



**FILED**

10/08/19  
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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Application of Pacific Gas and Electric  
Company for Authority, Among Other Things, to  
Increase Rates and Charges for Electric and Gas  
Service Effective on January 1, 2020. (U39M)

A.18-12-009  
(Filed December 13, 2018)

**THE CITY AND COUNTY OF SAN FRANCISCO'S MOTION TO ENTER INTO  
EVIDENCE THE DECLARATION OF DOUGLAS LIPPS IN RESPONSE TO  
PG&E'S TESTIMONY RELATED TO ITS CROSSBORE  
WORK IN SAN FRANCISCO**

Pursuant to Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission, the City and County of San Francisco ("San Francisco") moves to have the Declaration of Douglas Lipps admitted into evidence in this case. The admission of this declaration would serve the public interest and assist the Commission by clarifying the evidentiary record on a critical issue of public safety.

The declaration of Douglas Lipps addresses statements by PG&E witnesses Stephen Kerans and Andrew Abranches in their September 25, 2019, oral testimony. These statements address in part PG&E's progress in completing crossbore inspection and remediation work in San Francisco. As shown in the declaration of Mr. Lipps, San Francisco has worked closely with PG&E for more than five years to facilitate prompt inspection and remediation of crossbore conditions that threaten public safety. San Francisco has been concerned for some time that PG&E was not addressing crossbore conditions expeditiously. San Francisco is further concerned because PG&E's testimony is not consistent with information PG&E has provided to San Francisco.

Although San Francisco is a party to this proceeding, it has not actively participated in the evidentiary hearings. San Francisco became aware that PG&E had made representations about its

crossbore work in the City only a few days before the September 25 hearing. Once San Francisco reviewed the transcript, it promptly evaluated that testimony and prepared this declaration. Admitting this declaration would not unfairly prejudice any party. The declaration is short and limited to one issue. The evidentiary record is still open, and hearings are still underway, so there is time for any additional procedures that the Administrative Law Judges deem appropriate before admitting this evidence.

For these reasons, San Francisco respectfully requests that the Commission receive the attached declaration of Douglas Lipps into evidence.

Dated: October 8, 2019

Respectfully submitted,

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