

**PACIFIC GAS AND ELECTRIC COMPANY  
San Bruno Explosion and Fire Oil  
Investigation 12-01-007  
Data Request**

Recipient:	Consumer Protection and Safety Division	
PG&E Data Request No.:	PGE-CPSD_002	
PG&E File Name:	SanBrunoExplosion-FireOil_DR_PGE_CPSD002!	
Request Date:	March 30, 2012	
Due Date:	April 13, 2012	

- Q 1: Please identify all contributors to each section of the CPSD’s January 12, 2012, report on the San Bruno accident (hereinafter, “CPSD Report”). For each contributor, please describe his/her precise contribution; provide their curriculum vitae and a detailed summary of their experience with respect to the subject matter(s) they addressed in the CPSD Report.
- Q 2: Please state whether CPSD contends that the pressure on Line 132 on September 9, 2010 increased above 396 psig. If so, state all facts, and identify and provide copies of all documents that support that contention.
- Q 3: Referring to page 8, please identify all “historical pressure data” on which the CPSD based the statement that 386 psig “was the highest pressure Segment 180 had experienced within the seven years preceding the rupture.”
- Q 4: Referring to pages 11-13, please identify the source document, record or any other information on which CPSD based its description of each event and corresponding time designation in CPSD’s timeline.
- Q 5: Referring to page 11, at 6:11 pm on CPSD’s timeline, please explain in detail the basis for the statement that “SCADA data indicated that a rupture had occurred when pressures on Line 132 upstream of Martin Station rapidly decreased from a high of 386 psig.” Please identify all documents that support your explanation.
- Q 6: Referring to page 13, please identify the documents, and the specific pages in those documents, on which the following statement is based: “The NTSB team’s metallurgical examination and testing determined that the rupture occurred at a defective seam weld of substandard yield strength.”
- Q 7: Referring to page 14, please state whether the CPSD contends that there were gas odor complaints prior to September 9, 2010 that are related to the Line 132 rupture in San Bruno.