



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-4561

February 21, 2012

Frances S. Chang
PG&E Corporation
CorporateSecretary@pge.com

Re: PG&E Corporation

Dear Ms. Chang:

This is in regard to your letter dated February 15, 2012 concerning the shareholder proposal submitted by the New York State Common Retirement Fund for inclusion in PG&E's proxy materials for its upcoming annual meeting of security holders. Your letter indicates that the proponent has withdrawn the proposal, and that PG&E therefore withdraws its January 12, 2012 request for a no-action letter from the Division. Because the matter is now moot, we will have no further comment.

Copies of all of the correspondence related to this matter will be made available on our website at <http://www.sec.gov/divisions/corpfin/cf-noaction/14a-8.shtml>. For your reference, a brief discussion of the Division's informal procedures regarding shareholder proposals is also available at the same website address.

Sincerely,

Mark F. Vilardo
Special Counsel

cc: Patrick Doherty
State of New York Office of the State Comptroller
Pension Investments & Cash Management
633 Third Avenue-31st Floor
New York, NY 10017



**Pacific Gas and
Electric Company®**

Frances S. Chang
Attorney at Law
Law Department

One Market Plaza, Spear Tower
Suite 400
San Francisco, CA 94105

415.817.8207
Fax: 415.817.8225
E-Mail: fsc5@pge.com

February 15, 2012

Via e-mail to shareholderproposals@sec.gov

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

Re: PG&E Corporation – Withdrawal of Notice of Intent to Exclude
Shareholder Proposal Pursuant to Rule 14a-8 Submitted by The New
York State Common Retirement Fund

Ladies and Gentlemen:

On January 12, 2012, PG&E Corporation requested a No-Action Letter from the staff of the Securities and Exchange Commission, concurring that the Corporation could exclude from its 2012 proxy materials a Rule 14a-8 shareholder proposal submitted by the Comptroller of the State of New York (the "Proponent") relating to a report on political activities (the "Proposal"). The Proponent is sole trustee of the New York State Common Retirement Fund, which in turn is a shareholder of PG&E Corporation that is qualified to submit a proposal pursuant to Rule 14a-8. The Proponent also is the sole shareholder proponent for the Proposal.

On February 10, 2012, the Proponent formally withdrew the Proposal, and PG&E Corporation does not intend to include the Proposal in its 2012 Proxy Materials.

PG&E Corporation hereby withdraws its January 12, 2012 request for a No-Action Letter relating to the Proposal. In accordance with Staff Legal Bulletin 14, Section 14.B (July 13, 2001), attached is a copy of the Proponent's withdrawal letter (see Exhibit A).

A copy of this letter also is being provided to the Proponent.

If you have any questions, please contact me at (415) 817-8207.

Very truly yours,


Frances S. Chang
Attorney for PG&E Corporation

Attachments: Exhibit
cc: Linda Y.H. Cheng
Patrick Doherty

THOMAS P. DINAPOLI
STATE COMPTROLLER



STATE OF NEW YORK
OFFICE OF THE STATE COMPTROLLER

PENSION INVESTMENTS
& CASH MANAGEMENT
633 Third Avenue-31st Floor
New York, NY 10017
Tel: (212) 681-4489
Fax: (212) 681-4468

February 10, 2012

Ms. Linda Y.H. Cheng
Vice President, Corporate Governance and
Corporate Secretary
& Deputy General Counsel
PG&E Corporation
One Market Street, Spear Tower
- Suite 400
San Francisco, CA 94105

Dear Ms. Cheng:

On the basis of the commitments contained in your letter of February 9 regarding the adoption of new company policies on lobbying and political spending disclosure, I hereby withdraw the resolution filed with your company by the Office of the State Comptroller on behalf of the New York State Common Retirement Fund.

Very truly yours,

A handwritten signature in black ink, appearing to read "Patrick Doherty".

Patrick Doherty
pd:jm
Enclosures

January 12, 2012

Via e-mail to shareholderproposals@sec.gov

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

Re: PG&E Corporation—Notice of Intent to Omit Shareholder Proposal from Proxy Materials Pursuant to Rule 14a-8 Promulgated under the Securities Exchange Act of 1934, as amended, and Request for No-Action Ruling—Proposal from The New York State Common Retirement Fund

Ladies and Gentlemen:

PG&E Corporation, a California corporation, submits this letter under Rule 14a-8(j) of the Securities Exchange Act of 1934, as amended (the “Exchange Act”), to notify the Securities and Exchange Commission (the “Commission”) of PG&E Corporation’s intent to exclude all or portions of a shareholder’s proposal (with the supporting statement, the “Proposal”) from the proxy materials for PG&E Corporation’s 2012 Annual Meeting of Shareholders (the “2012 Proxy Materials”) for the following reasons:

- the Proposal has been substantially implemented and may be omitted pursuant to Rule 14a-8(i)(10), and
- portions of the Proposal are impermissibly false and misleading, contrary to Rule 14a-8(i)(3) and Rule 14a-9.

The Proposal was submitted by the Comptroller of the State of New York (the “Proponent”) who is sole trustee of the New York State Common Retirement Fund, which in turn is a shareholder of PG&E Corporation that is qualified to submit a proposal pursuant to Rule 14a-8. PG&E Corporation asks that the staff of the Division of Corporation Finance of the Commission (the “Staff”) confirm that it will not recommend to the Commission that any enforcement action be taken if PG&E Corporation excludes all or a portion of the Proposal from its 2012 Proxy Materials as described below.

In accordance with Rule 14a-8(j), a copy of this letter and its attachments is being provided to the Proponent.¹ The letter informs the Proponent of PG&E Corporation’s intention to omit the Proposal (or, if applicable, portions of the Proposal) from its 2012 Proxy Materials. Pursuant to Rule 14a-8(j), this letter is being submitted not less than 80 days before PG&E Corporation intends to file its definitive 2012 Proxy Materials with the Commission.

¹ Because this request is being submitted electronically, PG&E Corporation is not submitting six copies of the request, as specified in Rule 14a-8(j).

I. BACKGROUND

A. The Proposal

The Proposal is dated November 23, 2011, and requests the following:

Resolved, the shareholders of PG&E Corporation (“PG&E”) request the Board authorize the preparation of a report, updated annually, to disclose:

1. Company policy and procedures governing the lobbying of legislators and regulators, including that done on our company’s behalf by trade associations. The disclosure should include both direct and indirect lobbying and grassroots lobbying communications.
2. A listing of payments (both direct and indirect, including payments to trade associations) used for direct lobbying as well as grassroots lobbying communications, including the amount of the payment and the recipient.
3. Membership in and payments to any tax-exempt organization that writes and endorses model legislation.
4. Description of the decision making process and oversight by the management and Board for
 - a. direct and indirect lobbying contributions and
 - b. payment for grassroots lobbying expenditure.

For purposes of this proposal, a “grassroots lobbying communication” is a communication directed to the general public that (a) refers to specific legislation, (b) reflects a view on the legislation and (c) encourages the recipient of the communication to take action with respect to the legislation.

Both “direct and indirect lobbying” and “grassroots lobbying communications” include efforts at the local, state and federal levels.

The report shall be presented to the Audit Committee of the Board or other relevant oversight committees of the Board and posted on the company’s website.

The supporting statement emphasizes the importance of transparency and accountability with respect to lobbying activities. The supporting statement also states that PG&E Corporation spent approximately \$51.74 million in 2009 and 2010 on direct federal lobbying activities, according to disclosure reports, and suggests that this amount may not include grassroots lobbying to directly influence legislation by mobilizing public support or opposition. It also states that not all states require disclosure of lobbying expenditures.

A copy of the Proposal and all related correspondence is included in Exhibit A.

B. PG&E Corporation Political Engagement Website

PG&E Corporation is committed to transparency, accountability, and continuous improvement, including in the area of political engagement. Since the receipt of the Proposal in November 2011, PG&E Corporation has accelerated its planned enhancements to its political engagement guidance documents, standards, and procedures, and also has adjusted its website disclosures to address concerns raised in the Proposal. PG&E Corporation believes that these enhancements and PG&E Corporation's existing policies, practices, and procedures substantially implement the Proposal, and thus is submitting this No-Action Letter Request on that basis. Specific policies, procedures, and disclosures are discussed throughout this letter.

The Proponent's submission letter also invited PG&E Corporation to contact the Proponent to discuss the Proposal. PG&E Corporation recently contacted the Proponent in that regard. PG&E Corporation hopes to work with the Proponent to discuss the Proponent's concerns and the Corporation's recent disclosure activities.

PG&E Corporation will promptly notify Staff if any of those discussions affect this NAL request.

II. REASON FOR EXCLUSION/AMENDMENT

A. PG&E Corporation Already Provides Public Information Regarding its Lobbying Activities. The Proposal has Been Substantially Implemented and May be Excluded Under Rule 14a-8(i)(10).

Rule 14a-8(i)(10) permits an issuer to omit a Rule 14a-8 proposal if the company has already "substantially implemented the proposal." The purpose of Rule 14a-8(i)(10) is "to avoid the possibility of shareholders having to consider matters which have already been favorably acted upon by management." See SEC Release No. 34-12598 (regarding predecessor rule to Rule 14-8(i)(10)) (July 7, 1976). To be moot, the proposal need not be implemented in full or precisely as presented. Rule 14a-8(i)(10) does not require exact correspondence between the actions sought by a shareholder proponent and the issuer's actions in order for the shareholder's proposal to be excluded. *SEC Release 34-20091* (Aug. 16, 1983) (discussing Rule 14a-8(c)(3), the predecessor to Rule 14a-8(i)(3)).

Staff recently agreed Rule 14a-8(i)(10) provided grounds for a company to omit a proposal requesting a lobbying report, where the company's existing website disclosures addressed the underlying essential objective of the proposal (*General Electric Company*, Feb. 24, 2011). Staff also previously agreed that PG&E Corporation had grounds under Rule 14a-8(i)(10) omit a proposal requesting a report on the company's charitable contributions. Staff opined that PG&E Corporation's policies, practices, and procedures (including website disclosures) compared favorably with the proposal requesting a charitable contributions report, even though PG&E did not provide a formal "report" as requested by that Proposal (*PG&E Corporation*, March 10, 2010).

PG&E Corporation and its subsidiary, Pacific Gas and Electric Company (together, "PG&E") already provide the public with information regarding PG&E's political engagement policies,

procedures, and activities. This information is provided on the PG&E Corporation website (at http://www.pgecorp.com/aboutus/corp_gov/political_engagement/political_engagement.shtml).

These disclosures and related policies, practices, and procedures, compare favorably with the guidelines of the Proposal, and meet the essential objective of the Proposal, which is to provide transparency and accountability regarding PG&E's lobbying activities. Exhibit B contains a printout of the Political Engagement website pages (excluding publicly-filed reports). PG&E Corporation may make minor amendments to these materials from time to time, but does not intend to change the substantive scope or nature of the disclosures, or delete any information that currently is available.

Specific details with respect to how PG&E's existing activities and disclosures address each element of the Proposal's recommended report regarding lobbying activities (the "Lobbying Report") are described below:

- *Element 1 of the proposed Lobbying Report:* "Company policy and procedures governing the lobbying of legislators and regulators, including that done on our company's behalf by trade associations. The disclosure should include both direct and indirect lobbying and grassroots lobbying communications."

The Political Engagement website discusses why PG&E engages in political activities, including advocacy (which by definition includes direct, indirect, and grassroots lobbying communications). (See, e.g., Exhibit B-1.) The disclosures also reaffirm PG&E Corporation's commitment to transparency, accountability, and full compliance with applicable laws.

- *Element 2 the proposed Lobbying Report:* "listing of payments (both direct and indirect, including payments to trade associations) used for direct lobbying as well as grassroots lobbying communications, including the amount of the payment and the recipient"

The Political Engagement website contains the following:

- Links to government-sponsored websites where the public may access periodic reports regarding PG&E's federal lobbying and California state lobbying expenses. (See Exhibit B-1.) These reports are filed quarterly, as required by law.
- Federal lobbying reports provide information regarding expenses for "lobbying activities" as defined pursuant to the federal Internal Revenue Code ("Tax Code"),² which includes the value of corporate funds paid in connection with, among other things, (1) matters lobbied; (2) participating or intervening in a candidate's political campaign for public office at any level of government; (3) attempting to influence the public on elections, legislative matters or referendums (also known as "grassroots lobbying") at the federal, state, and local levels; (4) direct communications with

² As noted in these filings and as permitted by the Federal Lobbying Disclosure Act, 2 U.S.C. 1610, PG&E Corporation has elected to define its reportable lobbying expenditures using the Tax Code definition of non-deductible lobbying expenses.

certain very high-level federal executive branch officials in an attempt to influence the officials' actions or positions, and (5) the portion of contributions or dues paid to a tax-exempt organization (such as a trade association) that is allocable to the above lobbying or political expenditures as notified by the tax-exempt organization.

- California state lobbying reports provide information regarding lobbying "payments," which includes, among other things, (1) matters lobbied; (2) payments made in connection with direct and indirect attempts to influence legislative or administrative action (including grassroots lobby expenses); (3) payments (such as gifts, honoraria, consulting fees, salaries, and any other form of payment) benefitting a state elected official, legislative or agency official, state candidate, or their immediate family members, (3) name and address of any lobbying coalition paid, and the total amount paid to each such lobbying coalition; and (4) political contributions made to state candidates, elected state officers, their controlled committees (including controlled ballot measure committees), and committees primarily formed to support or oppose such officers or candidates.
- A separate table listing non-profit entities (including trade associations) that received over \$50,000 in dues and similar payments during 2010, and for which a portion of those dues was identified by the recipient to be non-deductible lobbying expenses for federal corporate income tax purposes (those non-deductible amounts also are listed). (See Exhibit B-7.) PG&E intends to update this disclosure annually, to reflect the most recently completed fiscal year.
- *Element 3 of the proposed Lobbying Report:* "membership in and payments to any tax-exempt organization that writes and endorses model legislation"

PG&E is unaware of any such memberships or payments.

- *Element 4 of the proposed Lobbying Report:* "Description of the decision making process and oversight by the management and Board for direct and indirect lobbying contributions and payment for grassroots lobbying expenditure."

The Political Engagement website describes the governance processes surrounding authorization of various activities relating to political engagement at PG&E. (See Exhibits B-1, B-2, and B-6.) Board-level responsibility is detailed, as well as the role that the PG&E Corporation Board and management play with respect to each other, and for approval of different actions. In addition, the website discusses the various ways in which the Board and its committees receive information throughout the year with respect to political activities, and thus exercise additional oversight.

- *Additional requirement regarding the proposed Lobbying Report:* "The report shall be presented to the Audit Committee of the Board or other relevant oversight committees of the Board and posted on the company's website."

Through its oversight responsibilities (as discussed above), the PG&E Corporation Board and its committees receive timely updates and reports regarding the PG&E's various political engagement activities. Taken in their entirety, PG&E's governing documents and

these various reporting activities provide the Board with much of the information requested in the proposed Lobbying Report.

For the reasons discussed above, PG&E Corporation believes its current political engagement program and website disclosures substantially implement the Proposal, and that the Proposal may be omitted from the 2012 Proxy Materials as provided in Rule 14a-8(i)(10).

B. Portions of the Proposal are False and Misleading, and May be Omitted Pursuant to Rule 14a-8(i)(3) and Rule 14a-9.

The Corporation believes that the Proponent's submission contains misleading statements, and that such statements may be omitted from the Corporation's 2012 Proxy Materials.

Under SEC Rule 14a-8(i)(3), a company may exclude all or portions of a proposal and supporting statement if the proposal or supporting statement is contrary to any of the Commission's proxy rules. By extension, this includes portions of proposals or supporting statements that are impermissibly false or misleading pursuant to SEC Rule 14a-9. Staff Legal Bulletin No. 14B (Sep. 15, 2004) clarifies the Staff's views on the application of Rule 14a-8(i)(3) and Rule 14a-9, and specifically states that exclusion of all or a portion of a supporting statement may be appropriate where (a) a company demonstrates objectively that a factual statement is materially false or misleading or (b) substantial portions of the supporting statement are irrelevant to a consideration of the subject matter of the proposal, such that there is a strong likelihood that a reasonable shareholder would be uncertain as to the matter on which she is being asked to vote.

The Proposal's supporting statement contains the following paragraph:

"PG&E spent approximately \$51.74 million in 2009 and 2010 on direct federal lobbying activities, according to disclosure reports (*U.S. Senate Officer of Public Records*). This figure may not include grassroots lobbying to directly influence legislation by mobilizing public support of opposition. Also, not all states require disclosure of lobbying expenditures to influence legislation or regulation."

This paragraph contains several inaccurate suggestions, which could mislead shareholders who are weighing whether they should support the Proposal's request for increased transparency into PG&E Corporation's political activities.

- *Suggestion 1: PG&E spent more than \$51 million dollars on direct federal lobbying activities during 2009 and 2010.*

Actual amounts spent by PG&E on direct federal lobbying during 2009 and 2010 are considerably lower than \$51 million. As noted in line 14 of PG&E Corporation's publicly-available federal lobbying reports, PG&E Corporation uses an alternative definition of reportable lobbying (set forth in the Tax Code and IRS regulations), which references section 162(e) of the Tax Code and includes costs for state and local lobby activity. Portions of the Federal Lobbying Report submitted for PG&E for the first quarter of 2011 are included as Exhibit C. (See page 1 for election of section 162(m) methodology.)

As a result, the federal lobbying reports for 2010 alone included over \$43 million in state and local lobbying expenditures, approximately \$42 million of which constitutes contributions to support or oppose California state ballot measures. (See, e.g., the note to Line 13, page 3 of Exhibit C, for disclosures relating to the first quarter of 2010.) Similarly, federal lobbying reports for 2009 included over \$4 million in state and local lobbying expenditures, including contributions to support or oppose California state ballot measures. Of the total amounts reported on the federal lobby reports for 2009-2010, and as noted on those reports, only \$3,830,376 was spent on federal lobbying activities during that two year period.

- *Suggestion 2: PG&E does not report expenditures for “grassroots lobbying to directly influence legislation by mobilizing public support of opposition.”*

Expenses for grassroots lobbying are included in the federal lobbying report, due to the fact that PG&E Corporation uses the Tax Code definition of “lobbying activities” to calculate reportable lobbying expenditures. PG&E also reports state-level grassroots lobbying expenditures on California State lobby and campaign finance reports.

- *Suggestion 3: PG&E’s state and local lobbying expenditures and activity are not reported (because “not all states require disclosure of lobbying expenditures to influence legislation or regulation”).*

PG&E’s operations are based in California, as are PG&E’s state-level lobbying activities. California has robust lobbying reporting requirements, which cover a wide variety of lobbying activities, including, among other things, payments made in connection with direct and indirect attempts to influence legislative or administrative action (including grassroots lobbying expenditures), payments to lobbying coalitions, and payments benefitting state officials.

California also requires detailed disclosure of state and local political contributions, including, for example, independent expenditures and contributions to support or oppose ballot measures. To the extent that these expenditures are considered “grassroots lobbying,” such as payments to influence State or local measures, the expenditures are disclosed to the public in the Federal Lobbying Reports as well as California campaign finance reports.

Accordingly, we believe the paragraph relating to the amount and nature of PG&E Corporation’s lobbying expenditures and lobbying reporting requirements should be deleted from the Proposal pursuant to Rule 14a-8(i)(3). The inclusion of this paragraph inappropriately inflates the amount of direct federal lobbying activity that is of interest to the Proponent, and inaccurately suggests a lack of disclosure, transparency, and accountability regarding PG&E’s lobbying activities.

III. CONCLUSION

As discussed above, we believe that the Proposal has been substantially implemented, and may be excluded from the 2012 Proxy Materials pursuant to SEC Rule 14a-8(i)(10). In addition, we believe that portions of the Proposal’s supporting statement are impermissibly misleading, and may be excluded from the 2012 Proxy Materials pursuant to SEC Rule 14a-8(i)(3). By this letter, I request confirmation that the Staff will not recommend enforcement action to the

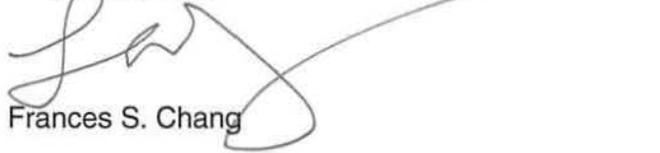
Commission if PG&E Corporation excludes the Proposal from its 2012 Proxy Materials or amends the Proposal in reliance on the aforementioned rules.

We would appreciate a response from Staff by March 8, 2012, to provide the Corporation with sufficient time to finalize and print its 2012 proxy materials.

Consistent with Staff Legal Bulletin No. 14F (dated October 18, 2011), I would appreciate it if the Staff would send a copy of its response to this request to me by e-mail at CorporateSecretary@pge.com when it is available. We do not have an e-mail address for the Proponent.

If you have any questions regarding this request or desire additional information, please contact me at (415) 817-8207.

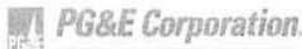
Very truly yours,



Frances S. Chang

cc: Linda Y.H. Cheng
Thomas P. DiNapoli

Enclosures: Exhibits A-C



Linda Y.H. Cheng
Vice President
Corporate Governance
and Corporate Secretary

One Market Street Tower
Suite 2400
San Francisco, CA 94105

415.267.2070
Fax: 415.267.7260

November 30, 2011

VIA FAX and FEDEX

State of New York
Office of the State Comptroller
The Honorable Thomas P. DiNapoli
State Comptroller
633 Third Avenue – 31st Floor
New York, NY 10017

Dear Mr. DiNapoli:

This will acknowledge receipt on November 23, 2011 of a shareholder proposal and supporting statement (the "Proposal") submitted by you as the sole Trustee of the New York State Common Retirement Fund and the administrative head of the New York State and Local Employees' Retirement System and the New York State Police and Fire Retirement System for consideration at PG&E Corporation's 2012 annual meeting. As noted by Mr. Patrick Doherty in the cover letter accompanying the proposal, confirmation regarding the number of shares of PG&E Corporation common stock owned by the New York State Common Retirement Fund has not yet been received.

The Securities and Exchange Commission's (SEC's) regulations regarding the inclusion of shareholder proposals in a company's proxy statement are set forth in its Rule 14a-8. A copy of these regulations can be obtained from the SEC, Division of Corporate Finance, 100 F Street, NE, Washington, D.C. 20549.

SEC Rule 14a-8, Question 2 specifies that, in order to be eligible to submit a proposal, a shareholder must have continuously held at least \$2,000 in market value, or 1% of the company's securities entitled to be voted on the proposal at the meeting for at least one year by the date the proposal is submitted. If the shareholder is not a registered holder, the shareholder must prove eligibility to submit a proposal by one of two methods:

1. The shareholder may submit to the company a written statement from the "record" holder of the securities (if the shareholder's bank or broker is not a "participant" in the Depository Trust Company (or DTC), then the shareholder must obtain proof of ownership from the DTC participant through which the securities are held) verifying that, at the time of submission, the shareholder continuously held the required securities for at least one year. If the DTC participant does not know the shareholder's holdings, then the shareholder may verify that the required amount of securities were held for the required time by submitting two proof of ownership statements, one of which would be from the bank or broker confirming the shareholder's ownership, and the other of which would be from the DTC participant confirming the bank or broker's ownership.

Mr. Thomas P. DiNapoli
November 30, 2011
Page 2

2. The shareholder may submit to the company appropriate filings on Schedule 13D, Schedule 13G, Form 3, Form 4, and/or Form 5, including amendments, demonstrating that the shareholder held the required number of shares.

I have been informed by our Law Department that the Corporation may notify a shareholder if the shareholder does not satisfy these SEC eligibility requirements, and provide the shareholder with the opportunity to adequately correct the problem. According to Rule 14a-8, paragraph (1) under Question 6, the shareholder's reply must be postmarked or transmitted electronically within 14 calendar days of receipt of this letter.

If the Corporation does not receive the confirmation of ownership from the New York State Common Retirement Fund within the 14-day limit, the Corporation intends to omit the Proposal from the Corporation's 2012 proxy statement, as permitted by Rule 14a-8.

Please note that, because the submission has not satisfied the eligibility requirements noted above, this letter does not address whether the Proposal could be omitted from the Corporation's proxy statement on other grounds. If within the 14-day timeframe you adequately correct the eligibility defect described above, the Corporation reserves the right to omit the Proposal if a valid basis for such action exists.

Sincerely,



Vice President, Corporate Governance
and Corporate Secretary

LYHC:jec

cc: Patrick Doherty, Director – Corporate Governance
Office of the State Comptroller

THOMAS P. DINAPOLI
STATE COMPTROLLER



STATE OF NEW YORK
OFFICE OF THE STATE COMPTROLLER

PENSION INVESTMENTS
& CASH MANAGEMENT
633 Third Avenue-31st Floor
New York, NY 10017
Tel: (212) 681-4489
Fax: (212) 681-4468

November 23, 2011

Linda Y.H. Cheng
Vice President, Corporate Governance and Corporate Secretary
PG&E Corporation
One Market, Spear Tower, Suite 2400
San Francisco, California 94105

Dear Ms. Cheng:

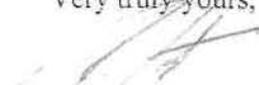
The Comptroller of the State of New York, The Honorable Thomas P. DiNapoli, is the sole Trustee of the New York State Common Retirement Fund (the "Fund") and the administrative head of the New York State and Local Employees' Retirement System and the New York State Police and Fire Retirement System. The Comptroller has authorized me to inform PG&E Corporation of his intention to offer the enclosed shareholder proposal for consideration of stockholders at the next annual meeting.

I submit the enclosed proposal to you in accordance with rule 14a-8 of the Securities Exchange Act of 1934 and ask that it be included in your proxy statement.

A letter from J.P. Morgan Chase, the Fund's custodial bank, verifying the Fund's ownership, continually for over a year, of PG&E Corporation shares, will follow. The Fund intends to continue to hold at least \$2,000 worth of these securities through the date of the annual meeting.

We would be happy to discuss this initiative with you. Should the board decide to endorse its provisions as company policy, we will ask that the proposal be withdrawn from consideration at the annual meeting. Please feel free to contact me at (212) 681-4823 should you have any further questions on this matter.

Very truly yours,


Patrick Doherty

pd:jm

Enclosures

Whereas, businesses have a recognized legal right to express opinions to legislators and regulators on public policy matters, it is important that our company's lobbying positions, as well as processes to influence public policy, are transparent. Public opinion is skeptical of corporate influence on Congress and public policy and questionable lobbying activity may pose risks to our company's reputation when controversial positions are embraced. Hence, we believe full disclosure of PG&E's policies, procedures and oversight mechanisms is warranted.

Resolved, the shareholders of PG&E Corporation ("PG&E") request the Board authorize the preparation of a report, updated annually, to disclose:

1. Company policy and procedures governing the lobbying of legislators and regulators, including that done on our company's behalf by trade associations. The disclosure should include both direct and indirect lobbying and grassroots lobbying communications.
2. A listing of payments (both direct and indirect, including payments to trade associations) used for direct lobbying as well as grassroots lobbying communications, including the amount of the payment and the recipient.
3. Membership in and payments to any tax-exempt organization that writes and endorses model legislation.
4. Description of the decision making process and oversight by the management and Board for
 - a. direct and indirect lobbying contribution or expenditure; and
 - b. payment for grassroots lobbying expenditure.

For purposes of this proposal, a "grassroots lobbying communication" is a communication directed to the general public that (a) refers to specific legislation, (b) reflects a view on the legislation and (c) encourages the recipient of the communication to take action with respect to the legislation.

Both "direct and indirect lobbying" and "grassroots lobbying communications" include efforts at the local, state and federal levels.

The report shall be presented to the Audit Committee of the Board or other relevant oversight committees of the Board and posted on the company's website.

Supporting Statement

As shareholders, we encourage transparency and accountability on the use of staff time and corporate funds to influence legislation and regulation both directly and indirectly as well as grassroots lobbying initiatives. We believe such disclosure is in shareholder's best interests. Absent a system of accountability, company assets could be used for policy objectives contrary to a company's long-term interests posing risks to the company and shareholders.

PG&E spent approximately \$51.74 million in 2009 and 2010 on direct federal lobbying activities, according to disclosure reports (*U.S. Senate Office of Public Records*). This figure may not include grassroots lobbying to directly influence legislation by mobilizing public support or opposition. Also, not all states require disclosure of lobbying expenditures to influence legislation or regulation.

Such expenditures and contributions can potentially involve the company in controversies posing reputational risks.

We encourage our Board to require comprehensive disclosure related to direct, indirect and grassroots lobbying.

J.P.Morgan

Daniel F. Murphy
Vice President
Client Service
Worldwide Securities Services

December 5, 2011

Linda Y.H. Cheng, Vice President
Corporate Governance and Corporate Secretary
PG & E Corporation
One Market, Spear Tower Suite 2400
San Francisco, CA 94105

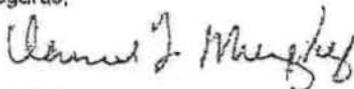
Dear Ms. Cheng,

This letter is in response to a request by The Honorable Thomas P. DiNapoli, New York State Comptroller as sole Trustee of the New York State Common Retirement Fund, regarding confirmation from J.P. Morgan Chase, that the New York State Common Retirement Fund has been a beneficial owner of PG&E Corporation continuously for at least one year as of November 23, 2011.

Please note, that J.P. Morgan Chase, as custodian and a member of the Depository Trust Company (DTC), for the New York State Common Retirement Fund, held a total of 1,435,924 shares of common stock as of November 23, 2011 and continues to hold shares in the company. The value of the ownership had a market value of at least \$2,000.00 for at least twelve months prior to said date.

If there are any questions, please contact me or Miriam Awad at (212) 623-8481.

Regards,



Daniel F. Murphy

cc: Patrick Doherty - NYSCRF
Glanna McCarthy - NYSCRF
Elaine Reilly - NYSCRF
George Wong - NYSCRF


[about us](#)
[investors](#)
[news](#)
[sustainability](#)

EXHIBIT B-1

[about us](#)
[our team](#)
[corporate governance](#)
[compliance & ethics](#)
[careers](#)
[history](#)
[safety](#)
[contact us](#)

CORPORATE GOVERNANCE | POLITICAL ENGAGEMENT

PG&E Corporation and its subsidiaries (together, "PG&E") engage at the federal, state, and local levels of government to ensure the concerns of customers, shareholders, and employees are adequately represented before lawmakers and regulators. These activities support PG&E's core business of providing safe and reliable and affordable gas and electric service to the millions of homes and businesses that depend on us.

As part of their oversight functions, Boards of Directors of PG&E Corporation and Pacific Gas and Electric Company oversee PG&E's political engagement policies, programs and practices. The Public Policy Committee of the PG&E Corporation Board of Directors is responsible for advising and assisting the Boards with respect to public policy and corporate responsibility issues that significantly affect the interests of the customers, shareholders, or employees of PG&E. This board-level oversight responsibility may include establishing general requirements for approval of political expenditures, and reviewing public policy issues that may affect customers, shareholders, or employees. The Boards of Directors also approve the overall corporate budgets that support PG&E's political activities.

Subject to this board-level oversight, management is responsible for developing the strategies and the day-to-day decisions and activities regarding how expenditures and advocacy activities can further PG&E's business objectives, and best serve the interests of customers, shareholders, employees, and the public.

Consistent with company values, PG&E is committed to full compliance with both the letter and the spirit of all federal, state, local and foreign political laws and to maintaining the highest ethical standards in the way we conduct our business.

Along with civic, charitable and volunteer activities, employees can participate in the political process. All eligible employees may make voluntary contributions to the company's political action committees: PG&E Corporation Employees EnergyPAC and Pacific Gas and Electric Company State and Local PAC. PAC contributions go directly to support candidates for elective office at both the federal and state levels. By law, PG&E cannot use corporate funds to make contributions to federal candidates.

POLITICAL CONTRIBUTIONS AND EXPENDITURES

PG&E is pleased to provide the following reports detailing policies, procedures, and 2010 contributions:

- ▶ [PG&E's Political Contribution Policy and Procedures](#)
- ▶ [Candidates and groups that received PG&E State and Local PAC contributions](#)
- ▶ [Candidates and groups that received PG&E Federal PAC contributions](#)
- ▶ [Candidates and groups that received PG&E corporate contributions](#)

Periodic disclosure reports dating back to 1999 can be found at the following websites:

- ▶ <http://www.fec.gov/disclosure.shtml> (Political Contributions to Federal Candidates and Campaigns)
- ▶ <http://cal-access.sos.ca.gov/campaign/> (Political Contributions to California State Candidates, Campaigns, and Committees)

PG&E LOBBYING AND ADVOCACY

PG&E is pleased to provide the following reports detailing 2010 lobbying policies and procedures, and activities:

- ▶ [PG&E's Advocacy and Lobbying Policy and Procedures](#)
- ▶ [Federal Lobbying Reports](#)
- ▶ [State Lobbying Reports](#)
- ▶ [Trade Associations that received dues payments in 2010 related to lobbying](#)

EXHIBIT B-2



[about us](#) [investors](#) [news](#) [sustainability](#)

[Search](#)

POLITICAL ENGAGEMENT | POLITICAL CONTRIBUTIONS POLICY AND PROCEDURES

- [about us](#)
- [our team](#)
- [corporate governance](#)
- [compliance & ethics](#)
- [careers](#)
- [history](#)
- [safety](#)
- [contact us](#)

[Back](#)

Policy Statement:

The Public Policy Committee of the PG&E Corporation Board of Directors reviews the political contributions program for PG&E Corporation and its subsidiaries (together, "PG&E") and recommends board-level and senior management approval limits for contributions from PG&E to candidates, measures, and political action committees. The Public Policy Committee also directs the preparation of an annual report detailing political contributions and certain other expenditures made by PG&E during the preceding year.

As part of PG&E's commitment to good governance and transparency, all reportable political contributions are publicly disclosed on the websites of the [California Secretary of State](#) and the [Federal Election Commission](#). The annual reports of political contributions from PG&E and PG&E-sponsored PACs to candidates and groups are available on PG&E Corporation's website.

[Back](#)

Copyright © 2004 - 2011 PG&E Corporation. All Rights Reserved . [feedback](#) . [sitemap](#) . [privacy policy](#)

EXHIBIT B-3



[about us](#) [investors](#) [news](#) [sustainability](#)

[Search](#)

POLITICAL ENGAGEMENT | STATE AND LOCAL PAC CONTRIBUTIONS

- [about us](#)
- [our team](#)
- [corporate governance](#)
- [compliance & ethics](#)
- [careers](#)
- [history](#)
- [safety](#)
- [contact us](#)

[Back](#)

2010 PG&E Employees State and Local PAC Contributions

The following candidates received campaign contributions from PG&E employees' state and local PAC in 2010:

Candidate/PAC/Other	Party	Office	2010 Total
Alby, Barbara	R	Board of Equalization	\$3,000.00
Campos, Tony	N/A	Supervisor, Santa Cruz County	\$250.00
Coonerty, Neal	N/A	Supervisor, Santa Cruz County	\$250.00
Runner, George	R	Board of Equalization	\$2,000.00
Steel, Michelle	R	Board of Equalization	\$3,000.00
Total State and Local PAC Contributions			\$8,500.00

[Back](#)

Copyright © 2004 - 2011 PG&E Corporation. All Rights Reserved . [feedback](#) . [sitemap](#) . [privacy policy](#)

EXHIBIT B-4



about us investors news sustainability

Search

POLITICAL ENGAGEMENT | FEDERAL PAC CONTRIBUTIONS

[Back](#)

- about us
- our team
- corporate governance
- compliance & ethics
- careers
- history
- safety
- contact us

2010 Federal PAC Contributions

The following candidates and organizations received campaign contributions from PG&E Corporation's employee federal PAC (EnergyPAC) in 2010:

Candidate/PAC/Other	Party	Office	2010 Total
Baca, Joe	D	House of Representatives	\$1,000.00
Barton, Joe	R	House of Representatives	\$1,000.00
Bass, Karen	D	House of Representatives	\$2,000.00
Becerra, Xavier	D	House of Representatives	\$1,000.00
Boehner, John	R	House of Representatives	\$2,500.00
Bono Mack, Mary	R	House of Representatives	\$1,500.00
Boren, David Daniel	D	House of Representatives	\$1,000.00
Calvert, Ken	R	House of Representatives	\$2,000.00
Camp, David	R	House of Representatives	\$1,000.00
Capps, Lois	R	House of Representatives	\$3,000.00
Cardoza, Dennis	D	House of Representatives	\$3,000.00
Clyburn, James	D	House of Representatives	\$1,500.00
Costa, Jim	D	House of Representatives	\$3,250.00
Crowley, Joseph	D	House of Representatives	\$1,000.00
Denham, Jeff	R	House of Representatives	\$2,000.00
Eshoo, Anna	D	House of Representatives	\$2,000.00
Farr, Sam	D	House of Representatives	\$2,000.00
Garamendi, John	D	House of Representatives	\$1,000.00
Harman, Jane	D	House of Representatives	\$3,000.00
Herger, Wally	R	House of Representatives	\$4,000.00
Honda, Mike	D	House of Representatives	\$2,000.00
Hoyer, Steny	D	House of Representatives	\$2,500.00
Issa, Darrell	R	House of Representatives	\$3,000.00
Levin, Sander	D	House of Representatives	\$1,000.00
Lewis, Jerry	R	House of Representatives	\$1,000.00
Lofgren, Zoe	D	House of Representatives	\$1,000.00
Lungren, Daniel	R	House of Representatives	\$1,000.00
Markey, Betsy	D	House of Representatives	\$1,000.00
McNerney, Jerry	D	House of Representatives	\$1,000.00
Miller, George	D	House of Representatives	\$2,500.00
Murphy, Scott	D	House of Representatives	\$1,500.00
Murphy, Tim	R	House of Representatives	\$500.00
Pelosi, Nancy	D	House of Representatives	\$1,000.00
Sanchez, Linda	D	House of Representatives	\$3,500.00
Shuster, William	R	House of Representatives	\$1,000.00
Speier, Jackie	D	House of Representatives	\$1,000.00
Thompson, Mike	D	House of Representatives	\$2,000.00
Upton, Fred	R	House of Representatives	\$2,500.00
Walden, Greg	R	House of Representatives	\$3,000.00
Total U.S. House Contributions			\$70,750.00
Baucus, Max	D	United States Senate	\$2,500.00
Bingaman, Jeff	D	United States Senate	\$1,000.00
Boxer, Barbara	D	United States Senate	\$800.00
Graham, Lindsey	R	United States Senate	\$2,000.00
Grassley, Charles	R	United States Senate	\$1,000.00
Kyl, Jon	R	United States Senate	\$1,500.00
Landrieu, Mary	D	United States Senate	\$1,000.00
Lincoln, Blanche	D	United States Senate	\$1,000.00

Manchin, Joe	D	United States Senate	\$1,000.00
McCain, John	R	United States Senate	\$1,000.00
McConnell, Mitch	R	United States Senate	\$1,500.00
Murkowski, Lisa	R	United States Senate	\$3,000.00
Reid, Harry	D	United States Senate	\$5,000.00
Specter, Arlen	D	United States Senate	\$1,000.00
Wyden, Ron	D	United States Senate	\$1,000.00
Total U.S. Senate Contributions			\$24,300.00
American Gas Association Political Action Committee	N/A	PAC	\$5,000.00
Asian American Action Fund	N/A	PAC	\$1,000.00
Blue Dog Political Action Committee	D	PAC	\$5,000.00
BOMA International Political Action Committee	N/A	PAC	\$600.00
Committee for Hispanic Causes/Building Our Leadership Diversity PAC (CHC BOLD PAC)	N/A	PAC	\$3,000.00
Congressional Black Caucus PAC	N/A	PAC	\$1,000.00
Congressional Trust 2010	R	Joint Fundraiser	\$2,500.00
Democratic Congressional Campaign Committee	D	Political Party	\$6,250.00
Democratic Senatorial Campaign Committee	D	Political Party	\$15,000.00
ERICPAC	R	Leadership PAC	\$2,500.00
Freedom Project	R	Leadership PAC	\$5,000.00
Majority Committee	R	Leadership PAC	\$5,000.00
National Republican Congressional Committee	R	Political Party	\$5,000.00
National Republican Senatorial Committee	R	Political Party	\$7,500.00
New Democrat Coalition Political Action Committee (NDC-PAC)	D	PAC	\$2,500.00
New Democratic Coalition Political Action Committee (AKA NDC PAC)	D	PAC	\$2,500.00
New PAC	R	Leadership PAC	\$2,500.00
Nuclear Energy Institute Federal Political Action Committee	N/A	PAC	\$5,000.00
PowerPAC of the Edison Electrical Institute	N/A	PAC	\$5,000.00
Republican Mainstreet Partnership PAC	R	PAC	\$2,000.00
Solidarity PAC	D	Leadership PAC	\$1,500.00
Valley Political Action Committee	D	Leadership PAC	\$1,000.00
Total Leadership/Other PAC Contributions			\$86,350.00
Total Federal PAC Contributions			\$181,400.00

[Back](#)

Copyright © 2004 - 2011 PG&E Corporation. All Rights Reserved . [feedback](#) . [sitemap](#) . [privacy policy](#)

EXHIBIT B-5



about us investors news sustainability

Search

POLITICAL ENGAGEMENT | CORPORATE CONTRIBUTIONS

- about us
- our team
- corporate governance
- compliance & ethics
- careers
- history
- safety
- contact us

[Back](#)

2010 Campaign Contributions

The following candidates, state and local ballot measures, political parties and other committees received corporate campaign contributions from PG&E in 2010:

Candidate/Committee/Organization	Party	Office	2010 Total
Abe-Koga, Margaret	N/A	City Council, City of Mountain View	\$200.00
Achadjian, Khatchik	R	Assembly	\$4,149.00
Adams, Anthony	R	Assembly	\$500.00
Albertson, Chris	N/A	City Council, City of Petaluma	\$200.00
Alejo, Luis	D	Assembly	\$4,900.00
Allen, Michael	D	Assembly	\$3,900.00
Alvarado, Teresa	N/A	Supervisor, Santa Clara County	\$500.00
Anderson, Joel	R	State Senate	\$3,900.00
Anderson, Susan	N/A	Supervisor, Fresno County	\$1,000.00
Armstrong, Harry	N/A	City Council, City of Clovis	\$1,500.00
Atkins, Toni	D	Assembly	\$7,800.00
Baines, Oliver	N/A	City Council, City of Fresno	\$900.00
Barba, Anthony	N/A	Supervisor, Kings County	\$500.00
Barnes, Janet	N/A	City Council, City of Salinas	\$250.00
Barrera, Tony	N/A	City Council, City of Salinas	\$250.00
Bartley, Scott	N/A	City Council, City of Santa Rosa	\$500.00
Bates, Nathan	N/A	Mayor, City of Richmond	\$250.00
Bauer-Davoli, Louise	N/A	City Council, City of Fresno	\$750.00
Berryhill, Bill	R	Assembly	\$5,800.00
Berryhill, Tom	R	State Senate	\$3,900.00
Bigelow, Frank	N/A	Supervisor, Madera County	\$1,000.00
Block, Marty	D	Assembly	\$1,500.00
Blumenfield, Bob	D	Assembly	\$3,500.00
Bonilla, Susan	D	Assembly	\$8,300.00
Bordonaro, Tom	N/A	Assessor, San Luis Obispo County	\$500.00
Bradford, Steven	D	Assembly	\$7,800.00
Brennan, Brian	N/A	City Council, City of Campbell	\$100.00
Briggs, Ron	N/A	Supervisor, El Dorado County	\$500.00
Brown, Jerry	D	Governor	\$31,800.00
Bruins, Jeannie	N/A	City Council, City of Citrus Heights	\$250.00
Bryant, Ronit	N/A	City Council, City of Mountain View	\$200.00
Buchanan, Joan	D	Assembly	\$6,800.00
Burns, Teri	N/A	Board, Natomas School Board	\$250.00

Butler, Betsy	D	Assembly	\$3,000.00
Caballero, Anna	D	State Senate	\$3,202.00
Calcagno, Lou	N/A	Supervisor, Monterey County	\$250.00
Calderon, Charles	D	Assembly	\$5,300.00
Calderon, Ron	D	State Senate	\$3,100.00
Callaway, Merita	N/A	Supervisor, Calaveras County	\$500.00
Campos, Nora	D	Assembly	\$7,800.00
Campos, Xavier	N/A	City Council, City of San Jose	\$500.00
Cannon, Sam	N/A	City Council, City of Roseville	\$250.00
Carpenter, Val	N/A	City Council, City of Los Altos	\$200.00
Carrasco, Magdalena	N/A	City Council, City of San Jose	\$500.00
Carter, Andrew	N/A	City Council, City of San Luis Obispo	\$200.00
Carter, Wilmer Amina	D	Assembly	\$1,900.00
Case, Judy	N/A	Supervisor, Fresno County	\$1,000.00
Cedillo, Gilbert	D	Assembly	\$3,500.00
Chan, Wilma	N/A	Supervisor, Alameda County	\$500.00
Chin, Ryan	N/A	City Council, City of Sacramento	\$250.00
Church, Mark	N/A	Clerk-Assessor-Recorder, San Mateo County	\$500.00
Cogan, Jim	N/A	City Council, City of San Jose	\$250.00
Constant, Pete	N/A	City Council, City of San Jose	\$250.00
Conway, Connie	R	Assembly	\$3,900.00
Cook, Paul	R	Assembly	\$3,900.00
Cook-Kallio, Cheryl	N/A	City Council, City of Pleasanton	\$250.00
Cooley, Steve	R	Attorney General	\$6,500.00
Correa, Lou	D	State Senate	\$1,271.00
Costello, Joe	N/A	City Council, City of Arroyo Grande	\$200.00
Coto, Joe	D	State Senate	\$1,000.00
Cristina, Jeff	N/A	City Council, City of Campbell	\$100.00
Dahlmeier, Linda	N/A	Mayor, City of Oroville	\$1,000.00
Davis, Gary	N/A	City Council, City of Elk Grove	\$250.00
De La Torre, Hector	D	Insurance Commissioner	\$5,000.00
de Leon, Kevin	D	State Senate	\$3,000.00
Dickinson, Roger	D	Assembly	\$4,900.00
Dolbow Vann, Kim	N/A	Supervisor, Colusa County	\$500.00
Donohue, Dennis	N/A	Mayor, City of Salinas	\$500.00
Egan, Elizabeth	N/A	District Attorney, Fresno County	\$1000.00
Emmerson, Bill	R	State Senate	\$3,900.00
Evans, Noreen	D	State Senate	\$5,900.00
Fang, James	N/A	Director, Bay Area Rapid Transit Board	\$1,000.00
Fletcher, Nathan	R	Assembly	\$1,500.00
Fong, Paul	D	Assembly	\$3,900.00
Fuentes, Felipe	D	Assembly	\$6,800.00
Fuller, Jean	R	State Senate	\$5,400.00
Furutani, Warren	D	Assembly	\$4,800.00
Gaines, Ted	R	State Senate	\$5,400.00

Gaigiani, Cathleen	D	Assembly	\$6,800.00
Garrick, Martin	R	Assembly	\$3,900.00
Gatto, Mike	D	Assembly	\$8,800.00
Gibson, Mike	N/A	Mayor, City of Paso Robles	\$200.00
Gioia, John	N/A	Supervisor, Contra Costa County	\$500.00
Glass, David	N/A	Mayor, City of Petaluma	\$200.00
Gordon, Richard S.	D	Assembly	\$1,000.00
Gorell, Jeff	R	Assembly	\$6,300.00
Gorin, Susan	N/A	City Council, City of Santa Rosa	\$500.00
Groom, Carole	N/A	Supervisor, San Mateo County	\$500.00
Grove, Shannon	R	Assembly	\$3,900.00
Hagen, Carl	N/A	City Council, City of Placerville	\$250.00
Hagman, Curt	R	Assembly	\$1,000.00
Halderman, Linda	R	Assembly	\$3,900.00
Hall, Isadore	D	Assembly	\$5,800.00
Hamon, John	N/A	City Council, City of Paso Robles	\$200.00
Hanley, Kevin	N/A	City Council, City of Auburn	\$250.00
Harkey, Diane	R	Assembly	\$4,900.00
Harris, Dilenna	N/A	Mayor, City of Vacaville	\$500.00
Harris, Mike	N/A	City Council, City of Petaluma	\$200.00
Hayashi, Mary	D	Assembly	\$3,900.00
Herman, Tim	N/A	City Council, City of Roseville	\$250.00
HernandezEdward P.	D	State Senate	\$6,300.00
Hernandez, Juan	N/A	City Council, City of Santa Rosa	\$500.00
Hernandez, Roger	D	Assembly	\$7,800.00
Higginbotham, Shelly	N/A	Mayor, City of Pismo Beach	\$200.00
Hill, Jerry	D	Assembly	\$900.00
Hollingsworth, Dennis	R	State Senate	\$5,000.00
Holman, Elbert	N/A	City Council, City of Stockton	\$1,500.00
Horsley, Don	N/A	Supervisor, San Mateo County	\$500.00
Huber, Alyson	D	Assembly	\$5,800.00
Hueso, Ben	D	Assembly	\$7,800.00
Hunter, Jill	N/A	City Council, City of Saratoga	\$150.00
Ives, Brent	N/A	Mayor, City of Tracy	\$75.00
Janda, Greg	N/A	City Council, City of Rocklin	\$250.00
Jeffries, Kevin	R	Assembly	\$1,000.00
Johnson, Ray	N/A	City Council, City of Petaluma	\$200.00
Johnson, Russell	N/A	City Council, City of Bakersfield	\$500.00
Jones, Dave	D	Insurance Commissioner	\$1,500.00
Jones, Tommy	N/A	Mayor, City of Los Banos	\$500.00
Jung, Mary	D	Board, San Francisco County Dem Party	\$500.00
Kanalakis, Mike	N/A	Sheriff, Monterey County	\$250.00
Kennedy, Patrick	N/A	City Council, City of Sacramento	\$250.00
Kirk, Maureen	N/A	Supervisor, Butte County	\$500.00

Knights, Steve	R	Assembly	\$4,800.00
Laird, John	D	State Senate	\$2,511.00
LaMalfa, Doug	R	State Senate	\$1,200.00
Lamnin, Sara	N/A	City Council, City of Hayward	\$250.00
Lara, Ricardo	D	Assembly	\$7,800.00
Larson, Phil	N/A	Supervisor, Fresno County	\$900.00
Lau, James	D	Assembly	\$3,900.00
Lavagnino, Steve	R	Supervisor, Santa Barbara County	\$250.00
Ledesma, Chris	N/A	City Council, City of West Sacramento	\$250.00
Lee, Otto	N/A	City Council, City of Sunnyvale	\$2,500.00
Logue, Dan	R	Assembly	\$3,900.00
Lopez, Myrna	N/A	City Council, City of Richmond	\$250.00
Low, Evan	N/A	City Council, City of Campbell	\$250.00
Lyons, Bill	N/A	Supervisor, Stanislaus County	\$1,000.00
Ma, Fiona	D	Assembly	\$1,000.00
Maffei, Paolo	N/A	Supervisor, Tuolumne County	\$750.00
Maldonado, Abel	R	Lieutenant Governor	\$7,500.00
Mansoor, Allan	R	Assembly	\$3,900.00
Marble, Bill	N/A	City Council, City of Woodland	\$250.00
Martinez, Revecca	N/A	Clerk-Recorder, Madera County	\$500.00
Massetti, Cecilia	N/A	Superintendent of Schools, Madera County	\$500.00
Mayne, Jeff	N/A	Mayor, City of Petaluma	\$200.00
McHugh, Pete	N/A	Mayor, City of Milpitas	\$250.00
McNutt, Diane	N/A	Town Council, Town of Los Gatos	\$150.00
Mendoza, Tony	D	Assembly	\$3,900.00
Miller, Jeff	R	Assembly	\$5,900.00
Miller, Steve	N/A	City Council, City of Citrus Heights	\$250.00
Mitchell, Holly	D	Assembly	\$4,900.00
Mitchoff, Karen	N/A	Supervisor, Contra Costa County	\$250.00
Montelth, Dick	N/A	Supervisor, Stanislaus County	\$1,000.00
Morrell, Mike	R	Assembly	\$3,900.00
Munks, Greg	N/A	Sheriff, San Mateo County	\$500.00
Nahabedian, Nayiri	D	Assembly	\$1,000.00
Nau, Karen	N/A	City Council, City of Petaluma	\$200.00
Negrete McLeod, Gloria	D	State Senate	\$1,900.00
Nelson, Mike	N/A	Supervisor, Merced County	\$750.00
Nemeth, Gary	N/A	Mayor, City of Paso Robles	\$200.00
Nestande, Brian	R	Assembly	\$6,800.00
Nguyen, Madison	N/A	City Council, City of San Jose	\$500.00
Niello, Roger	R	State Senate	\$1,500.00
Nielsen, Jim	R	Assembly	\$3,900.00
Norby, Chris	R	Assembly	\$3,000.00
O'Banion, Jerry	N/A	Supervisor, Merced County	\$750.00
Olivier, Clint	N/A	City Council, City of Fresno	\$1,250.00

Olsen, Kristin	R	Assembly	\$3,900.00
O'Malley, Tom	N/A	City Council, City of Atascadero	\$200.00
Oropeza, Jenny	D	State Senate	\$2,000.00
Ours, Jake	N/A	City Council, City of Santa Rosa	\$500.00
Page, Chuck	N/A	City Council, City of Saratoga	\$150.00
Parkinson, Ian	N/A	Sheriff-Coroner, San Luis Obispo County	\$500.00
Parra, Pete	D	Assembly	\$3,900.00
Pearl, Richard	N/A	Supervisor, Fresno County	\$250.00
Perea, Henry R.	N/A	City Council, City of Lincoln	\$1,000.00
Perea, Henry T.	D	Assembly	\$3,900.00
Perez, John A.	D	Assembly	\$3,900.00
Perez, Manuel	D	Assembly	\$4,800.00
Perez, Steve	N/A	Supervisor, Kern County	\$500.00
Piepho, Mary N.	N/A	Officeholder Account (Supervisor, Contra Costa County)	\$500.00
Pirzynski, Joe	N/A	Town Council, Town of Los Gatos	\$150.00
Poochigian, Debbie	N/A	Supervisor, Fresno County	\$1,500.00
Portantino, Anthony	D	Assembly	\$3,900.00
Powers, Bridget	N/A	City Council, City of Auburn	\$250.00
Price, Curren	D	State Senate	\$7,700.00
Quintero, Sal	N/A	City Council, City of Fresno	\$750.00
Rabbitt, David	N/A	Supervisor, Sonoma County	\$4,000.00
Radford, John	N/A	City Council, City of Los Altos Hills	\$250.00
Reed, Chuck	N/A	Mayor, City of San Jose	\$250.00
Reiss, Mary Ann	N/A	City Council, City of Pismo Beach	\$200.00
Rocha, Donald	N/A	City Council, City of San Jose	\$500.00
Rockholm, Rocky	N/A	Supervisor, Placer County	\$2,000.00
Rohan, Susan	N/A	City Council, City of Roseville	\$250.00
Rubio, Michael	D	State Senate	\$7,800.00
Rubio, Ralph	N/A	Mayor, City of Seaside	\$250.00
Runner, George	R	Board of Equalization	\$3,000.00
Salinas, Simon	N/A	Supervisor, Monterey County	\$250.00
Saylor, Don	N/A	Supervisor, Yolo County	\$500.00
Schenirer, Jay	N/A	City Council, City of Sacramento	\$250.00
Scrivner, Zack	N/A	Supervisor, Kern County	\$500.00
Sherlock, Joan	N/A	City Council, City of Los Altos Hills	\$250.00
Siegel, Jac	N/A	City Council, City of Mountain View	\$200.00
Silva, James W.	R	Assembly	\$3,900.00
Skinner, Nancy	D	Assembly	\$900.00
Smith, Laurie	N/A	Sheriff, Santa Clara County	\$250.00
Smyth, Cameron	R	Assembly	\$3,900.00
Solorio, Jose	D	Assembly	\$5,800.00
Steinbeck, Ed	N/A	City Council, City of Paso Robles	\$200.00

Steinberg, Darrell	D	State Senate	\$4,200.00
Sullivan, Mike	D	Board, San Francisco County Dem Party	\$250.00
Swanson, Sandre	D	Assembly	\$3,900.00
Sweeney, Mike	N/A	Mayor, City of Hayward	\$250.00
Tate, Steve	N/A	Mayor, City of Morgan Hill	\$250.00
Thomas, Russ	N/A	Supervisor, Calaveras County	\$500.00
Thomson, Helen	N/A	Supervisor, Yolo County	\$1,000.00
Torres, Norma	D	Assembly	\$1,000.00
Valadao, David	R	Assembly	\$7,800.00
Valle, Richard	N/A	Supervisor, Kings County	\$1,500.00
Vargas, Juan	D	State Senate	\$3,900.00
Vasquez, John	N/A	Supervisor, Solano County	\$500.00
Villalta, Michael	N/A	Mayor, City of Los Banos	\$500.00
Villegas, Steve	N/A	City Council, City of Salinas	\$250.00
Villines, Mike	R	Insurance Commissioner	\$1,500.00
Viramontes, Maria	N/A	City Council, City of Richmond	\$250.00
Wasserman, Mike	N/A	Supervisor, Santa Clara County	\$250.00
Waterman, Richard	N/A	City Council, City of Campbell	\$100.00
Weir, Kenton	N/A	City Council, City of Bakersfield	\$200.00
Wheeler, Tom	N/A	Supervisor, Madera County	\$1000.00
White, Justin	N/A	Supervisor, Madera County	\$1,000.00
Williams, Das	D	Assembly	\$2,000.00
Williams, Forrest	N/A	Supervisor, Santa Clara County	\$250.00
Worhtley, Steve	N/A	Supervisor, Tulare County	\$1000.00
Wyland, Mark	R	State Senate	\$5,8590.00
Xiong, Blong	N/A	City Council, City of Fresno	\$1,000.00
Yee, Garrett	D	Assembly	\$2,000.00
Yee, Leland	D	State Senate	\$3,900.00
Yuill, Scott	N/A	City Council, City of Rocklin	\$250.00
Zhao, Yan	N/A	City Council, City of Saratoga	\$150.00
Total Corporate Contributions to Candidates			\$513,958.00
African American Voter Registration, Education and Participation Project	N/A	PAC	\$20,000.00
Alameda County Democratic Central Committee	Political Party	D	\$1,500.00
Asian American Small Business PAC	N/A	PAC	\$10,000.00
Asian Pacific Demprcratic Club PAC	N/A	PAC	\$500.00
Bay Area Council Political Action Committee	N/A	PAC	\$50,000.00
Bay Area Municipal Elections Committee	N/A	PAC	\$1,500.00
Berkeley Alliance for Progress	N/A	Measure R, City of Berkeley	\$5,000.00
Berkeley Democratic Club	D	PAC	\$2,000.00
Black Women Organized for Political Action State PAC (BWOPA)	N/A	PAC	\$5,000.00
Building California's Future: John A. Perez Ballot Measure Committee	D	Ballot Measure Committee	\$5,000.00
Building Emeryville Schools Together (BEST) Committee for Support of School Bond Measure J	N/A	Measure J, Alameda County	\$5,000.00

Building Owners and Managers Association of San Francisco PAC-Ballot Issues	N/A	PAC	\$10,000.00
Building Owners and Managers Association of San Francisco PAC-IE	N/A	PAC	\$10,000.00
California 2020: Senator Alex Padilla's Ballot Measure Committee	D	Ballot Measure Committee	\$7,500.00
California Business PAC, Sponsored by California Chamber of Commerce (CALBUSPAC)	N/A	PAC	\$600,000.00
California Forward Issues Action Committee	N/A	Statewide Ballot Committee	\$50,000.00
California Professional Firefighters Ballot Issues Committee	N/A	PAC	\$100,000.00
California Republican Party	R	Political Party	\$375,000.00
California Taxpayers Advocate	N/A	Independent Expenditure PAC	\$10,000.00
California Young Democrats	D	PAC	\$5,000.00
Californians for a Fresh Start, A Coalition of Businesses and Working Men and Women	N/A	Statewide Ballot Committee	\$100,000.00
Californians for Balance and Fairness in the Civil Justice System	N/A	Independent Expenditure PAC	\$25,000.00
Californians for Clean Energy Future	N/A	PAC	\$739.11
Californians for Jobs and a Strong Economy	D	PAC	\$10,000.00
Californians for Voter Turnout, Education & Registration	N/A	PAC	\$75,000.00
Californians to Protect Our Right to Vote	N/A	Proposition 16	\$42,930,394.06
Chinese American Democratic Club Political Action Committee (CADCPAC)	N/A	PAC	\$650.00
Clean SF	N/A	PAC	\$65,000.00
Committee for Children's Health - Yes on A 2010	N/A	Measure A, Santa Clara County	\$1,000.00
Committee on Jobs Government Reform Fund	N/A	PAC	\$25,000.00
Common Sense San Joaquin	N/A	LAFCO Application	\$908,623.90
Conservation Action Fund	N/A	Proposition 22	\$150,000.00
Democratic State Central Committee of California	D	Political Party	\$452,000.00
East Bay Young Democrats	D	PAC	\$5,000.00
Elk Grove Chamber of Commerce Political Action Committee	N/A	PAC	\$1,000.00
Emmerson Legal Defense Fund	R	Legal Defense Fund	\$2,500.00
Fresno Chamber PAC	N/A	PAC	\$10,000.00
Golden State Leadership Council: Jim Nielsen Ballot Measure Committee	R	Ballot Measure Committee	\$5,000.00
Golden State Leadership Fund PAC	N/A	PAC	\$75,000.00
Governor Schwarzenegger's California Dream Team, a ballot measure committee	R	Ballot Measure Committee	\$100,000.00
Harry S. Truman - Slate	D	PAC	\$1,000.00
Inspiration and Hope for California (IH for CA)	D	Ballot Measure Committee	\$2,000.00
JobsPAC, a Bi-Partisan Coalition of California Employers	N/A	PAC	\$30,000.00
League of California Cities CITIPAC	N/A	PAC	\$250,000.00
Los Angeles County Democratic Party - Issues and Advocacy Committee	D	Political Party	\$175,000.00
Merced County Democratic Central Committee	D	Political Party	\$25,000.00
Monterey Bay Central Labor Council Committee on Political Education	N/A	PAC	\$2,000.00
Moving California Forward	N/A	PAC	\$3,500.00
No on 23 - Californians to Stop the Dirty Energy Proposition.	N/A	Proposition 23	\$500,000.00
North Bay Leadership Council Issues PAC	N/A	PAC	\$3,500.00
North Bay Leadership Council PAC	N/A	PAC	\$6,500.00
Oakland Jobs PAC	N/A	Primarily Formed Committee to Support Don Perata	\$10,000.00
Oakland Metropolitan Chamber of Commerce (OAKPAC)	N/A	PAC	\$2,500.00
OakPAC, Oakland Metropolitan Chamber of Commerce	N/A	PAC	\$5,000.00
One California for All - Yee for C	N/A	Proposition C - San Francisco	\$2,500.00
Peninsula Coalition Issues PAC	N/A	PAC	\$5,000.00
Plan C San Francisco PAC	N/A	PAC	\$5,000.00
Pleasanton Chamber of Commerce Business and			

Community Political Action Committee	N/A	PAC	\$2,000.00
Prosperity for California, A Ballot Measure Committee Sponsored by Assemblyman Solorio	D	Ballot Measure Committee	\$5,000.00
Rancho Cordova Chamber of Commerce PAC	N/A	PAC	\$1,000.00
Rocklin Area Chamber PAC	N/A	PAC	\$2,500.00
Sacramento Central Labor Council - COPE	N/A	PAC	\$2,500.00
Salinas Valley Democratic Club	N/A	PAC	\$2,500.00
San Francisco Building and Construction Trades Council Political Organization of Workers for Employees Rights (POWER PAC)	N/A	PAC	\$2,500.00
San Francisco Democratic Club	D	PAC	\$17,000.00
San Francisco Earthquake and Disaster Response Plan, Yes on B	N/A	Proposition B - San Francisco	\$1,000.00
San Francisco Forward, sponsored by San Francisco Chamber of Commerce	N/A	PAC	\$10,000.00
San Jose Silicon Valley Chamber of Commerce Political Action Committee (CHAMBERPAC)	N/A	PAC	\$5,000.00
San Mateo County Central Labor Council COPE	N/A	PAC	\$2,500.00
Santa Clara & San Benito Counties Building & Construction Trades Council	N/A	PAC	\$2,500.00
Santa Clara County Democratic Central Committee United Democratic Campaign	D	Political Party	\$1,250.00
Santa Rosa Chamber Business and Community Political Action Committee	N/A	PAC	\$2,500.00
Silicon Valley Leadership Group's Save California Jobs No - No on Proposition 23 and No on Proposition 24	N/A	Proposition 23 and Proposition 24	\$1,000.00
Sonoma County Alliance Political Action Committee	N/A	PAC	\$1,750.00
Sonoma Valley Community Political Action Committee (SonomaPAC)	N/A	PAC	\$2,500.00
South Bay AFL-CIO Labor Council Committee on Political Education (COPE)	N/A	PAC	\$2,500.00
Stanislaus Republican Central Committee (State Acct.)	R	Political Party	\$7,800.00
State and Local PAC	PAC	N/A	\$8,552.94
Stonewall Democratic Club - Issues and Advocacy Committee	D	PAC	\$5,000.00
SUNPAC	N/A	PAC	\$1,500.00
Taxpayers for Rod Wright Legal Defense Fund	D	Legal Defense Fund	\$5,000.00
The Diversity PAC	D	PAC	\$20,000.00
Tulare County Republican Central Committee (State Acct.)	R	Political Party	\$7,800.00
Unity PAC, A Sponsored Committee of the Alameda Labor Council, AFL-CIO	N/A	PAC	\$10,000.00
Ventura County Republican Party	R	Political Party	\$500.00
Voters for a New California	N/A	PAC	\$6,500.00
Women in Power	N/A	PAC	\$5,000.00
Working Californians	N/A	Independent Expenditure PAC	\$100,000.00
Yes on Measure BB Oaklanders for Community Health & Safety	N/A	Measure BB, City of Oakland	\$2,000.00
Yes on Measure Q, Citizens for Quality Schools	N/A	Measure Q, Fresno County	\$15,000.00
Yes on Prop A - Committee for Safe Schools	N/A	Proposition A - San Francisco	\$10,000.00
Total Corporate Contributions to Other Committees			\$47,515,560.01
Total Corporate Contributions			\$48,029,518.01

[Back](#)

EXHIBIT B-6



[about us](#) [investors](#) [news](#) [sustainability](#)

[Search](#)

POLITICAL ENGAGEMENT | ADVOCACY AND LOBBYING POLICIES AND PROCEDURES

about us
our team
corporate governance
compliance & ethics
careers
history
safety
contact us

[Back](#)

PG&E's Advocacy and Lobbying Policies and Procedures:

The Boards of Directors of PG&E Corporation and Pacific Gas and Electric Company are apprised of significant advocacy efforts. The Public Policy Committee of the PG&E Corporation Board of Directors also reviews and recommend board-level and senior management approval limits for payments from PG&E Corporation and its subsidiaries (together, "PG&E") to certain organizations that may engage in political activity. Contributions and expenditures are fully disclosed as required by law and in annual reports provided to the Public Policy Committee.

PG&E also regularly files publicly available lobby reports disclosing our activity. These include:

- [Federal Lobby Reports](#)
- [California State Lobby Reports](#)

PG&E employees who communicate with federal, state, or local officials on behalf of PG&E for the purpose of influencing official action or who engage in lobby activity coordinate with the PG&E Political Resources unit to ensure compliance with federal, state and local political laws.

[Back](#)

EXHIBIT B-7



[about us](#)

[investors](#)

[news](#)

[sustainability](#)

[Search](#)

POLITICAL ENGAGEMENT | POLITICAL ENGAGEMENT - 2010 TRADE ASSOCIATION DUES

- [about us](#)
- [our team](#)
- [corporate governance](#)
- [compliance & ethics](#)
- [careers](#)
- [history](#)
- [safety](#)
- [contact us](#)

[Back](#)

Political Engagement - 2010 Trade Association Dues

Portion of membership dues to trade associations that were non-deductible under section 162(e)(1) of the Internal Revenue Code.*

Name of Recipient	Portion of Dues That Were Non-Deductible
American Gas Association	\$35,497
California Electric Transportation Coalition	\$54,600
California Council for Environmental & Economic Balance (CCEEB)	\$12,217
Edison Electric Institute	\$344,748

* Includes trade associations which received annual membership dues over \$50,000. Reported amount based on information provided by the trade associations to PG&E Corporation and Pacific Gas and Electric Company.

[Back](#)