

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission’s Own Motion to Adopt New Safety and Reliability Regulations for Natural Gas Transmission and Distribution Pipelines and Related Ratemaking Mechanisms.

Rulemaking 11-02-019  
(Filed February 24, 2011)

**DIVISION OF RATEPAYER ADVOCATES  
AMENDMENT TO COMMENTS ON PROPOSED DECISION**

Pursuant to Rule 1.12 of the Commission’s Rules of Practice and Procedure, the Division of Ratepayer Advocates (DRA) files this Amendment on Comments on the Proposed Decision filed on November 16, 2012, in the above-captioned proceeding.

DRA’s Comments on the Proposed Decision contain two substantive typographical errors in Tables 2 and 3 on pages 8 and 10, respectively. DRA substitutes those two tables with the tables here, which show the error in redline under Scenario 1 “Disallowed Cost” for each table:

**Table 2: DRA Modeling To Correct Errors in Pipeline Replacement Disallowances**

<b>DRA Replacement Scenario</b>	<b>Cost model</b>	<b>Basis of disallowance</b>	<b>Disallowed Footage</b>	<b>Disallowed Cost</b>	<b>Calculated disallowance per foot</b>
<b>1</b>	PD fixed \$95.8/ft	Per PG&E/PD, calculation logic	172,264	<u>\$16,502,891</u>	\$95.80
<b>2</b>	PD fixed \$95.8/ft	Same as DRA Hydrotest Scenario 2	273,867	\$26,236,459	\$95.80
<b>3</b>	PD fixed \$95.8/ft	Same as DRA Hydrotest Scenario 3	450,467	\$ 43,154,739	\$95.80

**Table 3: DRA Modeling To Correct Errors in Pipeline Replacement Disallowances and Adjust For Proper Hydrotest Costs**

<b>DRA Replacement Scenario</b>	<b>Cost model</b>	<b>Basis of disallowance</b>	<b>Disallowed Footage</b>	<b>Disallowed Cost</b>	<b>Calculated disallowance per foot</b>
1	PD fixed \$95.8/ft	Per PG&E/PD, calculation logic	172,264	\$16,502,891	\$95.80
2	PD fixed \$95.8/ft	Same as DRA Hydrotest Scenario 2	273,867	\$26,236,459	\$95.80
3	PD fixed \$95.8/ft	Same as DRA Hydrotest Scenario 3	450,467	\$ 43,154,739	\$95.80
4	DRA variable	Per PG&E/PD, calculation logic	172,264	\$ 32,359,504	\$ 187.85
5	DRA variable	Same as DRA Hydrotest Scenario 2	273,867	\$ 56,324,500	\$205.66
6	DRA variable	Same as DRA Hydrotest Scenario 3	450,467	\$ 78,803,421	\$174.94

Respectfully submitted,

/s/ TRACI BONE

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TRACI BONE

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Ratepayer Advocates

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