



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

**FILED**  
11/01/19  
04:59 PM

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

(U 39 M)

Application 18-12-009  
(Filed December 13, 2018)

**FILING OF REVISED DECLARATION OF DOUGLAS LIPPS BY THE CITY  
AND COUNTY OF SAN FRANCISCO**

On October 8, 2019, the City and County of San Francisco (“San Francisco”) filed a motion to enter into evidence in this proceeding the Declaration of Douglas Lipps in Response to Pacific Gas and Electric Company’s (“PG&E”) Testimony Related to its Crossbore Work in San Francisco (“Lipps Decl.”). On October 16, 2019, PG&E and The Utility Reform Network (“TURN”) filed responses to the San Francisco’s motion. PG&E asked the California Public Utilities Commission (“Commission”) to deny San Francisco’s motion. One of the grounds for PG&E’s opposition to the motion was that San Francisco was attempting to insert issues into this proceeding that are the subject of ongoing negotiations between San Francisco and PG&E. TURN asked the Commission to grant San Francisco’s motion.

On October 17, 2019, Administrative Law Judges Rafael L. Lirag and Elaine Lau heard argument from the parties on San Francisco’s motion. Judges Lirag and Lau granted San Francisco’s motion on a number of conditions. One of those conditions was to strike from the Lipps Decl. “any testimony in relation to the agreement between the City of San Francisco and PG&E, any proposed agreements and any issues related to the negotiations . . . [regarding] proposed or established agreements between PG&E and the City of San Francisco.”

Judges Lirag and Lau ordered San Francisco to file a redacted version of the Lipps Decl. by November 1, 2019. They allowed PG&E to file its own version of the redacted Lipps Decl. if the parties could not agree on what language needs to be stricken.

San Francisco and PG&E have come to an agreement as to the language that needs to be stricken to comply with the order while retaining the context of the Lipps Decl. San Francisco and PG&E have agreed that the version of the Lipps Decl. attached hereto may be admitted into evidence in this proceeding. PG&E, however, has not agreed that any of the statements contained in the Lipps Decl. are true.

Dated: November 1, 2019

Respectfully submitted,

DENNIS J. HERRERA  
City Attorney  
THERESA L. MUELLER  
Chief Energy and Telecommunications Deputy  
WILLIAM K. SANDERS  
Deputy City Attorney

By: /s/William K. Sanders  
WILLIAM K. SANDERS

Attorneys for  
CITY AND COUNTY OF SAN FRANCISCO  
City Hall Room 234  
1 Dr. Carlton B. Goodlett Place  
San Francisco, California 94102-4682  
Telephone: (415) 554-6771  
E-Mail: [william.sanders@sfcityatty.org](mailto:william.sanders@sfcityatty.org)