

**I.11-02-016 LEGAL DIVISION  
DATA REQUEST NO. 16**

The Legal Division hereby requests that PG&E produce on or before October 21, 2011 the following documents in their entirety, complete with any appendices.

As a reference for answering the following questions, please see MAOP5439039 within PG&E's ECTS database, which is a document that shows 4,463.24 ft of 22" pipe originally installed on GM 40000 in 1930, salvaged and re-wrapped, then reused on the same project GM 123902 in 1954.

- 1) Prior to September 10, 2010, did PG&E have any written policies in place for tracking salvaged or reused pipe?
- 2) If yes, please provide copies of all such policies from before September 10, 2010.
- 3) Prior to September 10, 2010, did PG&E have any written policies in place as to the re-use of salvaged or used transmission pipe?
- 4) If yes, please provide copies of all such policies before September 10, 2010
- 5) After September 9, 2010 did PG&E create any new policies or change any then existing policies for tracking salvaged or reused transmission pipe?
- 6) If yes, please provide copies of these policies.
- 7) Please provide the dates that each of the policies provided in response to questions 2, 4, and 5 were created.
- 8) In practice, and before September 10, 2010, has PG&E tracked transmission pipe that had been either salvaged or reused before September 10, 2010?

- 9) If yes, please describe the method or methods by which PG&E tracked such pipe.
- 10) In practice, and after September 9, 2010, has PG&E tracked transmission pipe that had been either salvaged or reused after September 9, 2010?
- 11) If yes, please describe the method or methods by which PG&E tracked such pipe.
- 12) Provide all records generated by PG&E as a result of tracking methods described in answers to questions 8 and 10 above.
- 13) Has PG&E ever re-used transmission pipe that it has previously recorded as junked, salvaged, or identified for disposal in any other way? If so provide a table showing the following:
  - A. Identification of each such junked, salvaged, or disposal identified pipe.
  - B. The date of each such pipe's manufacture.
  - C. The type of pipe and welds, the metal (e.g. X42)
  - D. The pipeline number and segment or other source of the pipe in previous usage
  - E. The number of years of usage.
  - F. The reasons why each pipe was removed from service
  - G. The place where each such pipe was re-used in PG&E service.
  - H. The date on which each such pipe re-entered service.
  - I. The reasons why each pipe was used again in service.