

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 12, 2012

Commissioner Florio and ALJ Amy Yip-Kikugawa  
Administrative Law Judge  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**Re: Consumer Protection and Safety Division Testimony in  
Investigation 11-02-016**

Dear Commissioner Florio and ALJ Yip-Kikugawa:

The Commission's Order Instituting Investigation (OII) 11-02-016 stated: "This proceeding will pertain to PG&E's safety recordkeeping for the San Bruno, California gas transmission pipeline that ruptured on September 9, 2010, killing eight persons. This investigation will also review and determine whether PG&E's recordkeeping practices for its entire gas transmission system have been unsafe and in violation of law."<sup>1</sup> The Commission further clarified: "We define 'gas safety recordkeeping' in this context to mean PG&E's acquisition, maintenance, organization, safekeeping, and efficient retrieval of data that the Commission finds is necessary and appropriate under the circumstances for PG&E to make good and safe gas engineering decisions, and thus promote safety as required by Section 451 of the Public Utilities Code."<sup>2</sup>

The scope of Consumer Protection and Safety Division's (CPSD) review includes addressing the following question. "Was PG&E's gas transmission pipeline recordkeeping and its knowledge of its own transmission gas system, in particular the San Bruno pipeline, deficient and unsafe?"<sup>3</sup>

<sup>1</sup> OII, I.11-02-016, p. 1 (February 24, 2011).

<sup>2</sup> *Id.* at 11.

<sup>3</sup> I.11-02-016, Assigned Commissioner's Scoping Memo And Ruling, p. 2.

Pursuant to the OII and the Scoping Memo herein, CPSD respectfully provides you and all parties on the service list with this cover letter, the Report and Testimony of Ms. Margaret Felts (Exhibit 1), the Report and Testimony of Dr. Paul Duller and Ms. Alison North (Exhibit 2). As soon as possible, CPSD will provide you and the Commissioners with unredacted reference materials.

CPSD has provided reference documents associated with the exhibits in this proceeding to PG&E and understands that PG&E is almost finished redacting these documents, to ensure that no justifiably protected information is released.. CPSD has not seen PG&E's proposed redactions yet. Also, certain additional reference documents will be provided to PG&E in order to permit redaction. Soon, we believe this week, redacted reference documents associated with this proceeding will be available on the Commission website. Once they are available, these reference documents may be accessed at the web address below, which is on the Commission's website. To access the documents, search for the subject area called "Reference Documents for CPSD Reports in Recordkeeping Penalty Consideration Case." CPSD will notify all parties when the documents are available on the website.

CPSD may seek permission at the prehearing conference to file additional supplemental testimony at that time or shortly thereafter.

Very truly yours,

/s/ ROBERT C. CAGEN

Robert C. Cagen  
Staff Counsel

RCC:abh

cc: Service List. I.11-02-016