckeye.com);  
'patricia.borchmann@yahoo.com' (patricia.borchmann@yahoo.com);  
'ssc.chrissy@gmail.com' (ssc.chrissy@gmail.com); 'ppatterson2@nyc.rr.com'

(ppatterson2@nyc.rr.com); 'Robert.F.Lemoine@sce.com'  
(Robert.F.Lemoine@sce.com); 'tcollier@buckeye.com' (tcollier@buckeye.com);  
'timothyrea@hotmail.com' (timothyrea@hotmail.com); 'anjani.vedula@db.com'  
(anjani.vedula@db.com); Salazar, Jeff (JLSalazar@semprautilities.com);  
'priscila.castillo@ladwp.com' (priscila.castillo@ladwp.com); Aftab, Nadia  
(NAftab@semprautilities.com); Ng, Deana M (DNg@semprautilities.com);  
'andrewgay@arcassetltd.com' (andrewgay@arcassetltd.com); Healy, Gregory  
(GHealy@semprautilities.com); 'John.A.Apgar@Citi.com'  
(John.A.Apgar@Citi.com); Hrubby, Steven (SHrubby@semprautilities.com); Franco,  
Michael (MFranco@semprautilities.com); 'li@zimmerlucas.com'  
(li@zimmerlucas.com); 'stpehen.byrd@morganstanley.com'  
(stpehen.byrd@morganstanley.com); Horner, Trina  
(/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=TNHC); Pendleton,  
Jonathan (Law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=J1Pc); Chan, Daren  
(/o=PG&E/ou=Corporate/cn=Recipients/cn=D1Ct); 'tlong@turn.org'  
(tlong@turn.org); 'bstrottman@meyersnave.com' (bstrottman@meyersnave.com);  
'theresa.mueller@sfgov.org' (theresa.mueller@sfgov.org); Manheim, William (Law)  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=WVM3); Klein, Kerry (Law)  
(/o=PG&E/ou=Corporate/cn=Recipients/cn=KCK5); 'joc@cpuc.ca.gov'  
(joc@cpuc.ca.gov); 'sni@cpuc.ca.gov' (sni@cpuc.ca.gov); Andrus, Alan  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=APA6); 'jmalkin@orrick.com'  
(jmalkin@orrick.com); 'jmh@cpuc.ca.gov' (jmh@cpuc.ca.gov); 'hym@cpuc.ca.gov'  
(hym@cpuc.ca.gov); 'mab@cpuc.ca.gov' (mab@cpuc.ca.gov); 'dbp@cpuc.ca.gov'  
(dbp@cpuc.ca.gov); 'kcl@cpuc.ca.gov' (kcl@cpuc.ca.gov); 'ram@cpuc.ca.gov'  
(ram@cpuc.ca.gov); 'rmp@cpuc.ca.gov' (rmp@cpuc.ca.gov); 'ang@cpuc.ca.gov'  
(ang@cpuc.ca.gov); 'djg@cpuc.ca.gov' (djg@cpuc.ca.gov); 'mpo@cpuc.ca.gov'  
(mpo@cpuc.ca.gov); 'cpe@cpuc.ca.gov' (cpe@cpuc.ca.gov); 'emm@cpuc.ca.gov'  
(emm@cpuc.ca.gov); 'aad@cpuc.ca.gov' (aad@cpuc.ca.gov); 'pap@cpuc.ca.gov'  
(pap@cpuc.ca.gov); 'skh@cpuc.ca.gov' (skh@cpuc.ca.gov); 'mfl@cpuc.ca.gov'  
(mfl@cpuc.ca.gov); 'atrowbridge@daycartermurphy.com'  
(atrowbridge@daycartermurphy.com); 'cem@newsdata.com' (cem@newsdata.com);  
'rvn@a-klaw.com' (rvn@a-klaw.com); 'bfinkelstein@turn.org'  
(bfinkelstein@turn.org); 'filings@a-klaw.com' (filings@a-klaw.com);  
'ljt@cpuc.ca.gov' (ljt@cpuc.ca.gov); 'kpp@cpuc.ca.gov' (kpp@cpuc.ca.gov);  
'mdjoseph@adamsbroadwell.com' (mdjoseph@adamsbroadwell.com);  
'caj@cpuc.ca.gov' (caj@cpuc.ca.gov); 'service@spurr.org' (service@spurr.org);  
'nsuetake@turn.org' (nsuetake@turn.org); 'tcr@cpuc.ca.gov' (tcr@cpuc.ca.gov);  
'grant.kolling@cityofpaloalto.org' (grant.kolling@cityofpaloalto.org); 'wmc@a-  
klaw.com' (wmc@a-klaw.com); 'gburke@ap.org' (gburke@ap.org);  
'kfabry@sanbruno.ca.gov' (kfabry@sanbruno.ca.gov); 'gcaldwell@sanbruno.ca.gov'  
(gcaldwell@sanbruno.ca.gov); 'jkarp@winston.com' (jkarp@winston.com);  
'mmattes@nossaman.com' (mmattes@nossaman.com);  
'jarmstrong@goodinmacbride.com' (jarmstrong@goodinmacbride.com);  
'pzs@cpuc.ca.gov' (pzs@cpuc.ca.gov); 'dmarcus2@sbcglobal.net'  
(dmarcus2@sbcglobal.net); 'kab@cpuc.ca.gov' (kab@cpuc.ca.gov);  
'edd@cpuc.ca.gov' (edd@cpuc.ca.gov); 'mk3@cpuc.ca.gov' (mk3@cpuc.ca.gov);

'ag5@cpuc.ca.gov' (ag5@cpuc.ca.gov); 'ako@cpuc.ca.gov' (ako@cpuc.ca.gov);  
'tomb@crossborderenergy.com' (tomb@crossborderenergy.com); 'tbo@cpuc.ca.gov'  
(tbo@cpuc.ca.gov); 'jzr@cpuc.ca.gov' (jzr@cpuc.ca.gov);  
'RobertGnaizda@gmail.com' (RobertGnaizda@gmail.com); 'cguss@anaheim.net'  
(cguss@anaheim.net); 'sls@a-klaw.com' (sls@a-klaw.com);  
'ssciortino@anaheim.net' (ssciortino@anaheim.net);  
'aaron.joseph.lewis@gmail.com' (aaron.joseph.lewis@gmail.com);  
'ceyap@earthlink.net' (ceyap@earthlink.net); 'billjulian@sbcglobal.net'  
(billjulian@sbcglobal.net); 'blake@consumercal.org' (blake@consumercal.org);  
'tff@cpuc.ca.gov' (tff@cpuc.ca.gov); 'kowalewskia@calpine.com'  
(kowalewskia@calpine.com); 'bburns@caiso.com' (bburns@caiso.com);  
'Vrogers1994@yahoo.com' (Vrogers1994@yahoo.com); 'jjdavis@dcbsf.com'  
(jjdavis@dcbsf.com); 'sbender@energy.state.ca.us' (sbender@energy.state.ca.us);  
'rrussell@lodistorage.com' (rrussell@lodistorage.com); 'laura@messimer.com'  
(laura@messimer.com); 'jmullan@meyersnave.com' (jmullan@meyersnave.com);  
'waltowaiji@tustinca.org' (waltowaiji@tustinca.org); 'Jeff.cardenas@asm.ca.gov'  
(Jeff.cardenas@asm.ca.gov); 'rkennedy@energy.state.ca.us'  
(rkennedy@energy.state.ca.us); 'janill.richards@doj.ca.gov'  
(janill.richards@doj.ca.gov); 'john@clfp.com' (john@clfp.com);  
'gvanpelt@caiso.com' (gvanpelt@caiso.com); 'kuprewicz@comcast.net'  
(kuprewicz@comcast.net); 'kelder@aspenerg.com' (kelder@aspenerg.com);  
'jhunter@riversideca.gov' (jhunter@riversideca.gov); 'Susan.Durbin@doj.ca.gov'  
(Susan.Durbin@doj.ca.gov); 'sswaroop@naacoalition.org'  
(sswaroop@naacoalition.org); 'sean.beatty@genon.com' (sean.beatty@genon.com);  
'sberlin@mccarthylaw.com' (sberlin@mccarthylaw.com);  
'Susan.Skillman@Parsons.com' (Susan.Skillman@Parsons.com); Cendejas, Martha  
(MCendejas@semprautilities.com); Wong, Mary S.  
(marywong@semprautilities.com); 'SanBrunoGasSafety@cpuc.ca.gov'  
(SanBrunoGasSafety@cpuc.ca.gov)

Cc:

Bcc:

Subject: R.11-02-019; Pipeline Safety OIR [SCG/SDG&E's Opening Comments on PD Mandating PSIP, Disallowing Costs, Imposing Earnings Limitations, Allocating Risk of Inefficient Construction Mgmt to Shareholders, & Requiring On-Going Improvement in Safety Engineering]

**To All Parties on the Service List for R.11-02-019:**

Attached please find the **OPENING COMMENTS OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) AND SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) ON PROPOSED DECISION MANDATING PIPELINE SAFETY IMPLEMENTATION PLAN, DISALLOWING COSTS, IMPOSING EARNINGS LIMITATIONS, ALLOCATING RISK OF INEFFICIENT CONSTRUCTION MANAGEMENT TO**

**SHAREHOLDERS, AND REQUIRING ON-GOING IMPROVEMENT IN SAFETY ENGINEERING** (in Searchable PDF Format), which was electronically filed with the CPUC Docket Office and is being served today, November 16, 2012.

**Becky Roberts**

*Senior Legal Administrative Associate*

**SOUTHERN CALIFORNIA GAS COMPANY**

**SAN DIEGO GAS & ELECTRIC COMPANY**

555 West Fifth Street, GT-14E7, Los Angeles, CA 90013

Phone: (213) 244-2947 / Fax: (213) 629-9620

[broberts@semprautilities.com](mailto:broberts@semprautilities.com)