

From: Doll, Laura  
Sent: 11/4/2013 10:45:22 AM  
To: Bruno, Kenneth (kenneth.bruno@cpuc.ca.gov)  
Cc:  
Bcc:  
Subject: RE: citation signature

That would be great Ken. Any chance you could make that happen on the next citation form?  
It would help a lot. ☺

**From:** Bruno, Kenneth [mailto:kenneth.bruno@cpuc.ca.gov]  
**Sent:** Monday, November 04, 2013 10:33 AM  
**To:** Doll, Laura  
**Subject:** RE: citation signature

Hi Laura – Yes I agree – ALJ-274 specifically mentions the CEO as follows:

@10 "As stated above, we have eliminated a prescriptive correction period, but it is reasonable to ensure that each gas corporation's Chief Executive Officer is aware of the violation and that the Chief Executive Officer affirms that any delay in correcting a violation will not impact the safe operation of the gas pipelines."

@ Pg. 2 Appendix

*Response to Citation*

**1. Any immediate safety hazard requires immediate correction, as directed by Staff. For other violations, the Respondent shall inform the Director of CPSD when the violation is corrected. Unless the violation is corrected within ten calendar days after the date of service of the citation, Respondent shall, within ten calendar days after the citation is served, submit a Compliance Plan to the Director of CPSD that provides a detailed description of when the violation will be corrected, the methodology to be utilized, and a statement supported by an affidavit from the respondent's Chief**

**Executive Officer stating that in the respondent's best judgment, the time that will be taken to correct the violation will not affect the**

**safety** or integrity of the operating system or endanger public safety. It the citation is for a continuous violation, the amount of the fine may continue to accrue on a per-day basis until the violation is corrected.

I'll check with legal but I would propose something like:

"Signature of Gas Corporation's Treasurer, Chief Financial Officer, President/CEO, or delegated Officer thereof"

**From:** Doll, Laura [mailto:LRDD@pge.com]  
**Sent:** Monday, November 04, 2013 10:14 AM  
**To:** Bruno, Kenneth  
**Subject:** citation signature

Ken

I have looked at the ALJ 274 decision and do not find the specific wording that is currently on the citation form.

The details of the "citation payment form" are not specified; the form itself is merely referenced.

In Section B, Appendix A ["Citation Procedures and Appeal Process] in "Service of Citation" there are references to the citation being served on an "officer of the Respondent."

Here's a link to the decision:

[http://docs.cpuc.ca.gov/WORD\\_PDF/AGENDA\\_RESOLUTION/154205.pdf](http://docs.cpuc.ca.gov/WORD_PDF/AGENDA_RESOLUTION/154205.pdf)

Given this, I think we may proceed with the signature of the highest ranking officer of the PG&E Gas Corporation, Nick Stavropoulos, Executive Vice President.

Perhaps at some point in the future when you get around to making additional administrative changes to the form you might change the signature description to be broadly "Officer of the

Corporation.” But in the meantime, it will make our internal process much more efficient and enable a faster turn around if we can allow the signatories to include the head of the gas operation.

Does this sound ok to you?

Thanks

Laura

Laura Doll

Director, Regulatory Relations

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