

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Southern California Edison
Company (U338E) for Authority to Establish its
Authorized Cost of Capital for Utility Operations
for 2013 and to Reset the Annual Cost of Capital
Adjustment Mechanism.

Application 12-04-015
(Filed April 20, 2012)

And Related Matters.

Application 12-04-016
Application 12-04-017
Application 12-04-018

NOTICE OF EX PARTE COMMUNICATION

Pursuant to Rule 8.4(a) of the Commission's Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) hereby gives notice of the following ex parte communications. The communications occurred on Monday, December 17, 2012, by voice message and by electronic mails between the hours of 10:30 a.m. and 1:00 p.m., to the offices of California Public Utilities Commission. A copy of the email transmittals and its associated attachment are attached to this notice. [Rule 8.4(a), 8.4(c)]

John Hughes, Director, Regulatory Relations, PG&E, initiated the communication with Rahmon Momoh, Advisor to Commissioner Timothy Simon. [Rule 8.4(b)]

Mr. Hughes left voice message to Mr. Momoh to inform him that PG&E had just filed its Reply Comments to the Cost of Capital Proposed Decision. Mr. Hughes followed his voice message to Mr. Momoh with electronic mail with an attachment of PG&E's Reply Comments. In the voice mail message, Mr. Hughes described the contents of the reply comments. He stated

that PG&E took issue with the intervenor and DRA modeling results and the claim by Southern California Edison (SCE) that their capital structure is more leveraged than PG&E. Mr. Hughes stated that the intervenor and DRA modeling results were so low relative to several important benchmark and their results should be given little weight. He said that their modeling results were unreasonable compared to the national average.

Mr. Hughes also addressed the SCE claim that their capital structure is more leveraged than PG&E. Mr. Hughes explained that if preferred stock is treated as 50 per cent debt and 50 per cent equity, SCE's equity ratio would be the same as PG&Es. In an email (see attached) to Mr. Momoh at 12:47 pm, Mr. Hughes provided record support from testimony in the proceeding.

[Rule 8.4(c)]

Respectfully submitted,

/s/ Brian K. Cherry

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Attachment

Dated: December 17, 2012