

**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's Natural Gas Transmission  
Pipeline System in Locations with Higher  
Population Density.

Investigation I.11-11-009  
(Filed November 10, 2011)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 M)  
MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO OII**

STEPHEN L. GARBER

Law Department  
Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94105  
Telephone: (415) 973-8003  
Facsimile: (415) 973-0516  
Email: SLG0@pge.com

JOSEPH M. MALKIN

MATTHEW P. BARTLETT  
Orrick, Herrington, & Sutcliffe  
405 Howard Street  
The Orrick Building  
San Francisco, CA 94105  
Telephone: (415) 773-5505  
Facsimile: (415) 773-5759  
Email: jmalkin@orrick.com

Attorneys for  
PACIFIC GAS AND ELECTRIC COMPANY

Dated: December 2, 2011

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Pursuant to Rule 11.6 of the Commission's Rules of Practice and Procedure and Ordering Paragraph 7 of the Order Instituting Investigation ("OII"), Pacific Gas and Electric Company ("PG&E") moves for a 36-day extension of time to file a response to the OII (until January 17, 2012). PG&E has conferred with the Commission's Consumer Protection and Safety Division ("CPSD") and CPSD agrees with the extension request.

PG&E's June 30, 2011 class location study report, on which the OII is based, detailed the number of miles of transmission pipe for which the study done by Willbros Engineers indicated the current class location is different from that reflected in PG&E's GIS system. Willbros' work indicated that the class location of approximately 550 miles was different from that reflected in GIS – 173 miles in a higher class and 378 miles in a lower class. Based on this, PG&E identified approximately 7.5 miles requiring pressure reductions to make the maximum allowable operating pressure (MAOP) commensurate with the class location in the Willbros' study.

The OII involves PG&E's practices in several different areas: (1) pipeline patrolling; (2) continuous surveillance; (3) preparation of class location studies; and (4) confirmation or revision of MAOP following a class location change.

On top of the breadth of the areas of inquiry, the Willbros' work reported on June 30 did not attempt to determine either the reason for the class location change or when it may have

occurred. After discussions with CPSD, PG&E commissioned Willbros to conduct an additional study to answer those questions for each of the approximately 1500 segments that increased in class as a result of Willbros' initial study. PG&E has kept CPSD apprised of the progress of Willbros' work, and we anticipate that work will be completed by December 31, 2011.

To provide a meaningful response to the OII, PG&E needs sufficient time to analyze the work Willbros expects to complete at the end of the year and provide a narrative that accurately addresses that work as well as the practices called into question by the OII. The OII called on PG&E to provide a response within 30 days of mailing or by December 12, 2011. Given the upcoming holidays and the anticipated timing of the Willbros work, an extension to January 17, 2012 is necessary and appropriate. CPSD agrees. PG&E, therefore, requests that the ALJ extend its time to file extension a response to the OII to January 17, 2012.

Respectfully submitted,

STEPHEN L. GARBER

JOSEPH M. MALKIN  
MATTHEW P. BARTLETT

*/s/ Stephen L. Garber*

*/s/ Joseph M. Malkin*

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STEPHEN L. GARBER  
Law Department  
Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94105  
Telephone: (415) 973-8003  
Facsimile: (415) 973-0516  
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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

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