

BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric)	
Company for Authority, Among Other Things,)	
to Increase Rates and Charges for Electric and)	Application 12-11-009
Gas Service Effective on January 1, 2014.)	(Filed November 15, 2012)
(U 39 M))	
_____)	
)	
And Related Matter.)	Investigation 13-03-007
_____)	

**ALLIANCE FOR NUCLEAR RESPONSIBILITY'S
REPLY TO PG&E'S OPENING COMMENTS ON
ADMINISTRATIVE LAW JUDGE'S PROPOSED DECISION**

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I. INTRODUCTION.

Pursuant to Rule 14.3(d) of the California Public Utilities Commission (“Commission” or “CPUC”) Rules of Practice and Procedure, the Alliance for Nuclear Responsibility (“A4NR”) respectfully submits its Reply to the Opening Comments submitted by Pacific Gas and Electric Company (“PG&E”) on the Proposed Decision (“PD”) of Administrative Law Judge Thomas R. Pulsifer in PG&E’s 2014 General Rate Case Application 12-11-009 and the Commission’s consolidated Investigation 13-03-007.

II. COMMENT.

Due to Rule 14.3(d)’s provision that reply comments “shall be limited to identifying misrepresentations of law, fact or condition of the record contained in the comments of other parties,” A4NR simply notes that PG&E ‘s Opening Comments inaccurately describe the gravamen for A4NR’s Motion seeking oral argument. PG&E’s Opening Comments state that *“A4NR is dissatisfied by the PD’s treatment of two issues: (i) A4NR’s proposal to impose conditions related to the rate of spent fuel storage into dry casks [sic], and (ii) A4NR’s proposed disallowance of Senior Seismic Hazard Analysis Committee (SSHAC) costs.”*¹

As discussed in A4NR’s Opening Comments and made clear in its Opening Brief and testimony,² A4NR’s earlier proposal for a 50% disallowance – subsequently withdrawn after the supporting testimony was stricken -- extended to PG&E’s entire Long Term Seismic Program, not merely its SSHAC component.

¹ PG&E Opening Comments, pp. 15 – 16, footnotes omitted.

² A4NR Opening Comments, p. 13.

Respectfully submitted,

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