

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 13, 2011

To: PG&E  
[RegRelSBRequests@pge.com](mailto:RegRelSBRequests@pge.com)

From: Valerie Malliett  
(415) 703-1815  
[vm1@cpuc.ca.gov](mailto:vm1@cpuc.ca.gov)

**Re: Pipeline\_Reuse**  
**Due Date: October 27, 2011**

Dear PG&E:

The California Public Utilities Commission's (CPUC) Consumer and Protection and Safety Division (CPSD) requests information as described in the attached document.

Please carefully review the specifics of the attached data request. If you have any questions, do not hesitate to contact me via email ([vm1@cpuc.ca.gov](mailto:vm1@cpuc.ca.gov)) or telephone (415) 703-1815. Please submit the Data Response on or before October 27, 2011 to [SanBrunoGasSafety@cpuc.ca.gov](mailto:SanBrunoGasSafety@cpuc.ca.gov) and Hard Copy to:

Julie Halligan  
Deputy Director, CPSD  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

If for any reason, you are unable to complete the data request by this date, please provide a written explanation -- by 5:00 pm on October 17, 2011 -- why you cannot meet the response date and when you can provide the information.

Thank you for your cooperation.  
Sincerely,

Valerie Malliett,  
Legal Assistant to Michelle Cooke, Interim Director  
CPSD  
(415) 703-1815  
[vm1@cpuc.ca.gov](mailto:vm1@cpuc.ca.gov)

## DEFINITIONS AND INSTRUCTIONS

- A. You", "your", "responding party", and "respondent" refers to **PG&E**.
- B. The term "data" refers to any and all documents, work papers, reports, reference materials, spreadsheets, diskettes and any other papers or files in the respondent's possession, or in the possession of its agents, staff or representatives, including all written, recorded or graphic matters, however produced or reproduced, records, notes, summaries, schedules, contracts or diaries, reports, forecasts or appraisals, memoranda of telephone or in person conversations by or with any person, or any other memoranda, correspondence, letters, mail, e-mail, attachments to e-mail and all other forms of correspondence (however recorded), telegraphs, telexes or cables – whether presently in electronic or hard-copy form.
- C. Person means, in the plural as well as the singular, any natural person, association, partnership, corporation, or other form of legal entity, including all representatives of any such person.
- D. In answering each request, please reiterate the text of the data request to which the respondent is responding.
- E. Please provide responses electronically via e-mail and in hard copy. For data available only in hard copy, please so state on your email response when the hard copy response was sent.
- F. For any response that requires computation and/or calculation, please provide any and all relevant calculations on diskette(s) in Excel format.
- G. If any response refers to specific source document(s), please identify the source documents(s), specify the pages that are referenced and provide copies of the source documents(s).
- H. Provide the name and title of the person(s) who responded to the question(s) and his or her employer.

## DATA REQUEST

Please provide a Document Index that includes all requested documents relevant to this request. Uniquely number each document for identification.

1. For questions 1, 2, and 3 please refer to the attached document. At the time this document was written, did the short pups and scrap identified in the attached document make up one single 29.5 foot pipe or were some or all of the pups and scrap separate from each other? Provide all documents and data that support PG&E's response.
2. For each pup or piece of scrap or pipe identified in response to question 1, provide documentation identifying whether each pup or piece of scrap was re-used by PG&E after the attached memo was written, sold for salvage, or other disposition of the pipe, if applicable. Provide all documents and data that support PG&E's response. For this response, CPSD expects to see data and documents actually demonstrating where the pipe went after Milpitas, and will not be satisfied with a response limited to PG&E's policies of the period.
3. Provide a complete list of locations for any portion of the pipe identified in response to question 1 that was re-used. For each location of re-use, identify:
  - a. The line, segment, and mile post where each such pup or piece of scrap was re-used.
  - b. The date on which each such pup or piece of scrap re-entered service.
  - c. The reasons why each pipe was used again in service.
4. Provide all documents and data that support PG&E's response.
5. Was any pup or piece of scrap in this document disposed or sold for salvage?
6. If the answer to question 5 is yes, provide all documentation, including but not limited to accounting records, to show such disposal or sale. Please also provide a list showing the date each pup was disposed or sold, and provide documentation.

7. For questions 7(a) through 9, please refer to the National Transportation Safety Board Final Report (“Report”), Section 2.6.2.2 entitled “Identification and Assessment of Design/Material and Construction Threats on Line 132”.
  - a. Provide a list of all documents, including those that PG&E provided to the National Transportation Safety Board (“NTSB”), which identify both known and suspected design/material and construction defects on Line 132. These additional defects should include, but not be limited to, discovery of longitudinal weld seam cracks in addition to the four identified in the Report.
  - b. As part of the list requested in question 7(a), please provide the following:
    - i. If the defect was a weld, the date such a weld was made.
    - ii. The date each such weld was identified.
    - iii. The kind of defect.
    - iv. The segment of Line 132 where the defect is identified.
    - v. The precise mile post where the defect is identified.
    - vi. Whether PG&E provided the document to the NTSB prior to its issuance of the final report.
    - vii. Whether these defects are to welds or pipe or another element of Line 132.
    - viii. Whether these defects have been repaired or replaced.
    - ix. The entire chain of locations of each such defect, including the date of installation at each location.
    - x. A bates number for each document provided.
8. Please provide copies of all of the records requested by questions 7(a) and 7(b). Please provide a bates number on each document that properly matches the number requested by question 7(b)(i).
9. Please repeat the exercise requested in questions 7(b) and 8 for all other transmission lines in the PG&E system.

10. Please refer to PG&E's response to Data Request 8, question 16, submitted by PG&E on October 10<sup>th</sup>, 2011. For reference, the question and excerpt of the response of interest is shown below.

Question: "Provide complete, unedited, and unredacted copies of all video recordings and audio recordings from the Gas Control Rooms in San Francisco and Brentwood for the period 4 PM September 9, 2010 through 6 AM September 10, 2010. For any recording that PG&E is unable to do so, provide an explanation, including date, time, person and authority for deletions or redactions, and circumstances under which they were done."

Response: "There are no video cameras inside or immediately outside of the San Francisco Gas Control Room. Video cameras are installed at the Brentwood facility to monitor security system activation events. Video is recorded and retained on a digital video recorder until it is automatically overwritten when the disk array becomes full, which occurs after approximately 60 days. The video recording from the Brentwood facility for September 9 and 10, 2010, was overwritten in this manner."

11. Which person or person(s) at PG&E authorized the video identified in question 10 to be automatically overwritten?
12. Which person or person(s) at PG&E are responsible for managing the video recordings identified in question 10?
13. Please also refer to the attached letter from Commission Executive Director Paul Clanon to PG&E President Christopher Johns, dated September 13, 2010 ("letter"). In particular, please refer to point 7 in the letter.
14. Did Mr. Johns issue any direction or instructions to any PG&E employees to preserve the records ordered to be preserved by the point identified in question 13?
15. If so, please provide all of the instructions or directions Mr. Johns issued.
16. Did Mr. Johns instruct or communicate in any way that the staff who manage the video records identified in question 10 be informed to not allow the digital video recorder identified in question 10 to be automatically overwritten?

17. If the answer to question 16 is yes, please provide all such communications.
18. Please provide a list of all staff responsible for any portion of the management, handling, or any contact with the video recorder identified in question 10.