

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

PG&E Data Request No.:	LocalUnions246-342_002-12		
PG&E File Name:	GasPipelineSafetyOIR_DR_LocalUnions246-342_002-Q12		
Request Date:	January 3, 2012	Requester DR No.:	002
Date Sent:	January 20, 2012	Requesting Party:	Plumbers/Pipe Fitters/Steamfitters Local Unions 246/342
PG&E Responder:	Bob Suehiro,	Requester:	Sarah Grossman-Swenson

QUESTION 12

Please identify each firm or self-employed individual who, since January 1, 2000, has provided construction 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:
 - i. the time period(s) of each such person's employment with PG&E;
 - ii. the services each such person rendered in connection with the service provider's performance of the services described in response to subpart d. above;

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

ANSWER 12

PG&E objects to this data requests 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:

GasPipelineSafetyOIR_DR_LocalUnions246-342_002-Q12Atch01 contains tabs that describe capital and expense agreements covering Construction services related to gas transmission pipelines related work since 2000. The majority of the agreements 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.