

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 10, 2011

**Via E-Mail**

Brian K. Cherry  
Vice President, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Room 1087  
San Francisco, CA 94105

Re: Internal Audit Data Request

Dear Mr. Cherry:

Enclosed please find follow-up data requests of the California Public Utilities Commission's (CPUC) Consumer Protection and Safety Division (CPSD) to Pacific Gas and Electric Company (PG&E), related to PG&E's September 23, 2011 responses to CPSD's September 1, 2011 data request.

Please contact me at 415-703-2130, or Harvey Morris at 415-703-1086, if you have any questions regarding these data requests.

Thank you for your prompt attention to this matter.

Sincerely,

/s/ Marion Peleo

Marion Peleo  
Staff Counsel

cc: Lise H. Jordan  
Michelle Cooke  
Harvey Y. Morris  
Valerie Malliett

**SECOND DATA REQUEST OF  
THE CONSUMER PROTECTION AND SAFETY DIVISION  
TO PACIFIC GAS AND ELECTRIC COMPANY**

Pursuant to California Public Utilities Code sections 314, 581 and 582, the Consumer Protection and Safety Division (CPSD) of the California Public Utilities Commission (CPUC), hereby provides these data requests to Pacific Gas and Electric Company (PG&E).

Please provide your responses to the following persons within 10 business days, or by October 24, 2011:

Harvey Y. Morris  
California Public Utilities Commission  
505 Van Ness Avenue, Room 5036  
San Francisco, California 94102  
415-703-1086  
hym@cpuc.ca.gov

Marion Peleo  
California Public Utilities Commission  
505 Van Ness Avenue, Room 4107  
San Francisco, California 94102  
415-703-2130  
map@cpuc.ca.gov

Valerie Malliett  
Consumer Protection and Safety Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102  
415-703-1815  
vm1@cpuc.ca.gov

## **INSTRUCTIONS**

Please answer the following Data Requests with written, verified responses pursuant to Public Utilities Code sections 581 and 582. Restate the text of each request prior to providing the response. For any questions, call or email the CPSD contact(s) above.

Each Data Request is continuing in nature. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify CPSD as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition or an instruction is unclear, notify CPSD as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

## **DEFINITIONS**

Unless the request indicates otherwise, the following definitions are applicable in providing the requested information.

1. "Document" or "documents" refers to all writings or records of every type in PG&E's possession, control or custody, including, but not limited to: testimony and exhibits, memoranda, correspondence, letters, reports (including drafts, preliminary, intermediate, and final reports), survey, written analyses, studies, summaries, pamphlets, books, charts, tabulations, notes,

- photographs, maps, bulletins, corporate or other minutes, diaries, transcripts, microfilm, microfiche, computer data, computer files, computer tapes, computer inputs, computer outputs and printouts, accounting statements, workpapers, engineering diagrams, speeches, and all other records. “Documents” includes copies of documents, including copies of documents containing handwritten notes. “Documents” also includes any attachments or appendices to documents.
2. “Relating to” means concerning, addressing, referring, discussing, commenting upon, analyzing, mentioning or involving in any way.
  3. “Identify”:
    - a. When used in reference to a person includes stating his or her full name, his or her most recent known business address and telephone number, and his or her present title or position;
    - b. When used in reference to documents includes stating the nature of the document (e.g., letter, memorandum), the date (if any), the title of the document, the identity of the author and/or the document, the location of the document, the identity of the person having possession, control or custody of the document, and the general subject matter of the document.
  4. “CPUC” as used herein refers to the California Public Utilities Commission.
  5. “CPSD” as used herein refers to the Consumer Protection and Safety Division of the CPUC.
  6. “PG&E” as used herein refers to Pacific Gas and Electric Company.
  7. “First Data Request” as used herein refers to the September 1, 2011 data request from Valerie Malliett of CPSD to PG&E, which contained three data requests involving internal audits and complaints filed in court and filed in-house.
  8. “Redeker Complaint” as used herein refers to the Complaint for Damages and Injunctive Relief filed by James A. Redeker against PG&E Corporation on August 13, 2008 in San Francisco County Superior Court, a copy of which was provided to CPSD by PG&E in response to Question 2 of the First Data Request.

### **SECOND DATA REQUESTS**

1. In response to Question 1 of the First Data Request, PG&E provided several documents, each identified with a file name in the following format: PGE\_DR\_CPSD\_001-Q1-[document number]\_[file number]\_CONF. With the exception noted below, please provide completely unredacted versions of document numbers 099, 101, 102, 103, 105, 111, 143, 192 and 382. The exception to this data request would be the portion of the documents that identify social security numbers or partial social security numbers; CPSD does not require that those social security numbers or partial social security numbers be disclosed in PG&E’s response.

2. This data request relates to the Redeker Complaint. Please identify and provide all documents relating to the organizational structure in 2006 of PG&E's Internal Auditing Department and its successor, including, but not limited to, organizational charts, job descriptions and descriptions of the responsibilities of internal investigators and of the manager of internal investigations.
3. This data request relates to Paragraphs 11-14 on pages 4-5 of the Redeker Complaint. Please identify and provide all documents relating to PG&E's computer system password control or security policy in as they relate to Paragraphs 11-14 of the Redeker Complaint, including, but not limited to, any documents and communications referred to in Paragraphs 11-14 of the Redeker Complaint, policy and standard practice manuals, handbooks and guides, internal investigation reports and files, memoranda, meeting notes, emails and other communications.
4. This data request relates to Paragraphs 15-18 on pages 5-7 of the Redeker Complaint. Please identify and provide all documents relating to PG&E's Hazardous Substance Mechanism as it relates to Paragraphs 15-18 of the Redeker Complaint, including, but not limited to, any documents and communications referred to in Paragraphs 15-18 of the Redeker Complaint, internal audit and fraud investigation reports, files, workpapers, notes, memoranda, emails and other communications, and contracts and subcontracts with hazardous waste disposal facilities.
5. This data request relates to Paragraphs 19-21 on pages 8-9 of the Redeker Complaint. Please identify and provide all documents relating to PG&E's Supplier Diversity Program as it relates to Paragraphs 19-21 of the Redeker Complaint, including, but not limited to, any documents and communications referred to in Paragraphs 19-21 of the Redeker Complaint, reports, files, workpapers, notes, memoranda, emails and other communications.
6. This data request relates to Paragraphs 22-23 on pages 9-10 of the Redeker Complaint. Please identify and provide all documents relating to travel expenses PG&E's president and chief operating officer as they relate to Paragraphs 22-23 of the Redeker complaint, including, but not limited to, any documents and communications referred to in Paragraphs 22-23 of the Redeker Complaint, reports, files, workpapers, notes, memoranda, emails and other communications.
7. This question relates to Paragraph 24 on page 10 of the Redeker Complaint. Please identify and provide all documents relating to PG&E's internal investigation of the activities referred to in Paragraph 24 of the Redeker Complaint, including, but not limited to, any documents and communications referred to in Paragraph 24 of the Redeker Complaint, internal audit and investigation reports, files, workpapers, notes, memoranda, emails and other communications.
8. This question relates to Paragraphs 25-26 on pages 10-11 of the Redeker Complaint. Please identify and provide all documents relating to PG&E's anti-fraud program and anti-fraud internal controls as they relate to Paragraphs 25-26 of the Redeker Complaint, including, but not limited to, any documents and communications referred to in Paragraphs 25-26 of the Redeker Complaint, reports, files, workpapers, notes, memoranda, emails and other communications.

9. This question relates to Paragraphs 27-29 on pages 11-13 of the Redeker Complaint. Please identify and provide all documents relating to PG&E's investigation of the activities referred to in Paragraphs 27-29 of the Redeker Complaint, including, but not limited to, any documents and communications referred to Paragraphs 27-29 of the Redeker Complaint, internal audit and corporate security investigation plans, reports, files, workpapers, notes, memoranda, emails and other communications.
10. This question relates to Paragraphs 30-33 on pages 13-14 of the Redeker Complaint. Please identify and provide all documents relating to PG&E's internal investigation of and communications regarding the activities referred to in Paragraphs 30-33 of the Redeker Complaint, including, but not limited to, any documents and communications referred to Paragraphs 30-33 of the Redeker Complaint, reports, files, workpapers, notes, memoranda, emails and other communications.