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

Order Instituting Investigation and Order to
Show Cause on the Commission's Own
Motion into the Operations and Practices of
Pacific Gas and Electric Company with
Respect to Locate and Mark Practices and
Related Matters.

**I.18-12-007
(Issued December 14, 2018)**

**PACIFIC GAS AND ELECTRIC COMPANY'S
RESPONSE TO SAFETY AND ENFORCEMENT DIVISION'S
MOTION TO INCLUDE ELECTRIC DISTRIBUTION
IN THE SCOPE OF PROCEEDING**

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April 2, 2019

Attorneys for
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Pursuant to Rule 11.1 of the Commission's Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) submits this response to the Safety and Enforcement Division's (SED's) Motion to Include Electric Distribution in the Scope of Proceeding, filed on March 22, 2019.

As PG&E indicated at the Law and Motion hearing on February 5, 2019, PG&E has no objection to including the locating and marking of its underground electric distribution facilities with the issues identified in the Commission's Order Instituting Investigation and Order to Show Cause (OII) regarding PG&E's locating and marking of its gas facilities. As the parties discussed at the February 5 hearing, while the locating and marking of PG&E's *electric transmission* facilities is separately handled by a group within Electric Operations, the locating and marking of PG&E's underground *electric distribution* facilities is currently handled by the same Gas Operations group that has primary responsibility for locating and marking PG&E's gas

facilities. PG&E agrees “that a reasonable scope of this proceeding would be looking at the gas operations unit and their work on gas facilities and electric distribution facilities.”¹

PG&E also has no objection to including the locating and marking of its underground electric distribution facilities by Electric Operations personnel in the OII. As an exception to the current locate and mark structure described at the February 5 hearing, PG&E has determined that in certain circumstances during a portion of the 2012-2017 OII time period Electric Operations employees marked electric distribution facilities in the limited “electric only” portions of PG&E’s territory where PG&E does not provide gas service and there was, during the earlier time in question, no Gas Operations Locate and Mark (L&M) presence. Gas Operations currently handles locating and marking of those “electric only” electric distribution facilities as described at the February 5 hearing.² Because of this exception, PG&E recommends that if electric distribution facilities are included in the scope of the OII, all of those facilities should be included, whether located and marked by Gas Operations or Electric Operations personnel.

SED’s motion also proposes to add, in addition to the nine questions that the Commission included as in-scope in the original OII,³ eleven questions relating to PG&E’s use of Qualified Electrical Workers (QEWs) in its L&M processes. PG&E believes that its use of QEWs is already encompassed within the scope of this proceeding, particularly to the extent that late tickets were the result of difficulty in obtaining the timely services of a QEW. PG&E notes that

¹ Feb. 5 Law & Mot. Hrg. Trans., page 14, lines 2-6.

² Although not related to underground electric distribution facilities, PG&E also has identified that during a portion of the 2012-2017 OII time period a separate group within Gas Operations previously handled locating and marking of certain large “gas backbone” transmission pipelines. These facilities are currently located and marked by the Gas Operations L&M team along with other gas distribution and transmission facilities as described at the February 5 hearing.

³ OII at 13-14.

several of the proposed questions seek to address other aspects of its L&M processes but is prepared to address them if they are determined to be in scope.

Respectfully submitted,

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