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Sent: 11/15/2011 2:32:15 PM
To: Cagen, Robert (robert.cagen@cpuc.ca.gov)
Cc: Gruen, Darryl (darryl.gruen@cpuc.ca.gov); Johnson, Catherine A. (catherine.johnson@cpuc.ca.gov); margaret@mfelts.com (margaret@mfelts.com); 'Kinosian, Robert' (robert.kinosian@cpuc.ca.gov); Redacted
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Bcc:

Subject: DR 20 Re: Recent Hydrotest Events

Bob,

Last Tuesday, Legal Division sent PG&E DR 20. It asks seventeen questions about recent gas transmission line failures that occurred during strength tests on Lines 300B and 132. You asked for a response to Legal Division's DR 20 by today. DR 20 is one of seven data requests -- totaling well more than 100 questions plus subparts -- PG&E has received from the Legal Division in the records OII proceeding within the past week. You have set response dates for all seven of these data requests either before or (in most cases) on Thanksgiving Day.

PG&E needs an extension. The individuals most knowledgeable about these tests have been (and remain) busy conducting the tests and answering other questions about them. We will get back to you as soon as possible with a date by which we hope to respond to DR 20.

In the meantime, we'd ask you to reconsider whether this OII proceeding is the best place to address questions of the kind contained in DR 20. As you may be aware, the tests on Lines 300B and 132 are the subject of numerous parallel requests made by the Commission and Commission staff. The tests are the subject of inquiry in the OIR proceeding itself (See October 28th ruling), in data requests sent to PG&E by the Safety Branch (See e.g., CPUC Data Request #254) and by the DRA in the OIR (See Data Requests #17 and #21). Some have been answered, and some have recently been submitted. Broad as this proceeding may be, it is difficult to see how, for example, your question about PG&E's plans for water containment in the event of a test failure (DR 20, Question 9) reasonably connects to an investigation into PG&E's past gas safety recordkeeping practices.

Thank you for your consideration.

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