

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Revise and Clarify  
Commission Regulations Relating to the Safety of  
Electric Utility and Communications Infrastructure  
Provider Facilities.

Rulemaking 08-11-005  
(November 6, 2008)

**PHASE 2 JOINT PARTIES' WORKSHOP REPORT  
FOR WORKSHOPS HELD JANUARY – JUNE 2010**

Suzanne Toller  
DAVIS WRIGHT TREMAINE LLP  
505 Montgomery Street, Suite 800  
San Francisco, CA 94111  
Telephone: (415) 276-6536  
Facsimile: (415) 276-6599  
E-mail: [suzannetoller@dwt.com](mailto:suzannetoller@dwt.com)

Attorneys for Sunesys, LLC

August 13, 2010

## TABLE OF CONTENTS

- I. INTRODUCTION
- II. PROCEDURAL HISTORY
- III. CONSENSUS PROPOSED RULE CHANGES
- IV. MULTIPLE ALTERNATIVES PROCESS (MAP) PROPOSED RULE CHANGES
- V. IMPLEMENTATION

Appendix A – Consensus Proposed Rule Changes  
Appendix B – Multiple Alternatives Process (MAP) Alternatives  
Appendix C – Phase 2 Workshop Protocols  
Appendix D – List of Phase 2 Workshop Parties  
Appendix E – REAX Report

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Revise and Clarify  
Commission Regulations Relating to the Safety of  
Electric Utility and Communications Infrastructure  
Provider Facilities.

Rulemaking 08-11-005  
(November 6, 2008)

**JOINT PARTIES' WORKSHOP REPORT  
FOR WORKSHOPS HELD JANUARY – JUNE 2010**

**I. INTRODUCTION**

Pursuant to Rule 1.8(d) of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), Sunesys, LLC (Sunesys) (U-6991-C) submits this Joint Workshop Report on behalf of the following parties: AT&T California (U-1001-C) and New Cingular Wireless PCS, LLC (AT&T) (U-3060-C); California Public Utilities Commission's Consumer Protection and Safety Division (CPSD); California Public Utilities Commission's Division of Ratepayer Advocates (DRA); California Cable and Telecommunications Association (CCTA); California Farm Bureau Federation (CFBF); California Independent System Operator Corporation (CAISO); California Municipal Utilities Association (CMUA); California Association of Competitive Telecommunications Carriers (CALTEL); CTIA-The Wireless Association® (CTIA); Comcast Phone of California, LLC (Comcast) (U-5698-C); County of Los Angeles Fire Department (LA County); CoxCom, Inc. and Cox California Telecom, L.L.C. (U-5684-C) (Cox); Davey Tree; Frontier Communications of California (Frontier) (U-1024-C); International Brotherhood of Electrical Workers 1245 (IBEW 1245); Los Angeles Department of Water and Power (LADWP); Mussey Grade Road Alliance (MGRA); NextG Networks of

California, Inc. (NextG) (U-6745-C); Osmose Utilities Services; Pacific Gas and Electric Company (PG&E); PacifiCorp; San Diego Gas & Electric Company (SDG&E); Sierra Pacific Power Company (Sierra Pacific) (U-903-E); the Small LECs<sup>1</sup>; Sunesys; SureWest Telephone (U-1015-C); Southern California Edison (SCE); Sprint Nextel<sup>2</sup>; The Utility Reform Network (TURN); T-Mobile West Corporation d/b/a T-Mobile (U-3056-C); Time Warner Cable (U-6874-C); tw telecom of california, lp (U-5358-C); and Verizon California Inc. (Verizon) (U-1002-C).

With respect to the sponsoring of certain proposed rule changes and providing the associated rationale/justification therefore, and/or offering support or opposition to various proposed rule changes, certain parties formed coalitions – most notably the Joint Electric Utilities<sup>3</sup> and the CIP Coalition.<sup>4</sup>

## **II. PROCEDURAL HISTORY**

On November 6, 2008, the Commission issued the Order Instituting Rulemaking (OIR) which initiated this proceeding. The stated goal of the OIR was “to consider revising and clarifying the Commission’s regulations designed to protect the public from potential hazards, including fires, which may be caused from electric utility transmission or distribution lines or

---

<sup>1</sup> The Small LECs are the following carriers: Calaveras Telephone Company (U-1004-C), Cal-Ore Telephone Co. (U-1006-C), Ducor Telephone Company (U-1007-C), Foresthill Telephone Co. (U-1009-C), Happy Valley Telephone Company (U-1010-C), Hornitos Telephone Company (U-1011-C), Kerman Telephone Co. (U-1012-C), Pinnacles Telephone Co. (U-1013-C), The Ponderosa Telephone Co. (U-1014-C), Sierra Telephone Company, Inc. (U-1016-C), The Siskiyou Telephone Company (U-1017-C), Volcano Telephone Company (U-1019-C), and Winterhaven Telephone Company (U-1021-C).

<sup>2</sup> Sprint Spectrum L.P. as agent for WirelessCo, L.P. (U-3062-C) and Sprint Telephony PCS, L.P. (U-3064-C), Nextel of California, Inc. (U-3066-C).

<sup>3</sup> For the purposes of this Workshop Report, the Joint Electric Utilities are comprised of Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company.

<sup>4</sup> For the purposes of this Workshop Report, the CIP Coalition is comprised of AT&T, CCTA, CTIA, Comcast, Cox, Frontier, the Small LECs, Sunesys, SureWest Telephone, Sprint Nextel, T-Mobile, Time Warner Cable, tw telecom of california, lp, and Verizon.

communications infrastructure providers' facilities in proximity to the electric overhead transmission or distribution lines.”<sup>5</sup> Having received comments on the Rulemaking's proposed scope, an Assigned Commissioner's Ruling and Scoping Memo was issued on January 6, 2009, which divided the proceeding into two phases.<sup>6</sup> As described in the January 2009 Scoping Memo, Phase 1 was to “consider measures to reduce fire hazards that can be implemented in time for the 2009 autumn fire season in Southern California.”<sup>7</sup>

On August 25, 2009, the Commission issued a decision in Phase 1 of the Rulemaking. Consistent with the scope of Phase 1, many of the measures adopted in the Phase 1 Decision applied exclusively in areas defined in the decision as “Extreme and Very High Fire Threat Zones” in Southern California. A few of the Phase 1 measures, however, had statewide applicability. The measures adopted were incorporated into specific rules found in General Order 95, General Order 165, or, in limited instances, specific directives in the ordering paragraphs of the decision. Several of the measures were adopted on an interim basis, either by designating the rule as interim or by placing the directive in an ordering paragraph, with the Commission directing further consideration by the parties in Phase 2.<sup>8</sup>

Shortly after the issuance of the Phase 1 Decision, on September 18, 2009, the Assigned ALJ issued a ruling initiating Phase 2 of the Rulemaking. Subsequent to the receipt of comments on the appropriate scope of Phase 2 as well as a Prehearing Conference, a scoping memo was

---

<sup>5</sup> See Order Instituting Rulemaking, R. 08-11-005 (November 6, 2008) at p. 1.

<sup>6</sup> See Assigned Commissioner's Ruling and Scoping Memo, R. 08-11-005 (January 6, 2009) (January 2009 Scoping Memo).

<sup>7</sup> *Id.*, p.2

<sup>8</sup> See, e.g., Decision 09-08-029, at p. 11 (“Some of our measures are designated as interim. We expect to address the future applicability of such interim measures in phase 2.”)

issued on November 5, 2009.<sup>9</sup> The November 2009 Scoping Memo identified 25 issues within the scope of Phase 2 and which could be the subject of consideration through proposed changes to the Commission's current rules. In addition, the Scoping Memo identified workshops as the primary means for resolution of the identified issues and noted that such workshops would take several months. On October 27, 2009, Administrative Law Judges Jean Vieth and Angela Minkin were assigned to facilitate the workshops.

On December 16, 2009, parties filed proposed rule changes (PRCs). Parties were afforded an initial opportunity to respond to the PRCs proffered by others on January 11, 2010. The first workshop for Phase 2 was held on January 15, 2010. As an initial step in the workshop process, the parties agreed to a set of protocols designed to guide the manner in which proposed rule changes would be discussed, voted upon, and included in the workshop report. These protocols were determined upon a consensus vote at the workshop held on February 3, 2010. Subsequent to that, the protocols were amended once to clarify that only PRCs or alternatives to PRCs which are actually voted upon by workshop participants and not withdrawn would be included in this workshop report. The protocols also detailed the manner in which the workshops would be documented and noticed. A final version of the protocols which guided the workshop process is attached hereto as Appendix C.

In total, 25 days of workshops were held over a period of six months. The workshop sessions were publicly noticed and open to the public. While a significant majority of the workshops were held in San Francisco at the Commission, two days of workshops were conducted in Ontario, California. By the end of the workshop process, there were 38 active parties participating. The parties include the Commission's CPSD, investor-owned utilities,

---

<sup>9</sup> Assigned Commissioner's Ruling and Scoping Memo for Phase 2 of this Proceeding, R. 08-11-

municipal utilities, telecommunications companies, cable providers, labor, consumer groups and a variety of independent consultants. The parties represented at the workshops are set forth in Appendix D.

During the course of the workshop, the parties reached consensus on a number of PRCs. These consensus items are presented in full in Appendix A. The PRCs which did not reach consensus are presented in Appendix B of this report, often along with one or more alternative proposals. The proponents of each of the PRCs and the alternative proposals prepared rationales in support of their positions. A draft of this filing along with the Appendices was circulated to the parties for review and comment before being finalized for submission to the Commission. Each party's review of Appendix B was limited to reviewing the portions of the report that reflected their positions. Parties were not allowed to edit other parties' Appendix B submissions or to alter their initial comments to respond to arguments made in those submissions.

### **III. CONSENSUS PROPOSED RULE CHANGES**

The parties agreed to unanimously support a number of PRCs, generally after significant debate, discussion and comments by the workshop participants. Consensus was achieved if all of the parties present (or who provided their proxy to a party that was present) voted "yes" or "neutral" (or "abstain"). After consensus was achieved on a PRC, the item was placed on the consent calendar. This mechanism provided the workshop participants with time to consider their vote and explore with additional persons at the participant's company or institution whether to confirm their vote. Any participant could change its vote at any time up to the call of the consent calendar at the next workshop session. After call of the consent calendar, no vote changes were allowed.

The following table lists those PRCs on which consensus was reached. Appendix A to this Workshop Report contains the original rule, strikeout and underline version, and final proposed rule as well as the rationale for each of these PRCs.

<b>Rule</b>	<b>Description</b>	<b>Appendix A Reference</b>
General Order 95, Rule 18A	Reporting of discovered safety hazards; replacement of the term “violation” with “nonconformance”	II. A
General Order 95, Rule 18B	Notification of safety hazards; streamlines and clarifies rule	II. B
General Order Rule 35, Paragraphs 1-3	Clarifications to vegetation management rules	III.
General Order 95, Table 37, Table 1, Case 14 and associated footnotes (fff)-(jjj)	Rule 37, Table 1, Case 14 and associated footnotes (fff) through (jjj) no longer to be considered interim; correction of typos in footnote (fff).	IV.
General Order 95, Rules 44.1, 44.2, 44.3	Clarifications to Pole Loading Rules	V.
General Order 95, Rule 23.0	Clarification of the definition of “Reconstruction”	V.
General Order 165, Sections I-IV	Inspection of electric facilities; clarifications and streamlining of Purpose, Applicability, Definitions, Standards for Inspection, Record keeping Sections; Addition of Section IV pertaining to Transmission Facilities	VI.

#### **IV. MULTIPLE ALTERNATIVE PROPOSALS (MAP) PROPOSED RULE CHANGES**

After it was determined by the workshop participants that there appeared to be no possibility of obtaining a consensus, then the subject PRC would be moved to the Multiple Alternatives Process (MAP) in which one or more parties would return to a later workshop



meeting with alternative PRC(s). The proponent of each PRC in the MAP prepared a rationale, a strikeout and underline version of the rule being revised, and a final version of the rule, all of which are found in Appendix B. Any party who wished to propose an alternative to a PRC which entered the MAP process was able to do so during the workshop process. Those alternatives were generally also voted upon, and the ones that were voted upon are included in Appendix B.

Unlike the rationales for the consensus PRCs, which were agreed upon by all of the workshop participants, the rationales for the MAP PRCs were prepared solely by the MAP PRC proponents. Each of the MAP PRCs was discussed and debated at length, and the inability of the workshop participants to arrive at consensus was the result of genuine differences of opinion rather than a failure to expend adequate workshop time on the issues of concern. Each MAP PRC that was voted upon and not withdrawn is set forth in the table below.

<b>Map</b>	<b>Proponent</b>	<b>Description</b>	<b>Appendix B Reference</b>
MAP No. 1 – General Order 95, Rule 11	CPSD	Clarifies that lines must be designed and maintained in accordance with General Order 95 requirements; deletes modifier “electrical.”	II.A.
MAP No. 1 – General Order 95, Rule 11	CIP Coalition	Clarifies that lines must be designed and maintained in accordance with General Order 95 requirements; no other modifications to existing rule.	II.B.
MAP No. 2 – General Order 95, Rule 12	CPSD	Clarifies that General Order 95 safety rules apply to publicly owned utility electric facilities.	III.A.
MAP No. 3 – General Order 95, Rule 18A	CIP Coalition	Modifies existing rule by removing conflicting, unnecessary, and redundant provisions; otherwise maintains requirements to establish auditable maintenance programs and to take appropriate corrective actions.	IV.A.

<b>Map</b>	<b>Proponent</b>	<b>Description</b>	<b>Appendix B Reference</b>
MAP No. 3 – General Order 95, Rule 18A	SDG&E	SDG&E’s proposal is the same as the CIP coalition’s proposal except that level 2 nonconformances would need to be corrected within 12 months under certain circumstances.	IV.B.
MAP No. 4 – General Order 95, Rule 18C	Mussey Grade	Adds a new rule requiring electric utilities to develop contingency plans for conditions that exceed the wind loading requirements specified in Rule 43 in high fire risk areas.	V.A.
MAP No. 5 – General Order 95, Rule 31.1	Joint Electric Utilities	Adds a provision to define that a utility is in compliance with Rule 31.1 if its facilities are designed, constructed, and maintained in accordance with GO 95 provisions or if there are no GO 95 provisions, with “accepted good practice.” Defines “accepted good practice.”	VI.A.
MAP No. 6 – General Order 95, Rule 31.2	CIP Coalition members CCTA, Comcast, CTIA, NextG, Sprint Nextel, Sunesys, Time Warner, T-Mobile, tw telecom and Verizon	Adds new section to existing general inspection rule to require regular CIP patrol and detail inspections in specified high fire areas. (CIP 1)	VII.A.
MAP No. 6 – General Order 95, Rule 31.2	CIP Coalition members AT&T, Frontier Communications and Small LECs	Adds new section to existing general inspection rule to require CIP patrol inspections in specified high fire areas. (CIP 2)	VII.B.
MAP No. 6 – General Order 95, Rules 31.2 and 80.1A	CPSD	Requires CIPs to have procedures in place to ensure that all of their lines are subject to patrol and detailed inspections, and sets forth an explicit requirement in GO 95 setting minimum inspection cycle lengths for CIPs in certain circumstances.	VII.C.
MAP No. 6 – General Order 95, Rules 31.2 and 80.1	SDG&E	SDG&E’s proposal is the same as CPSD’s proposal except that: (1) communications lines on CIP-only poles within three spans of joint use poles would require inspections and (2) the maximum interval between detailed inspections in Extreme and Very High Fire Threat Zones in Southern California would be 5 years.	VII.D.

<b>Map</b>	<b>Proponent</b>	<b>Description</b>	<b>Appendix B Reference</b>
MAP No. 6 – General Order 95, Rule 80.1B	CPSD	Adds a new rule to General Order 95 setting forth specific requirements for intrusive inspections for wood poles supporting only communication lines or equipment.	VII.E.
MAP No. 7 – General Order 95, Rule 35 (paragraph 4)	Joint Electric Utilities	Adds a fourth paragraph permitting discontinuance of electric service if a property owner obstructs access to overhead facilities for vegetation management purposes.	VIII.A.
MAP No. 7 – General Order 95, Rule 35 (3 <sup>rd</sup> exception)	Joint Electric Utilities	Adds an exception 3 to Rule 35 regarding property owners who obstruct access to overhead facilities for vegetation management activities. Also changes “utility” to “supply or communication company” in exception 2.	VIII.B.
MAP No. 8 – General Order 95, Rule 35, Appendix E (Table 1)	Joint Electric Utilities	Increases minimum time-of-trim vegetation-to-conductor radial clearances for certain conductors in Extreme and Very High Fire Threat Zones in Southern California.	IX.A.
MAP No. 8 – General Order 95, Rule 35, Appendix E (Guidelines only)	Joint Electric Utilities	Provides a description of the numerous factors to be taken into consideration when determining the appropriate level of additional clearances that need to be obtained.	IX.B.
MAP No. 8 – General Order 95, Rule 35, Appendix E (Guidelines only)	Mussey Grade and Farm Bureau	Same as Joint Electric Utilities’, except adds rationale for additional clearances and adds tree crop production manuals as a factor to be considered.	IX.C.
MAP No. 9 – General Order 95, Rule 38 Footnote (aaa)	Joint Electric Utilities	Adds advisory footnote “aaa” regarding vertical separation requirements for conductors	X.A.
MAP No. 10 – General Order 95, Rule 44.4	CIP Coalition	Adds new rule section to provide for timely cooperation among all utilities and CIPs in sharing pole loading information and, where applicable, to provide reasons for rejection of pole attachment/joint pole applications.	XI.A.
MAP No. 10 – General Order 95, Rule 44.4 and Appendix I	Joint Electric Utilities	Adds guidelines for timely cooperation among all utilities and CIPs in sharing pole loading information and, where applicable, to provide reasons for rejection of pole attachment/joint pole applications.	XI.B.

<b>Map</b>	<b>Proponent</b>	<b>Description</b>	<b>Appendix B Reference</b>
MAP No. 11 – General Order 95, Rule 48	Joint Electric Utilities	Conforms Rule 48 with other GO 95 rules concerning “material strength” by removing “will not fail” language.	XII.A.
MAP No. 11 – General Order 95, Rule 48	CPSD	Proposes an ordering paragraph directing CPSD to establish a working group to conduct a comprehensive technical review of the strength requirements for all classes of lines in Section IV of General Order 95.	XII.B.
MAP No. 12 – General Order 95, Rule 91.5	SDG&E	Adds a new rule regarding marking of communication cables and conductors.	XIII.A.
MAP No. 13 – General Order 165, Section V	Mussey Grade and CPSD	Requires IOU electric utilities to collect and submit data on fire incidents to CPSD.	XIV.A.
MAP No. 13 – Ordering Paragraph	PG&E	Requires IOUs to meet and confer with CPSD and submit a report to executive director regarding adequacy of fire related data.	XIV.B.
MAP No. 14 – Fire Maps	Mussey Grade and CPSD	Proposes an ordering paragraph establishing a working group for the purpose of developing and reviewing a statewide, utility-specific fire threat map.	XV.A.
MAP No. 14 – Fire Maps	CIP Coalition	Adds provision to proposed CIP inspection PRC (CIP 1) which provides for the use of FRAP maps for Southern California and Reax (expert) maps for Central and Northern California to demarcate specified fire areas subject to inspection.	XV.B.
MAP No. 14 – Fire Maps	CIP Coalition	Adds provision to proposed CIP inspection PRC (CIP 2) which provides for the use of FRAP maps for Southern California and Reax (expert) maps for central and Northern California to demarcate specified fire areas subject to inspection.	XV.C.
MAP No. 15 – Cost Recovery	TURN and DRA	Proposes ordering paragraph allowing recovery of reasonable costs incurred to comply with measures adopted in Phase I and Phase II of the instant rulemaking. (General Rate Case process)	XVI.A.

<b>Map</b>	<b>Proponent</b>	<b>Description</b>	<b>Appendix B Reference</b>
MAP No. 15 – Cost Recovery	Joint Electric Utilities, Pacific Corp., Sierra Pacific and Small LECs	Proposes ordering paragraph allowing recovery of reasonable costs incurred to comply with measures adopted in Phase I And Phase II of the instant rulemaking. (Advice Letter process)	XVI.B.

**V. IMPLEMENTATION**

All parties believe that the Commission should afford a reasonable period for implementation of any rules adopted in this Phase 2. Individual parties will discuss the implementation issue in more detail in briefs to be submitted in September 2010.

\_\_\_\_\_  
 /s/  
 Suzanne Toller  
 DAVIS WRIGHT TREMAINE LLP  
 505 Montgomery Street, Suite 800  
 San Francisco, CA 94111  
 Telephone: (415) 276-6536  
 Facsimile: (415) 276-6599  
 E-mail: [suzannetoller@dwt.com](mailto:suzannetoller@dwt.com)

Attorneys for Sunesys, LLC

August 13, 2010

**CERTIFICATE OF SERVICE**

I, Judy Pau, certify:

I am employed in the City and County of San Francisco, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is 505 Montgomery Street, Suite 800, San Francisco, CA 94111.

On August 13, 2010, I caused the following to be served:

**PHASE 2 JOINT PARTIES' WORKSHOP REPORT  
FOR WORKSHOPS HELD JANUARY – JUNE 2010**

via electronic mail to all parties on the service list R.08-11-005 who have provided the Commission with an electronic mail address and by First class mail on the parties listed as “Parties” and “State Service” on the attached service list who have not provided an electronic mail address.

/s/

\_\_\_\_\_  
Judy Pau

**VIA EMAIL AND US MAIL**

Commissioner Timothy A. Simon  
Administrative Law Judge Timothy Kenny

**VIA-EMAIL**

nbingle@osmose.com; myates@wecc.biz; chilen@nvenegy.com; skuhn@counsel.lacounty.gov;  
Oscar.Alvarez@ladwp.com; Shanise.Black@ladwp.com; lionmeyer@gmail.com;  
jesus.g.roman@verizon.com; robert.f.lemoine@sce.com; dj0conklin@earthlink.net;  
KMelville@SempraUtilities.com; michael.bagley1@verizonwireless.com;  
jon.dohm@crowncastle.com; facilitiesmanagement@cox.net; cwl@cpuc.ca.gov;  
kjl@cpuc.ca.gov; nsuetake@turn.org; bfinkelstein@turn.org; Kristin.L.Jacobson@sprint.com;  
lhj2@pge.com; nelsonya.causby@att.com; pacasciato@gmail.com;  
jarmstrong@goodinmacbride.com; mgo@goodinmacbride.com; smalllecs@cwclaw.com;  
deyoung@caltel.org; O'Neill, Edward; Whang, Jane; Gray, Jeffrey; Toller, Suzanne;  
larry.abernathy@davey.com; john\_gutierrez@cable.comcast.com; anitaffrice@earthlink.net;

Jerome@calcable.org; lmb@wblaw.net; bats3@cruzio.com; bmcc@mccarthyllaw.com; rdelsman@nextgnetworks.net; cjhashimoto@tid.org; steve@cnuutility.com; jsanders@caiso.com; lkm4@ibew1245.com; Charlie.Born@frontiercorp.com; ernylee.chamlee@fire.ca.gov; mclaughlin@braunlegal.com; wynne@braunlegal.com; jjg@eslawfirm.com; kmills@cfbf.com; scohn@smud.org; jsadler@osmose.com; tciardella@nvenergy.com; mrw@mrwassoc.com; bob.ritter@crowncastle.com; Nick.limberopoulos@crowncastle.com; mike.roden@att.com; Matt.Pawlowski@NextEraEnergy.com; Kevin.Saville@frontiercorp.com; Marjorie.Herlth@Qwest.com; jordan.white@pacificorp.com; jcole@osmose.com; lsheehan@ceo.lacounty.gov; daryl.buckley@ladwp.com; stanton.snyder@ladwp.com; MThorp@SempraUtilities.com; jtodd@fire.lacounty.gov; craig.hunter@wilsonelser.com; jacque.lopez@verizon.com; lorraine.kocen@verizon.com; steve.ford@sce.com; case.admin@sce.com; james.lehrer@sce.com; NQuan@gswater.com; sdunn@dpw.lacounty.gov; scaine@cainelaw.com; ddowney@nctimes.com; jwmitchell@mbartek.com; ATrial@SempraUtilities.com; esther.northrup@cox.com; LEarl@SempraUtilities.com; LURick@SempraUtilities.com; JPacheco@SempraUtilities.com; schristianson@tosdalsmith.com; liddell@energyattorney.com; Blain@tbmlawyers.com; DDohren@SempraUtilities.com; GWalters@SempraUtilities.com; RGiles@SempraUtilities.com; geoffspreter@amslawoffice.com; bcarnahan@scppa.org; mswlegal@aol.com; lindab@stcg.net; bwilde@creatint.com; elaine.duncan@verizon.com; william.sanders@sfgov.org; jhendry@sfgwater.org; marcel@turn.org; mmitchell@aspenerg.com; rcosta@turn.org; steve.bowen@bowenlawgroup.com; bhc4@pge.com; ELK3@pge.com; fassil.t.fenikile@att.com; gwen.johnson@att.com; keith.krom@att.com; ldri@pge.com; margaret.dillon@att.com; michelle.choo@att.com; peter.hayes@att.com; rachel.birkey@ogc.usda.gov; CPUCcases@pge.com; rdj@att.com; MSL7@pge.com; thomas.selhorst@att.com; info@tobiaslo.com; gblack@cwclaw.com; mschreiber@cwclaw.com; Davidson, Josh; Carbone, Maria; irene@igc.org; hilary@newsdata.com; regrelcpucases@pge.com; robin.harrington@fire.ca.gov; amy.bartell@cityofpaloalto.org; Grant.Kolling@cityofpaloalto.org; lex@consumercal.org; douglas.garrett@cox.com; ll@calcable.org; ferpello@newton.berkeley.edu; rw8914@att.com; mnelson@mccarthyllaw.com; sberlin@mccarthyllaw.com; lmartin@pacwest.com; tomk@mid.org; joyw@mid.org; bll@tid.org; gayatri@jbsenergy.com; scott.tomashefsky@ncpa.com; blaising@braunlegal.com; abb@eslawfirm.com; cbk@eslawfirm.com; lmh@eslawfirm.com; mcf@calcom.ws; dbrown3@smud.org; cathie.allen@pacificorp.com; heide.caswell@pacificorp.com; Shannon.McWhinney@PacifiCorp.com; cindy.manheim@att.com; Adam.Sherr@Qwest.com; MCS@cpuc.ca.gov; lee@cpuc.ca.gov; mdr@cpuc.ca.gov; rst@cpuc.ca.gov; rgf@cpuc.ca.gov; bfs@cpuc.ca.gov; bds@cpuc.ca.gov; cg2@cpuc.ca.gov; dkl@cpuc.ca.gov; edm@cpuc.ca.gov; eyc@cpuc.ca.gov; hym@cpuc.ca.gov; jmh@cpuc.ca.gov; mg1@cpuc.ca.gov; ndw@cpuc.ca.gov; psp@cpuc.ca.gov; pm2@cpuc.ca.gov; rae@cpuc.ca.gov; rim@cpuc.ca.gov; rsm@cpuc.ca.gov; tim@cpuc.ca.gov; sbakk@parks.ca.gov