

From: Tom Long

Sent: 12/19/2012 9:56:55 PM

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Cc:

Bcc:

Subject: Fwd: R.11-02-019, Revised Proposed Decision

Parties to R.11-02-019,

In accordance with CPUC Rule of Practice and Procedure 8.3(c)(3), TURN hereby serves the ex parte e-mail communication with Sepideh Khosrowjah, Chief of Staff to Commissioner Florio, sent earlier this evening.

Tom Long
Legal Director
The Utility Reform Network (TURN)
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(415) 929-8876 x303

Begin forwarded message:

From: Tom Long <tlong@turn.org>
Date: December 19, 2012 8:44:52 PM PST
To: Sepideh Khosrowjah <sepideh.khosrowjah@cpuc.ca.gov>
Cc: Marcel Hawiger <marcel@turn.org>
Subject: **R.11-02-019, Revised Proposed Decision**

Ms. Khosrowjah-

I have just completed review of the revised proposed decision, which was posted on the website for the first time at the close of business today. TURN urges the following additional revisions, which I discussed in my meeting with Commisisoner Florio and you last week:

1. Require PG&E to provide a sound engineering justification for any replacement projects under Decision Tree Box M2 and, to promote transparency, require such justifications to be provided in the quarterly compliance reports made available to the parties (see TURN Comments on PD, pp. 6-8).
2. Require PG&E to remove non-contiguous Class 2 segments from Phase 1 (see TURN Comments on PD, pp. 4-5). This could be accomplished in the application required by new Ordering Paragraph (OP) 11.
3. Clarify that the "higher priority projects" referenced on p. 103, Finding of Fact (FOF) 39, Conclusion of Law (COL) 37 and OP 6 must be within the approved scope of Phase 1 (see TURN Comments on PD, pp. 20-21)

In addition, with respect to the application to update the PSEP database required by new OP 11, TURN urges PG&E to be given a date certain no later than 120 days after the effective date of the decision to file the application. As now phrased, the OP allows PG&E to indefinitely delay "the completion of its Maximum Allowable Operating Pressure validation and records search" to avoid reduction to the PSEP Phase 1 budget cap. Moreover, PG&E has already completed its records search for the high priority segments addressed in Phase 1, so there is no need to delay the application for the conclusion of the records search for the lower priority Phase 2 segments.

Thank you for your consideration of these requests.

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