

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; Kinoshian, 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 86

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; Kinoshian, 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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To learn more, please visit <http://www.pge.com/about/company/privacy/customer/>

	A	B	C	D
1	Date of Disk	Description	Status	ID
2	Global	Responses to DR 29 Q 5 - provide responses to CPSD DRs in the San Bruno investigation	PG&E omitted all - Hard Drive 12 Dec 2011 and GT matters CDs, but cited many of these records in response to OII DRs	Experts relied on these responses
3	12/20/2011	Gas Transmission System Records OII/PG&E's responses to CPSD Data Requests Post-12/07/2011	Disk not on toshiba drive	1.11-02-016
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
10	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
13	6/26/2012	San Bruno Explosion and Fire OII/PG&E's response and supporting exhibits to the CPSD's Incident Investigation	Disk not on toshiba drive	1.12-01-007
14	9/16/2011	Gas Transmission System Records OII/PG&E site visit 9/16/22 (recording from Brentwood site visit - oral DR)	Disk not on toshiba drive	1.11-02-16
15	9/22/2011	Gas Transmission System Records OII/Legal Division DR 3-Q6 - all data that PG&E gathered between January 1, 2000 and July 1, 2011 to update its HCAs and its transmission pipeline classifications	Disk not on toshiba drive	1.11-02-016
16	Global_DR7	DR 7 Q 7 List of Documents from DRA, IRA, NTSB, CPSD		
17	10/25/2011	Gas Transmission System Records OII/PG&E's response to Legal Division DR7, Q 7 Atchs	Disk not on toshiba drive	1.11-02-016
18	10/26/2011	Gas Transmission System Records OII/PG&E's response to Legal Division DR7 Q7 NTSB Responses (six disc's videos of pipe inspections after explosion)	Disk not on toshiba drive	1.11-02-016
19	10/26/2011	Gas Transmission System Records OII/PG&E's response to Legal Division D7, Q7 Atchs (NTSB Responses 2 disks)	Disk not on toshiba drive	
20	7/16/2012	Responses to DR 65 are missing - 2 videos plus text and attachments provided in email delivered on 7/16/2012	Disk not on toshiba drive	
21	7/23/2012	Gas Transmission System Records OII/DR Responses in 1.12-01-007 as requested by Darryl Gruen on 7/16/2012 Responses about missing video, Overland reports, etc. DR s by BanuAcimis, GaryHapster, GinaAdams	Disk not on toshiba drive	1.11-02-016
22	12/16/2011	Gas Transmission System/DRA 17 & 21 responses and attachments/CPSD 239 attachments	This disk has three folders. The first folder files do not match those files on the harddrive. Files in the second folder all match. Third folder is CPSD 239 attachments which is not on the harddrive.	1.11-02-016
23	12/22/2011	Gas Transmission System Records OII/Response to 12/20/11 and 12/21/11 CPUC requested documents from Emeryville records facility site visit	Disk not on toshiba drive	1.11-02-016
24	2/15/2012	Gas Transmission System Records OII/PG&E's response to DR 25 Q02(i) Supp0(10-20), Supp02(1-9)plus 2 atchs	Disk not on toshiba drive	1.11-02-016
25	6/26/2012	Gas Transmission System Records OII/ PG&E's response and supporting exhibits to the CPSD's Reports	Disk not on toshiba drive	1.11-02-016
26	6/26/2012	Gas Transmission System Records OII/ PG&E's Response and supporting exhibits to the CPSD's Reports (2 disks)	Disk not on toshiba drive	1.11-02-016
27	8/22/2012	Gas Transmission System Records OII/PG&E's response to CPUC 78 Q06_re Recordings of Radio Transmissions in Bay Area on 9 Sept 2010, DR 78 Q 4 is Verint Agreement	DR 78 Q 4 and Q 6 not on Toshiba Drive	1.11-02-016
28	6/6/2012	DR 64 Q1 Response and attachments	Not on Toshiba Drive	1.11-02-016

	A	B	C	D
1	Date of Disk	Description	Status	ID
29	10/21/2011	DR 16 Q 4 ECTS documents including As-Built	No ECTS documents on Toshiba Drive	
30				
31	Global	PG&E Response June 2011 and all supporting documents	Rolling Productions	
32	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	1.11-02-016
33				
34	5/20/2011	Additional Attachments to Chapter 2	Disk not on toshiba drive	1.11-02-016
35	6/3/2011	Additional Attachments to Chapter 2	Disk not on toshiba drive	1.11-02-016
36	7/29/2011	Gas Transmission System Records OII Document Production	Disk not on toshiba drive	1.11-02-016
37	7/29/2011	Gas Transmission System Records OII Document Production	Disk not on toshiba drive	1.11-02-016
	8/31/2011	Gas Transmission System Records OII/Weld Defect and Failure Rolling Production #2	Disk not on toshiba drive	1.11-02-16
38				
39	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 and C (resubmitted 10/3/2011)	Disk not on toshiba drive	1.11-02-16
40				
	9/30/2011	Gas Transmission System Records OII/PG&E's ammendment to Appendices B and C originally foled on 6/20/2011	Disk not on toshiba drive	1.11-02-16
41				
	1/13/2012	Gas Transmission System Records OII/PG&E"s Fourth Amendment to Response filed on 6/20/2011 Attch. B	Disk not on toshiba drive	1.11-02-15
42				
	1/13/2012	Gas Transmission System Records OII/PG&E"s Fourth Amendment to Response filed on 6/20/2011 Attch. B	Disk not on toshiba drive	1.11-02-15
43				
	3/19/2012	Gas Transmission System Records OII/Pacific Gas and Electric Company's Fifth Amendment to Response filed on 6/20/2011 (redacted)	Disk not on toshiba drive	1.11-02-016
44				
	3/19/2012	Gas Transmission System Records OII/Pacific Gas and Electric Company's Fifth Amendment to Response filed on 6/20/2011	Disk not on toshiba drive	1.11-02-016
45				
	1/13/2012	Gas Transmission System Records OII/PG&E"s Fourth Amendment to Response filed on 6/20/2011 Attch. B	Disk not on toshiba drive	1.11-02-15
46				
	1/13/2012	Gas Transmission System Records OII/PG&E"s Fourth Amendment to Response filed on 6/20/2011 Attch. B	Disk not on toshiba drive	1.11-02-15
47				