

From: Doll, Laura  
Sent: 9/27/2013 4:55:37 PM  
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Cc: Yura, Jane (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=JKY1)  
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Subject: Background on the first citation

Ken

Thanks again for your time this afternoon. It was helpful to be able to talk about the process and understand your new role.

Just out of curiosity I pulled up our comments on the proposed penalty. They are short – 9 pages!

(I think it was just after the comment phase of this proceeding that ALJ Burt Mattson was assigned to review the appeal.)

You'll see in the comments that we described three ways to calculate the penalty, ranging from over \$500 million (gulp) which we label "absurd," to nothing. But the middle option was fining according to the statutory maximum for each violation *for each of the 21 missed five-year* leak surveys to get to \$420,000. We objected to treating each month as a separate violation.

Just thought this might be interesting background.

Hope you have a good weekend with some non-reading moments.

Laura

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