

**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

R.11-02-019
(Filed February 24, 2011)

**COMMENTS OF PACIFIC GAS AND ELECTRIC
COMPANY ON SAFETY AND ENFORCEMENT
DIVISION'S PROPOSAL FOR CHANGES TO GENERAL
ORDER 112-E**

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Dated: September 27, 2013

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Pursuant to the Assigned Commissioner's Revised Scoping Memo issued on May 2, 2013, Pacific Gas and Electric Company (PG&E) submits its comments on the California Public Utilities Commission's (Commission) Safety and Enforcement Division's (SED) Proposal for Changes to General Order 112-E, served on August 15, 2013.

To aid SED's review, PG&E has provided its comments in spreadsheet format at Attachment A.

As an overall comment, certain of the proposed amendments to GO 112-E, many of which PG&E fully supports, have far-reaching implications with respect to cost, resources and programmatic changes. If the proposed changes are adopted, PG&E encourages the Commission to allow sufficient time for operators to implement the changes, as well as support reasonable cost recovery for all significant program updates that are required.

PG&E appreciates the opportunity to participate in the recent Commission workshops on SED's proposed changes to GO 112-E and for this opportunity to provide written comments.

Respectfully Submitted,

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JONATHAN D. PENDLETON

By: _____ /s/
JONATHAN D. PENDLETON

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