

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)

**JOINT MOTION FOR EXPEDITED RESOLUTION OF
PETITION FOR MODIFICATION OF DECISION NO. 12-12-030
AND MOTION TO SHORTEN TIME FOR RESPONSES**

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February 6, 2013

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In accordance with Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission, the Division of Ratepayer Advocates (DRA) and The Utility Reform Network (TURN) (together Joint Parties) hereby submit this Joint Motion for Expedited Resolution of Petition to Modify Decision No. 12-12-030 and Joint Motion to Shorten Time for Responses (Joint Motions).

Commission Decision No. (D.) 12-12-030 (Decision) approves Pacific Gas and Electric Company's (PG&E) Pipeline Safety Enhancement Plan (Implementation Plan or "IP"). In approving the IP, the Commission repeatedly expressed its commitment to "closely scrutinize" IP costs to obtain "the greatest safety value" for ratepayers and ensure that only necessary IP work is performed. (Decision at 4, 13, 83). However, as described in the Joint Parties' Petition for Modification of Decision No. 12-12-030 (Petition) filed concurrently with these Joint Motions, the Decision requires certain modifications to ensure that PG&E's Implementation Plan expenditures "obtain the greatest value for ratepayers." To this end, the Petition requests that the Decision be clarified to:

- Set a date certain of no more than 30 days after a decision on the Petition for PG&E to update its Implementation Plan with the most current data available regarding the Phase 1 pipeline segments;
- Clarify that Class 1 and 2 segments that are not in a high consequence area or adjacent to segments in an HCA should be removed from Phase 1; and
- Clarify the exception that allows PG&E to replace Phase 1 projects with undefined “higher priority” projects and thereby potentially evade the cost caps established in the Decision.

These requested clarifications are wholly consistent with the Decision’s intent and findings. And as demonstrated in the Appendix attached to the Petition, these clarifications can be easily and swiftly implemented.

The Joint Parties respectfully request expedited resolution of the Petition, as well as a shortening of time for responses to the Petition to 15 days. Expedited treatment of the Petition and a shortened response time are warranted because, as the Commission has repeatedly recognized, it is critical that PG&E prioritize its work and perform first the projects that are most important for public safety. Expedited resolution of the Petition will properly prioritize Implementation Plan work consistent with the Commission’s public safety goals and obligations. It will also ensure that PG&E does not expend ratepayer funds on unnecessary work and will avoid unnecessary conflicts over these issues in the future. As explained in the Petition, absent timely action, the Commission’s goals may be impeded as PG&E will have opportunities to perform lower priority work that should be deferred to Phase 2 and to hide cost-overruns in the currently excessive cost caps for the Phase 1 work.

PG&E will not be prejudiced by an expedited determination of the Petition. Clarity will benefit the Commission and all of the parties involved, by avoiding disputes that would consume time and resources that could be more productively devoted to ensuring the safety of PG&E’s gas transmission system. The sooner such clarity is obtained, the better for all concerned.

For the foregoing reasons, the Joint Parties respectfully request that the Commission shorten time for responses to the Petition to 15 days and take all reasonable steps to expedite the Commission's decision on the Petition.

Respectfully submitted,

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