



**Pacific Gas and  
Electric Company®**

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October 27, 2011

Frank R. Lindh  
General Counsel  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Dear Mr. Lindh:

We recently have learned that some employees of the Commission have received and may continue to possess e-mails from PG&E that are protected from disclosure by the attorney-client privilege and/or work product doctrine. These emails, some of which include attachments, are identified by date, time, sender and recipient in the attached table.

PG&E continues to assert attorney-client privilege, the work product doctrine and all legal protections which apply to each such email and attachment.

PG&E respectfully requests that the Commission (i) refrain from examining these emails and attachments (and any documents reflecting the substance of same); (ii) promptly sequester each such email, attachment and any related documents; and (iii) protect these documents from disclosure to any Commission employee or third party.

While PG&E is not presently aware of any additional instances in which privileged materials were forwarded to the Commission, we continue to assert all applicable privileges and respectfully reserve the right to request sequestration of such materials to the extent any were forwarded. Should the Commission become aware of any such forwarded privileged material, we respectfully request that you immediately sequester same and notify PG&E.

Thank you for your prompt attention to this matter.

Very truly yours,

  
Sanford L. Hartman

SLH/gj

Attachment

By e-mail; original by first class mail

SB\_GT&S\_0380563

Date	Time	Sender	Recipient(s)	Attachment
09/15/2010	5:03 pm	B. Cherry	P. Clanon	Yes
09/16/2010	2:44 pm	B. Cherry	P. Clanon	Yes
09/18/2010	10:15 am	B. Cherry	P. Clanon	Yes
09/24/2010	1:58 pm	B. Cherry	P. Clanon	No
09/25/2010	8:06 pm	B. Cherry	P. Clanon	Yes
09/26/2010	3:04 pm	B. Cherry	P. Clanon	Yes
09/27/2010	12:14 pm	B. Cherry	P. Clanon	Yes
09/29/2010	4:19 pm	B. Cherry	P. Clanon	No
10/05/2010	12:51 pm	B. Cherry	P. Clanon	No
10/14/2010	5:22 pm	B. Cherry	J. Como	Yes
10/15/2010	3:49 pm	B. Cherry	P. Clanon	Yes
10/15/2010	4:45 pm	B. Cherry	P. Clanon	No
11/08/2010	1:29 pm	B. Cherry	P. Clanon	Yes
11/23/2010	5:20 pm	B. Cherry	P. Clanon F. Lindh	Yes
12/07/2010	8:30 am	B. Cherry	P. Clanon	No
12/13/2010	11:46 am	B. Cherry	P. Clanon	Yes
12/13/2010	1:23 pm	B. Cherry	P. Clanon	No
12/13/2010	1:56 pm	B. Cherry	P. Clanon	No
12/13/2010	1:57 pm	B. Cherry	P. Clanon	No
12/16/2010	6:47 am	B. Cherry	P. Clanon	No
01/05/2011	8:16 am	B. Cherry	P. Clanon F. Lindh	Yes
01/05/2011	8:17 am	B. Cherry	P. Clanon F. Lindh	Yes
01/05/2011	8:18 am	B. Cherry	P. Clanon F. Lindh	Yes
01/19/2011	7:38 pm	B. Cherry	P. Clanon	No
02/14/2011	9:53 am	B. Cherry	mpl@cpuc.ca.gov cab@cpuc.ca.gov	Yes
03/21/2011	7:34 pm	B. Cherry	P. Clanon F. Lindh	Yes
03/23/2011	6:06 pm	B. Cherry	P. Clanon F. Lindh	Yes
04/01/2011	8:04 am	B. Cherry	A. Aguilar J. Perlstein cjs@cpuc.ca.gov	Yes

<b>Date</b>	<b>Time</b>	<b>Sender</b>	<b>Recipient(s)</b>	<b>Attachment</b>
04/01/2011	3:36 pm	B. Cherry	M. Zafar	Yes
05/03/2011	11:48 am	B. Cherry	P. Clanon	No
05/19/2011	6:45 pm	B. Cherry	F. Lindh	Yes
05/20/2011	8:26 am	B. Cherry	F. Lindh	Yes
05/25/2011	2:03 pm	B. Cherry	M. Zafar	Yes
05/25/2011	2:03 pm	B. Cherry	M. Zafar	Yes
05/26/2011	8:57 am	B. Cherry	M. Zafar	No
06/17/2011	5:08 pm	B. Cherry	P. Clanon M. Cooke jf2@cpuc.ca.gov	Yes
07/12/2011	5:36 pm	B. Cherry	mp1@cpuc.ca.gov	Yes