

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop a Risk-Based Decision-Making Framework to Evaluate Safety and Reliability Improvements and Revise the General Rate Case Plan for Energy Utilities.

Rulemaking 13-11-006
(November 14, 2013)

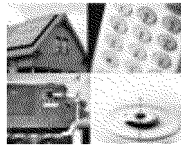
CERTIFICATE OF SERVICE

I hereby certify that I have on this date served a copy of **“OPENING COMMENTS OF THE OFFICE OF RATEPAYER ADVOCATES REGARDING THE REFINED STRAW PROPOSAL ON A RISK-BASED DECISION-MAKING FRAMEWORK TO EVALUATE SAFETY AND RELIABILITY IMPROVEMENTS AND REVISE THE GENERAL RATE CASE PLAN FOR ENERGY UTILITIES”** to all known parties by either United States mail or electronic mail, to each party named on the official service list attached in **R.13-11-006**.

I also hand delivered a hard copy to the assigned Administrative Law Judge’s mail slot.

Executed on **May 29, 2014** at San Francisco, California.

/s/ REBECCA ROJO
Rebecca Rojo



California Public
Utilities Commission

[CPUC Home](#)

CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: R1311006 - CPUC - OIR TO DEVELO
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: MAY 19, 2014

Parties

DIANE CONKLIN
SPOKEPERSON
MUSSEY GRADE ROAD ALLIANCE
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: MUSSEY GRADE ROAD ALLIANCE

JOHN LATHROP
DIRECTOR
DECISION STRATEGIES, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: DECISION STRATEGIES, LLC

STEVE GREENWALD
DAVIS WRIGHT TREMAINE LLP
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: LIBERTY UTILITIES (CALPECO
ELECTRIC) LLC

CATHERINE M. MAZZEO
ASSOCIATE GEN. COUNSEL
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150
FOR: SOUTHWEST GAS CORPORATION

SID NEWSOME
REGULATORY MGR.
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, GT14D6
LOS ANGELES, CA 90013-1011
GENERATION
FOR: SOUTHERN CALIFORNIA GAS COMPANY

NORMAN A. PEDERSEN
HANNA AND MORTON LLP
444 S FLOWER ST., SUITE 1500
LOS ANGELES, CA 90071-2916
FOR: SOUTHERN CALIFORNIA
COALITION (SCGC)

JANE LEE COLE, ESQ.
ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
ELECTRIC OP.
PO BOX 800 / 2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY
(SCE)

NGUYEN QUAN
MGR - REGULATORY AFFAIRS
GOLDEN STATE WATER CO. -
630 EAST FOOTHILL BOULEVARD
SAN DIMAS, CA 91773
FOR: GOLDEN STATE WATER COMPANY

91596758

SB_GT&S_0071318

KEITH MELVILLE
ATTORNEY
SAN DIEGO GAS & ELECTRIC COMPANY
NETWORK
101 ASH STREET, HQ-12B
SAN DIEGO, CA 92101
FOR: SOUTHERN CALIFORNIA GAS COMPANY /
NETWORK
SAN DIEGO GAS & ELECTRIC COMPANY

DONALD KELLY
EXE. DIR.
UTILITY CONSUMERS' ACTION

3405 KENYON STREET, SUITE 401
SAN DIEGO, CA 92110
FOR: UTILITY CONSUMERS' ACTION

(UCAN)

MICHAEL SHAMES
SAN DIEGO CONSUMERS' ACTION NETWORK
6975 CAMINO AMERO
SAN DIEGO, CA 92111
1850
FOR: SAN DIEGO CONSUMERS' ACTION
NETWORK (SDCAN)

EVELYN KAHL
COUNSEL
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE

SAN FRANCISCO, CA 94015
FOR: ENERGY PRODUCERS AND USERS
COALITION

MARC D. JOSEPH
ATTORNEY
COMMISSION
ADAMS BROADWELL JOSEPH & CORDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080
FOR: COALITION OF CALIFORNIA UTILITY
EMPLOYEES (CCUE)

LAURA J. TUDISCO
CALIF PUBLIC UTILITIES

LEGAL DIVISION
ROOM 5032
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: ORA

HAYLEY GOODSON
STAFF ATTORNEY
THE UTILITY REFORM NETWORK
FL.
785 MARKET ST., STE. 1400
SAN FRANCISCO, CA 94103
MARKETING
FOR: THE UTILITY REFORM NETWORK (TURN)

DAVID L. HUARD
MANATT, PHELPS & PHILLIPS, LLP
ONE EMBARCADERO CENTER, 30TH

SAN FRANCISCO, CA 94111
FOR: TESORO REFINING &

COMPANY LLC

RITA WHITTEN
ATTORNEY
MANATT, PHELPS & PHILLIPS, LLP
FLOOR
ONE EMBARCADERO CENTER, 30TH FLOOR
SAN FRANCISCO, CA 94111
SERVICES,
FOR: EXXONMOBIL POWER & GAS SERVICES

TARA S. KAUSHIK
HOLLAND & KNIGHT, LLP
50 CALIFORNIA STREET, 28TH

SAN FRANCISCO, CA 94111
FOR: EXXONMOBIL POWER & GAS

INC.

BRIAN CHERRY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, B10C
ENVIRONMENT

ROGER LIN
STAFF ATTORNEY
COMMUNITIES FOR A BETTER

SAN FRANCISCO, CA 94177
FOR: PACIFIC GAS & ELECTRIC COMPANY

1904 FRANKLIN ST., STE. 600
OAKLAND, CA 94612
FOR: COMMUNITIES FOR A BETTER
ENVIRONMENT

WILLIAM JULIAN II
UTILITY WORKERS UNION OF AMERICA
43556 ALMOND LANE
DAVIS, CA 95618
FOR: UTILITY WORKER'S UNION OF AMERICA
(UWUA)

RONALD LIEBERT
ATTORNEY AT LAW
ELLISON SCHNEIDER & HARRIS LLP
2600 CAPITOL AVENUE, STE. 400
SACRAMENTO, CA 95816
FOR: CALIFORNIA MANUFACTURERS &
TECHNOLOGY ASSOCIATION

JEDEDIAH J. GIBSON
ATTORNEY AT LAW
DIV.
ELLISON SCHNEIDER & HARRIS LLP
FEDERATION
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: BEAR VALLEY ELECTRIC SERVICE
FEDERATION

KAREN NORENE MILLS
ASSOC. COUNSEL - LEGAL SVCS.

CALIFORNIA FARM BUREAU

2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833
FOR: CALIFORNIA FARM BUREAU

CATHIE ALLEN
REGULATORY AFFAIRS MGR.
PACIFICORP
825 NE MULTNOMAH ST., STE 2000
PORTLAND, OR 97232
FOR: PACIFICORP

Information Only

AMANDA PHILLIPS
PACIFIC GAS AND ELECTRIC COMPANY
COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON

EMAIL ONLY
EMAIL ONLY, CA 00000

CASE COORDINATION
PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000

ELIZABETH KELLY
LEGAL DIRECTOR
MARIN CLEAN ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000

JAMES BIRKELUND
PRESIDENT
CARDOZO
SMALL BUSINESS UTILITY ADVOCATES
EMAIL ONLY

JAMIE L MAULDIN
ADAMS BROADWELL JOSEPH &

EMAIL ONLY
EMAIL ONLY, CA 00000

EMAIL ONLY, CA 00000
FOR: SMALL BUSINESS UTILITY ADVOCATES

JEREMY WAEN
REGULATORY ANALYST
MARIN CLEAN ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000

JOSEPH MITCHELL
EMAIL ONLY
EMAIL ONLY, CA 00000

KATY ROSENBERG
ALCANTAR & KAHL
EMAIL ONLY
EMAIL ONLY, CA 00000

MARTIN HOMEC
EMAIL ONLY
EMAIL ONLY, CA 00000

MCE REGULATORY
MARIN CLEAN ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000

RICHARD LO
DIRECTOR
UTILITYCONSULTING GROUP, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

SHALINI SWAROOP
MARIN CLEAN ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000

VIDHYA PRABHAKARAN
ATTORNEY
DAVIS WRIGHT & TREMAINE, LLP
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: LIBERTY UTILITIES (CALPECO
ELECTRIC) LLC

DAVIS WRIGHT TREMAINE LLP
EMAIL ONLY
EMAIL ONLY, CA 00000

MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

JUDY PAU
DAVIS WRIGHT TREMAINE LLP
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

KAREN TERRANOVA
ALCANTAR & KAHL
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

JIM O'REILLY
MCKINSEY & COMPANY
1200 19TH ST., N.W.
WASHINGTON, DC 20036

PAUL J. WOOD
CONSULTANT
CYCLA CORP.
211 SOMERVELLE ST.
ALEXANDRIA, VA 22304

DOUGLAS E. MILLER
VP - STRATEGY & BUSINESS DEVELOPMENT
TESORO COMPANIES, INC.
19100 RIDGEWOOD PARKWAY
SAN ANTONIO, TX 78259

EDWARD B. GIESEKING
DIR - PRICING AND TARIFFS
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150

91596758

SB_GT&S_0071321

VALERIE J. ONTIVEROZ
STATE REGULATORY AFFAIRS
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150

JEFFREY SALAZAR
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, GT14D6
LOS ANGELES, CA 90013

MIKE FRANCO
SOUTHERN CALIFORNIA GAS COMPANY
COMPANY
555 W. FIFTH STREET, GT14D6
LOS ANGELES, CA 90013

RASHA PRINCE
SAN DIEGO GAS & ELECTRIC
555 WEST 5TH STREET, GT14D6
LOS ANGELES, CA 90013

SHARON TOMKINS
SOUTHERN CALIFORNIA GAS COMPANY
555 W. FIFTH ST., GT14E7
1400
LOS ANGELES, CA 90013

JOHNNY J. PONG
SOUTHERN CALIFORNIA GAS COMPANY
555 W. 5TH ST. GT14E7, SUITE
LOS ANGELES, CA 90013-1034

HUBERT SHEN
MANAGER
ENVIRONMENT
BAIN & COMPANY
1901 AVENUE OF THE STARS, STE. 200
LOS ANGELES, CA 90067

MAYA GOLDEN-KRASNER
COMMUNITIES FOR A BETTER
6325 PACIFIC BLVD., STE. 300
HUNTINGTON PARK, CA 90255

FRED YANNEY
YANNEY LAW OFFICE
17409 MARQUARDT AVE., UNIT 4-C
COMPANY
CERRITOS, CA 90703

DANIEL A. DELL'OSA
DIR - RATES & REVENUE
SAN GABRIEL VALLEY WATER
11142 GARVEY AVENUE
EL MONTE, CA 91733-2425

MIKE MARELLI
DIRECTOR
COMPLIANCE
SOUTHERN CALIFORNIA EDISON COMPANY
COMPANY
2244 WALNUT GROVE AVE./PO BOX 800
AVENUE
ROASEMEAD, CA 91770

MILISSA MARONA
PINCIPAL ADV.-REG AFFAIRS &
SOUTHERN CALIFORNIA EDISON
PO BOX 800 / 2244 WALNUT GROVE
ROSEMEAD, CA 91770

KEITH SWITZER
VP - REGULATORY AFFAIRS
DIRECTOR
GOLDEN STATE WATER COMPANY
AMERICA
630 EAST FOOTHILL BOULEVARD
SAN DIMAS, CA 91773-9016

CARL WOOD
NATIONAL REGULATORY AFFAIRS
UTILITY WORKERS UNION OF
2021 S. NEVADA ST
OCEANSIDE, CA 92054

JOHN W. LESLIE
ATTORNEY
MCKENNA LONG & ALDRIDGE LLP
600 WEST BROADWAY, STE. 2600
SAN DIEGO, CA 92101

CENTRAL FILES
SDG&E/SOCALGAS
8330 CENTURY PARK COURT, CP31-E
SAN DIEGO, CA 92123

PETE GIRARD
SAN DIEGO GAS & ELECTRIC
REQUIREMENTS
8330 CENTURY PARK CT., CP 32C
COMPANY
SAN DIEGO, CA 92123

CHUCK MANZUK
DIR. - RATES & REVENUE

SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK CT, CP32D
SAN DIEGO, CA 92123-1530

SUE MARA
PRINCIPAL
CARDOZO
RTO ADVISORS, LLC
164 SPRINGDALE WAY
REDWOOD CITY, CA 94062

MARC D. JOSEPH
ADAMS BROADWELL JOSEPH &
601 GATEWAY BLVD. STE 1000
SOUTH SAN FRANCISCO, CA 94080

ROBERT FINKELSTEIN
GENERAL COUNSEL
THE UTILITY REFORM NETWORK
785 MARKET ST., STE. 1400
SAN FRANCISCO, CA 94103

THOMAS LONG
LEGAL DIR.
THE UTILITY REFORM NETWORK
785 MARKET ST., STE. 1400
SAN FRANCISCO, CA 94103

JOHN MCINTYRE
ALCANTAR & KAHL
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105

PATTY COOK
ICF INTERNATIONAL
620 FOLSOM ST., STE. 200
SAN FRANCISCO, CA 94105

STEVEN W. FRANK
ATTORNEY
PACIFIC GAS AND ELECTRIC CO
FL
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105

F. JACKSON STODDARD
MANATT, PHELPS & PHILLIPS, LLP
ONE EMBARCADERO CENTER, 30THE
SAN FRANCISCO, CA 94111

CALIFORNIA ENERGY MARKETS
425 DIVISADERO, STE. 303
COMPANY
SAN FRANCISCO, CA 94117

SHELLY SHARP
PACIFIC GAS AND ELECTRIC
77 BEALE STREET, MAIL CODE B9A
SAN FRANCISCO, CA 94177

AMRIT SINGH
SATVICK
526 WYCOMBE COURT
SAN RAMON, CA 94583

JOYCE STEINGASS
GAS TRANSMISSION SYSTEMS, INC.
575 LENNON LN, SUITE 250
WALNUT CREEK, CA 94598

CARMELITA L. MILLER
LEGAL FELLOW
THE GREENLINING INSTITUTE
141
1918 UNIVERSITY AVENUE, 2ND FLOOR
BERKELEY, CA 94704

C. SUSIE BERLIN
LAW OFFICES OF SUSIE BERLIN
1346 THE ALAMEDA, STE. 7, NO.

SAN JOSE, CA 95126

SCOTT BLAISING
ATTORNEY
AUTHORITY
BRAUN BLAISING MCLAUGHLIN & SMITH, P.C.
915 L STREET, STE. 1270
SACRAMENTO, CA 95814

TANYA DERIVI
SO. CALIFORNIA PUBLIC POWER

915 L STREET, STE. 1410
SACRAMENTO, CA 95814

ANDREW BROWN
ATTORNEY AT LAW
L.L.P.
ELLISON & SCHNEIDER
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905

LYNN HAUG
ELLISON, SCHNEIDER & HARRIS

2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5931

ANN L. TROWBRIDGE
ATTORNEY AT LAW
DAY CARTER & MURPHY LLC
3620 AMERICAN RIVER DRIVE, SUITE 205
SACRAMENTO, CA 95864

MIKE LONG
DIR - FINANCE & MGR
LIBERTY UTILITIES
933 ELOISE AVE.
SO. LAKE TAHOE, CA 96150
FOR: LIBERTY UTILITIES

MIKE CADE
ALCANTAR & KAHL
1300 SW 5TH AVENUE, STE. 1750
PORTLAND, OR 97201

DAVE WEBER
GILL RANCH STORAGE, LLC
220 NW SECOND AVENUE
PORTLAND, OR 97209

ETTA LOCKEY
ATTORNEY
PACIFICORP
825 NE MULTNOMAH ST., STE. 1800
1800
PORTLAND, OR 97232

MICHELLE R. MISHOE
SR. COUNSEL
PACIFICORP
825 NE MULTNOMAH STREET, SUITE

PORTLAND, OR 97232

CHARLES MAGEE
VP / GEN. COUNSEL
TESORO REFINING & MARKETING COMPANY LLC
3450 S. 344TH WAY, STE. 201
AUBURN, WA 98001

State Service

CAROLINA CONTRERAS, P.E.
CPUC
EMAIL ONLY
EMAIL ONLY, CA 00000

MICHAEL COLVIN
ADVISOR - ENERGY
CPUC
EMAIL ONLY
EMAIL ONLY, CA 00000

NANCY GONZALES
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
COMMISSION
EMAIL ONLY, CA 00000

RICHARD MYERS
ENERGY
CALIFORNIA PUBLIC UTILITIES
EMAIL ONLY
EMAIL ONLY, CA 00000

SCOTT MURTISHAW
CPUC
EMAIL ONLY
EMAIL ONLY, CA 00000

TONY MARINO
OFFICE OF SENATOR JERRY HILL
EMAIL ONLY
EMAIL ONLY, CA 00000

ARTHUR J. O'DONNELL
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
INFRASTRUCTURE PLANNING AND PERMITTING B
NATURAL GAS
ROOM 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BELINDA GATTI
CALIF PUBLIC UTILITIES
MARKET STRUCTURE, COSTS AND
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BISHU CHATTERJEE
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
GAS SAFETY AND RELIABILITY BRANCH
BRANCH
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHRISTOPHER PARKES
CALIF PUBLIC UTILITIES
GAS SAFETY AND RELIABILITY
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CLAYTON K. TANG
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
NATURAL GAS
ROOM 4205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DONALD J. LAFRENZ
CALIF PUBLIC UTILITIES
MARKET STRUCTURE, COSTS AND
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ELAINE LAU
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
MARKET STRUCTURE, COSTS AND NATURAL GAS
AREA 4-A
505 VAN NESS AVENUE

ELIZAVETA I. MALASHENKO
CALIF PUBLIC UTILITIES
SAFETY AND ENFORCEMENT DIVISION
ROOM 455
505 VAN NESS AVENUE

91596758

SB_GT&S_0071325

SAN FRANCISCO, CA 94102-3214

JOHN S. WONG
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
BRANCH
ROOM 5106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARC MONBOUQUETTE
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
MARKET STRUCTURE, COSTS AND NATURAL GAS
ROOM 4006
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NATHANIEL SKINNER
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
INFRASTRUCTURE PLANNING AND PERMITTING B
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RICHARD WHITE
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
POLICY & PLANNING DIVISION
NATURAL GAS BRA
ROOM 5-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TRACI BONE
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5027
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SAN FRANCISCO, CA 94102-3214

KENNETH BRUNO
CALIF PUBLIC UTILITIES
GAS SAFETY AND RELIABILITY
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARZIA ZAFAR
CALIF PUBLIC UTILITIES
POLICY & PLANNING DIVISION
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NIKI BAWA
CALIF PUBLIC UTILITIES
EXECUTIVE DIVISION
ROOM 5038
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT M. POCTA
CALIF PUBLIC UTILITIES
ENERGY COST OF SERVICE &
ROOM 4205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LYNN MARSHALL
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-20
SACRAMENTO, CA 95814