

From: Cooke, Michelle
Sent: 7/7/2011 9:48:50 AM
To: Horner, Trina (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=TNHC)
Cc:
Bcc:
Subject: FW: Discovery Status

Problems in discovery land for our audit. Can we touch base today? I'm going to visit my grandmother this afternoon but am otherwise free.

Issues:

Data Responses

Hydrotest Documentation

Whatever you shared with Julie and Paul this week

Other?

From: Wong, Zee
Sent: Thursday, July 07, 2011 9:32 AM
To: Cooke, Michelle
Cc: Halligan, Julie; Berdge, Patrick S.
Subject: FW: Discovery status
Importance: High

Michelle,

PG&E's delay in responding to Overland's data requests is a concern now.

FYI see below.

Zee Wong, Financial Examiner

(415) 703-2306

across from room 3100

zee.wong@cpuc.ca.gov

From: Redacted
Sent: Thursday, July 07, 2011 7:53 AM
To: BTS1@pge.com
Cc: Wong, Zee; Howard Lubow; Berdge, Patrick S.; Redacted
Subject: Discovery status

Hi Bruce:

Our initial discovery was submitted on June 8th. As of today only about one third of the questions have been answered. When do you expect to send out the remaining responses? Please send me a list of all the questions from the first set that you do not expect to respond to by Tuesday, July 12. For each item on the list indicate the expected response date.

As I emphasized at the kick-off meeting last week, this audit is on a tight schedule and meeting that schedule requires a relatively short response time for discovery. The response time for the first data request is not satisfactory and is putting the audit behind schedule. Hopefully, performance will improve significantly with the second set.

The second set was submitted on July 5th. We need to have the responses to 90 percent of those questions by July 22 to avoid further significant delays in the audit schedule. Please send me a list of the questions from the second set that you do not expect to respond to by July 22. For each item on the list indicate the expected response date.

Please contact me if you have any questions about the questions in the second set.

Gary