

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

<p>Order Instituting Investigation on the Commission's Own Motion into the Operations and Practices of Pacific Gas and Electric Company with Respect to Facilities Records for its Natural Gas Transmission System Pipelines.</p>	<p>Investigation 11-02-016 (Filed February 24, 2011) (Not Consolidated)</p>
<p>Order Instituting Investigation on the Commission's Own Motion into the Operations and Practices of Pacific Gas and Electric Company's Natural Gas Transmission Pipeline System in Locations with Higher Population Density.</p>	<p>Investigation 11-11-009 (Filed November 10, 2011) (Not Consolidated)</p>
<p>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, Law, Rules and Regulations in Connection with the San Bruno Explosion and Fire on September 9, 2010.</p>	<p>Investigation 12-01-007 (Filed January 12, 2012) (Not Consolidated)</p>
<p>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.</p>	<p>Rulemaking 11-02-019 (Filed February 24, 2011) (Not Consolidated)</p>

**NOTICE IN RESPONSE TO ALJ RULING
RE *EX PARTE* REPORTING REQUIREMENTS**

Bank of America (“BAC”) hereby provides its response to the Administrative Law Judge’s Ruling Granting Motion of the Division of Ratepayer Advocates for Clarification of Ex Parte Reporting Requirements, dated May 16, 2013, in the above captioned dockets (the “May 16 Ruling”). BAC is making its submission today per the extension of time that Administrative Law Judge Amy C. Yip-Kikugawa granted by e-mail dated May 30, 2013 (through which the Commission extended BAC’s time to respond to June 4, 2013 from the May 31, 2013 response date originally provided for in the May 16 Ruling).

BAC is not aware of any *ex parte* communication as defined in Rule 8.1(c) of the Commission’s Rules of Practice and Procedure (“Rules”) between itself or its representatives and the Commissioners’ offices in connection with these proceedings. Nevertheless, in an abundance of caution, and without agreeing that it is an “interested party” within the meaning of the Rules related to *ex parte* communications, BAC discloses the following communications between its Research Analysts and the Commission (or Commission advisors) which were in the nature of open-ended questions seeking only to gather information for inclusion in published research reports made available to clients of BAC:

- On April 7, 2011, BAC equity Research Analysts Steve Fleishman and Naaz Khumawala (and possibly representatives of some BAC clients) had individual meetings of approximately 30-45 minutes with Commissioners Timothy Simon, Michel Florio, Catherine Sandoval and Mark Ferron as well as with Carol Brown (Chief of Staff to President Michael R. Peevey) and Paul Clanon, Executive Director. These meetings took place in San Francisco. During each of these meetings, Mr. Fleishman and/or Ms. Khumawala asked only general, open-ended questions about a wide range of regulatory issues pertaining to the companies and issues BAC equity Research Analysts typically cover in their energy sector research reports.

- On February 2, 2012, BAC equity Research Analysts Steve Fleishman and Naaz Khumawala (and possibly representatives of some BAC clients) had individual meetings of approximately 30-45 minutes with Commissioners Timothy Simon, Michel Florio, Catherine Sandoval and Mark Ferron as well as with Carol Brown (Chief of Staff to President Michael R. Peevey), Paul Clanon, Executive Director and Michelle Cook, Head of Safety Enforcement at the Commission. These meetings took place in San Francisco. During each of these meetings, Mr. Fleishman and/or Ms. Khumawala asked only general, open-ended questions about a wide range of regulatory issues pertaining to the companies and issues BAC equity Research Analysts typically cover in their energy sector research reports.

- On February 10, 2012, BAC hosted a client lunch in New York in which Commissioner Catherine Sandoval was an invited speaker. Several BAC clients, mostly institutional investors who invest in the energy sector, were in attendance at this lunch. As was the case during the aforementioned meetings, during the client lunch Mr. Fleishman and/or Ms. Khumawala asked only general, open-ended questions about a wide range of regulatory issues pertaining to the companies and issues BAC equity Research Analysts typically cover in their energy sector research reports.

- On September 12, 2012, BAC equity Research Analysts Steve Fleishman and Naaz Khumawala (and possibly representatives of some BAC clients) had individual meetings of approximately 30-45 minutes with Commissioners Michel Florio, Catherine Sandoval and Mark Ferron as well as with Carol Brown (Chief of Staff to President Michael R. Peevey), Paul Clanon, Executive Director and Bishu Chatterjee, Advisor to Commissioner Simon. These meetings took place in San Francisco. During each of these meetings, Mr. Fleishman and/or Ms. Khumawala asked only general, open-ended questions about a wide range of regulatory

issues pertaining to the companies and issues BAC equity Research Analysts typically cover in their energy sector research reports.

Respectfully Submitted,

Date: June 4, 2013

/s/ Riche McKnight

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