

**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)

**REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC
COMPANY ON PROPOSED RULE CHANGES TO
GENERAL ORDER 112**

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Dated: July 25, 2014

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GENERAL ORDER 112**

I. INTRODUCTION

Pursuant to the Administrative Law Judge's Ruling Setting Schedule for Filing Comment on Proposed Rule Changes to General Order 112 (Ruling), issued on July 8, 2014, parties filed opening comments on the California Public Utilities Commission's (Commission) Safety and Enforcement Division's (SED) Proposed Rule Changes to General Order 112-E on July 18, 2014.^{1/} Also pursuant to the Ruling, Pacific Gas and Electric Company (PG&E) respectfully submits these brief reply comments regarding the Proposed Rule Changes.^{2/}

II. REPLY COMMENTS REGARDING THE REVISED PROPOSED RULE CHANGES TO GENERAL ORDER 112-E

PG&E supports the opening comments provided by Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) on the proposed rule changes, in particular the following proposed revisions:

- Proposed revisions to the definition of "Public Attention"^{3/}

^{1/} Opening comments on the Proposed Rule Changes were filed on July 18, 2014 by Pacific Gas and Electric Company, Southern California Gas Company and San Diego Gas & Electric Company, Southern California Edison Catalina Gas, The Office of Ratepayer Advocates, The Utility Reform Network, Utility Workers Union of America, and The Coalition of California Utility Employees.

^{2/} PG&E has limited its reply comments to the proposed changes that were included in SED's Proposed Rule Changes to General Order 112-E issued on July 8, 2014, and has not addressed requests from stakeholders for additional rule changes that were not part of SED's proposal.

^{3/} Comments of SoCalGas and SDG&E on Proposed Revisions to G.O. 112-E, July 25, 2014, p. 4.

- Proposed revisions to the definition of “Near Miss Event.”^{4/}
- Proposed revisions to Rule 123.2(c) relating to leak response time reporting.^{5/}
- Proposed revisions to the definition of Public Liaison Activities with Fire Departments.^{6/}

Additionally, PG&E supports the request made by SoCalGas and SDG&E for the creation of a balancing account to record the costs incurred to implement the changes to General Order 112-E.^{7/}

III. CONCLUSION

PG&E appreciates the opportunity to provide these reply comments regarding the proposed changes to General Order 112-E. As noted in its opening comments, PG&E recommends that the Commission schedule a further technical workshop to provide an opportunity for clarification of the newly proposed and modified major changes to General Order 112-E, and to enable an exchange of technical information among SED, operators and other stakeholders.

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^{4/} Id., p. 5.
^{5/} Id., pp. 6-7.
^{6/} Id., pp. 8-9.
^{7/} Id., p. 3.

Respectfully Submitted,

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By: _____ /s/
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