

# **EXHIBIT I**

**Investigation 11-02-016 CPSD Data Response to PG&E Data Request 015**  
**Request Date: December 20, 2012**  
**Date Sent: December 28, 2012**

In the course of the conference call between CPSD and PG&E held on December 10, 2012, Mr. Gruen emailed to Ms. Jordan an MAOP list (See attached) that Ms. Felts had created using ECTS. Ms. Felts indicated that she believed this MAOP list would have been provided to PG&E in response to its Data Request 13. After diligent inquiry, we are unable to locate any correspondence in which CPSD had produced this MAOP list prior to Mr. Gruen's December 10, 2012 email.

In light of the above, please answer by December 28, 2012, the following questions:

Q 1: Did CPSD provide the attached MAOP list to PG&E prior to December 10, 2012?

No.

If so, please provide a copy of the transmittal, including cover letter or email.

Not applicable.

Q 2. When did Ms. Felts compile the MAOP list?

Ms. Felts compiled the MAOP list of documents found in PG&E's ECTS database in April in preparation to ask PG&E to print them. This was happening just as PG&E provided CPSD with save and print capability of documents in ECTS.<sup>1</sup> CPSD used these new save and print capabilities for Ms. Felts to view the documents.

Q 3. When did Ms. Felts transmit the MAOP list to CPSD?

To the best of CPSD's knowledge, Ms. Felts first transmitted the MAOP list to CPSD in December. Ms. Felts and Mr. Gruen each reviewed their respective records and did not find any evidence of Ms. Felts transmitting the MAOP list prior to that time.

Q 4. Did Ms. Felts intend the MAOP list to form part of her response to PG&E's DR 13, Question 1?

No.

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<sup>1</sup> See attachment A to this Data Response to illustrate this point.

# **ATTACHMENT A**

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**From:** Gruen, Darryl  
**Sent:** Wednesday, April 25, 2012 4:25 PM  
**To:** 'margaret@mfelts.com'; Cagen, Robert; Johnson, Catherine A.  
**Subject:** RE: List of ECTS docs on my laptop computer

Thanks Margaret,

Lise said yesterday that as early as this Friday, or as late as next Friday, ECTS will be made faster. She also said they are going to work to get you printing, saving, and searching capabilities for ECTS!! I assured them that you will only search ECTS to retrieve documents you have already found in support of your testimony in responding to Data Request 4. However, once I get your list, I'll draft another data request asking that PG&E search ECTS for similar MAOP documents as well.

Darryl

**From:** Margaret Felts [<mailto:margaret@mfelts.com>]  
**Sent:** Wednesday, April 25, 2012 3:36 PM  
**To:** Gruen, Darryl; Cagen, Robert; Johnson, Catherine A.  
**Subject:** List of ECTS docs on my laptop computer

Darryl,

I am compiling a list of ECTS that I made screen shots of during my investigation. I use the laptop exclusively for ECTS access and SKYPE. So, there should be a complete set of every file I saved on the laptop. There are a lot of them. It's going slow because I am looking at each one to see why I might have saved it and to determine if any of them are responsive to PG&E's data requests. The quality is not very good when I enlarge them, but I am able to pull the MAOP number off of them and can read some of them. For the others, I will just have to wait until I get copies from PG&E to look at them closely.

Margaret

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