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)

PACIFIC GAS AND ELECTRIC COMPANY'S RESPONSE TO JOINT MOTION OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) AND SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) TO CLARIFY APPLICATION OF 49 CFR 192.3 BY CALIFORNIA PIPELINE OPERATORS

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Attorneys for

Dated: August 5, 2014 PACIFIC GAS AND ELECTRIC COMPANY

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Pacific Gas & Electric Company (PG&E) supports Southern California Gas Company's (SoCal Gas') and San Diego Gas & Electric Company's (SDG&E's) July 21, 2014, Joint Motion to clarify the application of 49 Code of Federal Regulations 192.3 by California gas operators. As stated in its response to SoCal Gas' and SDG&E's Motion to Transfer filed in PG&E's 2015 Gas Transmission and Storage Rate Case (A.13-12-012), rulemaking proceedings which provide notice to affected parties are the appropriate forum to address state-wide application of code interpretations. PG&E plans to actively participate in discussions regarding this clarification in this proceeding.

Respectfully Submitted,

LISE H. JORDAN KERRY C. KLEIN ERICH LICHTBLAU

By: /s/ Kerry C. Klein KERRY C. KLEIN

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