

PUBLIC UTILITIES COMMISSION

320 West 4th St, Suite 500
LOS ANGELES, CA 90013

**Sent via email**

November 16, 2010

To:

Brian Cherry
V.P. Regulatory Relations
Pacific Gas & Electric
PO BOX 770000
San Francisco, CA 94177
BKC7@pge.com

From:

Christopher W. Poschl
Senior Enforcement Analyst
California Public Utilities Commission
Consumer Protection and Safety Division, Utility Enforcement Branch
320 West 4th St., Suite 500
Los Angeles, CA 90013
cwp@cpuc.ca.gov
(213) 576-7090

Data Request No: 01**Due Date: December 10, 2010****Subject: Mr. Devereaux**

The California Public Utilities Commission's (CPUC) Consumer Protection and Safety Division (CPSD) requests information related to William Devereaux's activities as described below. Please provide all the information as it becomes available but no later than the close of business day on December 10, 2010. If you are unable to provide the information by this date, please provide a written explanation by November 29, 2010 as to why the response date cannot be met and your best estimate of when the information can be provided. If you have any questions regarding this data request, please contact me as soon as possible at either cwp@cpuc.ca.gov or 213-576-7090.

Data Request:

1. Please provide copies of all documents produced as result PG&E's investigation into William Devereaux's monitoring of online smart meter discussion groups.
2. Provide a list of all legal cases related to PG&E's smart meter program, including any legal action taken by online smart meter discussion groups.
3. Provide a list of all legal cases relating to William Devereaux's monitoring of online smart meter discussion groups.
4. Describe Mr. Devereaux's role with PG&E's SmartMeter program.
5. Provide organizational chart for Mr. Devereaux's SmartMeter Group including the reporting structure for Mr. Devereaux.

6. Identify any work groups within PG&E, Mr. Devereaux or his team regularly worked with, including the nature of the work group and associated organizational chart.
7. Did Mr. Devereaux review SmartMeter or EMF complaints received by PG&E?
8. Provide copies of all email, or phone correspondence, meeting notes, or internal communications related to PG&E's investigation into William Devereaux's monitoring of online smart meter discussion groups.
9. Describe the action(s) PG&E has taken or plans to take as a result of Mr. Devereaux's monitoring of online smart meter discussion groups.
10. What is PG&E's policy regarding Mr. Devereaux's monitoring of online smart meter discussion groups?
11. When did Mr. Devereaux first begin to monitor online smart meter discussion groups?
12. Provide a list of all the online smart meter discussion groups Mr. Devereaux monitored, joined or attempted to join.
13. Provide all of Mr. Devereaux's email messages to other PG&E employees relating to monitoring of online smart meter discussion groups.
14. Did PG&E or Mr. Devereaux act on any information acquired from monitoring the online smart meter discussion groups? If so, describe how.
15. Did Mr. Devereaux communicate with anyone at PG&E about his monitoring of online smart meter discussion groups?
16. When did PG&E first learn that Mr. Devereaux was monitoring online smart meter discussion groups?
17. Provide a listing of all meetings and appearances made by Mr. Devereaux at the CPUC, relating to the smart meter program, since July 2009. Include copies of all documents developed as result of those meetings and appearances, attendee names, presentations, notes or meeting minutes,
18. Provide copies of all communications Mr. Devereaux provided to the CPUC's Energy Division, Commission Offices, or the Executive Director.
19. Provide a list of Mr. Devereaux's public appearances relating to the smart meter program, since July 2009; include date, and location of appearance.
20. Provide all reports, memos, white-papers, and briefs Mr. Devereaux authored, co-authored, contributed to, or oversaw relating to EMF.
21. What is Mr. Devereaux's involvement in any past, current or pending litigation relating to the smart meter program?

Please provide responses electronically via e-mail and in hard copy. For information available only in hard copy, please so state on your email response when the hard copy response was sent.

Carefully review the specifics of the above data request, and if you have any questions, do not hesitate to contact me via email (cwp@cpuc.ca.gov) or telephone (213-576-7090).

Submit the information **on or before December 10, 2010** either via e-mail, cwp@cpuc.ca.gov, or to:

California Public Utilities Commission
Consumer Protection and Safety Division

Attn: Chris Poschl, Utility Enforcement Branch
320 West 4th St., Suite 500
Los Angeles, CA 90013

If for any reason, you are unable to complete the data request by this date, please provide a written explanation —by 3:00 p.m. on November 29, 2010—why you cannot meet the response date and when you can provide the information.

Sincerely,

Christopher W. Poschl
Senior Enforcement Analyst
California Public Utilities Commission
CPSD Utility Enforcement Branch
cwp@cpuc.ca.gov
(213) 576-7090

Cc: Linda Woods, Supervisor