

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)

**SAFETY AND ENFORCEMENT DIVISION'S OPENING COMMENTS  
TO COMMISSIONER FERRON'S ALTERNATE PROPOSED  
DECISION ON RULE 1.1**

In accordance with Rule 14.3 of the Commission's Rules of Practice and Procedure ("Rule" or "Rules"), the Safety and Enforcement Division ("SED") submits these comments on the Alternate Proposed Decision of Commissioner Ferron Imposing Sanctions on Pacific Gas and Electric Company ("PG&E") for violations of Rule 1.1 ("Alternate Proposed Decision").

SED supports the Alternate Proposed Decision.

Respectfully submitted,

/s/ DARRYL J. GRUEN

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Darryl J. Gruen  
Staff Counsel

Attorneys for the Safety and  
Enforcement Division

California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
Phone: (415) 703-1973  
Fax: (415) 703-4592

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