

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Adopt Rules and Procedures Governing Commission-Regulated Natural Gas Pipelines and Facilities to Reduce Natural Gas Leakage Consistent With Senate Bill 1371.

FILED
PUBLIC UTILITIES COMMISSION
JANUARY 15, 2015
SAN FRANCISCO, CA
RULEMAKING 15-01-008

ORDER INSTITUTING RULEMAKING TO ADOPT RULES AND PROCEDURES GOVERNING COMMISSION-REGULATED NATURAL GAS PIPELINES AND FACILITIES TO REDUCE NATURAL GAS LEAKAGE CONSISTENT WITH SENATE BILL 1371

Summary

This rulemaking is being commenced to carry out the intent of Senate Bill (SB) 1371 (Statutes 2014, Chapter 525). SB 1371 requires the adoption of rules and procedures to minimize natural gas leakage from Commission-regulated natural gas pipeline facilities consistent with Public Utilities Code Section 961(d), § 192.703(c) of Subpart M of Title 49 of the Code of Federal Regulation, the Commission's General Order 112-E, and the state's goal of reducing greenhouse gas emissions. SB 1371 also requires the gas corporations to file a report about their natural gas leaks, and their leak management practices. This rulemaking requires all of the respondents to file such a report by May 15, 2015.

As discussed below, we make the following Commission-regulated natural gas pipeline and facility operators respondents to this rulemaking: Alpine Natural Gas Operating Company No. 1 LLC; Pacific Gas and Electric Company; San Diego Gas & Electric Company; Southern California Edison Company;

Southern California Gas Company; Southwest Gas Corporation; West Coast Gas Company; Central Valley Gas Storage, LLC; Gill Ranch Storage, LLC; Lodi Gas Storage, LLC; and Wild Goose Storage Inc.

1. Background and Procedural History

Senate Bill (SB) 1371 (Statutes 2014, Chapter 525), which became effective on January 1, 2015, added Article 3 to the Public Utilities Code.¹ Article 3, which is entitled Methane Leakage Abatement, consists of §§ 975, 977, and 978.

As described in the Legislative Counsel’s Digest to SB 1371, this legislation requires the following:

This bill would require the commission, giving priority to safety, reliability, and affordability of service, to adopt rules and procedures governing the operation, maintenance, repair, and replacement of those commission-regulated gas pipeline facilities that are intrastate transmission and distribution lines to minimize leaks as a hazard to be mitigated pursuant to the Natural Gas Pipeline Safety Act of 2011, consistent with specified federal regulations, and a specified order of the commission, and to reduce emissions of natural gas from those facilities to the maximum extent feasible in order to advance the state’s goals in reducing emissions of greenhouse gases pursuant to the California Global Warming Solutions Act of 2006.

In Section 1 of SB 1371, the Legislature declares in part that “Reducing methane emissions by promptly and effectively repairing or replacing the pipes and associated infrastructure that is responsible for these leaks advances both policy goals of natural gas pipeline safety and integrity and reducing emissions of greenhouse gases.”

¹ Unless stated otherwise, all code section references are to the Public Utilities Code.

Subdivision (d) of § 975 directs this Commission, in consultation with the State Air Resources Board, to “commence a proceeding to adopt rules and procedures for those commission-regulated pipeline facilities that are intrastate transmission and distribution lines, as respectively described in paragraphs (1) and (2) of subdivision (a) of Section 950, to achieve the goals of subdivision (b)” of § 975. Subdivision (b) of § 975 states as follows:

With priority given to safety, reliability, and affordability of service, the commission shall adopt rules and procedures governing the operation, maintenance, repair, and replacement of those commission-regulated gas pipeline facilities that are intrastate transmission and distribution lines, as described in paragraphs (1) and (2) of subdivision (a) of § 950, to achieve both of the following:

- (1) Minimize leaks as a hazard to be mitigated pursuant to paragraph (1) of subdivision (d) of § 961, consistent with the requirements of Section 192.703(c) of Subpart M of Title 49 of the Code of Federal Regulations, the commission’s General Order 112-E, and their successors.
- (2) While giving due consideration to the cost considerations of § 977, reduce emissions of natural gas from those commission-regulated gas pipeline facilities that are intrastate transmission and distribution lines to the maximum extent feasible in order to advance the state’s goals in reducing emissions of greenhouse gases pursuant to the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code).

SB 1371 also mandates that the Commission require the gas corporations to file a report with certain information. Subdivision (c) of § 975 provides:

- (c) As soon as practicable, the commission shall require gas corporations to file a report that includes, but is not limited to, all of the following:

- (a) A summary of utility leak management practices.
- (b) A list of new methane leaks in 2013 by grade.
- (c) A list of open leaks that are being monitored or are scheduled to be repaired.
- (d) A best estimate of gas loss due to leaks.

To carry out SB 1371, and after consulting with the State Air Resources Board, we initiate this rulemaking to consider the adoption of rules and procedures to fulfill the objectives of §§ 975 and 977, and to require the gas corporations to file the required report.

2. Proposed Rulemaking

In this rulemaking, we intend to adopt rules and procedures to minimize natural gas leaks from commission-regulated intrastate transmission and distribution gas pipelines and facilities, as referred to in § 975(a) and as defined in § 950. These rules and procedures are to govern the operation, maintenance, repair, and replacement of these pipelines to achieve both of the following objectives: (1) to minimize the leaks as a hazard to be mitigated pursuant to § 961(d); and (2) while giving due deference to the cost considerations of § 977, to reduce the emissions of natural gas from these pipelines to the maximum extent feasible in order to advance the state's goals of reducing greenhouse gas emissions.

The rules and procedures to be adopted must meet the following six principles as set forth in § 975(e):

- (1) Provide for the maximum technologically feasible and cost-effective avoidance, reduction, and repair of leaks and leaking components in those commission-regulated gas pipeline facilities that are intrastate transmission and distribution lines within a reasonable time after discovery, consistent with the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with

Section 38500) of the Health and Safety Code) to achieve the goals in subdivision (b).

- (2) Provide for the repair of leaks as soon as reasonably possible after discovery, consistent with established safety requirements and the goals of reducing air pollution and the climate change impacts of methane emissions.
- (3) Evaluate the operations, maintenance, and repair practices of those commission-regulated gas pipeline facilities that are intrastate transmission and distribution lines to determine whether existing practices are effective at reducing methane leaks and promoting public safety, consistent with Section 961, achieve the goals of subdivision (b), and whether alternative practices may be more effective at achieving the goals of subdivision (b).
- (4) Establish and require the use of best practices for leak surveys, patrols, leak survey technology, leak prevention, and leak reduction. The commission shall consider in the development of best practices the quality of materials and equipment. Collected leak data shall remain the property of the utility and shall be available to the commission and parties in commission proceedings as determined by the commission or specified by statute.
- (5) Establish protocols and procedures for the development and use of metrics to quantify the volume of emissions from leaking gas pipeline facilities, and for evaluating and tracking leaks geographically and over time, that may be incorporated into the plans required by § 961, or into other state emissions tracking systems, or both, including the regulations for the reporting of greenhouse gases of the State Air Resources Board. The quantification of emissions shall provide operators, the commission, and the public with accurate information about the number and severity of leaks and about the quantity of natural gas that is emitted into the atmosphere over time.

- (6) To the extent feasible, require the owner of each commission-regulated gas pipeline facility that is an intrastate transmission or distribution line to calculate and report to the commission and the State Air Resources Board a baseline systemwide leak rate, along with any data and computer models used in making that calculation, and to annually report on measures that will be taken in the following year to reduce the systemwide leak rate to achieve the goals of subdivision (b).

Following the adoption of the rules and procedures, subdivision (f) of § 975 provides that these rules and procedures are to be incorporated into the safety plans required by § 961 and the applicable General Orders of the Commission.

SB 1371 also added § 977. That code section states as follows:

In order to achieve transparency and accountability for rate revenues and best value for ratepayers, and consistent with the commission's existing ratemaking procedures and authority to establish just and reasonable rates, the commission shall consider all of the following:

- (a) Providing for an adequate workforce to achieve the objectives of reducing hazards and emissions from leaks, including leak avoidance, reduction, and repair.
- (b) Providing revenues for all activities identified and required pursuant to § 975, including any adjustment of allowance for lost and unaccounted for gas related to actual leakage volumes.
- (c) Providing guidance for treatment of expenditures as being either an item of expense or a capital investment.
- (d) The impact on affordability of gas service for vulnerable customers as a result of the incremental costs of compliance with the adopted rules and procedures.

Based on our reading of § 977, and its references to "rate revenues," the establishment of "just and reasonable rates," and the "impact of affordability of gas service," it appears that the considerations set forth in that code section

should be addressed in the context of the utility's General Rate Case application or in a similar funding-related application. As described below, parties should be provided the opportunity to comment on where the considerations set forth in § 977 should be addressed.

In addition to the adoption of rules and procedures for commission-regulated pipeline facilities that are intrastate transmission and distribution lines, this rulemaking requires each of the gas corporations to file the report specified in § 975(c), and for the Commission to develop rules and procedures for the filing of annual reports as described in § 975(e)(6).

SB 1371 applies to a "commission-regulated gas pipeline facility." (§ 975(a).) That term, as used in § 975(a), has the same meaning as defined in § 950. § 950 states that a "Commission-regulated gas pipeline facility means an intrastate gas pipeline facility as defined in § 60101 of Title 49 of the United States Code...." § 60101 of Title 49 of the United States Code defines an "intrastate gas pipeline facility" to mean "a gas pipeline facility and transportation of gas within a State not subject to the jurisdiction of the [Federal Energy Regulatory] Commission under the Natural Gas Act (15 U.S.C. 717 et seq.)."² When all of those definitions are applied, the following natural gas utility companies subject to our jurisdiction are made respondents to this rulemaking: Alpine Natural Gas Operating Company No. 1 LLC, Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E),

² A "gas pipeline facility" is defined in § 60101 of Title 49 of the United States Code to include "a pipeline, a right of way, a facility, a building, or equipment used in transporting or treating gas during its transportation."

Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas), Southwest Gas Corporation, and West Coast Gas Company.

In addition, since a “gas pipeline facility” is defined to include “a pipeline, a right of way, a facility, a building, or equipment used in transporting gas or treating gas during its transportation,” and because the term “transporting gas” means “the gathering, transmission, or distribution of gas by pipeline, or the storage of gas,” the gas storage companies located within California are also made respondents to this rulemaking. (*See* 49 United States Code § 60101(a).) Accordingly, the following gas storage companies shall be respondents to this rulemaking as well: Central Valley Gas Storage, LLC; Gill Ranch Storage, LLC; Lodi Gas Storage, LLC; and Wild Goose Storage Inc.

The rules and procedures that will be under consideration for adoption in this proceeding shall apply to all of the above-named respondents.

This rulemaking will consist of two parts.

First, pursuant to § 975(c), we will require each of the respondents to file a report that includes the information described in § 975(c).³ This will allow us to gather additional information about natural gas leaks from such facilities, and how those leaks are currently being managed and mitigated.⁴ This in turn will

³ § 975(c) provides that “gas corporations” are required to file the report. Since the term gas corporation is defined in § 222 to mean “every corporation or person owning, controlling, operating, or managing any gas plant for compensation within this state,” and because “gas plant” is defined in § 221 to include “all real estate, fixtures, and personal property, owned, controlled, operated, or managed in connection with or to facilitate the production, generation, transmission, delivery, underground storage, or furnishing of gas ... for light, heat, or power,” all of the above-named respondents are required to file this report.

⁴ We note that in the context of SB 1371, that the term “leaks” could include the intentional release of natural gas from either pipelines or facilities, such as the venting of natural gas that occurs during pipeline hydrotesting. Such releases contribute to emissions of greenhouse gases.

Footnote continued on next page

assist the Commission in the development and adoption of appropriate rules and procedures to minimize natural gas leaks and to reduce natural gas emissions from such leaks to advance the goal of reducing greenhouse gases.

The report to be filed by each of the respondents, at a minimum, shall include the following information:

1. A description and general location of each gas corporation's gas pipeline facilities, including its intrastate transmission and distribution lines.
2. A summary of its current leak management practices.
3. A list of new methane leaks in 2013 by grade, and in 2014 by grade.
4. A list of open leaks that are being monitored or are scheduled to be repaired. If the open leak is only being monitored, provide the reason why the leak has not been scheduled to be repaired.
5. The total number of leaks detected and repaired in 2013 and 2014, and the time it took to repair those leaks once they were discovered.
6. A best estimate of gas loss due to leaks (list estimated gas loss by month for 2013 and 2014), and an explanation of how the estimates were derived.

Each of the respondent gas corporations shall tender the report for filing in this proceeding with the Docket Office by May 15, 2015, and shall serve a Notice of Availability of the report on the official service list for this proceeding.

(See Rules 1.9(d) and 1.13 of the Rules of Practice and Procedure.) Prior to the filing of these reports, we anticipate that the Commission's Safety and Enforcement Division staff will host a workshop to discuss the format, and to

These types of releases should be considered as we adopt rules and procedures in response to SB 1371.

ensure consistency with the data reported to the State Air Resources Board and to the United States' Department of Transportation Pipeline Hazardous Materials and Safety Administration.

The second part of this rulemaking is to solicit input from the utilities and other interested persons on what rules and procedures should be adopted by this Commission. As set forth in § 975(e), the rules and procedures to be adopted should, among other things, be technologically feasible, cost effective, and use best practices. In addition, § 975(e)(5) anticipates that protocols and procedures will use metrics "to quantify the volume of emissions from leaking gas pipeline facilities, and for evaluating and tracking leaks geographically and over time, that may be incorporated into the plans required by § 961, or into other state emissions tracking systems, or both, including the regulations for the reporting of greenhouse gases of the State Air Resources Board."⁵

To gather this type of information, and to allow interested parties to provide input on these types of issues, the assigned Commissioner, in consultation with the assigned Administrative Law Judge (ALJ), before or after the prehearing conference, are to determine what processes should be followed. The reports, which are to be filed by May 15, 2015, may provide useful information as to what kind of information gathering needs to be undertaken by the Commission before considering what rules and procedures should be adopted. In addition, the processes could include the use of workshops to

⁵ We note that § 975(e)(6) contemplates that a reporting system be instituted to establish the baseline systemwide leak rate for each gas pipeline facility, to periodically update the leak rate calculation, and to annually report on measures that will be taken in the following year to reduce the systemwide leak rate. The development of such a reporting system needs to be considered as part of the rules and procedures to be adopted in this proceeding.

discuss the leakage issues, and the type of activities and metrics that are being used or should be developed to detect, monitor, and repair such leaks. The workshops could also discuss potential ratemaking treatments to facilitate minimizing these leaks. Such workshops should be led by the Commission's Safety and Enforcement Division, in conjunction with the State Air Resources Board. This could then be followed by a workshop report, followed by proposals of the respondents and interested parties on the types of rules and procedures the Commission should adopt. If necessary, evidentiary hearings would then be held. The assigned Commissioner and ALJ will decide which processes should be utilized to gather ideas and proposals about the rules and procedures to be adopted by the Commission.

Pursuant to § 975(g), and consistent with § 961(e), the Commission is to facilitate the "robust ongoing participation of the workforce of gas corporations and those state and federal entities that have regulatory roles of relevance in all aspects of the proceeding to ensure that the rules and procedures it adopts are not inconsistent with the regulations and procedures adopted by those agencies." To encourage this kind of participation, this Rulemaking shall be served on the service lists in various proceedings in which the labor workforce of the utilities have participated in safety-related pipeline proceedings, in proceedings in which local, state, and federal interests have been raised, and in the climate change proceeding in which various agencies have been involved. Thus, this rulemaking shall be served on the following service lists, as well as on each respondent:

- Rulemaking (R.) 11-02-019 (Rulemaking to Adopt New Safety and Reliability Regulations)
- R.11-03-012 (Rulemaking to Address Cost and Revenue Issues Associated with Greenhouse Gas Emissions)

- Application (A.) 10-12-005 and A.10-12-006 (SDG&E and SoCalGas 2012 General Rate Case)
- A.12-11-009 and Investigation (I.) 13-03-007 (PG&E 2014 General Rate Case)
- A.13-11-003 (SCE 2015 General Rate Case)
- A.13-12-012 and I.14-06-016 (PG&E 2015 Gas Transmission and Storage)

As mentioned earlier, it appears that the issues identified in § 977 should be addressed in the context of each gas utility's rate case proceeding. However, interested parties should be given the opportunity in this proceeding to comment on whether any of the § 977 issues need to be addressed as part of this proceeding.

2.1. Preliminary Scoping Memo

As required by Rule 7.1(d), today's order initiating the rulemaking includes a preliminary scoping memo as set forth below. The issues to be considered in this proceeding include, but are not limited to:

1. In consultation with the State Air Resources Board, considering and adopting rules and procedures governing the operation, maintenance, repair, and replacement of commission-regulated gas pipeline facilities that are intrastate transmission and distribution lines to minimize leaks as a hazard to be mitigated consistent with § 961, and reducing emissions of natural gas from such facilities to advance the state's goals of minimizing greenhouse gases.
2. The adoption of such rules and procedures are to be consistent with the requirements set forth in § 975(e).
3. Addressing the requirement in § 975(c) that the gas corporations file a report.
4. Addressing the requirement in § 975(f) that each gas corporation incorporate the § 975 adopted rules and

procedures into its safety plans, and that the adopted rules and procedures be incorporated into the applicable General Orders.

5. Ensuring that the § 975 adopted rules and procedures are not inconsistent with the regulations and procedures adopted by the state and federal entities that are relevant to the issues raised by SB 1371.
6. Determining whether any of the considerations in § 977 need to be addressed in the rules and procedures to be adopted pursuant to § 975 in this proceeding, or whether the § 977 considerations should be addressed in the context of the utility's rate case proceeding.

2.2. Categorization

Pursuant to Rule 7.1(d), we preliminarily determine the category of this rulemaking proceeding to be quasi-legislative as that term is defined in Rule 1.3(d). Consistent with this categorization, we intend to establish rules and procedures for those commission-regulated pipeline facilities that are intrastate transmission and distribution lines to minimize natural gas leaks, and to reduce emissions of natural gas to the maximum extent feasible in order to advance the state's goals of reducing emissions of greenhouse gases.

At this time we do not anticipate holding evidentiary hearings. However, parties will have the opportunity to comment on the necessity for hearings, and we may re-evaluate the need for hearings after parties have submitted comments about the proposed rules and procedures the Commission should adopt.

2.3. Schedule

As discussed above, the respondents shall be required to file the report required by § 975(c) by May 15, 2015.

With regard to the schedule for adopting the § 975 rules and procedures, we anticipate that a prehearing conference will be scheduled by the assigned

ALJ. The ALJ, in consultation with the assigned Commissioner and the State Air Resources Board, will then determine, prior to, or at the prehearing conference, the processes to be followed for gathering information about current leakage practices, and what rules and procedures should be adopted. As discussed above, these processes could involve the use of the May 15, 2015 reports, workshops and workshop reports, the filing or serving of proposals and comments by interested parties, or the use of other processes. Accordingly, the assigned Commissioner or ALJ will issue a ruling that describes the processes that will be used, and the schedule to be followed.

Following the prehearing conference, the scoping memo and ruling will then finalize the category, and scope of this proceeding. In accordance with Rule 7.6, any party may then file and serve an appeal to the Commission regarding the assigned Commissioner's ruling on category.

Consistent with § 1701.5 and Rule 6.2, we anticipate that this proceeding will be resolved within 18 months from the issuance of the scoping memo and ruling.

2.4. Service of this Order and Service List for Proceeding

This rulemaking shall be served on all of the above-named respondents. In addition, this rulemaking shall be served on the service lists described earlier.

Since this rulemaking has just been initiated, a new service list will be created for this proceeding. The above-named respondents shall be included on the service list. Within 20 days of the issuance of this rulemaking, the respondents shall mail or e-mail the Commission's Process Office with a notice of their representative's contact information for the service list. The notice shall

specify that it is a respondent to this rulemaking, and contain the name, address, telephone number, and e-mail address of the respondent's representative.

Any other interested person who desires to be placed on this service list as a party shall file a motion to become a party, and provide the information set forth in Rule 1.4. The assigned ALJ will then rule on whether the person should be allowed to become a party. Alternatively, the person may make an oral motion at the prehearing conference to become a party.

Those persons who do not want to be parties, and only want notice of the hearings, rulings, proposed decisions, and decisions, may send a written or e-mail request to the Process Office asking that they be added to the service list for information only. Alternatively, one can sign up for e-mail notifications for the documents that are filed in this proceeding by using the Commission's subscription service at: <http://subscribecpuc.cpuc.ca.gov/>.

Those persons employed by the State of California who are interested in this proceeding may request to be added to the "state service" section of the service list by sending a written or e-mail request to the Process Office asking that they be added to the state service list. All of the names that appear on the state service list are to be served with all documents that parties may submit or file in connection with this proceeding.

The Process Office will then prepare and maintain the service list for this proceeding, and that service list will be posted on the Commission's web site at www.cpuc.ca.gov.

Any person interested in participating in this ruling who is unfamiliar with the Commission's procedures, should contact the Commission's Public Advisor Office in San Francisco at (415) 703-2074, or toll free at (866) 849-8390.

Every person on the official service list with an e-mail address shall be served with copies of any pleadings by e-mail. There is no need to serve paper copies of pleadings on a person who has an e-mail address. However, if a person is a party to this proceeding and has not provided an e-mail address, then that person must be served with a Notice of Availability of the pleading. Unless notified to the contrary, both an electronic and paper copy of each pleading must be served on the assigned Commissioner and assigned ALJ. (See Rule 1.10(e).)

2.5. Intervenor Compensation

Any party that expects to claim intervenor compensation for its participation in this rulemaking shall file its notice of intent to claim intervenor compensation no later than 30 days after the PHC. (See Rule 17.1.) Parties are encouraged to use the standardized form attached to the Intervenor Compensation Program Guide, which may be found at: <http://www.cpuc.ca.gov/PUC/IntervenorCompGuide/>. Questions about the intervenor compensation program should be directed to the Commission's Public Advisor.

2.6. Ex Parte Communications

This proceeding is subject to Article 8 of the Commission's Rules, which specifies the standards to be followed for communicating with a decision maker. Pursuant to Rule 8.3(a), *ex parte* communications are allowed without any restrictions or reporting requirements unless an appeal of the categorization pursuant to Rule 7.6 is successful.

3. Assignment of Rulemaking

Michael Picker is the assigned Commissioner. An ALJ will be assigned to this proceeding at a later date.

O R D E R

IT IS ORDERED that:

1. On the Commission's own motion, a rulemaking to implement Chapter 525 of the Statutes of 2014 is hereby initiated.
2. The following entities shall be respondents to this rulemaking: Alpine Natural Gas Operating Company No. 1 LLC; Pacific Gas and Electric Company; San Diego Gas & Electric Company; Southern California Edison Company; Southern California Gas Company; Southwest Gas Corporation; West Coast Gas Company; Central Valley Gas Storage, LLC; Gill Ranch Storage, LLC; Lodi Gas Storage, LLC; and Wild Goose Storage Inc.
3. The Commission's Process Office shall serve this Order Instituting Rulemaking on all of the Respondents as listed on their contact information to this proceeding.
4. Each of the above-named Respondents shall, within 20 days of the issuance of this Order Instituting Rulemaking, notify the Commission's Process Office of its representative's contact information (name, address, telephone number, and e-mail) for the service list.
5. The Commission's Process Office shall serve this Order Instituting Rulemaking on the following service lists: Rulemaking (R.) 11-02-019; R.11-03-012; Application (A.) 10-12-005 and A.10-12-006; A.12-11-009 and Investigation (I.) 13-03-007; A.13-11-003; and A.13-12-012 and I.14-06-016.
6. We direct all persons who wish to become a party in this proceeding to file a motion to become a party, or to make an oral motion at the prehearing conference, as described in this Order Instituting Rulemaking. Those persons who want to receive information about this proceeding but do not want to be parties, may send a request to the Process Office asking that they be added as

information only, or sign up for e-mail notifications, as described in this Order Instituting Rulemaking. Those persons employed by the State of California who are interested in this proceeding may send a request to the Process Office asking that they be added to the state service list.

7. Each of the above-named respondents shall file the report required by Public Utilities Code Section 975(c), and as described in this Order Instituting Rulemaking, with the Docket Office by May 15, 2015, and shall serve a Notice of Availability of the report on the service list for this proceeding.

8. Any person expecting to file an intervenor compensation claim for participation in this proceeding shall file a notice of intent to claim intervenor compensation no later than 30 days after the date of the prehearing conference.

9. Pursuant to Article 8 of the Commission's Rules of Practice and Procedure, *ex parte* communications in this proceeding are permitted without restriction or reporting requirements.

This order is effective today.

Dated January 15, 2015, at San Francisco, California.

MICHAEL PICKER
President
MICHEL PETER FLORIO
CATHERINE J.K. SANDOVAL
CARLA J. PETERMAN
LIANE M. RANDOLPH
Commissioners