

**PACIFIC GAS AND ELECTRIC COMPANY**  
**CHAPTER 5**  
**ALLEGED DEFICIENCIES IN DATA REQUEST RESPONSES**

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## CHAPTER 5

### ALLEGED DEFICIENCIES IN DATA REQUEST RESPONSES

In this chapter, we address the CPSD allegations regarding: (A) Gas Control audio recordings and transcripts; (B) Brentwood Alternate Gas Control facility security camera; (C) identification of PG&E employees at Milpitas Terminal; and (D) a service level agreement regarding call logging services.

#### A. Gas Control Audio Recordings and Transcripts

##### 1. Gas Control Phone Lines

CPSD implies there are missing Gas Control recordings as PG&E has 16 phone lines into the San Francisco Gas Control Room, and PG&E only provided recordings for 5 consoles. CPSD further notes its investigators did not follow-up on this discrepancy and recommends the issue be addressed in the future.<sup>1</sup>

PG&E provided all Gas Control recordings to CPSD, as requested, in its data responses.<sup>2</sup> The 16 phone lines identified by CPSD are programmed to direct calls to each of the 5 consoles, where the calls are recorded, to ensure no call goes unanswered or unrecorded. As a result, the recordings for the 5 consoles are all calls recorded on September 9, 2010.

##### 2. Gas Control Audio Files

CPSD asserts there are missing Gas Control audio files based on non-sequential numbering of the audio files produced by PG&E. Additionally, CPSD asserts PG&E failed to explain why some of the non-Gas Control audio files were after business hours and that PG&E did not produce evidence of the other types of calls recorded on the evening of September 9, 2010.<sup>3</sup>

The numbering of the Gas Control audio files provided to CPSD is non-sequential because the recording system also records phone calls from other non-Gas Control PG&E departments, some of which, such as Energy Trading, also work hours outside of 9 a.m. to 5 p.m., not because of missing

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<sup>1</sup> Felts Supplement at 6.

<sup>2</sup> Exs. 5-1, 5-2, 5-3.

<sup>3</sup> Felts Supplement at 6.

1 audio files, as explained in PG&E's response.<sup>4</sup> CPSD's data requests did  
2 not seek documentation regarding the calls recorded from the non-Gas  
3 Control departments. Nonetheless, PG&E provides with this testimony a list  
4 of every call recorded on September 9, 2010 by the recording system that  
5 captures Gas Control phone calls.<sup>5</sup>

### 6 **3. Gas Control Audio Recording and Transcript Review**

7 CPSD asserts at least one person that was present in the San Francisco  
8 Gas Control room not identified by PG&E in a February 6, 2012 data  
9 response<sup>6</sup> was reviewing audio records of September 9, 2010 after 10.p.m.  
10 CPSD bases this assertion on a Gas Control recording excerpt regarding  
11 personnel working on a timeline, and implies the individual could have  
12 deleted audio files.<sup>7</sup>

13 CPSD's assertion is based on the inaccurate conclusion that "[I]t would  
14 be impossible for [REDACTED] to figure out when phone calls were made  
15 and when things occurred without reviewing the call recordings for that  
16 evening."<sup>8</sup> The timeline referenced in the Gas Control recording CPSD cites  
17 was created by a Gas Control employee from handwritten notes taken in  
18 Gas Control during the events of September 9, 2010, as described in the  
19 abnormal incident report provided in PG&E's data request response<sup>9</sup> to  
20 CPSD. That employee did not review Gas Control call recordings on  
21 September 9, 2010 to create the referenced timeline.

### 22 **4. Gas Control Audio Transcripts**

23 CPSD, relying on differences in words and punctuation, asserts PG&E's  
24 transcription of the September 9, 2010 Gas Control recordings were  
25 inaccurate. CPSD bases this assertion on a comparison of PG&E's

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<sup>4</sup> Ex. 5-4.

<sup>5</sup> Ex. 5-7.

<sup>6</sup> Felts Supplement at 6-7.

<sup>7</sup> Felts Supplement at 6.

<sup>8</sup> Ex. 5-5.

<sup>9</sup> Ex. 5-6.

1 transcript to CPSD's "independent transcript", and further asserts there are  
2 missing audio files.<sup>10</sup>

3 The differences CPSD identifies result from different transcribers  
4 transcribing recordings that are not always clear and that contain uncommon  
5 names and words specific to PG&E's natural gas pipeline system and  
6 operations. The NTSB transcription of the same Gas Control recordings  
7 provides another example of how different transcribers will produce  
8 transcripts with different words when transcribing the same recordings.<sup>11</sup>  
9 Additionally, and as discussed in Section 1 above, there are no missing  
10 audio files.

## 11 **B. Brentwood Alternate Gas Control Facility Security Camera**

12 CPSD alleges that PG&E provided contradictory data responses regarding  
13 video recordings at the Brentwood Alternate Gas Control facility and that this  
14 constitutes a violation of Rule 1.1, Commission Executive Director Preservation  
15 Order, and Commission Resolution No. L-403. CPSD supports these  
16 allegations through PG&E data request responses<sup>12</sup> related to an internal video  
17 camera, Camera 6, at the Brentwood Alternate Gas Control facility.<sup>13</sup>

18 PG&E provided a response<sup>14</sup> to CPSD on October 10, 2011 which  
19 contained the known facts at that time. On March 9, 2012, PG&E provided a  
20 revised response<sup>15</sup> which contained new facts PG&E became aware of  
21 regarding the Brentwood Alternate Gas Control facility security camera, namely,  
22 that no video was recorded from the security camera on the digital video  
23 recorder (DVR). As PG&E self-disclosed the new facts to CPSD and revised  
24 prior responses<sup>16</sup>, the alleged Rule 1.1 violation is unwarranted. Additionally,  
25 Camera 6 recorded only video images, and all Gas Control audio recordings  
26 from September 9, 2010 are available, as described in Section A.2 above.

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<sup>10</sup> Felts Supplement at 7-8.

<sup>11</sup> See NTSB Ex. 2Y and Addendum to Ex. 2Y, Docket No. SA-534.

<sup>12</sup> Ex. 5-8.

<sup>13</sup> Felts Supplement at 1-5.

<sup>14</sup> Ex. 5-8.

<sup>15</sup> Ex. 5-9.

<sup>16</sup> Exs. 5-8, 5-9, 5-10, 5-11, 5-12.

1 **C. Identification of PG&E employees at Milpitas Terminal**

2 CPSD asserts PG&E violated Rule 1.1 by failing to identify all of the people  
3 in Milpitas that were handling the pressure problems on September 9, 2010. In  
4 support of this, CPSD alleges PG&E omitted the name of the Supervisor for the  
5 Milpitas Terminal, who was present after 5 PM, from PG&E's responses  
6 to CPSD.<sup>17</sup>

7 CPSD requested the names of field crew personnel who had access to  
8 operating diagrams at the Milpitas Terminal<sup>18</sup>, and the names of maintenance  
9 personnel and the maintenance supervisor headquartered at the Milpitas  
10 Terminal and their work hours on September 9, 2010.<sup>19</sup> Neither of the data  
11 requests asked PG&E to identify all of the people at the Milpitas Terminal  
12 handling the pressure problem on September 9, 2010, or all of the people who  
13 were present after 5 PM at Milpitas Terminal. The alleged violation is based on  
14 a question that was not asked.

15 **D. Call Logging Services (Verint) Contract**

16 CPSD alleges PG&E's inability to produce a copy of the Verint Service Level  
17 Agreement as it existed on September 9, 2010 amounts to a violation of Section  
18 451, Commission Executive Director Preservation Order, and Commission  
19 Resolution No. L-403.<sup>20</sup>

20 PG&E located the Verint Service Level Agreement in effect on September 9,  
21 2010 and provided it to CPSD in a Supplemental data response<sup>21</sup> dated May  
22 31, 2012.

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23  
<sup>17</sup> Felts Supplement at 8.

<sup>18</sup> Ex. 5-13.

<sup>19</sup> Ex. 5-14.

<sup>20</sup> Felts Supplement at 8-9.

<sup>21</sup> Ex. 5-15.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**CHAPTER 6**  
**STATEMENTS OF QUALIFICATIONS**

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1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **STATEMENT OF QUALIFICATIONS OF BENEDICT J. ALMARIO**

3    Q 1    Please state your name and business address.

4    A 1    My name is Benedict J. Almario, and my business address is Pacific Gas and  
5            Electric Company, 245 Market St., San Francisco, California.

6    Q 2    Briefly describe your responsibilities at Pacific Gas and Electric Company  
7            (PG&E).

8    A 2    I am currently the Director of Electric Operations' Emergency Management  
9            department. In this position, I am responsible for coordinating the overall  
10           response to large electric emergencies such as significant winter storms. I am  
11           also responsible for overseeing the financial program management functions for  
12           the electric emergency recovery program. In 2010, I was the Director of  
13           Incident Command. I was responsible for gas and electric preparedness  
14           activities. I also oversaw event response for significant events, both gas and  
15           electric.

16   Q 3    Please summarize your educational and professional background.

17   A 3    I received a Bachelor of Science degree in Business Management from Saint  
18           Mary's University, in 1996, and a Master of Business Administration with an  
19           emphasis in Finance from California State University East Bay in 2000. I joined  
20           PG&E in 1990 beginning my career in the Power Generation organization  
21           overseeing operations and maintenance departments. In 2000 I transferred to  
22           Transmission and Distribution (T&D) operations where I held a series of  
23           positions of increasing responsibility. These positions were in the fields of T&D  
24           operations, emergency response, strategic planning, and financial program  
25           management administration.

26   Q 4    What is the purpose of your testimony?

27   A 4    I am sponsoring Chapter 4.F.1, PG&E's Emergency Response.

28   Q 5    Does this conclude your statement of qualifications?

29   A 5    Yes.



1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **STATEMENT OF QUALIFICATIONS OF DAVID HARRISON**

3    Q 11    Please state your name and business address.

4    A 11    My name is David Harrison. My business address is Pacific Gas and Electric  
5            Company, 2700 Ygnacio Valley Blvd., Walnut Creek, California.

6    Q 12    Briefly describe your responsibilities at Pacific Gas and Electric Company  
7            (PG&E).

8    A 12    I am a Technical Consultant for PG&E working on the MAOP Validation Project.  
9            My responsibilities include developing processes and criteria for reviewing,  
10           analyzing, and recording key information associated with PG&E's gas  
11           transmission pipelines. I also manage a group of professionals who work on  
12           various technical and records management processes.

13   Q 13    Please summarize your educational and professional background.

14   A 13    I have a Bachelor of Science degree in Mechanical Engineering from the  
15            University of California at Santa Barbara. I am a Registered Professional  
16            Engineer in the State of California. I also have a Master of Business  
17            Administration from San Jose State University. I hold certificates in computer  
18            programming from University of California at Santa Cruz. I worked for PG&E  
19            from 1983 to 1999, holding positions of increasing responsibility in the areas of  
20            engineering, construction, maintenance, and operations. From 1999 to 2009, I  
21            worked in various computer companies. Since 2009, I have worked on PG&E  
22            projects as a Technical Consultant.

23   Q 14    What is the purpose of your testimony?

24   A 14    I am sponsoring Chapter 3.C., How PG&E Has Historically Used Gas Pipeline  
25            Records; Chapter 4.A., Segment 180 Records Related to Construction and  
26            Reconditioned Pipe; and Chapter 4.B., Post-Installation Pressure Test and  
27            Records for Segment 180.

28   Q 15    Does this conclude your statement of qualifications?

29   A 15    Yes.

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **STATEMENT OF QUALIFICATIONS OF M. KIRK JOHNSON**

3    Q 16    Please state your name and business address.

4    A 16    My name is M. Kirk Johnson. My business address is Pacific Gas and Electric  
5            Company, 77 Beale St., San Francisco, California.

6    Q 17    Briefly describe your responsibilities at Pacific Gas and Electric Company  
7            (PG&E).

8    A 17    I am Vice President of Gas Transmission Maintenance and Construction for  
9            PG&E. I am responsible for the gas transmission function for PG&E's entire  
10           service territory and manage responsibilities such as the execution of the  
11           Pipeline Safety Enhancement Plan, hydrostatic pressure testing and liquid  
12           natural gas pipeline services.

13   Q 18    Please summarize your educational and professional background.

14   A 18    I received a Bachelor of Science degree in Mechanical Engineering from the  
15           University of California, Davis and a Master of Business Administration from  
16           California State University, Hayward. I joined PG&E in 1980 and held  
17           leadership roles with Gas System Operations, Gas Transmission Products and  
18           Sales, Gas Maintenance and Technical Support, and Maintenance and  
19           Construction. I became Vice President of Gas Engineering and Construction in  
20           October 2010, and have held my current position since August 2011.

21   Q 19    What is the purpose of your testimony?

22   A 19    I am sponsoring Chapter 3.B., PG&E's Gas Transmission System.

23   Q 20    Does this conclude your statement of qualifications?

24   A 20    Yes.

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **STATEMENT OF QUALIFICATIONS OF MARK KAZIMIRSKY**

3    Q 21    Please state your name and business address.

4    A 21    My name is Mark Kazimirsky. My business address is Pacific Gas and Electric  
5            Company, 375 North Wiget Lane, Walnut Creek, California.

6    Q 22    Briefly describe your responsibilities at Pacific Gas and Electric Company  
7            (PG&E).

8    A 22    I am a Principal Engineer in charge of the Supervisory Control and Data  
9            Acquisition (SCADA) and Controls Group in the Gas Transmission Engineering  
10           department.

11   Q 23    Please summarize your educational and professional background.

12   A 23    I have an engineering degree in Electromechanical Engineering from the  
13            Institute of Technology, Odessa, Ukraine. I have been with PG&E for over 32  
14            years in various engineering and management positions. I have extensive  
15            experience in gas system operations, SCADA, control systems and automation  
16            technologies for the natural gas industry.

17   Q 24    What is the purpose of your testimony?

18   A 24    I am sponsoring Chapter 4.D., Milpitas Terminal on September 9, 2010, and  
19            Chapter 4.E., Supervisory Control and Data Acquisition (SCADA) System.

20   Q 25    Does this conclude your statement of qualifications?

21   A 25    Yes.

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **STATEMENT OF QUALIFICATIONS OF SARA B. PERALTA**

3    Q 26    Please state your name and business address.

4    A 26    My name is Sara B. Peralta, and my business address is Pacific Gas and  
5            Electric Company, 375 North Wiget Lane, Walnut Creek, California.

6    Q 27    Briefly describe your responsibilities at Pacific Gas and Electric Company  
7            (PG&E).

8    A 27    I am currently the Director of Gas Operations' Quality and Improvement  
9            department. In this position, I am responsible for overseeing quality control,  
10           quality assurance, and other improvement activities across PG&E's gas  
11           transmission and distribution organizations. In 2010, I was the Manager of  
12           Integrity Management.

13   Q 28    Please summarize your educational and professional background.

14   A 28    I received a Bachelor of Science degree in mechanical engineering from  
15            California Polytechnic State University, San Luis Obispo. I am a National  
16            Association of Corrosion Engineers (NACE) certified Cathodic Protection  
17            Technologist (Level 3). I joined PG&E in 2002 in the Gas Distribution and  
18            Planning Engineering department. I then helped build PG&E's gas  
19            transmission Integrity Management program as an External Corrosion Direct  
20            Assessment (ECDA) field engineer. I progressed to the position of ECDA  
21            project engineer, with supervisory responsibilities for the ECDA field engineers.  
22            After four years in the Integrity Management department, I moved to the  
23            Maintenance and Construction organization as a field supervisor. In 2009, I  
24            returned to gas engineering as the Manager of Integrity Management, where I  
25            was responsible for risk management, integrity assessment implementation,  
26            and the operator qualification program for both the transmission and distribution  
27            systems. In January 2012, I became the Director for Quality and Improvement  
28            for PG&E's Gas Operations.

29   Q 29    What is the purpose of your testimony?

30   A 29    I am sponsoring Chapter 3E, Integrity Management and Records.

31   Q 30    Does this conclude your statement of qualifications?

32   A 30    Yes.

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **STATEMENT OF QUALIFICATIONS OF STEVEN H. PHILLIPS**

3    Q 31    Please state your name and business address.

4    A 31    My name is Steven H. Phillips, and my business address is Pacific Gas and  
5            Electric Company, 77 Beale Street, San Francisco, California.

6    Q 32    Briefly describe your responsibilities at Pacific Gas and Electric Company  
7            (PG&E).

8    A 32    I am the Director of Regulatory Strategy and Compliance in the Customer  
9            Operations Department of PG&E's Customer Care organization. As such, I am  
10           responsible for managing Customer Operations participation in various  
11           proceedings before the CPUC, including the General Rate Case and for  
12           ensuring compliance within Customer Operations with various rules and  
13           regulations such as SEC reporting, SOX assessments, etc.

14   Q 33    Please summarize your educational and professional background.

15   A 33    I received a bachelor of science degree in mechanical engineering from the  
16           University of Wyoming in 1971. I am registered in the state of California as a  
17           professional engineer in mechanical engineering.

18           In May 1972, I joined PG&E as a gas engineer. From 1972 through 1993, I  
19           worked in various engineering and operations positions within PG&E's Gas  
20           department. From 1993 to 2002, I worked in several departments including  
21           Marketing, Information Technology and Internet Services.

22           In late 2002, I joined Customer Operations as manager of Contact Center  
23           Enhancements, which was responsible for implementing new and maintaining  
24           existing technologies for PG&E's Contact Centers, Credit and Collections  
25           Department and Local Offices. In 2007 I became Senior Manager of Office  
26           Services where I was responsible for the operation of PG&E's 75 customer  
27           service offices and approximately 600 Neighborhood Payment Centers. I have  
28           testified in numerous CPUC proceedings. In January 2012, I assumed my  
29           present position.

30   Q 34    What is the purpose of your testimony?

- 1 A 34 I am sponsoring Chapter 2.A, Overview of PG&E's Records Retention  
2 Standards and Practices, and Chapter 4.C, Records Used by PG&E to  
3 Establish MAOP for Line 132.
- 4 Q 35 Does this conclude your statement of qualifications?
- 5 A 35 Yes.



1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **STATEMENT OF QUALIFICATIONS OF KAREN S. ROTH**

3    Q 36    Please state your name and business address.

4    A 36    My name is Karen S. Roth and my business address is Pacific Gas and  
5            Electric Company, 375 North Wiget Lane, Walnut Creek, California.

6    Q 37    Briefly describe your responsibilities at Pacific Gas and Electric Company  
7            (PG&E).

8    A 37    I am the Director of Codes and Standards in the Standards and Policies  
9            Department of PG&E's Gas Operations organization. In this position I am  
10           responsible for developing and maintaining the guidance documents  
11           including standards and procedures that define how Gas Operations work is  
12           performed.

13   Q 38    Please summarize your educational and professional background.

14   A 38    I received a Bachelor of Science degree in Mechanical Engineering from the  
15            University of California at Davis in 1981. I joined PG&E that same year and  
16            have worked in a variety of engineering and leadership positions across  
17            PG&E's service territory focusing primarily on gas distribution and gas  
18            transmission. Beginning in 2005, I spent approximately five years in  
19            Finance in the areas of program management and business case  
20            development, returning to Gas Operations as the Director of Gas  
21            Maintenance and Construction in the Northern Region in 2010. In 2011, I  
22            joined Gas Engineering as the Director of Integrity Management and  
23            assumed my current position in October 2011.

24   Q 39    What is the purpose of your testimony?

25   A 39    I am sponsoring Chapter 3.D., Earthquake Risks and the GPRP.

26   Q 40    Does this conclude your statement of qualifications?

27   A 40    Yes.

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **STATEMENT OF QUALIFICATIONS OF JONATHAN E. SEAGER**

3    Q 41    Please state your name and business address.

4    A 41    My name is Jonathan E. Seager, and my business address is Pacific Gas  
5            and Electric Company, 77 Beale Street, San Francisco, California.

6    Q 42    Briefly describe your responsibilities at Pacific Gas and Electric Company  
7            (PG&E).

8    A 42    I am a Principal Regulatory Case Manager in the Regulatory Relations  
9            organization, responsible for case management of CPUC jurisdiction  
10           proceedings.

11   Q 43    Please summarize your educational and professional background.

12   A 43    I received a Bachelor of Science degree in Business Administration with an  
13            emphasis in management information systems and a minor in economics  
14            from San Jose State University, and a Master in Business Administration  
15            degree with an emphasis in Finance from the University of San Francisco. I  
16            have been employed at PG&E since 2005, have held analytical and support  
17            positions in various PG&E organizations, and have sponsored testimony  
18            before the Commission. Prior to my employment at PG&E, I worked at  
19            Salas O'Brien Engineers where my responsibilities included project analysis  
20            and information system administration.

21   Q 44    What is the purpose of your testimony?

22   A 44    I am sponsoring Chapter 5, Alleged Deficiencies in Data Request  
23            Responses.

24   Q 45    Does this conclude your statement of qualifications?

25   A 45    Yes.

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **STATEMENT OF QUALIFICATIONS OF SUMEET SINGH**

3    Q 46    Please state your name and business address.

4    A 46    My name is Sumeet Singh, and my business address is Pacific Gas and  
5            Electric Company, 2700 Ygnacio Valley Road, Walnut Creek, California.

6    Q 47    Briefly describe your responsibilities at Pacific Gas and Electric Company  
7            (PG&E).

8    A 47    As senior director of the Asset Knowledge Management organization within  
9            Gas Operations, I am responsible for the leadership and oversight of an  
10           organization focused on providing and sustaining real-time, traceable,  
11           verifiable, complete and accurate gas transmission and distribution asset  
12           information. The organization has accountability for overseeing the Records  
13           verification and MAOP validation effort, producing maps, managing  
14           records, developing a gas distribution geospatial information system,  
15           ensuring data quality, and maintaining technology and tools.

16   Q 48    Please summarize your educational and professional background.

17   A 48    I received a Bachelor of Science degree in Civil and Environmental  
18           Engineering from the University of California, Berkeley and a Master of  
19           Business Administration degree from University of California, Los Angeles  
20           Anderson School of Management. I am also a registered professional civil  
21           engineer in the state of California. I started with PG&E in 2000 as a gas  
22           engineer after graduating from UC Berkeley and have held a variety of  
23           positions with increasing level of responsibilities in the Gas Engineering and  
24           Operations organization both in the Gas Distribution and Gas Transmission  
25           Departments. I resigned from the company in 2006 to pursue my master's  
26           degree and returned in 2008 as a member of the Master of Business  
27           Administration Leadership Development Program. Since returning to PG&E,  
28           I have held leadership roles within Finance and Energy Procurement's  
29           Renewable Resource Development organizations.

30           I previously sponsored testimony before the California Public Utilities  
31           Commission for the Pipeline Safety Enhancement Plan (R.11-02-019).

32   Q 49    What is the purpose of your testimony?

- 1 A 49 I am sponsoring Chapter 1.D., Gas Transmission Records Improvement
- 2 Efforts.
- 3 Q 50 Does this conclude your statement of qualifications?
- 4 A 50 Yes.

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **STATEMENT OF QUALIFICATIONS OF KEITH SLIBSAGER**

3    Q 51    Please state your name and business address.

4    A 51    My name is Keith Slibsager. My business address is Pacific Gas and  
5            Electric Company, 77 Beale St., San Francisco, California.

6    Q 52    Briefly describe your responsibilities at Pacific Gas and Electric Company  
7            (PG&E).

8    A 52    I am a Manager in the Gas System Operations department. I have  
9            responsibility for the gas control room operations including the remote  
10           monitoring and controlling function of the pipeline and management of the  
11           natural gas pipeline inventory.

12   Q 53    Please summarize your educational and professional background.

13   A 53    I have a Bachelor of Science degree in Agriculture/Plant Science from  
14            California State University of Fresno. I have worked at PG&E for 29 years,  
15            holding various positions of increasing responsibility in gas operations.

16   Q 54    What is the purpose of your testimony?

17   A 54    I am sponsoring Chapter 4.D., Milpitas Terminal on September 9, 2010; and  
18            Chapter 4.E., Supervisory Control and Data Acquisition (SCADA) System.

19   Q 55    Does this conclude your statement of qualifications?

20   A 55    Yes.