## **EXHIBIT A**

From: Jordan, Lise (Law)

Sent: Thursday, December 06, 2012 10:56 PM

**To:** 'Gruen, Darryl'; Alison North; Cagen, Robert; Johnson, Catherine A.; Halligan, Julie; Kinosian, Robert; Linn, Courtney J (Law); Malkin, Joseph M (Law); Margaret Felts; Paul Duller; Pendleton, Jonathan (Law) **Subject:** RE: Missing Items on the PG&E's External Hard Drive Consisting of Data Responses 1 through

Darryl,

We have gone through your attached spreadsheet this afternoon and have several questions for you. In addition, you did not provide any information regarding the ECTS documents that you refer to as "Missing Items."

Unfortunately our schedules are such that we are not able to meet with you tomorrow morning. We are available on Monday. If you are available as well, we propose that we meet on Monday and go over the items in your spreadsheet for which we have questions, as well as discuss the ECTS documents. Given that your universe of documents you've identified as potential exhibits may not be consistent with our understanding of your original request, we suggest you defer your conversation with the ALJ until after we've had an opportunity to meet. We may suggest at that time that we join you in that conversation.

Thanks,

Lise H. Jordan | Attorney | Pacific Gas and Electric Company 415.973.6965 office

From: Gruen, Darryl [mailto:darryl.gruen@cpuc.ca.gov]

Sent: Thursday, December 06, 2012 9:47 AM

**To:** Alison North; Cagen, Robert; Johnson, Catherine A.; Jordan, Lise (Law); Halligan, Julie; Kinosian, Robert; Linn, Courtney J (Law); Malkin, Joseph M (Law); Margaret Felts; Paul Duller; Pendleton, Jonathan (Law)

Subject: Missing Items on the PG&E's External Hard Drive Consisting of Data Responses 1 through 86

Lise:

As you may remember, the ALJ instructed PG&E to provide the CPSD record keeping team with an external hard drive consisting of data responses 1 through 86. In the attached list, CPSD has identified a group of things that PG&E provided CPSD in its first 86 data responses during the course of the investigation, but that are missing from the external hard drive. In addition to the attached list, CPSD has a group of files downloaded from ECTS that were part of the discovery process. For shorthand, I refer to the incomplete set of data responses 1 through 86 as "Data Responses", and the missing items from the hard drive and group of files downloaded from ECTS as "Missing Items".

The ALJ is expecting me to update her on the status of the Missing Items tomorrow. Before talking with her, I wanted to communicate with you beforehand and inquire as to PG&E's willingness to remedy these deficiencies.

As context to explain what CPSD requests of PG&E to remedy these deficiencies, I am explaining the final products CPSD has made based in part upon the Data Responses ("Hereafter

called 'Final Products'"). CPSD has placed the Data Responses onto external hard drives that are almost ready to be distributed to the ALJ, parties to the proceeding and others who may require them. This includes having appropriate sets of redacted and confidential Data Responses. CPSD has also burned archival DVD's containing the Data Responses. As you know, many of the Data Responses were required to be converted to pdf/a format. CPSD received Commission guidance about which Data Responses to convert and which to leave in native file format before burning onto the Archival DVD's. CPSD also provided indexes that showed the organization of the Data Responses as well as other evidence.

Will PG&E agree to create the same set of Final Products with the Missing Items that are necessary to supplement the Final Products that CPSD has created with the Data Responses?

If you would like to talk about this, I am free to talk this morning or tomorrow morning. I look forward to hearing from you.

Darryl Gruen
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	Α	В	С	D
1	Date of Disk	Description	Status	ID
	Global	Responses to DR 29 Q 5 - provide responses to CPSD DRs in the San	PG&E omitted all - Hard Drive 12 Dec 2011 and GT matters CDs, but	Experts relied on these responses
2		Bruno investigation	cited many of these records in response to OII DRs	
	12/20/2011	Gas Transmission System Records OII/PG&E's responses to CPSD	Disk not on toshiba drive	I.11-02-016
3		Data Requests Post-12/07/2011		
4	12/8/2011	GT-Matters DR CPUC 254-Q07 Attachments /(note: Weld 300 AB	Disk not on toshiba drive	GT-Matters
5	12/9/2011	GT-Matters/ DR CPUC 194 Q11 Atch 01-conf	Disk not on toshiba drive	GT-Matters
6	12/9/2011	GT-Matters DR CPUC 280-q02 Atch 01, 02 and 03-conf	Disk not on toshiba drive	GT-Matters
7	1/10/2010	GT-Matters DR CPUC 279 Q01 and Q02	Disk not on toshiba drive	GT Matters
8	1/17/2012	GT-Matters DR CPUC 282	Disk not on toshiba drive	GT Matters
9	1/18/2012	GT-Matters DR CPUC 286-Q01-Supp01	Disk not on toshiba drive	GT Matters
LO	12/27/2011	GT-Matters/DR CPUC 280 q02-Supp 01 Attachments	Disk not on toshiba drive	GT-Matters
11	12/29/2011	GT-Matters DR CPUC 288 Q 04/(Skyline Pressure Charts)	Disk not on toshiba drive	GT Matters
12	1/12/2012	GT-Matters DR CPUC 254-Q06-Supp02/attachments	Disk not on toshiba drive	GT Matters
	6/26/2012	San Bruno Explosion and Fire OII/PG&E's response and supporting	Disk not on toshiba drive	1.12-01-007
.3		exhibits to the CPSD's Incident Investigation		
	9/16/2011	Gas Transmission System Records OII/PG&E site visit 9/16/22	Disk not on toshiba drive	1.11-02-16
L4	0.00.0014	(recording from Brentwood site visit - oral DR)	Section 1994 1995	111.00.00
	9/22/2011	Gas Transmission System Records OII/Legal Division DR 3-Q6 - all	Disk not on toshiba drive	1.11-02-016
		data that PG&E gathered between January 1, 2000 and July 1, 2011 to		
15		update its HCAs and its transmission pipeline classifications		
	Global DR7	DR 7 Q 7 List of Documents from DRA, IRA, NTSB, CPSD		
.0	10/25/2011	Gas Transmission System Records Oll/PG&E's response to Legal	Disk not on toshiba drive	I.11-02-016
١7	10/25/2011	Division DR7, O 7 Atchs	Disk not on tosinoa diffe	1.11-02-010
.,	10/26/2011	Gas Transmission System Records OII/PG&E's response to Legal	Disk not on toshiba drive	I.11-02-016
	10/20/2011	Division DR7 Q7 NTSB Responses (six disc's videos of pipe	Bisk not on comparative	02 010
18		inspections after explosion)		
	10/26/2011	Gas Transmission System Records OII/PG&E's response to Legal	Disk not on toshiba drive	
9		Division D7, Q7 Atchs (NTSB Responses 2 disks)		
	7/16/2012	Responses to DR 65 are missing - 2 videos plus text and attachments	Disk not on toshiba drive	
20		provided in email delivered on 7/16/2012		
	7/23/2012	Gas Transmission System Records OII/DR Responses in 1.12-01-007 as	Disk not on toshiba drive	1.11-02-016
		requested by Darryl Gruen on 7/16/2012 Responses about missing		
		video, Overland reports, etc. DR s by BanuAcimis, GaryHapster,		
21		GinaAdams		
	12/16/2011	Gas Transmission System/DRA 17 & 21 responses and	This disk has three folders. The first folder files do not match those files o	ı I.11-02-016
		attachments/CPSD 239 attachments	the hardrive. Files in the second folder all match. Third folder is CPSD 23	)
22			attachments which is not on the hardrive.	
	12/22/2011	Gas Transmission System Records OII/Response to 12/20/11 and	Disk not on toshiba drive	I.11-02-016
		12/21/11 CPUC requested documents from Emeryville records facility		
!3	topical appropriation and the	site visit		
	2/15/2012	Gas Transmission System Records OII/PG&E's response to DR 25	Disk not on toshiba drive	L11-02-016
24	6/26/2012	Q02(i) Supp0(10-20), Supp02(1-9)plus 2 atchs	D.1	111.00.017
. ב	6/26/2012	Gas Transmission System Records OII/ PG&E's response and supporting	, 1918k not on toshiba drive	1.11-02-016
25	6/26/2012	exhibits to the CPSD's Reports	District on tout the duine	111.02.016
, ,	6/26/2012	Gas Transmission System Records OII/ PG&E's Response and	Disk not on toshiba drive	1.11-02-016
26	8/22/2012	supporting exhibits to the CPSD's Reports (2 disks)	DP 78 O 4 and O 6 not on Tochiba Driva	I.11-02-016
	0/22/2012		DR 78 Q 4 and Q 6 not on Toshiba Drive	1.11-02-010
27	and the second s	Q06_re_ Recordings of Radio Transmissions in Bay Area on 9 Sept		
_	6/6/2012	2010, DR 78 Q 4 is Verint Agreement DR 64 Q1 Response and attachments	Not on Toshiba Drive	1.11-02-016
ں,	0/0/2012	DA 04 Q 1 Response and adactiments	TAUCUL LUMIUM DIEVE	1.11-04-010

	A	В	С	D
1	Date of Disk	Description	Status	IĐ
	10/21/2011	DR 16 Q 4 ECTS documents including As-Builts	No ECTS documents on Toshiba Drive	
30				
	Global	PG&E Response June 2011 and all supporting documents	Rolling Productions	
	4/8/2011	Initial Response/Attachments Supporting Chapters 1-5	Disk not on toshiba drive	1.11-02-016
	5/10/2011	Chapter 2 Attachments-Corrected Verison to May 6th, 2011 Production	Disk not on toshiba drive	I.11-02-016
33				
	5/20/2011	Additional Attachments to Chapter 2	Disk not on toshiba drive	I.11-02-016
	6/3/2011	Additional Attachments to Chapter 2	Disk not on toshiba drive	I.11-02-016
	7/29/2011	Gas Transmission System Records OII Document Production	Disk not on toshiba drive	I.11-02-016
	7/29/2011	Gas Transmission System Records OII Document Production	Disk not on toshiba drive	I.11-02-016
	8/31/2011	Gas Transmission System Records OII/Weld Defect and Failure Rolling	Disk not on toshiba drive	1.11-02-16
38		Production #2		
	9/13/2011	Gas Transmission System Records OII/Rolling Production	Disk not on toshiba drive	1.11-02-16
	9/30/2011	Gas Transmission System Records OII/Amendments to Appendices B	Disk not on toshiba drive	I.11-02-16
40		and C (resubmitted 10/3/2011)		
	9/30/2011	Gas Transmission System Records OII/PG&E's ammendment to	Disk not on toshiba drive	1.11-02-16
41		Appendices B and C originally foled on 6/20/2011		
	1/13/2012	Gas Transmission System Records OII/PG&E"s Fourth Amendment to	Disk not on toshiba drive	1.11-02-15
42		Response filed on 6/20/2011 Attch. B		
	1/13/2012	Gas Transmission System Records OII/PG&E"s Fourth Amendment to	Disk not on toshiba drive	1.11-02-15
43		Response filed on 6/20/2011 Attch. B		
	3/19/2012	Gas Transmission System Records OII/Pacific Gas and Electric	Disk not on toshiba drive	1.11-02-016
,,		Company's Fifth Amendment to Response filed on 6/20/2011 (redacted)		
44	2/10/2012			711.00.017
45	3/19/2012	Gas Transmission System Records OII/Pacific Gas and Electric	Disk not on toshiba drive	I.11-02-016
45	1/12/2012	Company's Fifth Amendment to Response filed on 6/20/2011	D. 1	T.14.00.15
16	1/13/2012	Gas Transmission System Records OII/PG&E"s Fourth Amendment to	DISK HOLOH TOSBIDA GLIVE	I.11-02-15
46	1/12/2012	Response filed on 6/20/2011 Attch. B	Pile and the life is a second of the second	T11 02 15
47	1/13/2012	Gas Transmission System Records OII/PG&E"s Fourth Amendment to	DISK not on toshiba drive	I.11-02-15
4/		Response filed on 6/20/2011 Attch. B		