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**Via Electronic Filing**

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**Subject: Comments of the Public Advocates Office on Draft Resolution SED-8 and Administrative Consent Order regarding the 2021 Dixie Fire.**

## **INTRODUCTION**

Pursuant to Rule 14.5 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) hereby submits these comments on *Draft Resolution SED-8 Approving Administrative Consent Order and Agreement of the Safety and Enforcement Division and Pacific Gas and Electric Company Regarding the 2021 Dixie Fire Pursuant to Resolution M-4846* (Draft Resolution SED-8).

In July 2021, the Dixie Fire ignited in PG&E's service territory after PG&E left an electric transmission line near the Cresta Dam energized, despite a PG&E troubleman's reported observation of blown fuses on the line almost six hours earlier on the day of the incident.<sup>1</sup> The resulting fire ultimately resulted in one fatality and the destruction of over 1,300 structures.<sup>2</sup> Nearly one million acres in California burned.

The California Department of Forestry and Fire Protection (Cal Fire) conducted an investigation of the Dixie Fire and found PG&E to be in violation of five distinct California statutes.<sup>3</sup> The Safety and Enforcement Division of the Commission (SED)

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<sup>1</sup> Draft Resolution SED-8, Attachment A, SED's investigation report into the Dixie Fire (SED report) at 1-2.

<sup>2</sup> Cal Fire Dixie Fire incident webpage, <https://www.fire.ca.gov/incidents/2021/7/13/dixie-fire/>

<sup>3</sup> Cal Fire investigation report into the Dixie Fire (Cal Fire report) at 1-4.

conducted a separate investigation and concluded that PG&E had violated requirements of General Order 95 and the California Public Utilities Code (PU Code).<sup>4</sup>

Pursuant to Resolution M-4846, SED negotiated a settlement with PG&E, memorialized in the proposed Administrative Consent Order (proposed ACO) that is attached to Draft Resolution SED-8 as Attachment B.<sup>5</sup> The Commission subsequently served Draft Resolution SED-8 on October 9, 2023, which would approve the proposed ACO and resolve all enforcement issues involving the Dixie Fire.<sup>6</sup>

The proposed ACO does not comply with the requirements listed in Resolution M-4846 and, therefore, is not an appropriate tool to resolve violations related to the Dixie Fire. Furthermore, the proposed ACO is flawed insofar as it does not require PG&E to investigate and remediate the contributing factors that led to the ignition of the Dixie Fire.

Cal Advocates urges the Commission to examine these issues and take appropriate steps to require PG&E to meet its fundamental obligation to provide safe and reliable service.<sup>7</sup> Adopting Draft Resolution SED-8 and the proposed ACO as written would contravene the law and would not mitigate the likelihood of a similar recurrence. Failure to take decisive action will leave an unacceptable risk of similar catastrophic failures in the future.

## I. COMMENTS

- A. Adopting the proposed ACO would constitute legal error because an Administrative Consent Order is an inappropriate tool to resolve violations related to the 2021 Dixie Fire.**
- 1. The proposed ACO does not meet the requirements of the Commission’s Enforcement Policy.**

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<sup>4</sup> SED report at 2. Note, Draft Resolution SED-8 and the proposed ACO use the phrases “possible violations” and “alleged violations,” but both the Cal Fire investigation report and the SED investigation report use the plain term “violations.”

<sup>5</sup> Administrative Consent Order and Agreement between SED and PG&E relating to the 2021 Dixie Fire (proposed ACO), included as Attachment B to Draft Resolution SED-8.

<sup>6</sup> Draft Resolution SED-8 at 1.

<sup>7</sup> PU Code 451: “Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities ... as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.”

Resolution M-4846 established the Commission’s Enforcement Policy,<sup>8</sup> which highlighted the Commission’s objective to “promote maximum compliance with Commission rules and requirements through the adoption and application of consistent enforcement practices.”<sup>9</sup> The Resolution included ACOs as one of several enforcement options available to the Commission. An ACO is intended to memorialize a settlement agreement between Commission staff and a utility to resolve violations.<sup>10</sup> As part of this settlement agreement, an ACO must specify seven elements, including the following:

- i. The law or Commission order, resolution, decision, or rule violated by the regulated entity;
- ii. The facts that form the basis for each violation;
- ...
- v. An agreement by the regulated entity to correct each violation;
- vi. A date by which the regulated entity must certify it corrected all violations.<sup>11</sup>

SED performed a thorough investigation into the Dixie Fire and identified seven violations of General Orders and the PU Code.<sup>12</sup> SED’s investigation report clearly identifies the facts that form the basis for each violation.<sup>13</sup> However, the proposed ACO does not rely on the evidence presented in the investigation report, and merely refers to the seven violations as “*alleged* violations.”<sup>14</sup>

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<sup>8</sup> California Public Utilities Commission Enforcement Policy (Enforcement Policy), included as an attachment to Resolution M-4846, November 5, 2020.

<sup>9</sup> Enforcement Policy at 1.

<sup>10</sup> Enforcement Policy at 10.

<sup>11</sup> Enforcement Policy at 10.

<sup>12</sup> SED report at 2.

<sup>13</sup> See, e.g., SED report at 45: “Had PG&E responded to the alarm in a reasonably prompt manner, considering the extreme fire danger, poor access, and history of previous wildfires, the Dixie Fire could have been prevented. PG&E missed two potential opportunities to respond in time to prevent the fire. First, PG&E had a 2.5-hour period in which to respond to the alarm and access the fuses before the bridge work obstructed access. Second, the bridge work finished at 1520 hours, but the Dixie Troubleman did not return to the bridge until 1630 hours. Assigning higher priority to trouble on the Bucks Creek 1101 circuit, based on the well-established high wildfire risk associated with the circuit, would have likely resulted in access to the fuses as soon as the road was passable, or other action (e.g., de-energizing the circuit) consistent with a higher priority response.”

<sup>14</sup> See, e.g., proposed ACO at 14, 16, A-1 (emphasis added).

As part of the settlement agreement, PG&E chooses not to contest three of the violations identified in SED's investigation report.<sup>15</sup> However, PG&E *does not* agree or admit to any violations and disputes that the remaining four violations occurred.<sup>16</sup> Egregiously, PG&E does not agree to correct these four contested violations (which include "all the alleged violations related to the cause of the Dixie Fire"), or to take any action to address SED's findings.<sup>17, 18</sup>

The language in Resolution M-4846 regarding violations is clear: an ACO must list the *violations* perpetrated by the regulated entity and must include the entity's agreement to correct each *violation*. The Enforcement Policy's framework for an ACO does not contemplate a disputed violation,<sup>19</sup> nor does it allow a regulated entity to dispute violations and refuse to mitigate them. Therefore, the proposed ACO fails to comply with the requirements or the objectives of the Enforcement Policy that the Commission adopted in Resolution M-4846.

## **2. An ACO is an inappropriate tool because SED and PG&E do not agree on essential facts.**

PG&E "specifically and expressly denies any fault, negligence, imprudence, or violation with respect to the Dixie Fire and, except as explicitly specified, any other matters that SED identified in its investigation into the Dixie Fire."<sup>20</sup> This statement means that the proposed ACO does not reflect agreement between SED and PG&E on substance, facts, or law. It is instead an agreement by PG&E to pay financial penalties to resolve SED's legal claims and foreclose "any further enforcement proceedings" by the Commission.<sup>21</sup>

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<sup>15</sup> Proposed ACO at A-2 through A-5. The three uncontested violations relate to an incorrect date on a 2020 vegetation management patrol record, incomplete records for a 2019 vegetation management patrol, and a failure to formally update PG&E's standards to reflect the increased vegetation clearances adopted by the Commission in D. 17-12-024.

<sup>16</sup> Proposed ACO at 3.

<sup>17</sup> Although the proposed ACO (at 3) contains a brief discussion of the requirement that it include "an agreement by the regulated entity to correct each violation," PG&E only agrees to correct the three violations it chose not to dispute.

<sup>18</sup> Proposed ACO at 16: "PG&E disputes most of SED's alleged violations, and all of the alleged violations related to the cause of the Dixie Fire."

<sup>19</sup> The term "alleged violation" appears only once in the Enforcement Policy at 1: "The Public Utilities Act (Public Utilities Code § 201 et. seq.) *requires the Commission to enforce the laws affecting regulated entities by promptly investigating and prosecuting alleged violations and imposing appropriate penalties*" (emphasis added).

<sup>20</sup> Proposed ACO at 3.

<sup>21</sup> Proposed ACO at 1-2 and 4.

As evidenced by SED's inclusion of alleged violations in the proposed ACO, there remain material disputed facts that were not adequately addressed and resolved through the settlement process. Furthermore, the proposed ACO does not contain findings of fact regarding the subject incident, presumably because PG&E does not admit to any fault or failure to comply with laws, rules, and regulations.<sup>22</sup>

Cal Advocates notes that, in light of the failure of the settlement process to adequately resolve the seven violations found by SED, the Commission could have pursued either an Administrative Enforcement Order or an Order Instituting Investigation. Either of these enforcement tools would have provided for the possibility of evidentiary hearings to resolve the disputed facts in an open forum with due process for all parties. While in some arenas, parties may arrive at settlements without admissions of liability, such an arrangement does not comply with the purpose and plain language of the Enforcement Policy.

**3. Adopting the proposed ACO would be harmful to the public interest and would constitute legal error.**

The Commission should not adopt the proposed ACO as currently written. The proposed ACO is not in compliance with the Enforcement Policy approved in Resolution M-4846. Adoption of the proposed ACO without addressing these deficiencies would constitute legal error. Using a different enforcement process, with fuller public input, likely would have produced better outcomes for customers.<sup>23</sup>

Approval of the proposed ACO is not in the public interest. First, the proposed ACO does not direct PG&E to correct each of the violations of General Orders and PU Code. It thereby fails to promote or protect public safety. The Commission should not be satisfied with an outcome that does not address known risks to public safety.

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<sup>22</sup> "The Parties agree that by entering into this ACO, PG&E does not admit to any violations of the General Order provisions or related statutory requirements identified in Part II of the Appendix to this ACO and SED does not concede that any of PG&E's defenses have merit." Proposed ACO at 8.

<sup>23</sup> The ACO process does not allow stakeholders or the public to participate until the end of the process (after the proposed ACO has been negotiated and issued). This means that stakeholders are unable to (1) conduct discovery to better understand the facts of the incident, (2) analyze the causes of the Dixie Fire, (3) analyze the number, duration and severity of violations; recommend proportionate penalties, or (4) develop and propose recommendations to remediate the root causes of the incident. Using an enforcement tool that enables stakeholder participation earlier in the process would be in the public interest. An open analysis and dialogue involving ratepayer advocates would likely result in better improved safety and reliability for all Californians.

Second, the proposed ACO makes no substantive findings of fact or law regarding what happened in the Dixie Fire incident. The lack of findings undermines the Enforcement Policy’s guiding principles of “firm enforcement” and “meaningful deterrence.”<sup>24</sup>

Finally and more fundamentally, the Commission should seek the truth and hold utilities accountable for their failures. An honest reckoning with the facts of the Dixie Fire incident is essential to learning and progress: the Commission and the public cannot meaningfully resolve any lingering safety hazards without understanding what happened.

In a situation where a utility does not admit and agree to remediate the violations identified by Commission staff, as is the case here, either an Administrative Enforcement Order or an Order Instituting Investigation would be a more appropriate tool than the Administrative Consent Order.

**B. The Commission should require staff to modify the proposed ACO to remove language that prohibits reference to the proposed ACO in future proceedings.**

The proposed ACO includes statements that appear to prohibit parties from referring to the ACO in future proceedings, such as a potential cost-recovery proceeding for PG&E’s expenditures related to the Dixie Fire. These statements include the following:

the Parties intend that neither the fact of this settlement nor any of its specific contents will be admissible as evidence of fault, imprudence, or liability in any other proceeding before the Commission, any other administrative body, any court, or any alternative dispute resolution proceeding, such as a mediation or arbitration<sup>25</sup>

This statement places the fact-finding burden on stakeholders who represent ratepayers in future cost-recovery proceedings, as the ACO would provide no conclusions on which to rely. Stakeholders, therefore, would need to litigate all the issues surrounding the Dixie Fire to determine whether PG&E’s actions were prudent and reasonable for purposes of cost-recovery. This would afford PG&E further opportunities to contest the findings in the SED and Cal Fire reports that demonstrate the imprudence of PG&E’s operations. Contrary to the objectives articulated in the proposed ACO, this additional litigation would *reduce* administrative efficiency.<sup>26</sup>

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<sup>24</sup> Enforcement Policy at 3.

<sup>25</sup> Proposed ACO at 6.

<sup>26</sup> Draft Resolution SED-8 at 6; proposed ACO at 17.

It is particularly troubling that PG&E may, in the future, contest the alleged violations that it did not contest in the proposed ACO. This provision opens the door to future disputes over issues that should and could be resolved here.

As noted earlier in these comments, the proposed ACO does not contain substantial findings of fact and law as to PG&E's conduct in the Dixie Fire. This is contrary to the findings of fact in both SED and Cal Fire's investigations, both of which found PG&E in violation of applicable laws and regulations.<sup>27</sup> Although the proposed ACO lists seven violations identified by SED, PG&E disputes four of these findings and merely opts not to contest the other three.<sup>28</sup> Despite the settlement reached between SED and PG&E, nothing in the Dixie Fire ACO resolves whether PG&E violated Commission rules or law, or whether PG&E operated in a prudent manner.<sup>29</sup>

Even if the proposed ACO included the findings required by the Enforcement Policy, the statements in the proposed ACO quoted above would remove the ability of parties to rely on those findings and stipulations to prove liability in another forum. Parties would need to litigate matters to establish basic facts about PG&E's liability for the Dixie Fire.

As a matter of principle, it is not reasonable to adopt an ACO that makes no factual determinations and prohibits references to the ACO for purposes of establishing PG&E's cost responsibility for the Dixie Fire in future Commission proceedings. To maintain a pattern of proper enforcement, the Commission should require staff to modify the proposed ACO to remove any passages that would limit the ability of stakeholders to rely on the ACO in future proceedings.

**C. The Commission should modify the Draft Resolution SED-8 to explicitly consider the Enhanced Oversight and Enforcement process pursuant to Decision 20-05-053.**

The Commission in D.20-05-053 established an Enhanced Oversight and Enforcement (EOE) process for PG&E.<sup>30</sup> The EOE process consists of six steps of increasing oversight, each of which can be activated upon the occurrence of any of several triggering events.<sup>31</sup> One of the triggering events for Step 2 of the EOE process is:

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<sup>27</sup> Cal Fire report at 2-4; SED report at 49.

<sup>28</sup> Proposed ACO at A-2 through A-5.

<sup>29</sup> "The Parties agree that by entering into this ACO, PG&E does not admit to any violations of the General Order provisions or related statutory requirements identified in Part II of the Appendix to this ACO and SED does not concede that any of PG&E's defenses have merit." Proposed ACO at 8.

<sup>30</sup> D.20-05-053, November 2, 2020, Appendix A.

<sup>31</sup> D.20-05-053, Appendix A.

A gas or electric incident occurs that results in the destruction of 1,000 or more dwellings or commercial structures and appears to have resulted from PG&E's failure to follow Commission rules or orders or prudent management practices.<sup>32</sup>

Notably, this trigger requires only the *appearance* of a failure to comply with rules, orders, or prudent management practices. Upon such an apparent failure, D.20-05-053 plainly states that “a Commission Resolution would place PG&E in the appropriate step” of the EOE process.<sup>33</sup>

The Dixie Fire was the *largest* utility-caused wildfire in California history and it destroyed over 1,300 structures.<sup>34</sup> This fact appears to meet the triggering threshold of “1,000 or more destroyed dwellings or commercial structures” for placing PG&E into Step 2.

Furthermore, both Cal Fire and SED investigated the Dixie Fire. Both entities found PG&E to be in violation of California codes, General Orders, and PU Code.<sup>35</sup> In particular, both reports recognized PG&E's failure to identify and remove the damaged and decayed tree that fell on PG&E's lines, which PG&E “should have ... discovered and removed” in the prior 13 years.<sup>36</sup> When the tree fell and contacted PG&E lines, the utility demonstrated “no sense of urgency” despite the history of extreme fire danger and poor access in the surrounding region,<sup>37</sup> and the fact that de-energization would not have caused any reliability impacts to downstream customers.<sup>38</sup>

PG&E's delayed response allowed the tree to remain in contact with energized lines for approximately 10 hours, which Cal Fire found to be a “direct and negligent factor in the ignition of the fire.”<sup>39</sup> The investigations performed by Cal Fire and SED present a

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<sup>32</sup> D.20-05-053, Appendix A at 3.

<sup>33</sup> D.20-05-053, Appendix A at 1. Note that the use of the word “would” implies a directive, rather than an option. The EOE process is clear that, upon the occurrence of a triggering event, the Commission must act to place PG&E in the appropriate step of the process.

<sup>34</sup> List of top 20 largest California Wildfires, Cal Fire. [https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/our-impact/fire-statistics/featured-items/top20\\_acres.pdf](https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/our-impact/fire-statistics/featured-items/top20_acres.pdf)

<sup>35</sup> Cal Fire report at 1-3; SED report at 2.

<sup>36</sup> Cal Fire report at 45-46.

<sup>37</sup> Cal Fire report at 45; SED report at 44-45.

<sup>38</sup> SED report at 39.

<sup>39</sup> Cal Fire report at 45.



plethora of evidence that PG&E’s actions with regard to the Dixie Fire failed to follow “prudent management practices,” and therefore the incident meets the criteria for the EOE process (quoted above).<sup>40</sup>

The Commission should modify Draft Resolution SED-8 in accordance with D.20-05-053 to include a discussion of the EOE process. The Commission should examine whether the Dixie Fire is a triggering event, and should make findings of fact and law as to whether the Dixie Fire warrants activating the EOE process. If the Commission finds that the Dixie Fire *does* constitute a triggering event — as the available data suggests it does — then the Commission should modify Draft Resolution SED-8 to place PG&E immediately into Step 2 of the EOE process.

- D. The Commission should require staff to modify the proposed ACO to include enforcement actions that address the root causes of the Dixie Fire.**
  - 1. The proposed ACO does not address the root causes of the Dixie Fire.**

The proposed ACO includes a stipulation that PG&E will spend \$40 million over five years to transition from hard copy records to electronic records for various inspections.<sup>41</sup> This is the only stipulation in the proposed ACO that is a corrective action for any of the seven violations listed in SED’s investigation report. While it is proper for PG&E to transition away from legacy hard copy records, doing so will not address many of the factors that led to the Dixie Fire.

As discussed earlier in these comments, both Cal Fire and SED found that a major factor in the Dixie Fire was PG&E’s failure to de-energize its equipment following a fault, in an area known for extreme fire danger and poor access.<sup>42</sup> In fact, the SED report makes clear that PG&E’s decision to leave the line energized prioritized the reliability of only *three customers* — whose electric service would not, in fact, have been lost by de-energization.<sup>43</sup> Instead of de-energizing the line as soon as the blown fuses were spotted, PG&E prioritized reliability over the predictable and probable fire risk associated with a possible downed conductor or fault on the line.

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<sup>40</sup> The incident “appears to have resulted from PG&E’s failure to follow Commission rules or orders or prudent management practices.” D.20-05-053, Appendix A at 3.

<sup>41</sup> Proposed ACO at 5.

<sup>42</sup> Cal Fire report at 45, SED report at 45.

<sup>43</sup> SED report at 39: “However, de-energizing the line in this case would have had minimal to no impact on customers, since two of the three customers were already experiencing an outage and the third ... had battery backup.”

PG&E’s choices did not represent prudent management decisions, and did not promote the safety of the public.<sup>44</sup> Yet the proposed ACO does not direct PG&E to audit its procedures to determine whether a similar negligent act could result in a wildfire in the future — and to modify its procedures if so.

The proposed ACO also does not require PG&E to perform any corrective actions that could reasonably and meaningfully prevent a recurrence of the issues that led to the Dixie Fire. As such, the proposed ACO does not comply with the guiding principles of the Enforcement Policy to enact “meaningful deterrence” and to “prevent non-compliance issues from recurring or continuing.”<sup>45</sup>

**2. Remedies: The Draft Resolution should require corrective actions that directly address the causes of the Dixie Fire.**

The Commission should modify Draft Resolution SED-8 to require prompt corrective actions designed to prevent a recurrence of all contributing factors to the Dixie Fire. Specifically, the corrective actions should include, at the least:

1. An audit of PG&E’s operating procedures to determine if the procedures should be modified to address the findings in both Cal Fire and SED’s investigation reports. For example, should lines with some but not all fuses blown, remain energized?
2. A study to determine whether Enhanced Powerline Safety Settings,<sup>46</sup> Downed Conductor Detection,<sup>47</sup> Partial Voltage Detection,<sup>48</sup> rapid earth fault current limiters (REFCL), or other technologies or operational strategies could have prevented the Dixie Fire.

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<sup>44</sup> PU Code 451: “Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities ... as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.”

<sup>45</sup> Resolution M-4846 at 10, 16.

<sup>46</sup> In response to data request CalAdvocates-PGE-2023WMP-16, question 9, April 21, 2023, PG&E stated that Enhanced Powerline Safety Settings do not reliably detect and de-energize high-impedance faults. High-impedance faults can occur when a tree contacts an energized primary conductor (<https://ieeexplore.ieee.org/document/5476205>), as occurred in the Dixie Fire.

<sup>47</sup> Discussed in PG&E’s 2023-2025 Wildfire Mitigation Plan R3, September 27, 2023, at 455-456.

<sup>48</sup> Discussed in PG&E’s 2023-2025 Wildfire Mitigation Plan R3, September 27, 2023, at 562.

3. An analysis of whether PG&E could use drones, remote imaging, or other technologies to more effectively respond to incidents in inaccessible or hard to access locations.

There are several procedural avenues available to the Commission to require PG&E to implement these corrective actions.

One approach would be to immediately move PG&E into Step 2 of the EOE process, as discussed previously in these comments. Step 2 would require PG&E to submit a Corrective Action Plan to the Executive Director of the CPUC. This Corrective Action Plan should address the violations listed in SED's investigation report, with particular focus on PG&E's decision to leave the line energized.

A second option would be to require the settling parties to modify the proposed ACO to include more corrective actions, particularly corrective actions that relate to improving PG&E's operational procedures.

As a third option, the Commission could also direct SED to perform a special audit of PG&E's operational procedures and direct PG&E to remediate its procedures based on any findings from that audit.

Finally, the Commission could retain an independent third party to perform a root cause investigation into the Dixie Fire, similar to the root cause analysis performed by Envista Forensics, Inc. for the 2017 wildfires in PG&E's territory.<sup>49</sup>

The Commission could adopt any or all four options described above. If needed, the Commission could reallocate some of the funds in the proposed ACO to pay for corrective actions or for an independent third-party audit. The proposed ACO allocates \$40 million for recordkeeping improvements; using a fraction of this amount to understand and correct the direct causes of the Dixie Fire would promote the long-term public interest in safe, reliable and affordable utility service.

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<sup>49</sup> *Settlement Agreement Between Pacific Gas and Electric Company, the Safety and Enforcement Division of the California Public Utilities Commission, Coalition of California Utility Employees, and the Office of the Safety Advocate Resolving Order Instituting Investigation I.19-06-015*, appended to D.20-05-019 at Attachment A, Exhibit C, Section B.7.

## II. CONCLUSION

Cal Advocates respectfully requests that the Commission adopt the recommendations discussed herein.

Sincerely,

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