

**PACIFIC GAS AND ELECTRIC COMPANY  
Gas Pipeline Safety OIR  
Rulemaking 11-02-019  
Data Response**

PG&E Data Request No.:	LocalUnions246-342_002-11Supp01		
PG&E File Name:	GasPipelineSafetyOIR_DR_LocalUnions246-342_002-Q11Supp01		
Request Date:	January 3, 2012	Requester DR No.:	002
Date Sent:	January 23, 2012	Requesting Party:	Plumbers/Pipe Fitters/Steamfitters Local Unions 246/342
PG&E Responder:	Redacted	Requester:	Sarah Grossman-Swenson

**QUESTION 11**

Please identify each firm or self-employed individual who, since January 1, 2000, has provided pipeline X-ray services to PG&E in connection with its gas transmission pipelines. As to each firm or person identified, please supply:

- a. the service provider's name;
- b. the service provider's last known address, telephone number, e-mail address and web site URL;
- c. in the case of a service provider other than a self-employed individual, the name(s) of the person(s) principally responsible for dealing with PG&E and for carrying out the services provided;
- d. the kind(s) and classification(s) of licenses held by or for the service provider (e.g., engineer's license, contractor's license, etc.);
- e. a description of each aspect of the services provided;
- f. copies of agreements pursuant to which the services were provided;
- g. the dates and locations of the services provided;
- h. performance records and evaluation of the service provided;
- i. the names of all persons employed by the service provider who have been employed by PG&E in the past, and:
  - ii. the time period(s) of each such person's employment with PG&E;
  - iii. the services each such person rendered in connection with the service provider's performance of the services described in response to subpart d. above;

- iv. whether or not the person is a participant or beneficiary of a retirement plan sponsored by PG&E.

#### **ANSWER 11 SUPPLEMENTAL**

PG&E objects to this data request on the grounds that it is outside the scope of this proceeding, not reasonably calculated to the discovery of admissible evidence, unduly burdensome, and that it calls for confidential and competitively sensitive information regarding current and former PG&E employees, and PG&E contractors. Subject to and without waiving the foregoing objections, PG&E responds as follows:

On January 17, 2012, PG&E provided a response identifying the names of contractors PG&E has contracts with for non-destructive examination. PG&E supplements that response with GasPipelineSafetyOIR\_DR\_LocalUnions246-342\_002-Q11Atch01, which contains tabs that describe capital agreements covering non-destructive examination services related to gas transmission pipeline related work. The majority of the agreements related to the multiple items listed in the attached workbook are maintained in PG&E's long term storage and must be manually researched and scanned, which would require a significant amount of time to provide. The burdensome nature of pulling these contracts outweighs the benefits.