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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.

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