

DRAFT COMMISSION POLICY	
Category: Commission Governance	Title: COMMISSION COMMENTS TO FEDERAL AGENCIES
Committee of Origin: Policy and Governance	Policy Number:
Date of Adoption:	Resolution No.
Revision:	Resolution No.

The Commission, acting as a body, appoints the General Counsel, and the President directs the General Counsel consistent with her or his statutory authority and the Principles for General Counsel policy. The Commission’s General Counsel is authorized to “represent and appear for the people of the State of California and the commission in all actions and proceedings involving any question under this part or any order or act of the commission.” (Public Utilities Code § 307.)

The General Counsel directs Legal Division to lead the drafting of formal comments which the CPUC submits to Federal agencies, either in responses to requests for formal comment or on the CPUC’s own initiative.

It is the Commission’s policy that:

- All formal comments submitted by the CPUC to Federal agencies shall be consistent with the CPUC’s adopted strategic directives.
- All staff recommendations for formal comment to Federal agencies to be prepared under the General Counsel’s direction shall be presented to the five-member Commission for approval.
- The General Counsel shall maintain a protocol for the preparation and Commission review of comments to Federal agencies that sets out roles, responsibilities, and timelines for legal and technical staff. The presently effective protocol is attached to this policy.