

# EXHIBIT A

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation on the  
Commission's Own Motion into the Operations  
and Practices of Pacific Gas and Electric  
Company with Respect to Facilities Records for  
its Natural Gas Transmission System Pipelines.

I.11-02-016  
(Filed February 24, 2011)

**DECLARATION OF JONATHAN SEAGER IN SUPPORT  
OF PACIFIC GAS AND ELECTRIC COMPANY'S  
MOTION FOR RECONSIDERATION OF RULING  
ADMITTING DATA RESPONSES AND CIVIL  
DEPOSITION TRANSCRIPTS INTO EVIDENCE, OR IN  
THE ALTERNATIVE, FOR LEAVE TO SUBMIT  
RESPONSIVE TESTIMONY**

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December 17, 2012

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I, JONATHAN SEAGER, do declare:

1. I am currently a Regulatory Manager in the Regulatory Affairs Department at Pacific Gas and Electric Company ("PG&E"). I received a Bachelor of Science degree in Business Administration from San Jose State University and a Master of Business Administration degree from the University of San Francisco. Except as indicated, I have personal knowledge of the following facts and, if called as a witness, would testify thereto.
2. Since September of 2011, I have been the case manager for the Commission's Order Instituting Investigation on the Commission's Own Motion into the Operations and Practices of Pacific Gas and Electric Company with Respect to Facilities Records for its Natural Gas Transmission System Pipelines (OII 11-02-016). In that capacity, I helped to manage the data request and response process, including monitoring the number and disposition of requests submitted by parties in the proceeding.
3. As of September 5, 2012, when hearings in this proceeding commenced, I am informed and believe that PG&E had received 86 Data Request sets from the Commission's Legal Division/Consumer Protection and Safety Division, totaling 775 individual data requests.

Those requests covered all aspects of PG&E's gas transmission business, as well as topics outside of that line of business. Many of the data requests sought information that spanned a period of over 70 years.

4. PG&E's responses to these requests totaled over 46,000 documents, reflecting 179 gigabytes of data. This includes approximately 12,000 pages of 17 deposition transcripts and exhibits from the civil proceedings relating to the San Bruno accident.
5. CPSD cited to 140 PG&E data request responses in its six sets of testimony submitted in this proceeding. An additional 9 PG&E data request responses were introduced into the record during the administrative hearings held from September 5, 2012 through October 5, 2012. CPSD did not cite to the 17 deposition transcripts in its reports.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 17<sup>th</sup> day of December 2012, at San Francisco, California.

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/s/  
JONATHAN SEAGER