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**Exhibit Number** :  
**Commissioner** : Michel Peter Florio  
**Admin. Law Judge** : Amy C. Yip-Kikugawa

**Utilities Safety and Reliability Branch  
Consumer Protection and Safety Division  
California Public Utilities Commission  
State of California**

**REBUTTLAL TESTIMONY OF  
WILLARD LAM**

**CLASS LOCATION OII  
Investigation 11-11-009  
(November 10, 2011)**

***San Francisco, California  
August 15, 2012***

1 Q. Please state your name and address.

2 A. My name is WILLARD LAM and my business address is California Public  
3 Utilities Commission ("CPUC" or "Commission"), 505 Van Ness Avenue, San  
4 Francisco, California 94102.

5 Q. Please briefly describe your present position and your professional and educational  
6 background.

7 A. I am presently employed in the Gas Safety and Reliability Branch ("GSRB") of the  
8 Consumer Protection and Safety Division ("CPSD"), as a Utilities Engineer. In  
9 that role, I am responsible for reviewing records and procedures, conducting audits  
10 and inspections, and investigating incidents to ensure compliance with Federal and  
11 State regulations. The GSRB is responsible for regulating natural gas and propane  
12 utilities in California. GSRB's primary duties include maintaining public safety by  
13 performing audits and inspections, investigating gas related incidents, and  
14 reviewing records and procedures to ensure compliance with State and Federal  
15 regulations.

16 My educational background includes a Bachelor of Science in Civil  
17 Engineering from the University of California, Davis. I joined the CPUC on  
18 January 14, 2011, as a Utilities Engineer in GSRB.

19 Q. What is the purpose of your testimony?

20 A. The purpose of my testimony is to support Staff's Report in the Class Location  
21 OIL, I.11-11-009, and rebut Pacific Gas and Electric Company's ("PG&E's") July  
22 23, 2012 Prepared Testimony of Jane K. Yura at page 1-1, that CPSD's May 25,  
23 2012 report "alleges code violations based on individual pipe segments...[but] the  
24 number and identity of pipeline segments is not fixed."

25 Q. Is your testimony based on specific instances in which PG&E admits that it failed  
26 to comply with state and/or federal safety regulations regarding safe operations of  
27 natural gas transmission pipelines and pipeline segments?

28 A. Yes.

1 Q. Is CPSD's Summary of Alleged PG&E Violations in Table 12 and the Attachments  
2 12, 13, 14, 15, and 16 of its May 25, 2012 investigative report in this proceeding  
3 accurate and correct?

4 A. Yes, CPSD's Summary of Alleged PG&E Violations in Table 12 and the  
5 Attachments 12, 13, 14, 15, and 16 of its May 25, 2012 investigative report in this  
6 proceeding are populated with data and information provided by PG&E and are  
7 accurate and correct.

8 Q. Does this conclude your prepared direct testimony?

9 A. Yes.

10  
11 

12 WILLARD LAM  
13 Utilities Engineer

14 California Public Utilities Commission  
15 505 Van Ness Avenue  
16 San Francisco, CA 94102, 2<sup>nd</sup> Fl.  
17 Phone: (415) 703-1327  
18 E-Mail: [wlm@cpuc.ca.gov](mailto:wlm@cpuc.ca.gov)

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing document, **“REBUTTAL TESTIMONY OF WILLARD LAM FOR THE UTILITIES SAFETY AND RELIABILITY BRANCH OF THE CONSUMER PROTECTION AND SAFETY DIVISION”** in I.11-11-009 on all the parties to this proceeding by first-class mail as well as the assigned Administrative Law Judge, Amy Yip-Kikugawa, by personal delivery.

Executed in San Francisco, California, on the 15<sup>th</sup> day of August, 2012.

/s/ NELLY SARMIENTO

NELLY SARMIENTO



California Public  
Utilities Commission

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