

ERRATA

Testimony of Paul Duller and Alison North, Supplement to March 12th Report, Exhibit 2. PG&E Violations.

Each of the 10 violations in this supplement constitutes one separate violation. For an explanation of how the rules listed under each violation apply, please see testimony of Consumer Protection and Safety Division Deputy Director, Ms. Julie Halligan, section V.

Rebuttal Testimony of Paul Duller and Alison North, Section 5.11. (Corrections are shown in red.)

CPSD wish to highlight a minor calculation error made in section 5.11 of CPSD's original rebuttal testimony served on August 20th 2012. When comparing the GIS2 and GIS3 datasets the formula used to assess the number of matched records was incorrectly set to review the first 4688 of the GIS2.0 records rather than all 10,051 records. This omission was identified last week and CPSD has already alerted PG&E that it wished to submit additional testimony, to correct this point and other matters. This error impacts the figures presented on Figure 5.11 in the original rebuttal testimony. Revised portions of section 5.11 of CPSD's original rebuttal testimony are presented below, with revisions identified in red. Additionally, a revision to figure 5.11 is provided below. The figures and formulas provided in the spreadsheets cited above have also been adjusted to reflect these changes.

In July 2012, PG&E provided a list of **4668** Job Numbers from their new GIS system, called Intrepid. This list was originally compiled from a range of primary PG&E sources such as construction as-built drawings and secondary sources such as Plat Sheets.¹ CPSD compared the partial list of PG&E Job numbers from PG&E's new GIS (**4,668** Job Numbers) with the Emeryville catalogue of existing gas transmission Job Folders (87,018 unique job numbers). The findings show that some of the job numbers in PG&E's new GIS Intrepid system do not have a matching job number, and at least one physical job folder in the Emeryville catalogue. This confirms that these job numbers once existed because PG&E references them from primary sources. Therefore, any corresponding job folder(s) may now be classified as "*Missing*".

This conclusion is supported by the following points:

¹ GasTransmissionSystemRecordsOII_DR_CPUC_066_Q04 Data Request 66, Question 4. As identified in this data request, this list was incomplete and represented only a small fraction of the known jobs. PG&E explained the small number by stating that this data was still in the process of being compiled.

- 1619 (35%) of the 4668 Job Numbers recorded in PG&E's new GIS (Intrepid) do NOT have a matching job number, and at least one physical job folder in the Emeryville Catalogue.
- 3049 (65%) of the 4668 job numbers in PG&E's new GIS (Intrepid) have corresponding entries within the 87018 unique job numbers identified in the Emeryville Catalogue (e.g. a 3.5% match).
- A similar trend is observed in PG&E's Live GIS system. 3580 (35%) of the 10,051 Job Numbers recorded in PG&E's Live GIS 2.0 system do NOT have a matching job number, or at least one corresponding physical job folder in the Emeryville Catalogue.
- Only 6471 (8%) of the 87018 job numbers in Emeryville have a corresponding job number out of the 10051 job numbers listed in PG&E's Live GIS 2.0 system.
- 180 out of the first 365 job numbers (49%) in the first 1-10,000 job number series identified in the new PG&E future GIS 3.0 Intrepid do NOT have a corresponding Job file entry in the Emeryville catalogue. The fact that these Job Numbers were identified by PG&E on primary source documents and plat sheets provides the supporting evidence necessary to demonstrate that these job numbers actually existed, were in use within PG&E, and should have had a corresponding job file associated with them.
- 581 out of the first 1023 job numbers (57%) in the first 1-10,000 job number series identified in PG&E's Live (existing) GIS 2.0 do NOT have a corresponding Job file entry in the Emeryville catalogue.

The fact that these Job Numbers are identified by PG&E in its live GIS system, and were originally derived from PG&E's plat sheets provide the supporting evidence necessary to demonstrate that these job numbers actually existed, were in use within PG&E, and should each have had a corresponding job file associated with them. These findings provide the evidence necessary to support the CPSD's contention that approximately 67.5%+ of the first 10,000 job numbers were actually assigned within the Gas Division and that a significant proportion of the corresponding job files and folders are now missing.

The overlapping relationship between Job Numbers in PG&E's GIS 2.0, GIS 3.0 and the corresponding Physical Job files as listed in the Emeryville catalogue is presented in Figure 5.11 below. A significant number of Jobs (4604) are recorded in the GIS systems (GIS 2.0 and GIS 3.0), but do not have a corresponding record and physical job file in the Emeryville catalogue.

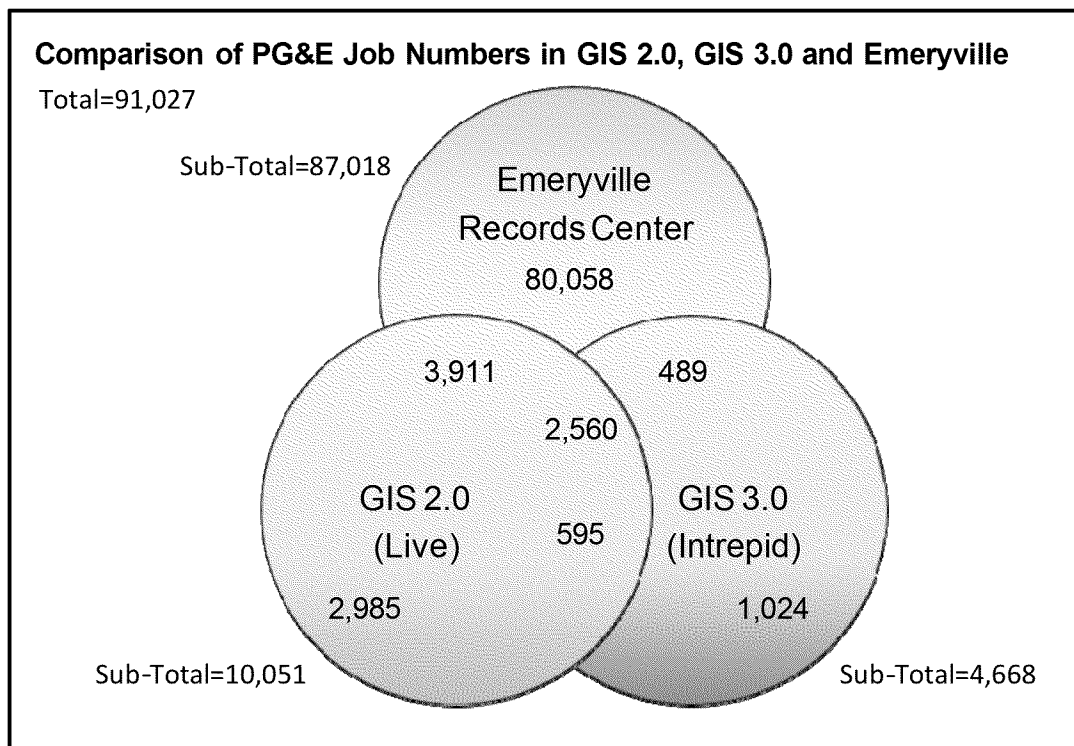


Figure 5.11 (Revised)

[Please note that this analysis does not include the additional 15,048 Job Numbers recently discovered and reported to CPSD on August 18, 2012. CPSD reserve the right to submit a supplemental testimony once it has completed its analysis of this late submitted data.]

The overlapping relationship between Job Numbers in PG&E's GIS 2.0, GIS 3.0 and the corresponding Physical Job files as listed in the Emeryville catalogue is presented in Figure 5.11 above. Please note the significant number of Jobs that are recorded in the GIS systems but do not have a corresponding record and physical job file in the Emeryville catalogue.