

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation on the Commission's Own Motion into the Operations and Practices of Pacific Gas and Electric Company to Determine Violations of Public Utilities Code Section 451, General Order 112, and Other Applicable Standards, Laws, Rules and Regulations in Connection with the San Bruno Explosion and Fire on September 9, 2010.

I.12-01-007  
(Filed January 12, 2012)

**PG&E'S RESPONSE TO MOTION OF THE UTILITY REFORM  
NETWORK, THE CITY OF SAN BRUNO, AND THE DIVISION OF  
RATEPAYER ADVOCATES TO EXCLUDE THE LATE-  
PRESENTED HALL & ASSOCIATES CONCLUSIONS DOCUMENT**

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Dated: February 6, 2013

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**PG&E'S RESPONSE TO MOTION OF THE UTILITY REFORM NETWORK, THE CITY OF SAN BRUNO, AND THE DIVISION OF RATEPAYER ADVOCATES TO EXCLUDE THE LATE-PRESENTED HALL & ASSOCIATES CONCLUSIONS DOCUMENT**

PG&E disagrees with every statement in the motion but one: "By granting this motion, the Commission can avoid subjecting the Commission and the parties to the considerable distraction of additional discovery and additional evidentiary hearings. . . ." (Motion at 2.) Given the significant ongoing discovery on the financial analysis testimony, the scheduled

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evidentiary hearing on that issue, and the relatively tight briefing schedule, PG&E does not oppose the motion to exclude Exhibit PG&E-43, the Hall & Associates year-end assessment.<sup>1</sup>

Respectfully submitted,

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<sup>1</sup> With no prior discussion, the conclusion of the motion asks the ALJ to strike “all re-direct (and re-cross) examination relating to the document.” (Motion at 8.) This relief is not mentioned in the caption or anywhere else in the motion. The motion fails to identify by page and line the testimony to which it refers and has no discussion of that subject. Accordingly, to the extent that relief is seen as within the scope of the motion, it should be denied.