



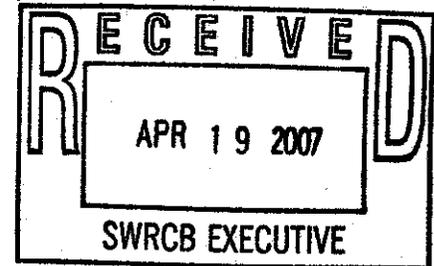
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April 20, 2007

Ms. Song Her, Clerk to the Board, Executive Office
State Water Resources Control Board
P.O. Box 100,
Sacramento, CA 95812-0100



Subject: Comment Letter – Wetland and Riparian Protection Policy

Dear Ms. Her and Members of the Board:

On behalf of Pacific Gas and Electric Company (PG&E), thank you for the opportunity to provide comments on the Proposed Wetland and Riparian Protection Policy Scoping Document. PG&E appreciates the State Water Resources Control Board's (SWRCB) efforts to release this initial scoping document for public review and comment. PG&E agrees that a SWRCB policy will bring much needed clarity and consistency in the definition and regulation of state-only waters (including wetland and riparian areas) and supports the development of the Policy for that purpose.

Pacific Gas and Electric Company is the largest combination natural gas and electric utility in California. The company provides natural gas and electric service to approximately 15 million people throughout a 70,000-square-mile service area in northern and central California. Our service area stretches from Eureka in the north to Bakersfield in the south and from the Pacific Ocean in the west and the Sierra Nevada in the east. Our electric service comprises 123,054 miles of electric distribution lines and 18,610 miles of interconnected transmission lines, while our gas service comprises 40,123 miles of natural gas distribution pipelines and 6,136 miles of transmission pipelines. Our hydroelectric system is built along 16 river basins stretching nearly 500 miles from Redding in the north to Bakersfield in the south.

Our customers rely on us everyday to provide natural gas and electricity service which is essential to their daily lives and the economic health of our state. In order for us to meet our customers' needs of reliable energy, PG&E must continually inspect, maintain, repair and replace our facilities – either through routine maintenance programs or in response to emergencies. We are committed to providing our customers with reliable energy in a safe, economical and environmentally protective manner.

Incumbent on us meeting this commitment is the development of a wetland and riparian protection policy that supports an innovative, efficient and timely process to obtain permits and authorization for work. We urge you to develop a policy that is clear and consistent in its definition of wetland and riparian areas such that it minimizes overlap of agency jurisdictions (California Department of Fish and Game, California Coastal Commission, Bay Conservation and Development Commission) and enables

consistent state agency requirements (Regional Water Boards), as well as state and federal agency requirements (SWRCB and Army Corp of Engineers). We also support a permitting process that allows for a long-term/programmatic approach. Additionally, we strongly support the development and provision of tools, such as GIS mapping of wetland and riparian areas, and resources to adequately implement the policy in a clear and consistent manner.

We appreciate the opportunity to comment on this proposed scoping document. We look forward to continuing our work with you during the CEQA scoping process on this policy with the goal of achieving protection of water quality and continuing to provide safe and reliable energy to our customers.

Thank you for your consideration of these comments.

Sincerely,

Anne M. Jackson

