

## PUBLIC UTILITIES COMMISSION

## LEGAL DIVISION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298  
ID 84-3031353



December 6, 2013

Britt K. Strottman  
Special Counsel, City of San Bruno  
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Oakland, CA 94607  
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**VIA ELECTRONIC MAIL**

Re: Public Records Act Request  
CPUC Reference No.: PRA #933

Dear Ms. Strottman:

You ask the California Public Utilities Commission (Commission/CPUC) to provide you copy of the following:

- Any citations' or issued under *Resolution ALJ 274* by the *Consumer Protection and Safety Division (CPSD)* against natural gas utilities from December 7, 2011 until present.
- Citations CPSD Director Jack Hagan has issued against gas utilities since his tenure at the *Commission*.
- Proposed citations that have been submitted, but are outstanding for final approval, by CPSD Director Jack Hagan.

Among other things, the City of San Bruno requests Commission records regarding the Resolution ALJ-274 Safety Citation Program.

I am sending you a list of, and links to, the Commission records responsive to this request.

**RECORDS OF CITATIONS RELATED TO RESOLUTION ALJ-274**

These records are available on the Commission's internet site, under the tab for Transportation and Safety Enforcement, and the links for Pipeline Safety, Pipeline Safety Citations Issued, and CPUC Fines PG&E \$16 Million Through Citation Program Pipeline Safety  
<http://www.cpuc.ca.gov/PUC/safety/Pipeline/>

Citation Information

<http://www.cpuc.ca.gov/PUC/safety/Pipeline/citations.htm>

Standard Operating Procedure

[http://www.cpuc.ca.gov/PUC/safety/Pipeline/Standard\\_Operating\\_Procedure\\_for\\_Citations.htm](http://www.cpuc.ca.gov/PUC/safety/Pipeline/Standard_Operating_Procedure_for_Citations.htm)

Citations Issued

<http://www.cpuc.ca.gov/PUC/safety/Pipeline/citations.htm>

Pipeline Safety Citations Issued

<http://www.cpuc.ca.gov/PUC/safety/Pipeline/citations.htm>

Standard Operating Procedure for Citations

[http://www.cpuc.ca.gov/PUC/safety/Pipeline/Standard\\_Operating\\_Procedure\\_for\\_Citations.htm](http://www.cpuc.ca.gov/PUC/safety/Pipeline/Standard_Operating_Procedure_for_Citations.htm)

Press Release Announcing Citation Program

[http://docs.cpuc.ca.gov/published/News\\_release/154502.htm](http://docs.cpuc.ca.gov/published/News_release/154502.htm)

Resolution ALJ-274

[http://docs.cpuc.ca.gov/WORD\\_PDF/AGENDA\\_RESOLUTION/154205.pdf](http://docs.cpuc.ca.gov/WORD_PDF/AGENDA_RESOLUTION/154205.pdf)

Citations Issued

November 18, 2013: Citation to PG&E for \$50,000 for violations

<http://www.cpuc.ca.gov/NR/ronlyres/0FB67E86-11CF-46A5-AC5C-1A0209099D42/0/SEDGasCitation12004PGE.pdf>

Enclosure 1

<http://www.cpuc.ca.gov/NR/ronlyres/6E604A3D-66E6-4548-B8F9-56F8D4E9662C/0/Enclosure1SelfidentifiedLetterdated2242012.pdf>

Enclosure 2

<http://www.cpuc.ca.gov/NR/ronlyres/76A65A5B-1165-4524-8800-105BC92463D6/0/Enclosure2SelfidentifiedLetterdated5112012.pdf>

Enclosure 3

<http://www.cpuc.ca.gov/NR/ronlyres/79DE501B-1D8B-4179-B5FE-978E9AA9F1F0/0/Enclosure3SelfidentifiedLetterdated5182012.pdf>

Enclosure 4

<http://www.cpuc.ca.gov/NR/ronlyres/8639423B-503E-4E41-A553-2629EA0FE8F7/0/Enclosure4Selfidentifiedletterdated7312012.pdf>

Enclosure 5

<http://www.cpuc.ca.gov/NR/ronlyres/B005F4D5-A2D9-4E26-B673-3AD9ED4C1330/0/Enclosure5SelfidentifiedLetterdated362013.pdf>

November 5, 2013: \$8.1 Million Citation issued to PG&E for Non-Standard Pipeline Testing

Citation

<http://www.cpuc.ca.gov/NR/rdonlyres/3BDE82E8-8484-48CE-8DFB-1FEAA8449C9E/0/Citation13003PGE.pdf>

Letter to PG&E

<http://www.cpuc.ca.gov/NR/rdonlyres/7ED0E0F1-1C4D-4DD8-8DDC-49A008270C04/0/Enclosure1LettertoPGE.pdf>

Press Release

<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M081/K460/81460968.PDF>

October 25, 2013: Citation Issued to Southern California Gas Company for \$150,000 for missing a leak survey on a distribution line

<http://www.cpuc.ca.gov/NR/rdonlyres/984DE4B2-54B2-4D12-B04D-C462CD810E3B/0/SEDGasCitation13002SoCalGas.pdf>

Enclosure 1

<http://www.cpuc.ca.gov/NR/rdonlyres/63AB07F2-6F29-46F8-AE49-D9CD9435DEBC/0/Enclosure1SEDInvestigationReport13002.pdf>

Enclosure 2

<http://www.cpuc.ca.gov/NR/rdonlyres/F282DBA1-0C2D-4C6D-A905-6A7FB599E3F9/0/Enclosure2SCGI3002.pdf>

Enclosure 3

<http://www.cpuc.ca.gov/NR/rdonlyres/7C500207-D2DE-47C4-BA5F-76DFA1EAC3EC/0/Enclosure3SCGI3002.pdf>

November 4, 2013: Southern California Gas Company Appeal of Citation

<http://www.cpuc.ca.gov/NR/rdonlyres/85DFE589-F181-4540-A7AA-90310F0635AB/0/ALJ274Citation13002SoCalGasAppeal110413R13.pdf>

October 11, 2013: Citation Issued to PG&E for \$140,000 for General Order Violation

<http://www.cpuc.ca.gov/NR/rdonlyres/171076F0-89F2-436A-BEC2-318A95140DC9/0/SEDGasCitationforSI20121PGE.pdf>

CPUC Fines PG&E 16 Million Through Citation Program

On Jan. 27, 2012, the CPUC fined PG&E \$16.8 million for failure to conduct natural gas distribution pipeline leak surveys.

Read the Press Release

<http://www.cpuc.ca.gov/NR/rdonlyres/E22319E2-C4C1-4726-8F55-032E9ADE5FAF/0/Citation012712.pdf>

Citation

<http://www.cpuc.ca.gov/NR/rdonlyres/74380965-89C8-4445-94A9-D46EB0151687/0/CitationPGE012711.pdf>

Appeal of Citation

[http://www.cpuc.ca.gov/NR/rdonlyres/2B02D51C-222E-4A25-BFC2-BDBB611A22F9/0/CitationNo201201001\\_AttachmentofNoticeofAppeal.pdf](http://www.cpuc.ca.gov/NR/rdonlyres/2B02D51C-222E-4A25-BFC2-BDBB611A22F9/0/CitationNo201201001_AttachmentofNoticeofAppeal.pdf)

CPUC's Denial of Appeal

[http://docs.cpuc.ca.gov/PUBLISHED/COMMENT\\_RESOLUTION/161959.htm](http://docs.cpuc.ca.gov/PUBLISHED/COMMENT_RESOLUTION/161959.htm)

More Documents on this Citation

[http://www.cpuc.ca.gov/PUC/safety/Pipeline/120827\\_CPUCFinesPGE16MillionThroughCitationProgram.htm](http://www.cpuc.ca.gov/PUC/safety/Pipeline/120827_CPUCFinesPGE16MillionThroughCitationProgram.htm)

Main Gas Pipeline Citations Page

<http://www.cpuc.ca.gov/PUC/safety/Pipeline/citations.htm>

CPUC Rulings

Regarding Prehearing Conference, Evidence, Schedule, and Issues, February 10, 2012

<http://www.cpuc.ca.gov/NR/rdonlyres/AFFEA4DE-BA61-4EE6-AA80-D164D06CD961/0/021012159453.pdf>

Attachment A -- Citation

<http://www.cpuc.ca.gov/NR/rdonlyres/3FDF81F4-84D9-4215-BF55-9B041A27D14B/0/021012AttA159455.pdf>

Attachment B -- Notice of Appeal

<http://www.cpuc.ca.gov/NR/rdonlyres/A7F7C2D2-7FD7-43C3-83FC-0P344536E0B2/0/021012AttB159456.pdf>

Regarding Exhibits 3, 4 and 5, February 24, 2012

<http://www.cpuc.ca.gov/NR/rdonlyres/31EEC597-B82D-4B21-86E4-2D70E26DF943/0/022412160287.pdf>

Certificate of Service

<http://www.cpuc.ca.gov/NR/rdonlyres/598EEE4D-3FBB-4C42-89B9-C3DA010ADD75/0/022412COS160289.pdf>

Opening and Reply Briefs

PG&E's Brief on Appeal of Citation No. ALJ-274, February 28, 2012

<http://www.cpuc.ca.gov/NR/rdonlyres/C532587E-9BF9-4CFF-9555-0113957D0828/0/01PGEBriefCitationAppealBriefPGEFINAL022812.pdf>

**Attachment A – Message from Stavropoulos**

<http://www.cpuc.ca.gov/NR/rdonlyres/52332714-7480-4FDB-874B-3A41F24E9EA6/0/02PGEBriefAttachmentAMessagefromStavropoulosCitiCPSDPenaltyCitationCPSD.pdf>

**Attachment B – Citi CPSD Penalty Citation**

<http://www.cpuc.ca.gov/NR/rdonlyres/574B1EED-D3F8-4C48-AE08-D9B3494BC7F8/0/03PGEBriefAttachmentB013112CitiCPSDPenaltyCitation.pdf>

**Certificate of Service**

<http://www.cpuc.ca.gov/NR/rdonlyres/427F4225-246D-40D7-BA13-97610A362F90/0/04PGEBriefCOSandSvcLstPGEFINAL022812.pdf>

**CPSD's Opening Brief, February 28, 2012**

<http://www.cpuc.ca.gov/NR/rdonlyres/A0810200-7D72-4DBD-B51C-8FD6A1848CBF/0/CPUC01576190v1Citation No ALJ 274 Opening Brief of the CPSD.PDF>

**CPSD's Reply Brief, March 9, 2012**

<http://www.cpuc.ca.gov/NR/rdonlyres/6EF928D8-C26B-46B6-9CB5-8F1077A8B543/0/CPUC01576942v1Citation No ALJ274 201201001 Reply Brief of the CPSD.PDF>

**PG&E's Reply Brief, March 9, 2012**

<http://www.cpuc.ca.gov/NR/rdonlyres/DDB13A2B-DD9C-435F-BD22-26681562EF4C/0/PGEReplyBriefonAppealofCNoALJ274201201001 CPUC.pdf>

**Certificate of Service**

<http://www.cpuc.ca.gov/NR/rdonlyres/46B62099-F383-434C-A167-AEDBBCC1345C/0/PGECertificateofServiceCALJ274201201001.pdf>

**Exhibit 1 – Citation for Violations Issued Pursuant to Resolution ALJ-274 of General Order 58-A, 58-B and/or 112-E**

<http://www.cpuc.ca.gov/NR/rdonlyres/0EFCF372-2B41-45B4-9D3B-85BF71A05D46/0/Exhibit1CitationPGE012711.pdf>

**Exhibit 2 – Notice of Appeal**

<http://www.cpuc.ca.gov/NR/rdonlyres/B45851AE-B87D-4980-98E9-E063138B4717/0/Exhibit2CitationNo201201001 AttachmentofNoticeofAppeal.pdf>

**Exhibit 3 – PG&E 2011 Annual Report**

<http://www.cpuc.ca.gov/NR/rdonlyres/718F323C-7F7F-410C-8107-2DA5333A3422/0/Exhibit32011AnnualReport.pdf>

**Exhibit 4 – 2011 PG&E Joint Proxy Statement**

<http://www.cpuc.ca.gov/NR/rdonlyres/41BAE5ED-914D-46B5-9F4D-538189E3CF68/0/Exhibit42011ProxyStatement.pdf>

**Exhibit 5 – PG&E 10-Q, Filed November 3, 2011**

<http://www.cpuc.ca.gov/NR/rdonlyres/A52C834D-BA08-49E3-B1D3-48F90ECD277C/0/Exhibit5PGECorporation10Q20111103.pdf>

**Exhibit 6 – PG&E Documents Reporting the Violations, December 30, 2011  
Cover Letter, December 30, 2011**

<http://www.cpuc.ca.gov/NR/rdonlyres/217479DD-19BC-474F-916A-1F43CE15E3CA/0/Exh6PGE123011CoverLetter.pdf>

**Citation Program Report**

<http://www.cpuc.ca.gov/NR/rdonlyres/79429D38-4FC8-48C3-B287-895C322161C8/0/Exh6PGE123011AttachedReport.pdf>

**Update Letter, December 30, 2012**

<http://www.cpuc.ca.gov/NR/rdonlyres/1688A963-754F-4FC5-8945-3E611AB1D4FE/0/Exh6PGE123011Updateletter.pdf>

**Affidavit of Thomas Guarino**

<http://www.cpuc.ca.gov/NR/rdonlyres/38323933-4F0E-4C33-8107-074A939E5302/0/Exh6PGE123011UpdateAttachmentAffidavitofThomasGuarino.pdf>

**Exhibit 7 – Leak Survey Plat Map Information**

**PG&E Self-Identification Follow-Up, January 6, 2012**

<http://www.cpuc.ca.gov/NR/rdonlyres/E0280A9A-F9E6-4FFA-BA84-448ECAD28AEF/0/Exh7PGEselfidentificationfollowup1612.pdf>

**Diablo Missed Five Year Leak Survey Plat Map Information, provided to CPUC January 6, 2012**

<http://www.cpuc.ca.gov/NR/rdonlyres/F0EE8B88-D26B-4FF1-8D75-0208D705C34E/0/Exh7DiabloMissed5yrLeakSurveyPlatMapInfoprovidedtoCPSDon1612.xls>

**Judge's Resolution**

**Resolution, Filed March 19, 2012**

<http://www.cpuc.ca.gov/NR/rdonlyres/E4A691AA-FA85-49DE-8CB5-A38541DD0754/0/031912FiledDraftResALJ277161959.pdf>

**Appendix A**

<http://www.cpuc.ca.gov/NR/rdonlyres/D421E6F4-4088-4E7C-81ED-A0B8B9C4F0BB/0/031912AppendixA161962.pdf>

Service List

<http://www.cpuc.ca.gov/NR/rdonlyres/5DB3557A-B480-4844-BE10-EF44BAEBC3E8/0/031912ServiceList161968.pdf>

Comments on Judge's Resolution  
PG&E, April 9, 2012

<http://www.cpuc.ca.gov/NR/rdonlyres/6514456B-830E-435F-A082-50B7F14EE6AD/0/030912ALJ274201201001ServiceList.pdf>

Judge's Service List, April 9, 2012

<http://www.cpuc.ca.gov/NR/rdonlyres/6514456B-830E-435F-A082-50B7F14EE6AD/0/030912ALJ274201201001ServiceList.pdf>

Certificate of Service, April 9, 2012

<http://www.cpuc.ca.gov/NR/rdonlyres/03B1F656-8F83-4549-9819-A34503FF3193/0/COSCommentsOnDftResolutionFINAL040912DOC.pdf>

City and County of San Francisco, April 9, 2012

<http://www.cpuc.ca.gov/NR/rdonlyres/4EE5ADF9-8E63-4897-890A-1FC4F3902684/0/CCSFCOMMENTSONDRAFTRESOLUTIONALJ277.PDF>

CPSD Reply Comments PG&E, April 16, 2012

<http://www.cpuc.ca.gov/NR/rdonlyres/E3E3D8E5-6E5B-44CE-9FB6-60A7E7591751/0/PGEReReplyCommentsonDR.pdf>

CPUC Resolution, Issued April 20, 2012

<http://www.cpuc.ca.gov/NR/rdonlyres/A509D738-48C7-4C4A-BB1E-3320169CB908/0/164605.pdf>

I will soon respond to the remainder of your records requests.

I hope this is helpful.

Very truly yours,



Fred Harris  
Staff Counsel