

# **EXHIBIT G**

**From:** Gruen, Darryl [<mailto:darryl.gruen@cpuc.ca.gov>]  
**Sent:** Thursday, July 19, 2012 3:24 PM  
**To:** Jordan, Lise (Law); Cagen, Robert; Johnson, Catherine A.; Halligan, Julie; Margaret Felts  
**Cc:** Morris, Harvey Y.; Courtney Linn ; Joe Malkin; [Paul.Duller@tribalgroup.com](mailto:Paul.Duller@tribalgroup.com)  
**Subject:** RE: I.11-02-016 CPSD Data Request 65

Lise,

With respect to the hard drives, would you please send three hard drives to my attention at the CPUC, and send one to Margaret Felts?

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:** Jordan, Lise (Law) [<mailto:LHJ2@pge.com>]  
**Sent:** Wednesday, July 18, 2012 4:30 PM  
**To:** Gruen, Darryl; Cagen, Robert; Johnson, Catherine A.; Halligan, Julie; Margaret Felts  
**Cc:** Morris, Harvey Y.; Courtney Linn ; Joe Malkin; [Paul.Duller@tribalgroup.com](mailto:Paul.Duller@tribalgroup.com)  
**Subject:** RE: I.11-02-016 CPSD Data Request 65

Darryl,

Per DR #59, you will be receiving another redaction production on July 20. We expect that to contain 40,000 pages of redactions. Our final redaction production is planned for August 3, with approximately 225,000 pages of redactions. That will complete the redaction of Records OII Data Request responses, totaling approximately 330,000 pages. We are not redacting our responses to CPSD data requests that were submitted outside of the Records OII proceeding. Also, as you requested in DR #59, we are providing redacted versions of data request responses where appropriate on a going forward basis. The final set of hard drives provided on August 3 will contain data requests and responses through July 27.

Given that we are producing for you hard drives with two sets of the data requests in the Records OII, one confidential and one containing redacted versions of those responses submitted under section 583, our final production on August 3 will satisfy your request below.

Also, given that Valerie Malliet is no longer working with CPSD, we will not be producing a hard drive for her, as you had requested. We will be providing the hard drives to you and Bob, as you indicated in DR #59. Please let us know if there is anyone else who should receive a hard drive.

With respect to your recent data requests 66 and 67, we are working through them and expect to provide responses to most of them within the requested timeframe. Regarding DR #67, we will need

more time to respond to Q.5 and Q.23. As soon as we get a handle on what it will take to respond, we'll let you know when you can expect a response. With respect to the other requests, we will let you know as soon as practical if we will not be able to meet your requested response date.

Thanks,

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

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

**Sent:** Wednesday, July 18, 2012 1:04 PM

**To:** Jordan, Lise (Law); Cagen, Robert; Johnson, Catherine A.; Halligan, Julie; Margaret Felts

**Cc:** Morris, Harvey Y.; Courtney Linn ; Joe Malkin; [Paul.Duller@tribalgroup.com](mailto:Paul.Duller@tribalgroup.com)

**Subject:** RE: I.11-02-016 CPSD Data Request 65

Lise,

Valerie Malliet is no longer working for CPSD. The Records Management team looks forward to receiving the CD containing all data request responses in I.12-01-007. Also, will you please include Dr. Paul Duller to all future correspondence related I.11-02-016? Emails should be sent to [Paul.Duller@tribalgroup.com](mailto:Paul.Duller@tribalgroup.com). Any attachments not sent through email should be sent to my address and addressed to me and Dr. Duller.

Additionally, we are requesting that PG&E send to my attention an up to date external hard drive of all data requests and data responses in I.11-02-016. The folder structure should be as follows:

The first level of folders should have a number that corresponds with each data request to date. Within each numbered folder, please provide the following subfolders.

Subfolder 1 should be labelled "Data Request". In this subfolder, please provide the CPSD data request. Subfolder 2 should be labelled "Data Response". In this subfolder, please provide PG&E's textual answer. If PG&E has provided supplemental textual answers to a given data response, please provide all of those in this subfolder as well.

Subfolder 3 should be labelled "Data Response Attachments". In this subfolder, please provide all attachments that accompany each PG&E data response. If there is more than one attachment, please be sure that each file is saved with a name/number that PG&E gave to the attachment when initially providing it.

Please place a label on this external hard drive that says "I.11-02-016-PG&E Data Responses to Date".

Thank you.

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:** Jordan, Lise (Law) [<mailto:LHJ2@pge.com>]  
**Sent:** Monday, July 16, 2012 5:15 PM  
**To:** Gruen, Darryl; Cagen, Robert; Johnson, Catherine A.; Halligan, Julie; Margaret Felts  
**Cc:** Morris, Harvey Y.; Courtney Linn ; Joe Malkin  
**Subject:** RE: I.11-02-016 CPSD Data Request 65

Darryl,

You should have received our response to DR #65 this afternoon. Please let me know if you have questions regarding that response.

We will provide the Records Management team with a CD on Friday July 20th, containing all data request responses provided to CPSD in I.12-01-007, which was opened in January of 2012. As discussed in prior communications, we encourage you to work with your CPSD colleagues to obtain discovery responses already submitted via the use of CPSD's discovery repository that we understand is being managed by Valerie Malliet.

We have modified the list of recipients of Records OII data request responses as requested.

Thanks,

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

**From:** Gruen, Darryl [<mailto:darryl.gruen@cpuc.ca.gov>]  
**Sent:** Monday, July 16, 2012 11:10 AM  
**To:** Jordan, Lise (Law); Cagen, Robert; Johnson, Catherine A.; Halligan, Julie; Margaret Felts  
**Cc:** Morris, Harvey Y.; Courtney Linn ; Joe Malkin; Pendleton, Jonathan (Law)  
**Subject:** RE: I.11-02-016 CPSD Data Request 65

Lise,

We have a few requests of you.

First, we have not yet received PG&E's proposed response to DR #65. As PG&E has already prepared and provided us with that response, will you please share that with us promptly? Also, when providing the records management team with this response, would you please identify the response to Sunil described below as "I.11-02-016 Data Response 65"?

Next, would you please update the Records Management team in I.11-02-016 with all of the data requests and data responses that PG&E has provided the San Bruno team in I.12-01-007 since last providing the Records Management team an external hard drive containing all data requests and data responses in I.12-01-007? It appears that the last such responses PG&E provided the Records Management team was on December 16, 2011.

Finally, will you please add Margaret Felts to all future correspondence in I.11-02-016, and remove Robert Kinosian and Valerie Malliet from all future correspondence in this proceeding?

Thank you.

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:** Jordan, Lise (Law) [<mailto:LHJ2@pge.com>]  
**Sent:** Thursday, July 12, 2012 10:44 AM  
**To:** Gruen, Darryl; Cagen, Robert; Johnson, Catherine A.; Halligan, Julie; Kinosian, Robert; Margaret Felts  
**Cc:** Morris, Harvey Y.; Courtney Linn ; Joe Malkin; Pendleton, Jonathan (Law)  
**Subject:** RE: I.11-02-016 CPSD Data Request 65

Darryl,

In DR #65, dated July 11, you request information regarding the testimony of a former PG&E employee referenced in our San Bruno OII response. We received a data request from Sunil Shori on Friday, June 29, requesting the same information, to which we responded that same day, and supplemented on July 3. I have attached the data request correspondence for your reference. We will provide you with a copy of our response, including the attachments, which will satisfy DR #65, but wanted you to be aware that we have already provided this information to CPSD .

Also on June 29, we received a data request from Harvey Morris that originally covered both OII proceedings, but has subsequently been amended to cover only the Records OII. (The data request is attached.) That data request asks for detailed information about all depositions taken of PG&E witnesses in the civil cases related to the San Bruno event. We will be responding to that data request this week. Harvey suggested that we number that DR as the next in order in the Records OII. I suggest that we number that DR as DR #68, given that you've now submitted DR #65 in the Records OII. Please let me know if you concur.

Thanks,

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

**From:** Gruen, Darryl [<mailto:darryl.gruen@cpuc.ca.gov>]  
**Sent:** Wednesday, July 11, 2012 2:55 PM  
**To:** [robert.cagen@cpuc.ca.gov](mailto:robert.cagen@cpuc.ca.gov); [catherine.johnson@cpuc.ca.gov](mailto:catherine.johnson@cpuc.ca.gov); Jordan, Lise (Law); Julie Halligan; Kinosian, Robert; Linn, Courtney (Law); Malkin, Joseph M (Law); Margaret Felts; Pendleton, Jonathan (Law)  
**Subject:** I.11-02-016 CPSD Data Request 65

Good Afternoon:

Attached, please find CPSD Data Request 65. Please let us know if there are any questions.

Darryl Gruen  
Staff Counsel  
California Public Utilities Commission  
505 Van Ness Ave. - San Francisco, CA 94102  
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