

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation on the
Commission's Own Motion into the
Operations and Practices of Pacific Gas and
Electric Company with Respect to Facilities
Records for its Natural Gas Transmission
System Pipelines.

I.11-02-016
(Filed February 24, 2011)

**PACIFIC GAS AND ELECTRIC COMPANY'S FURTHER
RESPONSE**

MICHELLE L. WILSON
LISE H. JORDAN
Pacific Gas and Electric Company
Law Department
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-6965
Facsimile: (415) 973-0516
E-Mail: LHJ2@pge.com

JOSEPH M. MALKIN
COURTNEY J. LINN
Orrick, Herrington & Sutcliffe LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105
Telephone: (415) 773-5505
Facsimile: (415) 773-5759
Email: jmalkin@orrick.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

September 13, 2011

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation on the Commission's Own Motion into the Operations and Practices of Pacific Gas and Electric Company with Respect to Facilities Records for its Natural Gas Transmission System Pipelines.

I.11-02-016
(Filed February 24, 2011)

**PACIFIC GAS AND ELECTRIC COMPANY'S FURTHER
RESPONSE**

I. INTRODUCTION

On June 20, 2011, Pacific Gas and Electric Company (PG&E) responded to the directives in the Order Instituting Investigation (OII). Appendix A to the June 20th Response reproduced the five chapters that were part of PG&E's Initial Response filed on April 18, 2011, and added new Chapters 1A, 2A, 2B, 3A, 6A-D, 7 and 8. In addition to the testimony in Appendix A, PG&E filed over 16,000 records responsive to the Commission's directives. Those records form part of Appendices B and C to the Response. Appendices B and C also included 11 indices (some with sub-indices) listing the records according to the chapter to which they correspond.¹ On July 12, 2011, PG&E filed an amendment to Appendices B and C to the Response, including additional records, adding unique document identification numbers, taking further steps to redact non-management PG&E employees, and correcting document identification numbers in the index to Chapter 7.

This filing further amends and supplements Appendices B and C. In this further response, PG&E has included a handful of additional records, described in more detail below,

¹ Appendices B and C contained the same indices and redacted documents but differed in the data storage format used. Appendix B consisted of 27 DVDs filed with the Commission and Appendix C consisted of an external hard drive served on all parties.

that are responsive to OII directives and should be included in Appendices B and C. PG&E is providing these records and amended portions of indexes of attachments with this filing on DVD as Attachment A, and will re-file Appendices B and C in their entirety on September 30, 2011.

II. DISCUSSION

The additional records filed in this amendment are described in more detail below.

(1) 2004 High Consequence Area Risk Calculation

This amendment includes the 2004 High Consequence Area Risk Calculation and incorporates it into the attachments to Chapter 6C. This document is being produced as Attachment P3-20055_1. The document previously produced as Attachment P3-20056 incorrectly indicated that it included both 2004 and 2005 High Consequence Area Risk Calculations, when it only included the calculations for 2005. Sub Index 4 to Chapter 6C has been amended accordingly.

(2) GPRP Priority Analysis and Databases

This amendment also includes additional documents related to the Gas Pipeline Replacement Program (GPRP) as Attachments P3-20038_1, P3-20038_2, and P3-20038_3. Attachment 20038_1 contains computer instructions for administering the GPRP program, including financial reporting and priority analysis calculations. Attachments P3-20038_2 and P3-20038_3 are snapshots of transmission pipe in the GPRP database as of September 2001. Attachment P3-20038_2 contains a list of transmission pipe segments in PG&E's transmission system at the time of the snapshot. Attachment P3-20038_3 contains a list of transmission pipe segments that had been replaced as part of the GPRP at the time of the snapshot. The Chapter 6C index of attachments has been amended accordingly.

III. CONCLUSION

As stated previously, PG&E understands the importance of the Commission's investigation into PG&E's recordkeeping practices associated with its gas transmission pipelines, and will continue to do its best to provide a comprehensive response to the OII's directives.

PG&E will continue to cooperate with the Commission, its staff and other parties over the course of this OIL.

Respectfully submitted,

_____/s/
LISE H. JORDAN
MICHELLE L. WILSON
Law Department
Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-6965
Facsimile: (415) 973-5520
Email: LHJ2@pge.com

_____/s/
JOSEPH M. MALKIN
COURTNEY J. LINN
Orrick, Herrington & Sutcliffe LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105
Telephone: (415) 773-5505
Facsimile: (415) 773-5759
Email: jmalkin@orrick.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

September 13, 2011

ATTACHMENT A

(Attachment A consists of a DVD which has been provided to the Commission's Docket Office and served on all parties.)

CERTIFICATE OF SERVICE

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is 77 Beale Street, San Francisco, California 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On September 13, 2011, I served a true copy of:

**PACIFIC GAS AND ELECTRIC COMPANY'S
FURTHER RESPONSE**

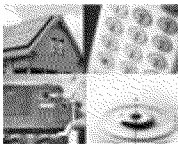
[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for **I.11-02-016** with an e-mail address.

[XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service list for **I.11-02-016** without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in San Francisco, California on September 13, 2011.

/s/
TAUVELA V. U'U



California Public
Utilities Commission

CPUC Home

CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

**PROCEEDING: I1102016 - CPUC - OII INTO THE
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: SEPTEMBER 6, 2011**

**[DOWNLOAD THE COMMA-DELIMITED FILE
ABOUT COMMA-DELIMITED FILES](#)**

[Back to Service Lists Index](#)

Parties

STEPHANIE C. CHEN
ATTORNEY
THE GREENLINING INSTITUTE
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: THE GREENLINING INSTITUTE

MARCEL HAWIGER
ENERGY ATTORNEY
THE UTILITY REFORM NETWORK
EMAIL ONLY
EMAIL ONLY, CA 00000-0000
FOR: TURN

MARTIN HOMECA
EMAIL ONLY
EMAIL ONLY, CA 00000-0000
FOR: CALIFORNIANS FOR RENEWABLE ENERGY

DEANA MICHELLE NG
SOUTHERN CALIFORNIA GAS COMPANY
555 W. 5TH STREET, STE. 1400
LOS ANGELES, CA 90013
FOR: SOUTHERN CALIFORNIA GAS COMPANY

DARRYL J. GRUEN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5133
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

ROBERT C. CAGEN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: LEGAL

AUSTIN M. YANG
CITY AND COUNTY OF SAN FRANCISCO
OFFICE OF THE CITY ATTORNEY, RM. 234
1 DR. CARLTON B. GODDLETT PLACE
SAN FRANCISCO, CA 94102-4682
FOR: CITY AND COUNTY OF SAN FRANCISCO

BRIAN K. CHERRY
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, ROOM 1087
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

CHRISTOPHER P. JOHNS
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

LISE H. JORDAN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B30A
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

JOSEPH M. MALKIN
ORRICK HERRINGTON & SUTCLIFFE LLP
THE ORRICK BUILDING
405 HOWARD STREET

BRIAN T. CRAGG
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

SAN FRANCISCO, CA 94105-2669
FOR: PACIFIC GAS AND ELECTRIC COMPANY

FOR: ENGINEERS AND SCIENTISTS OF
CALIFORNIA, LOCAL 20

STEVEN R. MEYERS
PRINCIPAL
MEYERS NAVE
555 12TH STREET, STE. 1500
OAKLAND, CA 94607
FOR: CITY OF SAN BRUNO

BARRY F. MCCARTHY
ATTORNEY
MCCARTHY & BERLIN, LLP
100 W. SAN FERNANDO ST., SUITE 501
SAN JOSE, CA 95113
FOR: NORTHERN CALIFORNIA GENERATION
COALITION (NCGC)

Information Only

CASSANDRA SWEET
DOW JONES NEWSWIRES
EMAIL ONLY
EMAIL ONLY, CA 00000

CLEO ZAGREAN
MACQUARIE CAPITAL (USA)
EMAIL ONLY
EMAIL ONLY, NY 00000

ENRIQUE GALLARDO
THE GREENLINING INSTITUTE
EMAIL ONLY
EMAIL ONLY, CA 00000

JAMES J. HECKLER
LEVIN CAPITAL STRATEGIES
EMAIL ONLY
EMAIL ONLY, NY 00000

LAUREN DUKE
DEUTSCHE BANK SECURITIES INC.
EMAIL ONLY
EMAIL ONLY, NY 00000

SCOTT SENCHAK
DECADE CAPITAL
EMAIL ONLY
EMAIL ONLY, NY 00000-0000

NAAZ KHUMAWALA
BANK OF AMERICA, MERRILL LYNCH
700 LOUISIANA, SUITE 300
HOUSTON, TX 77002

JEFFERY L. SALAZAR
SOUTHERN CALIFORNIA GAS COMPANY
555 W. FIFTH STREET, GT14D6
LOS ANGELES, CA 90013

RASHA PRINCE
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST 5TH STREET, GT14D6
LOS ANGELES, CA 90013-1034

SERGEANT GEOFF CALDWELL
CITY OF SAN BRUNO-POLICE DEPARTMENT
POLICE PLAZA-1177 HUNTINGTON AVENUE
SAN BRUNO, CA 94066-1500

KLARA A. FABRY
DIR. - DEPT. OF PUBLIC SERVICES
CITY OF SAN BRUNO
567 EL CAMINO REAL
SAN BRUNO, CA 94066-4247

CONNIE JACKSON
CITY MANAGER
CITY OF SAN BRUNO
567 EL CAMINO REAL
SAN BRUNO, CA 94066-4299

RACHAEL E. KOSS
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080

MARC D. JOSEPH
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080-7037

SARAH R. THOMAS
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5033
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

THERESA L. MUELLER
CITY AND COUNTY OF SAN FRANCISCO
CITY HALL, ROOM 234
1 DR. CARLTON B. GOODLETT PLACE
SAN FRANCISCO, CA 94102-4682

BRUCE T. SMITH
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B9A
SAN FRANCISCO, CA 94105

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105

SEEMA SRINIVASAN
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105

CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST. STE 303
SAN FRANCISCO, CA 94117-2242

CASE COORDINATION
PACIFIC GAS AND ELECTRIC COMPANY

BRITT STROTSMAN
MEYERS & NAVE

PO BOX 770000; MC B9A
SAN FRANCISCO, CA 94177

555 12TH STREET, SUITE 1500
OAKLAND, CA 94607
FOR: CITY OF SAN BRUNO

MELISSA W. KASNITZ
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, FOURTH FLOOR
BERKELEY, CA 94704-1204

MARGARET C. FELTS
M.C. FELTS COMPANY
8822 SHINER CT.
ELK GROVE, CA 95624

ANN L. TROWBRIDGE
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, SUITE 205
SACRAMENTO, CA 95864

DIANA S. GENASCI
ATTORNEY AT LAW
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, STE. 205
SACRAMENTO, CA 95864

MIKE CADE
ALCANTAR & KAHL, LLP
1300 SW 5TH AVE, SUITE 1750
PORTLAND, OR 97201

State Service

D. ISAIAH LARSEN, P.E.
CPUC
CPSD
EMAIL ONLY
EMAIL ONLY, CA 00000

KAN WAI TONG
CALIF PUBLIC UTILITIES COMMISSION
UTILITIES SAFETY AND RELIABILITY BRANCH
320 West 4th Street Suite 500
Los Angeles, CA 90013

MICHAEL COLVIN
ADVISOR - ENERGY
CPUC
RM. 5212
SAN FRANCISCO, CA 94102

AMY C. YIP-KIKUGAWA
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CATHERINE A. JOHNSON
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

EUGENE CADENASSO
CALIF PUBLIC UTILITIES COMMISSION
MARKET STRUCTURE, COSTS AND NATURAL GAS
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

HARVEY Y. MORRIS
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5036
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JULIE HALLIGAN
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
ROOM 2203
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KELLY C. LEE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MATTHEW TISDALE
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5303
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHELLE COOKE
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
ROOM 5108
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TERRIE D. PROSPER
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5301
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TOP OF PAGE

[BACK TO INDEX OF SERVICE LISTS](#)

**THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
EMAIL SERVICE LIST**

Last Updated: September 6, 2011

CPUC DOCKET NO. I1102016

atrowbridge@daycartermurphy.com;austin.yang@sfgov.org;ayk@cpuc.ca.gov;bcragg@goodinmacbride.com;BKC7@pge.com;bmcc@mccarthyLaw.com;bstrottman@meyersnave.com;bts1@pge.com;caj@cpuc.ca.gov;cassandra.sweet@dowjones.com;cem@newsdata.com;cjackson@sanbruno.ca.gov;cleo.zagrean@macquarie.com;cpe@cpuc.ca.gov;cpj2@pge.com;dgenasci@DayCarterMurphy.com;djjg@cpuc.ca.gov;dng@semprautilities.com;enriqueg@greenlining.org;filings@a-klaw.com;gcaldwell@sanbruno.ca.gov;hym@cpuc.ca.gov;jheckler@levincap.com;JLsalazar@SempraUtilities.com;JMalkin@Orrick.com;jmh@cpuc.ca.gov;kcl@cpuc.ca.gov;kfabry@sanbruno.ca.gov;kwt@cpuc.ca.gov;lauren.duke@db.com;lhj2@pge.com;marcel@turn.org;margaret@mfelts.com;martinhomec@gmail.com;MD7@cpuc.ca.gov;mdjoseph@adamsbroadwell.com;michael.colvin@cpuc.ca.gov;mlc@cpuc.ca.gov;mwt@cpuc.ca.gov;naaz.khumawala@baml.com;pucservice@dralegal.org;rcc@cpuc.ca.gov;regrelcpuccases@pge.com;rkoss@adamsbroadwell.com;RPrince@SempraUtilities.com;scott.senchak@decade-llc.com;sls@a-klaw.com;smeyers@meyersnave.com;srt@cpuc.ca.gov;StephanieC@greenlining.org;tdp@cpuc.ca.gov;theresa.mueller@sfgov.org;wmc@a-klaw.com;