

**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
THIRD AMENDMENT TO RESPONSE FILED
ON JUNE 20, 2011**

MICHELLE L. WILSON
LISE H. JORDAN
Pacific Gas and Electric Company
Law Department
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-6965
Facsimile: (415) 973-0516
E-Mail: LHJ2@pge.com

JOSEPH M. MALKIN
COURTNEY J. LINN
Orrick, Herrington & Sutcliffe LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105
Telephone: (415) 773-5505
Facsimile: (415) 773-5759
Email: jmalkin@orrick.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

September 30, 2011

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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 contained in 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 chapters in Appendix A, PG&E filed over 16,000 records. 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 most closely correspond.¹ On July 12, 2011, PG&E amended Appendices B and C to include additional records, add unique document identification numbers, take further steps to redact non-management PG&E employees, and correct document identification numbers in the index to Chapter 7. On September 15, 2011, PG&E filed a Second Amendment to the Response Filed on June 20, 2011, supplementing Appendices B and C with additional records responsive to OII directives.

This Third Amendment to the June 20th Response (Third Amendment) amends the chapters in Appendix A as follows: (1) in Chapter 2A, to provide additional substantive

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.

information about PG&E's electronic recordkeeping systems and aperture cards; (2) in Chapter 2A, to reference an additional document describing a PG&E records facility; and (3) in Chapter 7, to describe additional documents responsive to OII Directive No. 7. Attachment A to this Third Amendment contains the strikeout/underline amendments to Appendix A.

PG&E's Third Amendment also amends and supplements Appendices B and C as follows:

(1) Pursuant to the Ruling Granting Motion for Extension of Time issued on June 8, 2011 (Ruling), PG&E has included additional documents responsive to OII Directive No. 7, addressed in Chapter 7 of its June 20th Response.²

(2) In two instances, PG&E produced documents in this OII that it has determined were missing a page. In this Third Amendment, PG&E has added the missing page(s) in each of the following Attachments: P2-235 and P2-1434. PG&E has amended the indices accompanying Appendices B and C to include the additional pages.

(3) PG&E has determined that it listed an incorrect document identification number in the index to Chapter 2A and in the index to Chapter 6C. PG&E has amended these indices to include the correct document numbers.

(4) PG&E has included additional records, described in more detail below, that are responsive to OII directives and should be included in Appendices B and C:

(a) Article Regarding Brisbane Records Center

This amendment also includes an additional document related to Chapter 2A, identified as Attachment P2-1458. Attachment P2-1458 contains an article from PG&E Life (Big "Memory Center" Stores Vital Files in San Francisco, July-August 1961) describing the opening of a PG&E records center in Brisbane in 1961. The Chapter 2A index of attachments has been amended accordingly.

² Pursuant to the Ruling, PG&E served additional documents responsive to OII Directive No. 7 on July 29, 2011 and August 31, 2011. As part of its Third Amendment, PG&E has included the documents served in those rolling productions, as well as additional documents responsive to OII Directive No. 7.

(b) Documents Responsive to OII Directive No. 7

Pursuant to the Ruling, PG&E has included additional documents responsive to OII Directive No. 7, addressed in Chapter 7 of its June 20th Response. The additional documents are identified as Attachments P7-7095 to P7-7174. PG&E previously served Attachments P7-7095 to P7-7105 on July 29, 2011, and served Attachments P7-7106 to P7-7134 on August 31, 2011. Attachments P7-7135 to P7-7174 comprise PG&E's final rolling production of these documents. The Chapter 7 index of attachments has been amended accordingly.

(c) Material Supplier Reports

This amendment includes additional documents related to Chapter 7, identified as Attachments P7-7175 through P7-7181. These Attachments contain mill inspection reports created by PG&E and/or third party vendors relating to inspection of pipe lengths that contain evidence of discovery of weld defects and/or failures. The Chapter 7 index of attachments has been amended accordingly.

(d) Root Cause Analyses

This amendment includes additional documents related to Chapter 7, identified as Attachments P7-7182 through P7-7190. These Attachments contain failure analysis investigation reports created by PG&E's gas engineering organization and/or PG&E's Applied Technology Services organization. The Chapter 7 index of attachments has been amended accordingly.

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Attachment B to this Third Amendment, consisting of a single DVD and six indices, contains PG&E's amendments to Appendices B and C.

Respectfully submitted,

_____/s/
LISE H. JORDAN
MICHELLE L. WILSON
Law Department
Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-6965
Facsimile: (415) 973-5520
Email: LHJ2@pge.com

_____/s/
JOSEPH M. MALKIN
COURTNEY J. LINN
Orrick, Herrington & Sutcliffe LLP
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405 Howard Street
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Telephone: (415) 773-5505
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