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 LISE H. JORDAN IN SUPPORT OF PACIFIC GAS AND ELECTRIC COMPANY'S RESPONSE TO CPSD'S MOTION TO CLARIFY SEPTEMBER 18, 2012 ADMINISTRATIVE LAW JUDGE RULING ETC.

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I, LISE H. JORDAN, do declare:

1. I am an attorney in the Law Department at Pacific Gas and Electric Company and I am one of the attorneys representing Pacific Gas and Electric Company ("PG&E") in this proceeding. Except as indicated, I have personal knowledge of the following facts and, if called as a witness, could testify thereto.
2. In connection with the ALJ Yip-Kikugawa's September 18 ruling admitting into evidence PG&E's responses to CPSD's Data Requests 1 through 86, she instructed PG&E to provide to CPSD redacted and confidential versions of these responses on a single hard drive. The assigned ALJ provided this instruction during a conference call on September 25, 2012. The instruction did not require PG&E to make copies of the hard drive, determine if the documents needed to be converted to a pdf "a" format, or serve the parties with the redacted and confidential responses. These were tasks for CPSD to

perform. As instructed, PG&E provided a Toshiba hard drive to CPSD on or about September 28, 2012.

3. On December 6, 2012, Darryl Gruen, an attorney for CPSD, emailed me concerning the Toshiba hard drive PG&E provided. This was the first communication I had received from him regarding the hard drive after it was provided to CPSD on September 28. Attached as Exhibit A to my declaration is a true and correct copy of Mr. Gruen's December 6 email (with attachments) together with my initial response email.
4. On December 10, 2012, I and other representatives for PG&E conducted a conference call with Mr. Gruen and Margaret Felts, a consultant and witness for CPSD in this proceeding. In the midst of the conference call, Mr. Gruen forwarded to me a list of MAOP numbers drawn from ECTS. Attached as Exhibit B is a true and correct copy of Mr. Gruen's December 10 email (with attachment).
5. On the December 10 conference call, Ms. Felts indicated she had prepared the MAOP list (Exhibit B above) and stated her belief that the list had been previously sent to PG&E in response to its Data Request 13. A true and correct copy of CPSD's response to PG&E Data Request 13 is attached hereto as Exhibit C.
6. Following the conference call, I prepared a list of "action items" summarizing what PG&E had committed to do as the result of the call and the status of each item and emailed it to Mr. Gruen. A true and correct copy of that email (excluding attachments) is attached hereto as Exhibit D.
7. Based on a further review of the Toshiba hard drive after the conference call, PG&E confirmed that some of the items identified by CPSD were in fact missing. In the course of that review, PG&E identified a few additional omitted materials and documents. PG&E prepared a revised Toshiba hard

drive to correct these omissions and transmitted that hard drive to CPSD and its consultant Ms. Felts on or about December 21, 2012. As part of that transmission, PG&E provided an index with information about each individual data response (1 through 86). Attached hereto as Exhibit E is a true and correct copy of the December 21, 2012 transmission email as well as the information PG&E provided about each individual data response.

8. On December 11, 2012, PG&E transmitted Data Request 14 to CPSD. CPSD responded by letter dated December 13, 2012 and I am informed that PG&E received it on or about December 20, 2012. Attached hereto as Exhibit F is a true and correct copy of CPSD's response to PG&E's Data Request 14.

9. In the course of discovery, and in or about May, 2012, CPSD reaffirmed a request made earlier (but then placed on hold) that PG&E make available all of PG&E's data responses in a redacted form by August 3, 2012. In a telephone call relating to this request, Bob Cagen, counsel for CPSD, justified the breadth of the request by stating in substance that CPSD had not yet determined which of PG&E's data responses it intended to use in the hearings.

10. CPSD identifies at lines 1-12, and line 19 of Attachment A to CPSD's Motion PG&E's responses to Data Requests made outside of the Records OII proceeding. CPSD characterizes these as items that are not on the Toshiba Drive. In an email I sent to CPSD, its attorneys, and its consultants on July 18, 2012, I stated explicitly that "We are not redacting our responses to CPSD data requests that were submitted outside of the Records OII proceeding." Attached as Exhibit G is a true and correct copy of the email in which I communicated that PG&E was not redacting non-Records OII data responses. At no time prior to December 6 of this year did CPSD express

any concern that PG&E was not providing redacted copies of these non-Records OII data requests.

11. CPSD identifies as missing items at lines 14-16 of Attachment A attachments to PG&E's response to Legal Division DR 7-Q7. A true and correct copy of PG&E's narrative response to DR 7-Q7 (attachments not included) is attached hereto as Exhibit H.

12. Following the December 10 conference call, PG&E sent Data Request 15 to CPSD, which asked follow-up questions about the MAOP list Mr. Gruen provided by email during that conference call. Attached as Exhibit I is a true and correct copy of the response PG&E received from CPSD to PG&E Data Request 15 (including attachments).

13. In the course of discovery, in addition to PG&E DR 13, PG&E sent several data requests to CPSD which called for and/or elicited documents and materials CPSD and its consultants had drawn from ECTS. Attached as Exhibit J are CPSD's narrative responses, including cover emails where provided, (attachments not included) to PG&E data requests: DR 4, Questions 2, 13, 14, 20, 21, 22, and 25; and DR 7-Q1.

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

Executed that 4th day of January, 2013.

/S/ LISE H. JORDAN
Lise H. Jordan