

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 3:00 p.m. on Wednesday, August 28, 2013 at the offices of the California Public Utilities Commission in San Francisco, DRA representatives met with Allison Brown and Jessica Hecht, both advisors to Commissioner Catherine Sandoval. DRA was represented by Karen Paull, Interim Chief Counsel, Tom Roberts, Senior Utilities Engineer, Nathaniel Skinner, Program and Project Supervisor, and Traci Bone, attorney. 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 a comprehensive quality assurance and quality control (QA/QC) Plan 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 its August 1, 2013 Reply to PG&E's Response to its Motion (Exhibit B), a letter from PG&E to the U.S. Nuclear Regulatory Commission dated August 2, 2012 (Exhibit C), a bubble chart (Exhibit D), and a sample QA/QC plan provided by AMEC Environment and Infrastructure, Inc., which currently consults with

PG&E on non-PSEP issues (Exhibit E). Exhibits A, C, D, and E are not in the record in this proceeding.

The DRA representatives urged the advisors to support DRA's request for the Commission to order PG&E to develop a QA/QC Plan for the PSEP work. The DRA representatives also spoke briefly with the advisors regarding the joint DRA and The Utility Reform Network (TURN) motion filed August 21, 2013 requesting a ruling confirming the scope of the Pipeline Safety Plan (PSEP) Update Application ordered by D.12-12-030. The DRA representatives reiterated the points set forth in the August 21 motion and clarified that they believe that the issues raised in its QA/QC motion are best addressed outside the scope of the Update Application.

Respectfully submitted,

KAREN PAULL
TRACI BONE

/s/ TRACI BONE

TRACI BONE

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