

**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  
SECOND AMENDMENT TO RESPONSE FILED  
ON JUNE 20, 2011**

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  
SECOND AMENDMENT TO RESPONSE FILED  
ON JUNE 20, 2011**

**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 20<sup>th</sup> 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.<sup>1</sup> 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,

---

<sup>1</sup> 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.)*