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Bcc:
Subject: R.11-02-019 – PG&E Comments to June 27 CPUC Workshop on Reporting Metrics

Dear Mr. Shori and Mr. Robertson,

PG&E appreciates the opportunity to comment on the CPUC’s presentation of “Gas System Metrics for Consideration” at the June 27, 2013 workshop. Currently, PHMSA and the CPUC require gas operators to report out on numerous metrics related to safety performance. PHMSA and the NTSB currently have initiatives or recommendations on developing additional metrics to improve safety performance. To that end, PG&E is supportive of establishing metrics that are consistent with PHMSA and NTSB goals to establish clear, meaningful performance measures that will improve overall program effectiveness and safety performance.

In addition, the Amended Scoping Memo and Ruling of the Assigned Commissioner, issued May 2, 2013, includes an objective to create a set of reporting metrics that convey consistent and comparable information regarding the gas system safety parameters, ideally using readily available data with innovative and efficient proposals. PG&E supports this objective to have reporting metrics that convey consistent and comparable information amongst the gas operators in California, using data that is readily available.

Per the CPUC’s request at the June 27, 2013 CPUC workshop on reporting metrics, attached are PG&E’s comments to the CPUC’s presentation on “Gas System Metrics for Consideration.”

Please contact Frances Yee at FSC2@pge.com or (925) 974-4316 for any questions regarding PG&E's comments.

Redacted on behalf of Frances Yee

Pacific Gas and Electric Company

Redacted

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