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August 7, 2014

Paul Clanon, Executive Director  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**Re: Request for Extension to Submit Pacific Gas and Electric Company's  
Gas Distribution Pipeline Safety Report, Number 2014-01**

Dear Mr. Clanon:

I am seeking your approval under the CPUC's Rule of Practice and Procedure 16.6 for an extension of time until 90 days from the issuance of a Final Decision in PG&E's 2014 GRC (A.12-11-009) to submit the Gas Distribution Pipeline Safety Report (the Report) covering the period January 1 through June 30, 2014. The Report, which would otherwise be due on September 30, 2014, requires PG&E to compare actual to authorized spending levels. Such authorized amounts will not be available until such time as PG&E's 2014 GRC is finalized.

**Background**

In D.11-05-018, the Commission requires PG&E to submit semi-annual "gas distribution pipeline safety reports," continuing "until further notice of the Commission."<sup>1</sup> The reports are due at the end of September for the first six months of the year and at the end of March for the second six months.<sup>2</sup> To date, PG&E has submitted six semi-annual reports. The seventh report, covering the period January 1 through June 30, 2014, is currently due to the Commission on September 30, 2014.

**Justification for Request**

Among other things, D.11-05-018 requires PG&E's gas distribution safety reports to compare recorded spending to authorized funding. The authorized funding levels for 2014 will not be known until the Commission issues its final decision in PG&E's 2014 GRC. The requested 90-day extension will align the filing of the report with additional

<sup>1</sup> D.11-05-018, p. 100 (Ordering Paragraph 44) and Attachment 5, page 1.

<sup>2</sup> D.11-05-018, Attachment 5, page 1.

reporting requirements that compare budgeted, spent and authorized amounts for all GRC major work categories<sup>3</sup> and will provide sufficient time for PG&E to review the Final Decision and ensure that adopted and budgeted amounts are presented on a comparable basis (e.g., consistent treatment of overheads, shared costs) for the expense and capital categories that will be included in the Report.

Respectfully submitted,



Meredith Allen  
Sr. Director, Regulatory Relations

cc: Timothy J. Sullivan, Acting Chief Administrative Law Judge  
([aljextensionrequests@cpuc.ca.gov](mailto:aljextensionrequests@cpuc.ca.gov))  
Joe Como, Director, Office of Ratepayer Advocates  
Mark Pocta, Office of Ratepayer Advocates  
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Edward Randolph, Director, Energy Division  
Denise Tyrrell, Acting Director, Safety and Enforcement Division  
Lisa Malashenko, Safety and Enforcement Division  
Bob Finkelstein, The Utility Reform Network (via email)  
Service List for A.09-12-020  
Service List for A.12-11-009

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<sup>3</sup> PG&E has proposed, and the Proposed Decision in the 2014 GRC would adopt, the continuation of this reporting requirement from PG&E's 2011 GRC D.11-05-018.