

**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)

**REPLY TO RESPONSE TO THE
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**

With the permission of Administrative Law Judge (“ALJ”) Mark Wetzell,¹ The Utility Reform Network (“TURN”), the City of San Bruno, and the CPUC’s Division of Ratepayer Advocates (collectively “Joint Parties”) submit this Reply to the Response of Pacific Gas & Electric Company (“PG&E”) to the Joint Parties’ Motion to Exclude the Late-Presented Hall & Associates Conclusions Document.

The Joint Parties are pleased that PG&E does not oppose the Joint Parties' motion to exclude the Hall Conclusions document. However, in footnote one of its response, PG&E interposes technical, non-substantive objections to the motion's request to strike witness Yura's re-direct and re-cross testimony relating to the document. This request was plainly stated in the motion and is an

¹ ALJ Wetzell granted this permission in an e-mail to the service list on February 6, 2013.

obvious corollary to the request to exclude the document. Given that the document itself is outside the scope of the cross examination, the witness's testimony laying a foundation for the document is also clearly outside the scope of cross examination.

The relevant testimony to strike would be all answers by witness Yura on PG&E's re-direct examination from transcript page 1022, line 28, to page 1034, line 7, specifically:

- Page 1023, lines 14 to 22 and 26
- Page 1031, lines 12 and 16
- Page 1032, lines 3, 8-9, and 13-27
- Page 1033, lines 2-16 and 27; and
- Page 1034, lines 2, 7.

From the re-cross examination, the relevant testimony to strike would be all answers by witness Yura from page 1036, line 26, to page 1042, line 18, specifically:

- Page 1037, lines 1, 3, 5-6, 8-10, 13-19, 22-24, and 27
- Page 1038, lines 2-5, 8, 11-12, 16-20, 23-27
- Page 1039, lines 1-5, 9-13, 17, 19, 21-25
- Page 1040, lines 2-5, 9, 13, 17, 19-22, 25
- Page 1041, lines 2, 5-6, 8-9; and
- Page 1042, lines 3-9, 11-13, 15, 17-18

The Joint Parties appreciate the opportunity to submit this Reply.

Date: February 8, 2013

Respectfully submitted,

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