

**PACIFIC GAS AND ELECTRIC COMPANY
Gas Transmission System Records OII
Investigation 11-02-016
Data Response**

PG&E Data Request No.:	CARE_001-01		
PG&E File Name:	GasTransmissionSystemRecordsOII_DR_CARE_001-Q01		
Request Date:	March 30, 2011	Requester DR No.:	001
Date Sent:	April 11, 2011	Requesting Party:	Californians for Renewable Energy
PG&E Witness:		Requester:	Martin Homec

QUESTION 1

Provide a list or chart of all natural gas transportation or storage facilities (facilities) that are included in the scope of OII 11-02-016. A reference to proceedings of the National Transportation Safety Board, California Energy Commission or California Public Utilities Commission websites is sufficient. CARE needs a list of all facilities and a note explaining their ownership.

- A. Provide a list of insurance coverage purchased by PG&E or other relevant insurance coverage corresponding to each facility.
- B. Provide copies of the insurance documents together with all other relevant documents that will allow CARE to determine whether any of the insurance coverage is still active.

ANSWER 1

PG&E objects to this data request on the grounds that it seeks information that is beyond the scope of this proceeding as described by the Commission in the OII:

By this order, the Commission institutes a formal investigation to determine whether the named Respondent, Pacific Gas and Electric Company (PG&E), violated any provision or provisions of the California Public Utilities Code, Commission general orders or decisions, or other applicable rules or requirements pertaining to safety recordkeeping for its gas service and facilities. This proceeding will pertain to PG&E's safety recordkeeping for the San Bruno, California gas transmission pipeline that ruptured on September 9, 2010, killing eight persons. This investigation will also review and determine whether PG&E's recordkeeping practices for its entire gas transmission system have been unsafe and in violation of the law.

Notwithstanding this objection, PG&E responds as follows:

PG&E understands this OII to apply to its recordkeeping policies and practices as they relate to all its gas transmission facilities.

PG&E's general liability insurance policy covers all its gas transmission facilities.

In response to CARE's statement at the March 17, 2011, prehearing conference, PG&E's insurance policies cover events that occur during the term of the policies. In the situation referenced by CARE during the prehearing conference regarding the Hazardous Substance Mechanism, insurance coverage was matched with the time in prior years during which the environmental damage occurred. As regards the San Bruno incident, the only insurance policies "active" are those that were in effect on the date of the incident.