

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)

**LEGAL DIVISION'S MOTION TO EXTEND TIME FOR REPORT**

Pursuant to Rule 11.1 of the Commission's Rules of Practice and Procedure, the Legal Division (LD) now requests that its report due date be extended three weeks, to March 16, 2012. The report is currently due on February 24, 2012. The report will identify and document PG&E gas recordkeeping violations that LD alleges, and will detail the effect those violations had on Segment 180 of Line 132, and on other transmission lines as well.

Legal Division seeks this extension so that our recordkeeping experts, Alison North and Paul Duller, will have sufficient time to complete an accurate and complete report. These two experts spent two weeks in California, from October 22 to November 4, visiting multiple PG&E records facilities, examining and reviewing data, and talking with PG&E document managers and other PG&E personnel. Their review in California raised a number of questions and led to the issuance of four written data requests to PG&E, on November 10, 2011. PG&E has stated that, because of the crush of work necessary to answer the data requests, they could not respond to some of these particular data requests until December 15, and could not finish responding to all four requests until January 20, 2011.

North and Duller live in the United Kingdom, which led to some contracting delays. Thus, LD retained the recordkeeping team later in the investigation than did other team members. Their assignment and report will be important to this investigation, because it will take a “macro” view of PG&E’s recordkeeping systems. PG&E’s data responses to their request, and perhaps another visit to PG&E in January with follow up data requests, will be key to placing valuable and accurate factual information before the Commission.

LD and PG&E have spent considerable time and effort communicating with each other virtually every week trying to renegotiate a data response schedule. LD’s goal has been to negotiate a schedule that allows responses to be incorporated into the report, but still accommodates PG&E’s needs for adequate time to respond to the data requests. LD and PG&E have had, and continue to have, significant disagreements about the proper scope of data requests, the difficulties in responding fully, and other topics. Both parties have negotiated about response dates, reducing data request scope, and the like. Even so, LD recognizes that PG&E does face significant work in responding to our data requests, and that PG&E has stated that it simply cannot respond in the time LD originally set for responses. Although LD has concerns about PG&E’s seeming inability to respond to certain data requests promptly, PG&E is in a controlling and superior position of knowledge as to the timing of its responses. LD believes it more efficient to try to negotiate differences rather than bring motions to compel responses.

LD and its consultants have been working hard to obtain information and to write and release its report. We ask for this time extension reluctantly, and we wish to assure the Commission that LD will not request another extension of time. We understand that PG&E has no objection to LD’s request. In fact, PG&E has stated that if the Commission grants LD’s motion, PG&E would not seek to extend the deadline for its own report in response to LD’s report. Thus, the date for hearings would remain the same.

LD does not wish its motion to be misunderstood. LD will make every effort to provide a useful, accurate, and thorough report, regardless of whether an extension of its

due date is granted. LD is quite sure it will accomplish a high quality report. We ask for this accommodation because the report will be better for this moderate delay.

Respectfully submitted,

/s/ ROBERT CAGEN

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