

Redacted

May 3, 2013

Commissioners
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

Re: CNG Vehicles; CPUC Complaint Procedures

Dear President Peevey and Commissioners Sandoval, Florio, Feron, and Peterman:

I am writing regarding a pair of linked experiences – a problem with PG&E’s compressed natural gas service, and an even more disturbing experience I had utilizing the Commission’s informal complaint procedure.

I have owned compressed natural gas (CNG) vehicles as my only car for over 12 years. While these alternative fueled vehicles are very environmentally friendly, they do present certain challenges. Two of the major challenges being relatively short range on a tank of “gas”, and limited refueling options.

I spend a lot of my time in Marin county. Marin county has only one CNG refueling station – the PG&E yard in San Rafael. Although the gate is locked evenings and weekends, PG&E has always allowed CNG customers that requested it night and weekend access through the use of a special access card.

In January, I received a letter from PG&E stating that as of February 1st night and weekend access would no longer be allowed. There is no other place to obtain CNG in Marin. The only station in Northern San Francisco (in the Presidio) closed over a year ago.

This unilateral decision by PG&E made owning a CNG car in Marin County far more problematic than it had ever been. Given the short driving range of CNG vehicles, removing a fueling option when there are no other nearby fueling options, is a major event.

In late January, before the effective date of the access cut-off, I filed an online complaint with the PUC’s Consumer Affairs Branch about this situation. I pointed out the social utility of alternative

Commissioners
California Public Utilities Commission
May 3, 2013
Page Number 2

fuel vehicles, and the shortage of alternatives to the pumps that PG&E was about to restrict. I believed that a complaint to the PUC was appropriate as I understood that the PUC regulated PG&E, and I also had been told in the past that the provision of natural gas was a core service subject to tariffs.

I never heard from PUC staff. I never even received a confirmation email from the PUC staff with a complaint number. Instead, much to my surprise, I received a phone call from PG&E the very next day telling me that it had been contacted by PUC staff, and that the PUC had determined that it did not have jurisdiction.

While I have little experience with PUC practices, as you can see from the letterhead I am a lawyer. I have been a litigator for over 30 years. This is the first time that I have initiated a complaint or proceeding against a person or entity only to be told by the adverse person or entity (not the adjudicative body) that my complaint had been rejected.

Had staff bothered to contact me, I would have explained that I believed the CPUC does have jurisdiction over this matter, that CNG fueling is a tariffed service, and that the Commission has an interest in seeing PG&E make it easier – not more difficult -- to use alternative fuels.

I am not a raging paranoid. However, as a member of the public, having a PG&E representative contact me to tell me that my complaint with the Commission had been rejected the day after it was filed raises the inference that Commission staff and PG&E are a bit too close to each other. I wonder how many other complainants have experienced the same.

I hope you will look both at the Commission procedure for handling informal online complaints, as well as the substance of my original complaint. I would appreciate some response to this letter, or at least an acknowledgment of its receipt.

Thank you.

Very truly yours,

Redacted

cc: Consumer Affairs Branch

Ed Randolph, Director, Energy Division