

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)

**NOTICE OF *EX PARTE* COMMUNICATION**

Pursuant to Rule 8.4 of the Commission's Rules of Practice and Procedure, the Division of Ratepayer Advocates (DRA) hereby gives notice of the following *ex parte* communication.

At 4:00 p.m. on Tuesday, August 6, 2013, at the offices of the California Public Utilities Commission in San Francisco, DRA representatives met with Sepideh Khosrowjah, an advisor to Commissioner Mike Florio. DRA was represented by Joe Como, Acting Director, Karen Paul, Interim Chief Counsel, and Tom Roberts, Senior Utilities Engineer. DRA initiated the communication, which was oral.

The DRA representatives discussed DRA's July 8, 2013, Motion for a ruling directing Pacific Gas and Electric Company (PG&E) to provide quality assurance and quality control (QA/QC) plans for the development and implementation of its pipeline safety plan (PSEP). The DRA representatives reiterated the points set forth in DRA's Motion, and in the handout attached hereto as Exhibit A. In summary, the DRA representatives explained what a QA/QC Plan should contain. They then observed that while PG&E's response to the DRA Motion reflects that PG&E appears to be performing some level of QC on an *ad hoc* basis on some aspects of its PSEP work, it has thus far failed to provide a comprehensive QA/QC Plan, which is essential to a project of the magnitude of the PSEP.

DRA also provided copies at the meeting of the attached letter (Exhibit B) from PG&E to the U.S. Nuclear Regulatory Commission dated August 2, 2012. DRA explained that this letter demonstrates that at least some divisions within PG&E know what a real QA/QC Plan is. DRA also provided copies of two sample QA/QC plans, also attached (Exhibits C and D), including one provided by AMEC Environment and Infrastructure, Inc., which currently consults with PG&E on non-PSEP issues (Exhibit C). Finally, DRA provided a copy of a template for a QA

plan from the EPA (Exhibit E) and an article on quality assurance in nuclear power plants (Exhibit F). None of these QA/QC documents are part of the record in this proceeding.

The DRA representatives urged the advisor to support DRA's request for the Commission to order PG&E to develop a QA/QC Plan for the PSEP work.

Respectfully submitted,

KAREN PAULL  
TRACI BONE

/s/ TRACI BONE  
TRACI BONE

Attorneys for  
The Division of Ratepayer Advocates  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
Telephone: (415) 703-2048  
Email: tbo@cpuc.ca.gov

August 9, 2013