

**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**

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September 13, 2011

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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,

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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**

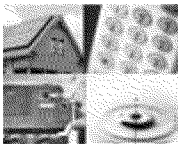
[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for **I.11-02-016** with an e-mail address.

[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

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CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

**PROCEEDING: I1102016 - CPUC - OII INTO THE
FILER: CPUC
LIST NAME: LIST
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