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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