

# EXHIBIT F

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 13, 2012

Lise H. Jordan  
Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94105

Re: Recordkeeping OII. I 11-02-016

Dear Lise:

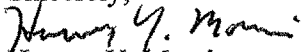
This letter is in response to PG&E's Data Request No. PGE-CPSD\_014, Questions 1 and 2, concerning communications between CPSD and ALJ Yip-Kikugawa. These communications involve the specific formatting of files from PG&E's data responses to CPSD's Data Requests 1 through 86 in this proceeding to be placed on Archival DVD's, and the timing of completion of those DVD's. These communications also involve the timing of completing copies of the external hard drive provided by PG&E to CPSD, containing PG&E's responses to Data Requests 1 through 86, as well as the use of a search engine on these external hard drives.

The e-mails and conversations reflect the difficulty CPSD was having in providing these enormous exhibits. These communications occurred after ALJ Yip-Kikugawa's ruling on September 18, 2012 (Tr. 1571:9 -1582:14, 1620:24-1628:5) granting CPSD's request to put the entire group of PG&E's Data Responses to CPSD Data Requests 1 through 86 (subject to redactions for the public filing) into the record.

In response to Question 1, please find a summary of the communications between CPSD and ALJ Yip-Kikugawa concerning this matter, which was prepared by Darryl Gruen.

In response to Question 2, please find all of the e-mails between CPSD and ALJ Yip-Kikugawa on this matter. I have arranged the e-mails chronologically, but note that the 2 and 4 page chains of e-mails are completely duplicated within the 6-page chain of e-mails, except for the first 2 or 3 sentences.

Sincerely,

  
Harvey Y. Morris  
Assistant General Counsel

HYM:rbg

Enclosure

## QUESTION 1

Q 1: Please summarize all communications between CPSD and Administrative Law Judge Yip-Kikugawa that in any way concern or relate to Commission Investigation 11-02-016.

The following conversations focused upon the questions regarding the timing and logistics for placing PG&E's data responses on external hard drives. These conversations also focused upon the unprecedented question before the Commission of which of the vast variety of PG&E's different file formats from PG&E's data responses 1-86 ("data responses") were appropriate to convert to pdf/a format for archiving purposes, and which were not. These conversations all followed the ALJ's ruling in hearings on September 18<sup>th</sup> that all of PG&E's data responses from numbers 1 through 86 would be admitted into evidence.

During October, 2012 CPSD and the ALJ had various conversations concerning the deadlines for CPSD to deliver external hard drives and archival DVD's containing PG&E's data responses that she ruled would come into evidence during hearings on September 18<sup>th</sup>. These conversations also included questions about which files from the data responses to be placed on archival DVD should be converted to pdf/a format and which of those files remain in native file format.

On October 17<sup>th</sup>, 2012, CPSD and ALJ Yip-Kikugawa spoke regarding delivering copies of an external hard drive provided by PG&E to her and other parties within several weeks. On October 18<sup>th</sup>, 2012, CPSD and the ALJ spoke regarding necessary delays regarding the delivery of the external hard drives. Also on October 18<sup>th</sup>, 2012, the ALJ informed CPSD that she did not want the delay to negatively impact the schedule for resuming the OII's. The ALJ also mentioned that she needs a complete record of the proceeding.

On November 7<sup>th</sup>, 2012, CPSD received the ALJ's guidance about which files from I.11-02-016 to be placed on archival DVD for archiving purposes should be converted to pdf/a format, and which of these files should remain in native file format.

On November 19<sup>th</sup>, 2012, CPSD met with the ALJ to receive guidance regarding whether a search engine on the external hard drive would be necessary to review the data responses provided by PG&E.

## QUESTION 2

**Gruen, Darryl**

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**From:** Gruen, Darryl  
**Sent:** Monday, September 24, 2012 5:24 PM  
**To:** Yip-Kikugawa, Amy C.  
**Subject:** RE: CPSD Exhibits

Been organizing and culling through all of them. Will get them to you as soon as I can.

Darryl Gruen  
Staff Counsel  
California Public Utilities Commission  
505 Van Ness Ave. - San Francisco, CA 94102  
(415) 703-1973 - [djg@cpuc.ca.gov](mailto:djg@cpuc.ca.gov)

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**From:** Yip-Kikugawa, Amy C.  
**Sent:** Thursday, September 20, 2012 3:28 PM  
**To:** Gruen, Darryl  
**Subject:** CPSD Exhibits

Can you give me extra hard copies of CPSD Exhibits 5, 9 and 10? Thanks.

Amy C. Yip-Kikugawa  
Administrative Law Judge  
California Public Utilities Commission  
(415)-703-5256

## **Gruen, Darryl**

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**From:** Gruen, Darryl  
**Sent:** Friday, October 19, 2012 10:48 AM  
**To:** Yip-Kikugawa, Amy C.  
**Cc:** Cagen, Robert  
**Subject:** RE: I.11-02-016 - CPSD Exhibits 18-30 (Archival DVDs of PG&E's Data Responses)

Thank you for your guidance Your Honor.

We will work to follow it and I will keep you posted.

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**From:** Yip-Kikugawa, Amy C.  
**Sent:** Thursday, October 18, 2012 10:24 PM  
**To:** Gruen, Darryl  
**Cc:** Cagen, Robert; Yip-Kikugawa, Amy C.  
**Subject:** I.11-02-016 - CPSD Exhibits 18-30 (Archival DVDs of PG&E's Data Responses)

Mr. Gruen,

In order to prevent any misunderstanding of what is expected to be provided to me, I would like to confirm our various conversations concerning CPSD's exhibits containing PG&E's data responses. As you know, CPSD has requested and been given a number of extensions to provide these exhibits. While I believe these past extensions were warranted, I would like to ensure that there is no unnecessary delay in providing the exhibits.

Based on our conversation yesterday, I understand that CPSD would not be able to provide the exhibits on archival DVDs for several weeks due to the amount of time that will be required to convert all the documents into PDF-A format and to burn these documents onto the archival DVDs. As I had informed you, only the copy of the data requests and responses that is to be kept in Central Files needs to be in PDF-A format and on archival DVDs. While it is not necessary to provide the archival DVDs immediately, I do want all parties to have copies of the exhibits (data requests and responses) as soon as possible so that the documents will be available for them as they write their briefs. Therefore, I had requested that CPSD provide each party a hard drive containing copies of PG&E's data responses in the format that had been provided to CPSD (e.g., Word or Excel).

Due to the number of data requests and the number of documents contained in PG&E's responses to the data requests, it appears that CPSD would need more than the currently reserved 12 exhibit numbers if it were to consider each archival DVD a separate exhibit. Therefore, I have suggested that the data requests be divided into groups and assigned a single exhibit number. The exhibit would then identify the range of data requests and the number of disks in that range (e.g., Exhibit CPSD-18 - PG&E responses to CPSD Data Request 1 - 10, consisting of 8 archival DVDs).

At the time CPSD provides the hard drive to parties, it would include a document that would list the data requests by number (with a short description of the subject/topic of the data request) and identify for each response to that request (by sub-part as needed):

1. whether the data response was cited by a CPSD witness in his/her testimony, with a cite to the appropriate footnote;
2. whether the data response was used as a CPSD exhibit during hearings; and
3. the CPSD exhibit whether the data response may be found

At the end of yesterday's meeting, you had stated that you anticipated this hard drive could be provided to me and the other parties in the next two weeks and the archival DVDs would be available before the resumption of evidentiary hearings. However, you informed me this afternoon that your team has been requested by Ms. Cooke to work on another matter first. I understand that this will delay when the hard drives and the archival DVDs will be available. However, as I told you this afternoon, I do not want the delay to negatively impact the schedule that ALJ Wetzell and I have set for the

resumption of the OIIs on November 1, 2012. Further, I need these exhibits so that I will have a complete record in this proceeding. As I mentioned to you, even if parties ultimately reach a settlement agreement, I will need a complete record in order to determine whether any proposed settlement is reasonable and in the public interest.

I would like an update by November 1, 2012 on when CPSD expects the hard drives and archival DVDs will be available.

Thank you,

Amy C. Yip-Kikugawa  
Administrative Law Judge  
California Public Utilities Commission  
415.703.5256



**Gruen, Darryl**

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**From:** Gruen, Darryl  
**Sent:** Thursday, November 01, 2012 4:18 PM  
**To:** Yip-Kikugawa, Amy C.  
**Cc:** Cagen, Robert  
**Subject:** RE: I.11-02-016 - CPSD Exhibits 18-30 (Archival DVDs of PG&E's Data Responses)

Thank you Your Honor:

I look forward to hearing back from you next week about file conversion or whether to leave files in their existing format, and will provide another update of our progress on November 13, 2012.

Darryl Gruen  
Staff Counsel  
California Public Utilities Commission  
505 Van Ness Ave. - San Francisco, CA 94102  
(415) 703-1973 - [djg@cpuc.ca.gov](mailto:djg@cpuc.ca.gov)

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**From:** Yip-Kikugawa, Amy C.  
**Sent:** Thursday, November 01, 2012 4:10 PM  
**To:** Gruen, Darryl  
**Cc:** Cagen, Robert  
**Subject:** RE: I.11-02-016 - CPSD Exhibits 18-30 (Archival DVDs of PG&E's Data Responses)

Mr. Gruen,

Thank you for the update. In response to your question below, I would prefer that you provide the parties with a complete set of the documents on the external hard drives. Therefore, please ask PG&E when they will be able to provide replacements for the corrupted/unreadable files. These files should be provided so that CPSD will have the hard drives and list completed for distribution to parties by November 26, 2012 at the latest. I would like an update of your progress on November 13, 2012.

I will be consulting with the Docket Office to determine whether some of the file formats provided by PG&E should be converted to PDF/A or some other format and respond to you next week.

Thank you,

Amy C. Yip-Kikugawa  
Administrative Law Judge  
California Public Utilities Commission  
(415)-703-5256

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**From:** Gruen, Darryl  
**Sent:** Thursday, November 01, 2012 3:30 PM  
**To:** Yip-Kikugawa, Amy C.  
**Cc:** Cagen, Robert  
**Subject:** RE: I.11-02-016 - CPSD Exhibits 18-30 (Archival DVDs of PG&E's Data Responses)

Good Afternoon Your Honor:

Per your instructions, today CPSD provides an update on when it expects the external hard drives and archival DVDs will be available in your proceeding.

### **External Hard Drive Update**

*Regarding the external hard drives, here is what we have done so far.*

We have acquired 20 external hard drives that are large enough to store the data you have instructed to go into evidence.

Per your instructions, we have worked to put all of PG&E's data responses as of October 4<sup>th</sup>, 2012 onto external hard drives. As of October 4<sup>th</sup>, 2012, PG&E's data responses constitute approximately 95,000 files (including both public and confidential versions) to go into evidence. Of the approximately 95,000 files, we have identified 61 that are corrupt and unreadable. We have requested that PG&E provide replacements to these 61 files. We have quality assured and validated all of the other pdf files PG&E provided as part of its data responses, except for the 61 that have failed and are unreadable.

We have also copied all of the quality assured and validated pdf formatted data responses included in the public and confidential sets to 15 of those 20 external hard drives. We can also validate that each non-pdf document is what PG&E has provided, but will not have time to ensure that the non pdf files PG&E provided are readable. If a party finds a non-pdf file is unreadable, we can request PG&E provide a readable version.

We have copied the public set to only to 5 of the 20 external hard drives. This should be sufficient for those parties only receiving public sets of data responses.

*Here is what we still need to do.*

We still need to get the 61 replacement files back from PG&E that can be read. We have asked PG&E for them and are waiting to hear back about when they will provide those.

We need to begin working on the list to accompany the hard drives for all of the parties, but aim to have that fairly soon.

We would still like to include documents referenced by CPSD testimony in the external hard drives.

*Request at this point.*

If you would like, we could work to provide the parties with external hard drives of all of the data responses except for the 61 files that are unreadable within the next few days. However, this would mean we would need to provide supplemental CD's with these files when we get them. Instead, may we work to get a timeline from PG&E as to when they will provide us with the 61 files, work on the list to accompany the hard drives, and work on adding the referenced documents by CPSD testimony? In this way, we can provide parties with one comprehensive external hard drive with all of CPSD's evidence along with a comprehensive list. I would be glad to provide you with another update on this effort at a time of your choosing.

### **Archival DVD Update**

We have identified the necessary processes to convert and correct approximately 70,000 pdf files to pdf/a format for archiving. We will begin converting these files to pdf/a format soon, but are completing the process to fix all of the pdf files so that they can be converted to pdf/a format.

Yesterday, we asked Messrs. Nakahara and Williams for guidance about whether to convert any of the more than 100 other file types provided by PG&E to pdf/a. For reference, attached is a list showing all of the different kinds of files that PG&E has provided us. We have requested guidance about which of these to convert to pdf/a and which to provide in their current native file format. We are mindful of your guidance that files we have in excel format are okay to provide without converting.

*Request at this point.*

We plan to begin converting pdf files to pdf/a format shortly. Also, once we hear from the ALJ, docket office and/or Mr. Williams about which files to convert to pdf/a format, we will then work to create a complete set of confidential documents, and a separate set of public documents to burn onto the archival DVD's. I am happy to update you about the status of this effort at a time of your choosing.

I believe this addresses your instructions shown below. If I have missed anything, I look forward to hearing from you so that I may address it.

Darryl Gruen  
Staff Counsel  
California Public Utilities Commission  
505 Van Ness Ave. - San Francisco, CA 94102  
(415) 703-1973 - [djg@cpuc.ca.gov](mailto:djg@cpuc.ca.gov)

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**From:** Yip-Kikugawa, Amy C.  
**Sent:** Thursday, October 18, 2012 10:24 PM  
**To:** Gruen, Darryl  
**Cc:** Cagen, Robert; Yip-Kikugawa, Amy C.  
**Subject:** I.11-02-016 - CPSD Exhibits 18-30 (Archival DVDs of PG&E's Data Responses)

Mr. Gruen,

In order to prevent any misunderstanding of what is expected to be provided to me, I would like to confirm our various conversations concerning CPSD's exhibits containing PG&E's data responses. As you know, CPSD has requested and been given a number of extensions to provide these exhibits. While I believe these past extensions were warranted, I would like to ensure that there is no unnecessary delay in providing the exhibits.

Based on our conversation yesterday, I understand that CPSD would not be able to provide the exhibits on archival DVDs for several weeks due to the amount of time that will be required to convert all the documents into PDF-A format and to burn these documents onto the archival DVDs. As I had informed you, only the copy of the data requests and responses that is to be kept in Central Files needs to be in PDF-A format and on archival DVDs. While it is not necessary to provide the archival DVDs immediately, I do want all parties to have copies of the exhibits (data requests and responses) as soon as possible so that the documents will be available for them as they write their briefs. Therefore, I had requested that CPSD provide each party a hard drive containing copies of PG&E's data responses in the format that had been provided to CPSD (e.g., Word or Excel).

Due to the number of data requests and the number of documents contained in PG&E's responses to the data requests, it appears that CPSD would need more than the currently reserved 12 exhibit numbers if it were to consider each archival DVD a separate exhibit. Therefore, I have suggested that the data requests be divided into groups and assigned a single exhibit number. The exhibit would then identify the range of data requests and the number of disks in that range (e.g., Exhibit CPSD-18 - PG&E responses to CPSD Data Request 1 - 10, consisting of 8 archival DVDs).

At the time CPSD provides the hard drive to parties, it would include a document that would list the data requests by number (with a short description of the subject/topic of the data request) and identify for each response to that request (by sub-part as needed):

1. whether the data response was cited by a CPSD witness in his/her testimony, with a cite to the appropriate footnote;
2. whether the data response was used as a CPSD exhibit during hearings; and

3. the CPSD exhibit whether the data response may be found

At the end of yesterday's meeting, you had stated that you anticipated this hard drive could be provided to me and the other parties in the next two weeks and the archival DVDs would be available before the resumption of evidentiary hearings. However, you informed me this afternoon that your team has been requested by Ms. Cooke to work on another matter first. I understand that this will delay when the hard drives and the archival DVDs will be available. However, as I told you this afternoon, I do not want the delay to negatively impact the schedule that ALJ Wetzell and I have set for the resumption of the OIIs on November 1, 2012. Further, I need these exhibits so that I will have a complete record in this proceeding. As I mentioned to you, even if parties ultimately reach a settlement agreement, I will need a complete record in order to determine whether any proposed settlement is reasonable and in the public interest.

I would like an update by November 1, 2012 on when CPSD expects the hard drives and archival DVDs will be available.

Thank you,

Amy C. Yip-Kikugawa  
Administrative Law Judge  
California Public Utilities Commission  
415.703.5256

**Gruen, Darryl**

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**From:** Gruen, Darryl  
**Sent:** Wednesday, November 07, 2012 10:36 AM  
**To:** Yip-Kikugawa, Amy C.  
**Cc:** 'rcc@cpuc.ca.gov'  
**Subject:** RE: PG&E Recordkeeping OII Data Response formats

Okay.

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**From:** Yip-Kikugawa, Amy C.  
**Sent:** Wednesday, November 07, 2012 10:35 AM  
**To:** Gruen, Darryl  
**Cc:** Yip-Kikugawa, Amy C.; Cagen, Robert  
**Subject:** Re: PG&E Recordkeeping OII Data Response formats

I'll call you when I get there.

Sent from my iPhone

On Nov 7, 2012, at 9:28 AM, "Gruen, Darryl" <darryl.gruen@cpuc.ca.gov> wrote:

<image002.gif>

Yes. Do you want me to come by your office a few minutes after noon?

Darryl

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**From:** Yip-Kikugawa, Amy C.  
**Sent:** Wednesday, November 07, 2012 9:17 AM  
**To:** Gruen, Darryl; Cagen, Robert  
**Subject:** PG&E Recordkeeping OII Data Response formats

Do you have time to meet with me some time between noon and 1:00 today to discuss the format for the files? I am in hearings, but will be available then. Thank you.

Amy C. Yip-Kikugawa  
Administrative Law Judge  
California Public Utilities Commission  
(415)-703-5256

**Gruen, Darryl**

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**From:** Gruen, Darryl  
**Sent:** Monday, November 19, 2012 10:40 AM  
**To:** Yip-Kikugawa, Amy C.  
**Cc:** Cagen, Robert; Morris, Harvey Y.  
**Subject:** RE: I.11-02-016 - CPSD Exhibits 18-30 (Archival DVDs of PG&E's Data Responses)

Perhaps my office is best then? I already have the search engine plugged in and ready to show.

Darryl

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**From:** Yip-Kikugawa, Amy C.  
**Sent:** Monday, November 19, 2012 10:38 AM  
**To:** Gruen, Darryl  
**Cc:** Cagen, Robert; Morris, Harvey Y.  
**Subject:** RE: I.11-02-016 - CPSD Exhibits 18-30 (Archival DVDs of PG&E's Data Responses)

Will need to meet in your office or a conference room. I have a young visitor with me today. ☺

Amy C. Yip-Kikugawa  
Administrative Law Judge  
California Public Utilities Commission  
(415)-703-5256

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**From:** Gruen, Darryl  
**Sent:** Monday, November 19, 2012 9:41 AM  
**To:** Yip-Kikugawa, Amy C.  
**Cc:** Cagen, Robert; Morris, Harvey Y.  
**Subject:** RE: I.11-02-016 - CPSD Exhibits 18-30 (Archival DVDs of PG&E's Data Responses)

Sure. I will set up a meeting at 11:00 and can come by your office.

Darryl Gruen  
Staff Counsel  
California Public Utilities Commission  
505 Van Ness Ave. - San Francisco, CA 94102  
(415) 703-1973 - [djg@cpuc.ca.gov](mailto:djg@cpuc.ca.gov)

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**From:** Yip-Kikugawa, Amy C.  
**Sent:** Monday, November 19, 2012 8:14 AM  
**To:** Gruen, Darryl  
**Cc:** Cagen, Robert; Morris, Harvey Y.  
**Subject:** Re: I.11-02-016 - CPSD Exhibits 18-30 (Archival DVDs of PG&E's Data Responses)

Are you available to meet today? I would like to look at the search engine. Any time after 10:30 would be ok.  
Thank you.

Sent from my iPhone

On Nov 16, 2012, at 5:19 PM, "Gruen, Darryl" <[darryl.gruen@cpuc.ca.gov](mailto:darryl.gruen@cpuc.ca.gov)> wrote:

Good Afternoon Your Honor:

I now have external hard drives available for distribution to all parties in the proceeding, which include the responses PG&E provided to CPSD Data Requests 1 through 86, and the documents referenced by CPSD's testimony. The external hard drives contain indexes on them for reference. I also have Gold Standard Archival DVD's with these data responses and documents in pdf/a format or other format you instructed us to provide, depending upon the file type. Having said this, I have a few questions moving forward.

1. Each External Hard Drive contains a search engine that allows the user to search for all documents containing a term or set of terms. The search engine has a similar search logic to a Lexis/Nexis or Westlaw database search. While we thought this might facilitate access to the data, I have not yet created a list that provides general subject matter of each data request. The first 86 data requests include approximately 500 questions, which cover a variety of topics. We did not necessarily organize our data requests by one or two subjects when we asked them. This list can be created, but will take time. How would you like us to proceed?
2. We have begun a separate process of checking the external hard drive including Data Responses 1 through 86 to ensure they are not missing any files PG&E provided us in data responses during the course of this investigation. If we find the external hard drives are missing any files, we can prepare supplements that contain these files soon. Is that okay?
3. We have a list of an extremely small batch of files out of the total of approximately 95,000 that we do not recognize and cannot open, which are shown on the lists of the attached file. Do you want us to coordinate with PG&E about providing the public with access to these files if someone needs to read them?
4. If you would like, we can provide you with whatever you would like of these items on Monday, and coordinate with other parties about distributing external hard drives to them for their reference as well.
5. As we are still doing discovery, we may also need to provide supplemental storage devices with PG&E's data responses to Data Requests 87 onward. This assumes your guidance about entering all data responses into the record applies to these as well. Is this an accurate reading of your ruling?

We look forward to hearing from you about these questions and any other instructions you may have.

Darryl Gruen  
Staff Counsel  
California Public Utilities Commission  
505 Van Ness Ave. - San Francisco, CA 94102  
(415) 703-1973 - [djg@cpuc.ca.gov](mailto:djg@cpuc.ca.gov)

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**From:** Gruen, Darryl  
**Sent:** Thursday, November 15, 2012 6:10 PM  
**To:** Yip-Kikugawa, Amy C.  
**Subject:** RE: I.11-02-016 - CPSD Exhibits 18-30 (Archival DVDs of PG&E's Data Responses)

Good Afternoon Your Honor:

Per your request, I am providing an update of our progress for when CPSD expects to provide external hard drives and archival DVD's.

Consistent with your guidance below, we expect that we will have external hard drives available for distribution to all of the parties before November 26, 2012. These external hard drives will contain:

- PG&E's responses to date to CPSD Data Requests 1 through 86.
- Documents referenced by CPSD's testimony.

Additionally, before November 26, 2012, we expect to have Gold Standard Archival DVD's with documents converted to pdf/a where you have instructed us to do that, and files in their native format in cases where you have instructed us to not convert a file to pdf/a format. These Archival DVD's will contain:

- PG&E's responses to date to CPSD Data Requests 1 through 86.
- Documents referenced by CPSD's testimony.

We have successfully gotten replacements for the corrupted/unreadable files from PG&E and will have the valid replacement files on the external hard drives and on the Archival DVD's as part of the deliverables identified above. I may have a supplement to this update as early as tomorrow, but wanted to respond now and let you know our latest expectations. Apologies for missing the latest update deadline.

Darryl Gruen  
Staff Counsel  
California Public Utilities Commission  
505 Van Ness Ave. - San Francisco, CA 94102  
(415) 703-1973 - [djg@cpuc.ca.gov](mailto:djg@cpuc.ca.gov)

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**From:** Yip-Kikugawa, Amy C.  
**Sent:** Thursday, November 01, 2012 4:10 PM  
**To:** Gruen, Darryl  
**Cc:** Cagen, Robert  
**Subject:** RE: I.11-02-016 - CPSD Exhibits 18-30 (Archival DVDs of PG&E's Data Responses)

Mr. Gruen,

Thank you for the update. In response to your question below, I would prefer that you provide the parties with a complete set of the documents on the external hard drives. Therefore, please ask PG&E when they will be able to provide replacements for the corrupted/unreadable files. These files should be provided so that CPSD will have the hard drives and list completed for distribution to parties by November 26, 2012 at the latest. I would like an update of your progress on November 13, 2012.

I will be consulting with the Docket Office to determine whether some of the file formats provided by PG&E should be converted to PDF/A or some other format and respond to you next week.

Thank you,

Amy C. Yip-Kikugawa  
Administrative Law Judge  
California Public Utilities Commission  
(415)-703-5256

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**From:** Gruen, Darryl  
**Sent:** Thursday, November 01, 2012 3:30 PM  
**To:** Yip-Kikugawa, Amy C.  
**Cc:** Cagen, Robert  
**Subject:** RE: I.11-02-016 - CPSD Exhibits 18-30 (Archival DVDs of PG&E's Data Responses)



Good Afternoon Your Honor:

Per your instructions, today CPSD provides an update on when it expects the external hard drives and archival DVDs will be available in your proceeding.

**External Hard Drive Update**

*Regarding the external hard drives, here is what we have done so far.*

We have acquired 20 external hard drives that are large enough to store the data you have instructed to go into evidence.

Per your instructions, we have worked to put all of PG&E's data responses as of October 4<sup>th</sup>, 2012 onto external hard drives. As of October 4<sup>th</sup>, 2012, PG&E's data responses constitute approximately 95,000 files (including both public and confidential versions) to go into evidence. Of the approximately 95,000 files, we have identified 61 that are corrupt and unreadable. We have requested that PG&E provide replacements to these 61 files. We have quality assured and validated all of the other pdf files PG&E provided as part of its data responses, except for the 61 that have failed and are unreadable.

We have also copied all of the quality assured and validated pdf formatted data responses included in the public and confidential sets to 15 of those 20 external hard drives. We can also validate that each non-pdf document is what PG&E has provided, but will not have time to ensure that the non pdf files PG&E provided are readable. If a party finds a non-pdf file is unreadable, we can request PG&E provide a readable version.

We have copied the public set to only to 5 of the 20 external hard drives. This should be sufficient for those parties only receiving public sets of data responses.

*Here is what we still need to do.*

We still need to get the 61 replacement files back from PG&E that can be read. We have asked PG&E for them and are waiting to hear back about when they will provide those.

We need to begin working on the list to accompany the hard drives for all of the parties, but aim to have that fairly soon.

We would still like to include documents referenced by CPSD testimony in the external hard drives.

*Request at this point.*

If you would like, we could work to provide the parties with external hard drives of all of the data responses except for the 61 files that are unreadable within the next few days. However, this would mean we would need to provide supplemental CD's with these files when we get them. Instead, may we work to get a timeline from PG&E as to when they will provide us with the 61 files, work on the list to accompany the hard drives, and work on adding the referenced documents by CPSD testimony? In this way, we can provide parties with one comprehensive external hard drive with all of CPSD's evidence along with a comprehensive list. I would be glad to provide you with another update on this effort at a time of your choosing.

## Archival DVD Update

We have identified the necessary processes to convert and correct approximately 70,000 pdf files to pdf/a format for archiving. We will begin converting these files to pdf/a format soon, but are completing the process to fix all of the pdf files so that they can be converted to pdf/a format.

Yesterday, we asked Messrs. Nakahara and Williams for guidance about whether to convert any of the more than 100 other file types provided by PG&E to pdf/a. For reference, attached is a list showing all of the different kinds of files that PG&E has provided us. We have requested guidance about which of these to convert to pdf/a and which to provide in their current native file format. We are mindful of your guidance that files we have in excel format are okay to provide without converting.

*Request at this point.*

We plan to begin converting pdf files to pdf/a format shortly. Also, once we hear from the ALJ, docket office and/or Mr. Williams about which files to convert to pdf/a format, we will then work to create a complete set of confidential documents, and a separate set of public documents to burn onto the archival DVD's. I am happy to update you about the status of this effort at a time of your choosing.

I believe this addresses your instructions shown below. If I have missed anything, I look forward to hearing from you so that I may address it.

Darryl Gruen  
Staff Counsel  
California Public Utilities Commission  
505 Van Ness Ave. - San Francisco, CA 94102  
(415) 703-1973 - [djg@cpuc.ca.gov](mailto:djg@cpuc.ca.gov)

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**From:** Yip-Kikugawa, Amy C.  
**Sent:** Thursday, October 18, 2012 10:24 PM  
**To:** Gruen, Darryl  
**Cc:** Cagen, Robert; Yip-Kikugawa, Amy C.  
**Subject:** I.11-02-016 - CPSD Exhibits 18-30 (Archival DVDs of PG&E's Data Responses)

Mr. Gruen,

In order to prevent any misunderstanding of what is expected to be provided to me, I would like to confirm our various conversations concerning CPSD's exhibits containing PG&E's data responses. As you know, CPSD has requested and been given a number of extensions to provide these exhibits. While I believe these past extensions were warranted, I would like to ensure that there is no unnecessary delay in providing the exhibits.

Based on our conversation yesterday, I understand that CPSD would not be able to provide the exhibits on archival DVDs for several weeks due to the amount of time that will be required to convert all the documents into PDF-A format and to burn these documents onto the archival DVDs. As I had informed you, only the copy of the data requests and responses that is to be kept in Central Files needs to be in PDF-A format and on archival DVDs. While it is not necessary to provide the archival DVDs immediately, I do want all parties to have copies of the exhibits (data requests and responses) as soon as possible so that the documents will be available for them as they write their briefs. Therefore, I had requested that CPSD provide each party a hard drive containing copies of PG&E's data responses in the format that had been provided to CPSD (e.g., Word or Excel).

Due to the number of data requests and the number of documents contained in PG&E's responses to the

data requests, it appears that CPSD would need more than the currently reserved 12 exhibit numbers if it were to consider each archival DVD a separate exhibit. Therefore, I have suggested that the data requests be divided into groups and assigned a single exhibit number. The exhibit would then identify the range of data requests and the number of disks in that range (e.g., Exhibit CPSD-18 - PG&E responses to CPSD Data Request 1 - 10, consisting of 8 archival DVDs).

At the time CPSD provides the hard drive to parties, it would include a document that would list the data requests by number (with a short description of the subject/topic of the data request) and identify for each response to that request (by sub-part as needed):

1. whether the data response was cited by a CPSD witness in his/her testimony, with a cite to the appropriate footnote;
2. whether the data response was used as a CPSD exhibit during hearings; and
3. the CPSD exhibit where the data response may be found

At the end of yesterday's meeting, you had stated that you anticipated this hard drive could be provided to me and the other parties in the next two weeks and the archival DVDs would be available before the resumption of evidentiary hearings. However, you informed me this afternoon that your team has been requested by Ms. Cooke to work on another matter first. I understand that this will delay when the hard drives and the archival DVDs will be available. However, as I told you this afternoon, I do not want the delay to negatively impact the schedule that ALJ Wetzell and I have set for the resumption of the OIIs on November 1, 2012. Further, I need these exhibits so that I will have a complete record in this proceeding. As I mentioned to you, even if parties ultimately reach a settlement agreement, I will need a complete record in order to determine whether any proposed settlement is reasonable and in the public interest.

I would like an update by November 1, 2012 on when CPSD expects the hard drives and archival DVDs will be available.

Thank you,

Amy C. Yip-Kikugawa  
Administrative Law Judge  
California Public Utilities Commission  
415.703.5256

<Unknown File Types.docx>

**Yip-Kikugawa, Amy C.**

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**From:** Yip-Kikugawa, Amy C.  
**Sent:** Monday, December 10, 2012 10:52 AM  
**To:** Gruen, Darryl  
**Subject:** RE: Update on Missing Items from PG&E's External Hard Drive

Mr. Gruen,

I didn't receive an attachment with your email. Also, when were you planning to distribute the hard drive? I thought it was going to be some time last week, with any necessary updates/corrected to follow. Did I misunderstand this?

Thank you,

Amy C. Yip-Kikugawa  
Administrative Law Judge  
California Public Utilities Commission  
(415)-703-5256

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**From:** Gruen, Darryl  
**Sent:** Friday, December 07, 2012 5:21 PM  
**To:** Yip-Kikugawa, Amy C.  
**Subject:** Update on Missing Items from PG&E's External Hard Drive

Good Afternoon Your Honor:

I have an update for you on the items I mentioned to you that are missing from PG&E's external hard drive. On Wednesday, December 5<sup>th</sup>, CPSD provided PG&E with a list showing particular portions of data responses that were missing from the external hard drive, which is attached. Also on December 5<sup>th</sup>, we communicated with PG&E that a group of additional documents may be missing as well, that were found as part of the discovery process. We are confirming whether those additional documents are missing or not and should have that information available shortly.

Also on Wednesday, we asked that PG&E be responsible for organizing and placing all missing items that we identify onto supplemental external hard drives for the parties and others at the Commission who require them, for converting appropriate documents to pdf/a and burning onto supplemental archival DVD's, and for performing other tasks that CPSD undertook to complete this effort. PG&E has requested to meet with us Monday to discuss this, and ask questions about the list and the additional documents. We intend to make PG&E's future efforts to remedy these missing responses a part of that conversation too.

I will endeavor to provide you with an update (either just from CPSD or jointly with PG&E) about the status and results of this meeting next week. If there is anything else needed to achieve progress on getting all of PG&E's data responses into evidence, I look forward to hearing from you.

Darryl Gruen  
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California Public Utilities Commission  
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