

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

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January 13, 2012

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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 13, 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. On September 30, 2011, PG&E filed a Third Amendment to the Response Filed on June 20, 2011, amending chapters in Appendix A and again supplementing Appendices B and C with additional records responsive to OII directives.

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.

This Fourth Amendment to the Response Filed on June 20, 2011 (Fourth Amendment) amends Chapter 2A of Appendix A to include references to additional documents responsive to OII Directive 2. Attachment A to this Fourth Amendment contains PG&E's amendments to Appendix A. The Fourth Amendment also amends Table 2A-2 in Chapter 2A to include additional and corrected information about the evolution of PG&E's gas transmission records practices. Much of the information added to Table 2A-2 derives from the additional documents identified in paragraph (a) below.

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

(a) Additional Documents Responsive to Directive No. 2

This amendment includes additional documents responsive to Directive No. 2, identified as Attachments P2-1459 through P2-1476. These attachments contain materials that discuss past PG&E recordkeeping practices. The attachments include documents discussing (1) the creation of PG&E's Vital Records program starting in World War II, its expansion in the late 1960s and developments during the 1970s; (2) an incident in 1973 of inadvertent destruction of records and a flood in 1982 in PG&E's Bayshore Records Center; (3) the need for additional records storage space and the ultimate expansion in the early 1980s of the Bayshore Records Center; (4) the creation in the early 80s of a computerized system to track records boxes in the Records Center; and (5) a chronology of the history of the Bayshore Records Center drafted in 1998 by Bayshore Records Center personnel for internal use. The attachments also include two revisions of PG&E's Decimal File Manual (1983 revision and 1990 revision), outlining a memoranda and correspondence filing system used internally to organize and retrieve documents between approximately 1948 and 1995, and some related documents.

(b) Additional Documents Responsive to Directive No. 7

This amendment includes additional documents responsive to Directive No. 7, identified as Attachments P7-7191 through P7-7196. These documents include a list of girth weld failures that PG&E believes were identified by Gas System Design Department personnel during the

development of the Gas Pipeline Replacement Program (P7-7191) in the early to mid 1980s, a list of hydrotest failures (many of which were previously provided in Chapter 7, as indicated in the “source” column) provided to the CPSD in a recent data response (P7-7192), and evaluations of long seam and girth weld defects provided to the CPSD in a recent data response (P7-7193 through P7-7196). The Chapter 7 index of attachments has been amended accordingly.

(c) Administrative Matters

This amendment corrects the Index of Attachments in Chapter 3/3A as to a document that was unintentionally omitted from production on June 20, 2011. The omitted document had been separately produced under another attachment number; the revised Index indicates that attachment number for reference. This amendment also corrects a technical issue that prevented production of attachment P3-27498. The corrected attachment has been substituted, and the Chapter 6C index of attachments and sub-index 17 have been amended to reflect the production date of the corrected attachment with this amendment.

Attachment B to this Fourth Amendment, consisting of a single DVD, updated indices to Chapters 2A, 3/3A, 6C, and 7, and updated sub-indices for Chapters 6C and 7, contains PG&E’s amendments to Appendices B and C.

Respectfully submitted,

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