

From: Garber, Stephen (Law  
Sent: 6/28/2012 11:11:10 AM  
To: Berdge, Patrick S. (patrick.berdge@cpuc.ca.gov)  
Cc: Bruno, Kenneth (kenneth.bruno@cpuc.ca.gov); Halligan, Julie  
(julie.halligan@cpuc.ca.gov); Boles, Kevin (kevin.boles@cpuc.ca.gov); Lam,  
Willard (willard.lam@cpuc.ca.gov); Doll, Laura  
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(/o=PG&E/ou=Corporate/cn=Recipients/cn=SRRd); 'jmalkin@orrick.com'  
(jmalkin@orrick.com); 'Bartlett, Matthew P. (mbartlett@orrick.com)'  
(mbartlett@orrick.com) (mbartlett@orrick.com)  
Bcc:  
Subject: RE: Transmission Patrol issues

Here is the second report. Steve

**From:** Garber, Stephen (Law)  
**Sent:** Thursday, June 28, 2012 11:09 AM  
**To:** 'Berdge, Patrick S.'  
**Cc:** 'Bruno, Kenneth'; 'Boles, Kevin'; 'Lam, Willard'; 'Halligan, Julie'; 'jmalkin@orrick.com'; 'Bartlett, Matthew P. (mbartlett@orrick.com)' (mbartlett@orrick.com); Ramaiya, Shilpa R; Doll, Laura  
**Subject:** Transmission Patrol issues

Patrick,

I wanted to share with you some information that PG&E shared last week with CPSD regarding transmission patrol issues just in case you haven't already seen it.

As I mentioned in the email below from April, to evaluate the scope of our concerns about an "overbuild" issue, and as a check on the quality of the prior patrols, PG&E initiated a review of sections of two transmission lines that uncovered several potential encroachments. That led to further evaluation, including an effort to survey the boundaries of easements with potential encroachments. I promised to keep you apprised of our progress since this related to the quality of our transmission patrols under review in the Class OIL.

While I was on vacation last week, Jane Yura, Laura Doll and Shilpa Ramaiya met with Julie

Halligan, Sunil Shori and Mike Robertson to provide them with results of the review of sections of Lines 132 and 153, the two transmission lines involved in the pilot effort and to lay out PG&E's initial plans to expand our review system wide. I have attached to this email a copy of a five page handout they provided to CPSD at the meeting, as well as one of the two "Final Report" packages of pictures showing encroachments that were also given to CPSD. (I'll send the 2d in a separate email given the size of the files.) I understand this same group plans to meet again in the second half of July to discuss more detailed plans and next steps.

Please let me know if you have any questions.

Steve Garber 415.973.8003

**From:** Garber, Stephen (Law)

**Sent:** Friday, April 13, 2012 6:47 PM

**To:** 'Berdge, Patrick S.'

**Cc:** Bruno, Kenneth; Boles, Kevin; Lam, Willard; Halligan, Julie; 'jmalkin@orrick.com'; 'Bartlett, Matthew P. ([mbartlett@orrick.com](mailto:mbartlett@orrick.com))' ([mbartlett@orrick.com](mailto:mbartlett@orrick.com)); Ramaiya, Shilpa R

**Subject:** RE: PG&E's system-wide review of patrol records

Patrick,

As we discussed yesterday, here is an update on the status of PG&E's effort to confirm that all transmission lines were patrolled quarterly as required by PG&E's procedures.

PG&E's patrol validation team has reviewed the records at every district office and at all but two division offices. (As a general rule, the districts are responsible for the backbone transmission system and the division offices are responsible for local transmission and distribution feeder mains that meet the definition for transmission.) We are not done with our analysis, but so far we have determined that approximately 20 miles of transmission pipelines were not being patrolled. I will provide you with a spreadsheet listing those lines by Monday. We are still completing our due diligence on other pipelines, and expect to be able to respond more fully by the end of this month. PG&E has and will immediately patrol any portions of its transmission system where we determine that the section of pipe had not been patrolled.

Besides class, another patrol-related issue is that PG&E is taking steps to inventory instances in which landowners have built into PG&E's easements or rights of way. During a hydrotest on the Peninsula late last year on Line 132 we discovered more than one such "overbuild". To evaluate the scope of this issue and as a check on the quality of the prior patrols, we initiated a review of sections of two transmission lines that uncovered several potential encroachments, which in turn has led to further evaluation, including an effort to survey the boundaries of certain easements with potential encroachments. PG&E expects to perform similar reviews in other areas of our system in the coming months. As we confirm the extent of encroachments we will continue to keep you apprised, but since this relates to the quality of our transmission patrols (and to the corrective actions PG&E is taking) I wanted to bring it to your attention.

Please let me know if you have any questions.

Steve Garber 415.973.8003

**From:** Berdge, Patrick S. [<mailto:patrick.berdge@cpuc.ca.gov>]  
**Sent:** Tuesday, April 03, 2012 2:00 PM  
**To:** Garber, Stephen (Law)  
**Cc:** Bruno, Kenneth; Boles, Kevin; Lam, Willard; Halligan, Julie  
**Subject:** PG&E's system-wide review of patrol records

STEVE: Do you think you will have completed, or nearly completed, PG&E's "system-wide review of patrol records" by the PHC of April 17, 2012, in the Class Location OII (I.11-11-009)?

Thanks.

PATRICK S. BERDGE

Staff Counsel

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