PACIFIC GAS AND ELECTRIC COMPANY CHAPTER 5 ALLEGED DEFICIENCIES IN DATA REQUEST RESPONSES

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CHAPTER 5

ALLEGED DEFICIENCIES IN DATA REQUEST RESPONSES

In this chapter, we address the CPSD allegations regarding: (A) Gas Control audio recordings and transcripts; (B) Brentwood Alternate Gas Control facility security camera; (C) identification of PG&E employees at Milpitas Terminal; and (D) a service level agreement regarding call logging services.

A. Gas Control Audio Recordings and Transcripts

1. Gas Control Phone Lines

CPSD implies there are missing Gas Control recordings as PG&E has 16 phone lines into the San Francisco Gas Control Room, and PG&E only provided recordings for 5 consoles. CPSD further notes its investigators did not follow-up on this discrepancy and recommends the issue be addressed in the future.1

PG&E provided all Gas Control recordings to CPSD, as requested, in its data responses.² The 16 phone lines identified by CPSD are programmed to direct calls to each of the 5 consoles, where the calls are recorded, to ensure no call goes unanswered or unrecorded. As a result, the recordings for the 5 consoles are all calls recorded on September 9, 2010.

2. Gas Control Audio Files

CPSD asserts there are missing Gas Control audio files based on non-sequential numbering of the audio files produced by PG&E. Additionally, CPSD asserts PG&E failed to explain why some of the non-Gas Control audio files were after business hours and that PG&E did not produce evidence of the other types of calls recorded on the evening of September 9, 2010.3

The numbering of the Gas Control audio files provided to CPSD is non-sequential because the recording system also records phone calls from other non-Gas Control PG&E departments, some of which, such as Energy Trading, also work hours outside of 9 a.m. to 5 p.m., not because of missing

¹ Felts Supplement at 6.

Exs. 5-1, 5-2, 5-3.

³ Felts Supplement at 6.

audio files, as explained in PG&E's response.⁴ CPSD's data requests did not seek documentation regarding the calls recorded from the non-Gas Control departments. Nonetheless, PG&E provides with this testimony a list of every call recorded on September 9, 2010 by the recording system that captures Gas Control phone calls.⁵

3. Gas Control Audio Recording and Transcript Review

CPSD asserts at least one person that was present in the San Francisco Gas Control room not identified by PG&E in a February 6, 2012 data response⁶ was reviewing audio records of September 9, 2010 after 10.p.m. CPSD bases this assertion on a Gas Control recording excerpt regarding personnel working on a timeline, and implies the individual could have deleted audio files.⁷

CPSD's assertion is based on the inaccurate conclusion that "[I]t would be impossible for [REDACTED] to figure out when phone calls were made and when things occurred without reviewing the call recordings for that evening." The timeline referenced in the Gas Control recording CPSD cites was created by a Gas Control employee from handwritten notes taken in Gas Control during the events of September 9, 2010, as described in the abnormal incident report provided in PG&E's data request response to CPSD. That employee did not review Gas Control call recordings on September 9, 2010 to create the referenced timeline.

4. Gas Control Audio Transcripts

CPSD, relying on differences in words and punctuation, asserts PG&E's transcription of the September 9, 2010 Gas Control recordings were inaccurate. CPSD bases this assertion on a comparison of PG&E's

Ex. 5-4.

Ex. 5-7.

Felts Supplement at 6-7.

⁷ Felts Supplement at 6.

⁸ Ex. 5-5.

Ex. 5-6.

transcript to CPSD's "independent transcript", and further asserts there are missing audio files. 10

The differences CPSD identifies result from different transcribers transcribing recordings that are not always clear and that contain uncommon names and words specific to PG&E's natural gas pipeline system and operations. The NTSB transcription of the same Gas Control recordings provides another example of how different transcribers will produce transcripts with different words when transcribing the same recordings. 11 Additionally, and as discussed in Section 1 above, there are no missing audio files.

B. Brentwood Alternate Gas Control Facility Security Camera

CPSD alleges that PG&E provided contradictory data responses regarding video recordings at the Brentwood Alternate Gas Control facility and that this constitutes a violation of Rule 1.1, Commission Executive Director Preservation Order, and Commission Resolution No. L-403. CPSD supports these allegations through PG&E data request responses 12 related to an internal video camera, Camera 6, at the Brentwood Alternate Gas Control facility. 13

PG&E provided a response 14 to CPSD on October 10, 2011 which contained the known facts at that time. On March 9, 2012, PG&E provided a revised response 15 which contained new facts PG&E became aware of regarding the Brentwood Alternate Gas Control facility security camera, namely, that no video was recorded from the security camera on the digital video recorder (DVR). As PG&E self-disclosed the new facts to CPSD and revised prior responses 16, the alleged Rule 1.1 violation is unwarranted. Additionally, Camera 6 recorded only video images, and all Gas Control audio recordings from September 9, 2010 are available, as described in Section A.2 above.

¹⁰ Felts Supplement at 7-8.

¹¹ See NTSB Ex. 2Y and Addendum to Ex. 2Y, Docket No. SA-534.

Ex. 5-8.

¹³ Felts Supplement at 1-5.

Ex. 5-8.

Ex. 5-9.

Exs. 5-8, 5-9, 5-10, 5-11, 5-12.

C. Identification of PG&E employees at Milpitas Terminal

CPSD asserts PG&E violated Rule 1.1 by failing to identify all of the people in Milpitas that were handling the pressure problems on September 9, 2010. In support of this, CPSD alleges PG&E omitted the name of the Supervisor for the Milpitas Terminal, who was present after 5 PM, from PG&E's responses to CPSD.17

CPSD requested the names of field crew personnel who had access to operating diagrams at the Milpitas Terminal 18, and the names of maintenance personnel and the maintenance supervisor headquartered at the Milpitas Terminal and their work hours on September 9, 2010. 19 Neither of the data requests asked PG&E to identify all of the people at the Milpitas Terminal handling the pressure problem on September 9, 2010, or all of the people who were present after 5 PM at Milpitas Terminal. The alleged violation is based on a question that was not asked.

D. Call Logging Services (Verint) Contract

CPSD alleges PG&E's inability to produce a copy of the Verint Service Level Agreement as it existed on September 9, 2010 amounts to a violation of Section 451, Commission Executive Director Preservation Order, and Commission Resolution No. L-403.20

PG&E located the Verint Service Level Agreement in effect on September 9, 2010 and provided it to CPSD in a Supplemental data response²¹ dated May 31, 2012.

¹⁷ Felts Supplement at 8.

Ex. 5-13.

Ex. 5-14.

²⁰ Felts Supplement at 8-9.

Ex. 5-15.

PACIFIC GAS AND ELECTRIC COMPANY CHAPTER 6 STATEMENTS OF QUALIFICATIONS

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PACIFIC GAS AND ELECTRIC COMPANY STATEMENT OF QUALIFICATIONS OF BENEDICT J. ALMARIO

3	Q 1	Please state your name and business address.
4	A 1	My name is Benedict J. Almario, and my business address is Pacific Gas and
5		Electric Company, 245 Market St., San Francisco, California.
6	Q 2	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E).
8	A 2	I am currently the Director of Electric Operations' Emergency Management
9		department. In this position, I am responsible for coordinating the overall
10		response to large electric emergencies such as significant winter storms. I am
11		also responsible for overseeing the financial program management functions for
12		the electric emergency recovery program. In 2010, I was the Director of
13		Incident Command. I was responsible for gas and electric preparedness
14		activities. I also oversaw event response for significant events, both gas and
15		electric.
16	Q 3	Please summarize your educational and professional background.
17	A 3	I received a Bachelor of Science degree in Business Management from Saint
18		Mary's University, in 1996, and a Master of Business Administration with an
19		emphasis in Finance from California State University East Bay in 2000. I joined
20		PG&E in 1990 beginning my career in the Power Generation organization
21		overseeing operations and maintenance departments. In 2000 I transferred to
22		Transmission and Distribution (T&D) operations where I held a series of
23		positions of increasing responsibility. These positions were in the fields of T&D
24		operations, emergency response, strategic planning, and financial program
25		management administration.
26	Q 4	What is the purpose of your testimony?
27	A 4	I am sponsoring Chapter 4.F.1, PG&E's Emergency Response.
28	Q 5	Does this conclude your statement of qualifications?
29	A 5	Yes.

PACIFIC GAS AND ELECTRIC COMPANY STATEMENT OF QUALIFICATIONS OF CHRISTINE C. CHAPMAN

3	Q 6	Please state your name and business address.
4	A 6	My name is Christine C. Chapman, and my business address is Pacific Gas
5		and Electric Company, 375 North Wiget Lane, Walnut Creek, California.
6	Q 7	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E).
8	A 7	As Director of Distribution Integrity Management within Gas Operations, I am
9		responsible for the leadership and oversight of an organization focused on
10		assessing the integrity of the distribution system. I am also responsible for the
11		development of a strategic integrity management plan for the entirety of PG&E's
12		distribution assets. In addition, I oversee PG&E's damage prevention program.
13	Q 8	Please summarize your educational and professional background.
14	A 8	I received a Bachelor of Science degree in Mechanical Engineering from the
15		University of California (UC), Berkeley and a Master of Business Administration
16		from UC Berkeley, Haas School of Business. I am also a Registered
17		Professional Mechanical Engineer in the State of California.
18		I started with PG&E in 2001 as a summer intern in the gas distribution
19		organization and after graduating from UC Berkeley began a full-time position
20		as a gas engineer. Since then, I have held a variety of positions with increasing
21		levels of responsibility in the Gas Engineering and Operations organization,
22		mainly focused on gas distribution functions.
23		In 2008, I transitioned to PG&E's Human Resources department where I
24		held various leadership roles. I returned to Gas Operations in January of 2012
25		as the Director of Distribution Integrity Management.
26	Q 9	What is the purpose of your testimony?
27	A 9	I am sponsoring Chapter 3.F., Leak Records, and 3.G., the Quality of GIS Data.
28	Q 10	Does this conclude your statement of qualifications?
29	A 10	Yes.

1 PACIFIC GAS AND ELECTRIC COMPANY 2 STATEMENT OF QUALIFICATIONS OF DAVID HARRISON

3	Q 11	Please state your name and business address.
4	A 11	My name is David Harrison. My business address is Pacific Gas and Electric
5		Company, 2700 Ygnacio Valley Blvd., Walnut Creek, California.
6	Q 12	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E).
8	A 12	I am a Technical Consultant for PG&E working on the MAOP Validation Project.
9		My responsibilities include developing processes and criteria for reviewing,
10		analyzing, and recording key information associated with PG&E's gas
11		transmission pipelines. I also manage a group of professionals who work on
12		various technical and records management processes.
13	Q 13	Please summarize your educational and professional background.
14	A 13	I have a Bachelor of Science degree in Mechanical Engineering from the
15		University of California at Santa Barbara. I am a Registered Professional
16		Engineer in the State of California. I also have a Master of Business
17		Administration from San Jose State University. I hold certificates in computer
18		programming from University of California at Santa Cruz. I worked for PG&E
19		from 1983 to 1999, holding positions of increasing responsibility in the areas of
20		engineering, construction, maintenance, and operations. From 1999 to 2009, I
21		worked in various computer companies. Since 2009, I have worked on PG&E
22		projects as a Technical Consultant.
23	Q 14	What is the purpose of your testimony?
24	A 14	I am sponsoring Chapter 3.C., How PG&E Has Historically Used Gas Pipeline
25		Records; Chapter 4.A., Segment 180 Records Related to Construction and
26		Reconditioned Pipe; and Chapter 4.B., Post-Installation Pressure Test and
27		Records for Segment 180.
28	Q 15	Does this conclude your statement of qualifications?
29	A 15	Yes.

PACIFIC GAS AND ELECTRIC COMPANY STATEMENT OF QUALIFICATIONS OF M. KIRK JOHNSON

3	Q 16	Please state your name and business address.
4	A 16	My name is M. Kirk Johnson. My business address is Pacific Gas and Electric
5		Company, 77 Beale St., San Francisco, California.
6	Q 17	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E).
8	A 17	I am Vice President of Gas Transmission Maintenance and Construction for
9		PG&E. I am responsible for the gas transmission function for PG&E's entire
10		service territory and mange responsibilities such as the execution of the
11		Pipeline Safety Enhancement Plan, hydrostatic pressure testing and liquid
12		natural gas pipeline services.
13	Q 18	Please summarize your educational and professional background.
14	A 18	I received a Bachelor of Science degree in Mechanical Engineering from the
15		University of California, Davis and a Master of Business Administration from
16		California State University, Hayward. I joined PG&E in 1980 and held
17		leadership roles with Gas System Operations, Gas Transmission Products and
18		Sales, Gas Maintenance and Technical Support, and Maintenance and
19		Construction. I became Vice President of Gas Engineering and Construction in
20		October 2010, and have held my current position since August 2011.
21	Q 19	What is the purpose of your testimony?
22	A 19	I am sponsoring Chapter 3.B., PG&E's Gas Transmission System.
23	Q 20	Does this conclude your statement of qualifications?
24	A 20	Yes.

1 PACIFIC GAS AND ELECTRIC COMPANY 2 STATEMENT OF QUALIFICATIONS OF MARK KAZIMIRSKY

3	Q 21	Please state your name and business address.
4	A 21	My name is Mark Kazimirsky. My business address is Pacific Gas and Electric
5		Company, 375 North Wiget Lane, Walnut Creek, California.
6	Q 22	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E).
8	A 22	I am a Principal Engineer in charge of the Supervisory Control and Data
9		Acquisition (SCADA) and Controls Group in the Gas Transmission Engineering
10		department.
11	Q 23	Please summarize your educational and professional background.
12	A 23	I have an engineering degree in Electromechanical Engineering from the
13		Institute of Technology, Odessa, Ukraine. I have been with PG&E for over 32
14		years in various engineering and management positions. I have extensive
15		experience in gas system operations, SCADA, control systems and automation
16		technologies for the natural gas industry.
17	Q 24	What is the purpose of your testimony?
18	A 24	I am sponsoring Chapter 4.D., Milpitas Terminal on September 9, 2010, and
19		Chapter 4.E., Supervisory Control and Data Acquisition (SCADA) System.
20	Q 25	Does this conclude your statement of qualifications?
21	A 25	Yes.

1 PACIFIC GAS AND ELECTRIC COMPANY 2 STATEMENT OF QUALIFICATIONS OF SARA B. PERALTA

3	Q 26	Please state your name and business address.
4	A 26	My name is Sara B. Peralta, and my business address is Pacific Gas and
5		Electric Company, 375 North Wiget Lane, Walnut Creek, California.
6	Q 27	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E).
8	A 27	I am currently the Director of Gas Operations' Quality and Improvement
9		department. In this position, I am responsible for overseeing quality control,
10		quality assurance, and other improvement activities across PG&E's gas
11		transmission and distribution organizations. In 2010, I was the Manager of
12		Integrity Management.
13	Q 28	Please summarize your educational and professional background.
14	A 28	I received a Bachelor of Science degree in mechanical engineering from
15		California Polytechnic State University, San Luis Obispo. I am a National
16		Association of Corrosion Engineers (NACE) certified Cathodic Protection
17		Technologist (Level 3). I joined PG&E in 2002 in the Gas Distribution and
18		Planning Engineering department. I then helped build PG&E's gas
19		transmission Integrity Management program as an External Corrosion Direct
20		Assessment (ECDA) field engineer. I progressed to the position of ECDA
21		project engineer, with supervisory responsibilities for the ECDA field engineers.
22		After four years in the Integrity Management department, I moved to the
23		Maintenance and Construction organization as a field supervisor. In 2009, I
24		returned to gas engineering as the Manager of Integrity Management, where I
25		was responsible for risk management, integrity assessment implementation,
26		and the operator qualification program for both the transmission and distribution
27		systems. In January 2012, I became the Director for Quality and Improvement
28		for PG&E's Gas Operations.
29	Q 29	What is the purpose of your testimony?
30	A 29	I am sponsoring Chapter 3E, Integrity Management and Records.
31	Q 30	Does this conclude your statement of qualifications?
32	A 30	Yes.

PACIFIC GAS AND ELECTRIC COMPANY STATEMENT OF QUALIFICATIONS OF STEVEN H. PHILLIPS

3	Q 31	Please state your name and business address.
4	A 31	My name is Steven H. Phillips, and my business address is Pacific Gas and
5		Electric Company, 77 Beale Street, San Francisco, California.
6	Q 32	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E).
8	A 32	I am the Director of Regulatory Strategy and Compliance in the Customer
9		Operations Department of PG&E's Customer Care organization. As such, I am
10		responsible for managing Customer Operations participation in various
11		proceedings before the CPUC, including the General Rate Case and for
12		ensuring compliance within Customer Operations with various rules and
13		regulations such as SEC reporting, SOX assessments, etc.
14	Q 33	Please summarize your educational and professional background.
15	A 33	I received a bachelor of science degree in mechanical engineering from the
16		University of Wyoming in 1971. I am registered in the state of California as a
17		professional engineer in mechanical engineering.
18		In May 1972, I joined PG&E as a gas engineer. From 1972 through 1993, I
19		worked in various engineering and operations positions within PG&E's Gas
20		department. From 1993 to 2002, I worked in several departments including
21		Marketing, Information Technology and Internet Services.
22		In late 2002, I joined Customer Operations as manager of Contact Center
23		Enhancements, which was responsible for implementing new and maintaining
24		existing technologies for PG&E's Contact Centers, Credit and Collections
25		Department and Local Offices. In 2007 I became Senior Manager of Office
26		Services where I was responsible for the operation of PG&E's 75 customer
27		service offices and approximately 600 Neighborhood Payment Centers. I have
28		testified in numerous CPUC proceedings. In January 2012, I assumed my
29		present position.
30	Q 34	What is the purpose of your testimony?

- 1 A 34 I am sponsoring Chapter 2.A, Overview of PG&E's Records Retention
 2 Standards and Practices, and Chapter 4.C, Records Used by PG&E to
 3 Establish MAOP for Line 132.
 4 Q 35 Does this conclude your statement of qualifications?
- 5 A 35 Yes.

PACIFIC GAS AND ELECTRIC COMPANY STATEMENT OF QUALIFICATIONS OF KAREN S. ROTH

3	Q 36	Please state your name and business address.
4	A 36	My name is Karen S. Roth and my business address is Pacific Gas and
5		Electric Company, 375 North Wiget Lane, Walnut Creek, California.
6	Q 37	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E).
8	A 37	I am the Director of Codes and Standards in the Standards and Policies
9		Department of PG&E's Gas Operations organization. In this position I am
10		responsible for developing and maintaining the guidance documents
11		including standards and procedures that define how Gas Operations work is
12		performed.
13	Q 38	Please summarize your educational and professional background.
14	A 38	I received a Bachelor of Science degree in Mechanical Engineering from the
15		University of California at Davis in 1981. I joined PG&E that same year and
16		have worked in a variety of engineering and leadership positions across
17		PG&E's service territory focusing primarily on gas distribution and gas
18		transmission. Beginning in 2005, I spent approximately five years in
19		Finance in the areas of program management and business case
20		development, returning to Gas Operations as the Director of Gas
21		Maintenance and Construction in the Northern Region in 2010. In 2011, I
22		joined Gas Engineering as the Director of Integrity Management and
23		assumed my current position in October 2011.
24	Q 39	What is the purpose of your testimony?
25	A 39	I am sponsoring Chapter 3.D., Earthquake Risks and the GPRP.
26	Q 40	Does this conclude your statement of qualifications?
27	A 40	Yes.

PACIFIC GAS AND ELECTRIC COMPANY STATEMENT OF QUALIFICATIONS OF JONATHAN E. SEAGER

3	Q 41	Please state your name and business address.
4	A 41	My name is Jonathan E. Seager, and my business address is Pacific Gas
5		and Electric Company, 77 Beale Street, San Francisco, California.
6	Q 42	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E).
8	A 42	I am a Principal Regulatory Case Manager in the Regulatory Relations
9		organization, responsible for case management of CPUC jurisdiction
10		proceedings.
11	Q 43	Please summarize your educational and professional background.
12	A 43	I received a Bachelor of Science degree in Business Administration with an
13		emphasis in management information systems and a minor in economics
14		from San Jose State University, and a Master in Business Administration
15		degree with an emphasis in Finance from the University of San Francisco. I
16		have been employed at PG&E since 2005, have held analytical and support
17		positions in various PG&E organizations, and have sponsored testimony
18		before the Commission. Prior to my employment at PG&E, I worked at
19		Salas O'Brien Engineers where my responsibilities included project analysis
20		and information system administration.
21	Q 44	What is the purpose of your testimony?
22	A 44	I am sponsoring Chapter 5, Alleged Deficiencies in Data Request
23		Responses.
24	Q 45	Does this conclude your statement of qualifications?
25	A 45	Yes.

PACIFIC GAS AND ELECTRIC COMPANY STATEMENT OF QUALIFICATIONS OF SUMEET SINGH

3	Q 46	Please state your name and business address.
4	A 46	My name is Sumeet Singh, and my business address is Pacific Gas and
5		Electric Company, 2700 Ygnacio Valley Road, Walnut Creek, California.
6	Q 47	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E).
8	A 47	As senior director of the Asset Knowledge Management organization within
9		Gas Operations, I am responsible for the leadership and oversight of an
10		organization focused on providing and sustaining real-time, traceable,
11		verifiable, complete and accurate gas transmission and distribution asset
12		information. The organization has accountability for overseeing the Records
13		verification and MAOP validation effort, producing maps, managing
14		records, developing a gas distribution geospatial information system,
15		ensuring data quality, and maintaining technology and tools.
16	Q 48	Please summarize your educational and professional background.
17	A 48	I received a Bachelor of Science degree in Civil and Environmental
18		Engineering from the University of California, Berkeley and a Master of
19		Business Administration degree from University of California, Los Angeles
20		Anderson School of Management. I am also a registered professional civil
21		engineer in the state of California. I started with PG&E in 2000 as a gas
22		engineer after graduating from UC Berkeley and have held a variety of
23		positions with increasing level of responsibilities in the Gas Engineering and
24		Operations organization both in the Gas Distribution and Gas Transmission
25		Departments. I resigned from the company in 2006 to pursue my master's
26		degree and returned in 2008 as a member of the Master of Business
27		Administration Leadership Development Program. Since returning to PG&E
28		I have held leadership roles within Finance and Energy Procurement's
29		Renewable Resource Development organizations.
30		I previously sponsored testimony before the California Public Utilities
31		Commission for the Pipeline Safety Enhancement Plan (R.11-02-019).
32	Q 49	What is the purpose of your testimony?

- 1 A 49 I am sponsoring Chapter 1.D., Gas Transmission Records Improvement
- 2 Efforts.
- 3 Q 50 Does this conclude your statement of qualifications?
- 4 A 50 Yes.

PACIFIC GAS AND ELECTRIC COMPANY STATEMENT OF QUALIFICATIONS OF KEITH SLIBSAGER

3	Q 51	Please state your name and business address.
4	A 51	My name is Keith Slibsager. My business address is Pacific Gas and
5		Electric Company, 77 Beale St., San Francisco, California.
6	Q 52	Briefly describe your responsibilities at Pacific Gas and Electric Company
7		(PG&E).
8	A 52	I am a Manager in the Gas System Operations department. I have
9		responsibility for the gas control room operations including the remote
10		monitoring and controlling function of the pipeline and management of the
11		natural gas pipeline inventory.
12	Q 53	Please summarize your educational and professional background.
13	A 53	I have a Bachelor of Science degree in Agriculture/Plant Science from
14		California State University of Fresno. I have worked at PG&E for 29 years,
15		holding various positions of increasing responsibility in gas operations.
16	Q 54	What is the purpose of your testimony?
17	A 54	I am sponsoring Chapter 4.D., Milpitas Terminal on September 9, 2010; and
18		Chapter 4.E., Supervisory Control and Data Acquisition (SCADA) System.
19	Q 55	Does this conclude your statement of qualifications?
20	A 55	Yes.