PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



March 16, 2012

Ms. Amy Yip-Kikugawa Administrative Law Judge California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Investigation Scope of Review

Dear ALJ Yip-Kikugawa:

The purpose of this letter is to notify your honor and all parties of our identification and correction of errors in the March 12, 2012 Report and Testimony of Margaret Felts. References are to current pages and lines.

Current page 3, line 21, states: "period 1965 to 1970" Replace with: "period 1978 to 2003"

Current page 6, line 2 and 3, states: "Although PG&E states that it has been operating both sections of the line at an MAOP of 400 psi since at least 1975, there is no contemporaneous record of that MAOP". Change - delete sentence above

Current page 10, line 6, states "Milpitas". Replace with "Milpitas Terminal".

Current page 40, lines 5-11 A paragraph appears starting with "the risks of allowing leaks' on line 5 and ends on line 11 with "that made the data retrievable". Change by removing entire paragraph language and placing it after the quote that appears on pages 41 and 42 through line 8, and before the paragraph on page 42 line 42, and that states in its first line that "The A-Form is one of PG&E's oldest record systems."

Current page 40 Lines13-16. Two sentences begin with "For instance" and end with "726 leaks".

Delete two sentences identified above and replace with the following: "For instance, in 2006, integrity management staff documented 13 leaks in line 132 between 1964 and 1988 based on A-forms. Of the 13 leaks identified, PG&E could determine the cause of only 1 leak because no cause was documented on the A-forms for the other 12 leaks".

With this letter we are also serving a copy of the original report with track changes shown on the document, and another report with the changes incorporated. The reports will bear the date of March 16, 2012 and will also be entitled "Revised Report and Testimony of Margaret Felts". We will place the reports on the Commission website also as soon as possible.

Very truly yours,

<u>/s/ Robert C. Cagen</u> Robert C. Cagen Staff Counsel

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