

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

PG&E Data Request No.:	CARE_001-03		
PG&E File Name:	GasTransmissionSystemRecordsOII_DR_CARE_001-Q03		
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 3

Were the natural gas transportation or storage facilities that are included in the scope of OII 11-02-016 licensed and permitted by the applicable local licensing authorities (sic)? If not, provide a list of facilities not properly licensed and an explanation of which permits, etc. were omitted.

What insurance coverage would these licensing authorities have that could provide coverage for expenses for natural gas facilities that were improperly installed or that did not conform with the best engineering practices that were applicable at the time that the facilities were installed and inspected by these local authorities?

ANSWER 3

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.