

**Pacific Gas and Electric Company**  
**Gas Transmission Records Investigation I.11-02-016**  
**CPUC LEGAL DIVISION REQUEST TRACKING LOG**  
**12/21/2012**

Data Request Number	Request Description	Date Response Completed	External Requestor	Attachment Source
OII_DR_LegalDivision_001-001	<p>Is Milpitas Station an "unmanned major gas facility?"</p> <p>a. If yes, has it always been unmanned? If the answer is "no,"</p> <p>1) When did the Station become an unmanned station? 2) How was the Station staffed prior to becoming unmanned? 3) Why did PG&amp;E change the Station to unmanned?</p> <p>b. List PG&amp;E policies and procedures, past and present, relevant to the operation and maintenance of unmanned major gas facilities. For each document or record that contains such policy and/or procedure information (whether hard copy or electronic) indicate:</p> <p>1) The title and date of the document or record. 2) Whether the document or record applies to daily or emergency operations. 3) Who has access to each item identified, both for daily operations and for emergencies, and how the item is accessed. 4) Where the document or record was stored on September 9, 2010. 5) Produce each such document and record</p>	8/22/2011 (Part 1a submitted on 08/01/2011)	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed. 1.) "PG&E's Response to LegalDivision_DR_001 Attachments to Questions 1b, 4, 7, 8, 13, 15, 17, 18, 20" dated August 1, 2011 2.) "Oil Data Response Legal Division_001-Q01B Attachments to Initial Response and Supplemental Response 01" dated August 1 and 15, 2011 3.) "PG&E's Supplemental Response to LegalDivision_001Q01b Attachments to Question 1b" dated August 15, 2011 4.) Oil Data Response Legal Division_001-Q01b Supplemental Response Attachments" dated August 22, 2011
OII_DR_LegalDivision_001-002	<p>Regarding phone calls before September 10, 2010 recorded at System Gas Control:</p> <p>a. What phone calls were recorded? b. How were the call records created and saved? c. How long were and are the call records kept? d. Provide a copy of the PG&amp;E policies and procedures relevant to the recording, transcription, review, maintenance, storage and destruction of System Gas Control calls. e. Other than System Gas Control, and excluding customer, sales and marketing calls, list other calls that were recorded within PG&amp;E for the purposes of system quality control and operations records.</p>	7/26/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_001-003	<p>Identify all records and data that purport to show (accurately or not) the operating status (pressure and other operating criteria) of Line 107 on September 9, 2010. Provide all such records and data in PG&amp;E's response.</p>	7/28/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_001-004	<p>Identify the records PG&amp;E keeps regarding pipeline gas storage facilities including, but not limited to, pipe-type holders. For each record, identify the type of storage and the location(s) where these records are stored and maintained.</p>	8/1/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_001 Attachments to Questions 1b, 4, 7, 8, 13, 15, 17, 18, 20" dated August 1, 2011
OII_DR_LegalDivision_001-005	<p>Provide the following information regarding daily pipeline operating pressures:</p> <p>a. Date range(s) of such daily records maintained for each pipeline in PG&amp;E's system, hard copy and/or electronic. b. For each record identified, provide the location(s) where these records are stored and maintained either in physical or electronic form.</p>	7/28/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_001-006	<p>Provide a full size, legible copy of a drawing that existed on September 9, 2010 that shows all Bay area transmission piping and clearly identifies all lines or line sections, including pipe-type holders, designated as "storage." Identify the location(s) where this drawing was stored on September 9, 2010.</p>	7/28/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "Oil Data Requests Legal Division_001-Q06_Attachment 01" dated July 28, 2011
OII_DR_LegalDivision_001-007	<p>Identify by title, date, version, and Bates numbers (for already produced documents) all records stored and maintained at the Milpitas Station as of September 9, 2010.</p>	8/1/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD, 14588 on 1 hard drive CD label: "PG&E's Response to LegalDivision_DR_001 Attachments to Questions 1b, 4, 7, 8, 13, 15, 17, 18, 20" dated August 1, 2011 Hard Drive Label: ""GasTransmissionSystemRecordsOil_DR_LegalDivision_001-Q07-atrch03"

EXHIBIT E

Oii_DR_LegalDivision_001-008	Provide copies of all PG&E emergency procedures existing as of September 9, 2010 applicable to transmission line incidents, including incidents that could occur at Stations and System Gas Control facilities within PG&E's system.	8/1/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD 1.) "PG&E's Response to LegalDivision_DR_001 Attachments to Questions 1b, 4, 7, 8, 13, 15, 17, 18, 20" dated August 1, 2011 2.) "PG&E's Supplemental Response to CPUC_001-Question 8 Attachment" dated June 25, 2012
Oii_DR_LegalDivision_001-009	Provide a list of locations where PG&E documents (records) are stored, including electronic files and backups for electronic files. For each location, provide the location address and a list of the types of documents stored at that location.	8/1/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_001-010	Have PG&E employees regularly stored PG&E technical or engineering records at their homes or in their personal or company vehicles or on their personal electronic devices? If yes, identify the types of records stored in each location (home, vehicle or electronic device) and provide the PG&E policies applicable, and existing on September 9, 2010, to such storage.	7/26/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_001-011	Provide copies of all policies and guidance existing on September 9, 2010, for the creation and storage of transmission line incident reports by PG&E employees and contractors. Provide copies of all incident reports created by PG&E employees and contractors related to the September 9, 2010 San Bruno incident.	7/28/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_001-012	Provide a copy of the SCADA operating manual(s) and guidance available to the SCADA operators in System Gas Control Rooms as of September 9, 2010.	7/26/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_001 Attachments to Question 12" dated July 26, 2011
Oii_DR_LegalDivision_001-013	Provide a list of all PG&E transmission line numbers and identify the starting and ending point of each line on the list. Provide the date or dates of installation of each line and of replacement of portions of it.	8/1/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD, 2 hard copy maps "PG&E's Response to LegalDivision_DR_001 Attachments to Questions 1b, 4, 7, 8, 13, 15, 17, 18, 20" dated August 1, 2011
Oii_DR_LegalDivision_001-014	Provide copies of all pressure recordings and alarms from both gas control rooms (Walnut Creek and San Francisco) as they were recorded from 16:30 through 18:30 on September 9, 2010 for the following lines: L101, L109, L132, L132B, L132A, L147, and L107.	7/26/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_001-015	Has Line 132 ever suffered a short-term upset of liquid? If yes, provide a copy of reports and dates for each event. (reference P2-390 Procedure for inspection for corrosion control and P2-391 In-line inspections)	8/1/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_001 Attachments to Questions 1b, 4, 7, 8, 13, 15, 17, 18, 20" dated August 1, 2011
Oii_DR_LegalDivision_001-016	Provide copies of all Risk Assessment Reports/Documents prepared for L132 and identify: a. Where each assessment was prepared, b. When each assessment was prepared, c. Who prepared each assessment, d. Where the underlying documents, data and records used in the assessment were stored when accessed for the creation of each risk assessment, and e. Where the underlying documents, data and records were stored on September 9, 2010. f. Provide PG&E policies and guidance used by PG&E employees and/or contractors in the development of each risk assessment. g. If the Risk Assessment Reports/Documents do not include formulas, data and assumptions used to develop the Reports/Documents, provide the formulas, data and assumptions for each Report/Document	8/1/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_001-017	Provide records of all pressure tests performed on lines L101, L109, L132, L132B, L132A, L147, and L107 since constructed. For each test performed, identify the applicable PG&E policy, law or regulatory code that required or authorized the test.	8/1/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CDs "PG&E's Response to LegalDivision_DR_001 Attachments to Questions 1b, 4, 7, 8, 13, 15, 17, 18, 20" dated August 1, 2011
Oii_DR_LegalDivision_001-018	Identify by date and location within PG&E all records related to corrosion investigations, identification and repairs made to lines L101, L109, L132, L132B, L132A, L147, and L107	8/1/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_001 Attachments to Questions 1b, 4, 7, 8, 13, 15, 17, 18, 20" dated August 1, 2011

## EXHIBIT E

OII_DR_LegalDivision_001-019	Identify the type of records stored by PG&E that contained transmission line weld seam documentation as of September 9, 2010. For each type of record identified, provide the location where the records were stored as of September 9, 2010.	8/1/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_001-020	Provide copies of PG&E policies regarding the programming and re-programming of automatic valves in PG&E transmission lines, including those at unmanned stations.	8/1/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CDs "PG&E's Response to LegalDivision_DR_001 Attachments to Questions 1b, 4, 7, 8, 13, 15, 17, 18, 20" dated August 1, 2011
OII_DR_LegalDivision_002-001	Legal Division has found a number of illegible documents in PG&E's electronically produced responses. PG&E should immediately review all documents it has produced to date in this proceeding (both in response to Commission or ALJ requirements and to Legal Division requests) to confirm that they are legible. For each illegible document or portion of document found, Legal Division requests that PG&E leave the original illegible document in place, followed by the same document in as legible for as possible. The legible document should be identified by the same identifying numbers, and followed by an annotation such as a "(b)" to designate its status as a duplicate, but legible, document. Legal Division requests that PG&E provide its responsive documents by July 29, 2011, along with an index identifying the illegible document replacements and their locations within the corrections.  One example of an unreadable document is found at: P2-150-rmp-01 Risk Management.PDF(518KB)	8/24/2011 Supplemental Completed on 9/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; DVD; hard drive. DVD label: OII Data Response Legal Division 002-Q01 Attachments" dated August 24, 2011 - Hard Drive label: GasTransmissionSystemRecords OII_DR_LegalDivision_002-Q01-supp01 Attachments"
OII_DR_LegalDivision_003-001	Provide all PG&E document indices, documents, and data to CPSD and to the Commission in a searchable format, and redo the data previously PG&E previously submitted so that both the Commission and the staff have searchable versions of all data previously submitted by PG&E. For Excel Files and data, see Question No. 8 below.	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; hard drive. Hard drive label: Response to LegalDivision_003-Q01, Q08 Attachments"
OII_DR_LegalDivision_003-002	Provide all audio tapes of Brentwood and San Francisco control rooms from the entire day of September 9, 2010 (midnight to midnight), and provide PG&E transcripts of all such tapes.	8/12/2011 Supplemental Completed on 8/19/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; DVD - 1.) "PG&E's Response to LegalDivision_DR_003 Attachment to Question 02" dated August 12, 2011 2.) "PG&E's Supplemental Response to LegalDivision_DR_003-Q02 Additional Attachments to Question 2" dated August 19, 2011 3.) LegalDivision_DR_003-Q02 SF and Brentwood Gas Control Audio Files and Transcripts" dated August 26, 2011
OII_DR_LegalDivision_003-003	PG&E data responses and documents sometimes refer to "California Gas Transmission" or "CGT". They identify it as a "business unit" of PG&E. Please explain:  A. When CGT was in existence". B. Its function and role with respect to recordkeeping. C. The name or names of its managers heading the unit during its existence.	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_003-004	Does PG&E keep data which shows its response time to shut gas off and provide other appropriate responses after PG&E becomes aware of a gas leak or another gas emergency? If yes, identify the data and explain how and where it is kept. Is the information kept in job files in individual offices or is it entered centrally into a computer? Provide all data from January 1, 2000 to September 9, 2010 that shows response time to all PG&E gas leaks and to other gas emergencies.	8/26/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_003-005	PG&E recently provided the NTSB with documents regarding the 1988 leak on line 132. We cannot find the data (NTSB Documents 335-340) in the material produced to the Commission in response to the OII requirement re weld failures or flaws. Please confirm whether PG&E has or has not provided all such data to the Commission previously, and if not explain why it did not do so. For each document already provided, provide the attachment number and bates numbers.	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_003 Attachments to Questions 5, 7, 10, 11, 12, 13, 15, 18" dated August 12, 2011

EXHIBIT E

OII_DR_LegalDivision_003-006	Provide all data that PG&E gathered between January 1, 2000 and July 1, 2011 to update its HCAs and its transmission pipeline classifications. Identify all PG&E changes made to PG&E's identification of HCAs and transmission pipeline classifications, in any and all portions of PG&E's gas system, from July 2000 to July 2011.	9/29/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_003 Attachments to Question 6" dated September 29, 2011
OII_DR_LegalDivision_003-007	Provide all documents, manuals, and memos written between January 1, 1995 and July 1, 2011 that identify or discuss PG&E's policies and practices for updating HCAs and transmission pipeline classifications.	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_003 Attachments to Questions 5, 7, 10, 11, 12, 13, 15, 18" dated August 12, 2011
OII_DR_LegalDivision_003-008	Provide all Excel files (those already produced in flat printout format and all future excel files) in unlocked, fully operating and functional Excel file format so staff can view all data, metatags, calculations, and formulas, using all functions provided by Excel.	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; 1.) "PG&E's Response to LegalDivision_DR_003 Attachments to Q06" dated September 29, 2011 2.) "LegalDivision_DR_003-Q06 (CPUC_139-Q01 Disc 1 of 1 Segment Specific Class Location Studies)" dated September 22, 2011 3.) "LegalDivision_DR_003-Q06 (CPUC_164-Q01- Disc 1 of 4, 2of 4, 3of 4, and 4 of 4)" dated September 22, 2011 5.) "LegalDivision_DR_003-Q06 (Attachments to CPUC_139-Q01 & Q02 Disc 1 of 9, 2 of 9, 3 of 9, 4 of 9, 5 of 9, 6 of 9, 7 of 9, 8 of 9, 9 of 9)" dated September 22, 2011
OII_DR_LegalDivision_003-009	Provide a copy of the entire file NTSB No. 262 titled "NTSB 010-005 AsBuilt Info from 1956 - Relocation GM No. 13647 Brisbane 80 PO for Line 132"	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "LegalDivision_DR_003 Attachment to Question 9" dated August 12, 2011
OII_DR_LegalDivision_003-010	Identify all PG&E policies and procedures PG&E used in 1956 to determine the integrity of the salvaged 30" pipe used in the construction of segment 180 of L-132 when the pipe was relocated in 1956? Provide a copy of each policy and procedure identified.	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_003 Attachments to Questions 5, 7, 10, 11, 12, 13, 15, 18" dated August 12, 2011
OII_DR_LegalDivision_003-011	Has PG&E verified that all of the pipe installed in segment 180 is either X42 pipe or X52 pipe and met the specifications for such pipe? If yes, provide documents traced by PG&E and that demonstrate PG&E's verification. If no, provide PG&E's identification of all pipes in segment 180 that fail to meet the appropriate specifications for such pipes. Provide the reasons why each such pipe failed to meet such standards, and provide all documents that PG&E had prior to September 9, 2010 and had used to label and characterize the portions of segment 180 as X42, X52, or any other standard.	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_003 Attachments to Questions 5, 7, 10, 11, 12, 13, 15, 18" dated August 12, 2011
OII_DR_LegalDivision_003-012	Provide the contract, including the statement of work and all attachments, between contractor John Groppetti and PG&E to perform the pre-work to replacing the UPS System at the Milpitas Station on September 9, 2010.	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_003 Attachments to Questions 5, 7, 10, 11, 12, 13, 15, 18" dated August 12, 2011

EXHIBIT E

OII_DR_LegalDivision_003-013	Provide a copy of the checklist (with completion markings and signatures) provided by John Groppetti, and used by the PG&E team, for the pre-work to replacing the UPS System that was performed at the Milpitas Station on September 9, 2010.	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_003 Attachments to Questions 5, 7, 10, 11, 12, 13, 15, 18" dated August 12, 2011
OII_DR_LegalDivision_003-014	Provide all maintenance records for all valves, by Valve Number, in the Milpitas Station system and on Line 132 between Milpitas and Martin Stations.	8/26/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "LegalDivision_DR_003-Q14 Attachments" dated August 31, 2011
OII_DR_LegalDivision_003-015	Is Drawing Number 383510 submitted to the NTSB the most recent Milpitas Operating Diagram as of September 9, 2010? If yes, does PG&E contend that drawing No. 383510 accurately reflects the Milpitas station as it existed on September 9, 2010? If no, provide a drawing that is accurate as of September 9, 2010.	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_003 Attachments to Questions 5, 7, 10, 11, 12, 13, 15, 18" dated August 12, 2011
OII_DR_LegalDivision_003-016	Provide a copy of PG&E's Engineer's Estimator's Manual, including S.P. 463-8 (most recent as of September 9, 2010).	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_003 Attachment to Question 16" dated August 12, 2011
OII_DR_LegalDivision_003-017	Provide a copy of the CGT Standards Book current as of September 9, 2010.	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "LegalDivision_003-Q17 Gas Transmission Standards Manual December 2009" dated August 12, 2011
OII_DR_LegalDivision_003-018	Provide a high quality and readable copy of Drawing No. 385121 updated 1998, pipeline survey Milpitas Term. to Gas Load Center.MP 39 to 41. The copy previously supplied by PG&E is barely readable.	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_003 Attachments to Questions 5, 7, 10, 11, 12, 13, 15, 18" dated August 12, 2011
OII_DR_LegalDivision_003-019	Does the drawing identified in number 18 above identify the line as 24 inches in diameter? Is that a misstatement of the lines diameter? What is the lines correct diameter? If there is a mistake identify how the mistake was made and whether the mistake was corrected on later drawings.	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_003-020	PG&E has provided both references to a segment 180 MAOP of 400 PSI and to 390 PSI (pipeline survey sheet uploaded to PG&E data base in about 1998). Explain the reasons for this difference, and the period of time in which each was used.	8/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_004-001	Did PG&E make independent engineering based record maintenance decisions throughout the 1955 through 2010 period or did it tailor its record maintenance practices exclusively to State and Federal requirements?	9/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_004-002	Before September 9, 2010 did PG&E ever have engineering based records maintenance policies, practices, procedures or retention periods that exceeded California and Federal requirements? If so, state which records or policies and state in what respect PG&E's practice exceeded legal requirements. In each case, state PG&E's reasons for exceeding the requirement, and the period in which that policy or practice was in place.	9/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_004-003	Did PG&E ever destroy or discard gas transmission records on the belief that state or federal law required it to do so? If yes, identify the records destroyed or discarded, the dates of such actions, and cite the applicable regulatory requirement.	9/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

Oii_DR_LegalDivision_004-004	Identify any records maintenance experts or specialists that PG&E hired, contracted with or consulted at any time before September 9, 2010. a. Provide a curriculum vitae and current contact information for each person identified in this response. If contact information cannot be provided, explain the reason. b. Provide the date or dates of each person's involvement with PG&E. c. Provide any report, memo or recommendation pertaining to PG&E's records maintenance prepared by one of the experts or specialists identified in response to this question.	9/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_004 Attachments to Questions 4 and 12" dated September 30, 2011
Oii_DR_LegalDivision_004-005	For several time periods on Table 2A-2 of PG&E's June 20, 2011 Response the following statement appears: "Moves require recordkeeping decisions to be made, based on current operational needs, engineering judgment, and recordkeeping requirements." Explain with specificity in what manner each of the referenced moves required recordkeeping decisions to be made. State what decisions were made in the course of each move. If documents were destroyed or discarded in the course of the moves, state what documents were destroyed or discarded as a result of each move and why.	9/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed (Same cover letter for Q5 and Q6)
Oii_DR_LegalDivision_004-006	For the dates 1995 – 1996 Table 2A-2 includes the following statement: "Some pipeline records were misplaced or discarded in and around this time frame." Provide details to explain this statement. State with specificity, which records were misplaced and which were discarded, and the explanation of how and why they were misplaced or discarded. State which, if any, "misplaced" records were subsequently located.	9/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed (Same cover letter for Q5 and Q6)
Oii_DR_LegalDivision_004-007	PG&E addresses Transmission Integrity Management Program (TIMP) saying, "... TIMP fundamentally changed how PG&E and other operators need to use their pipeline safety records." (June 20, 2011 Response at p. 2A-10.) Explain this statement, state which pipeline safety records PG&E is addressing in the statement and state what fundamental change TIMP imposed for each of the named safety records.	9/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed (Same cover letter for Q7 and Q8)
Oii_DR_LegalDivision_004-008	PG&E also states, "TIMP rules created new demands for accessing, reviewing and integrating historical pipeline information and records, in ways that existing recordkeeping systems and practices were neither designed nor intended to address." (June 20, 2011 Response at p. 2A-10.) For each of the three demands identified in PG&E's statement ("accessing, reviewing and integrating") explain how the demands of TIMP exceeded the design and intent of the existing recordkeeping systems.	9/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed (Same cover letter for Q7 and Q8)
Oii_DR_LegalDivision_004-009	PG&E states, "PG&E began putting in place more sophisticated records management systems before TIMP." (June 20, 2011 Response at p. 2A-10.) Identify with specificity and by dates the records management systems that were initiated before TIMP, as referenced in this statement.	9/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_004-010	For the dates 1994 – 1995 Table 2A-2 states "the hard copy PLSSs became obsolete." (June 20, 2011 Response at p. 2A-15.) What did PG&E do with these obsolete records? If these records still exist, where are they now?	9/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_004-011	PG&E explains that it believes the incorrect "seamless" designation on the Pipeline Survey Sheet was based on an incorrect interpretation of the acronym "smi" which appeared on the 1956 journal voucher shown on Figure 5-1. (June 20, 2011 Response at pp. 5-3 to 5-5.) What is the basis for PG&E's belief? Provide data and documents supporting this belief. Provide the correct meaning for the acronym "smi" and for each acronym and abbreviation that appears on Figure 5-1.	9/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_004-012	From 1956 through August 2010, describe and identify PG&E's policy and practice for conducting metallurgical analyses or other failure analyses for pipes and welds that failed, leaked, or otherwise were suspected of loss of integrity. Describe how and where PG&E keeps such reports, and the way in which they are organized, and state what PG&E's document retention policies and practices were for such reports during that period. Provide the policies and practices as they were written in manuals and other documents.	9/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_004 Attachments to Questions 4 and 12" dated September 30, 2011
Oii_DR_LegalDivision_004-013	Provide all metallurgical and failure analysis reports or other documents for any such analysis that PG&E conducted or contracted to be conducted for any and all weld failures, weld leaks, and all other weld defects, conducted from 1956 to the present time in 2011 for any component of PG&E's transmission system.	9/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_004-014	Provide all metallurgical and failure analysis reports or other documents for any analysis that PG&E did or contracted to be done for the 1963 failure of the transmission pipe near Alemany Blvd. in SF, and for the 1988 longitudinal weld leak on Line 132.	9/16/2011 Supplemental Response Completed on 3/7/12	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_004-015	PG&E's GIS identifies segment 180 as X42. Provide all documents and data that PG&E used to support that entry in GIS and the Pipeline Survey Sheets, and provide all documents and data that support that entry regardless of whether they were used to support the GIS or Pipeline Survey Sheets	9/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_004-016	Provide all as-built documents of any and all portions of line 132.	8/19/2011 Supplemental Completed on 11/4/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_005-001	As of September 9, 2010 identify the location of every underground gas holder in the PG&E system. For each holder, identify the location, capacity, MAOP and MOP, the compressor station associated with the holder, and the transmission line(s) that can receive gas directly from it. Provide the most recent monthly, annual and 10 year inspection reports for each holder identified.	10/4/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_005 Attachments to Questions 1 and 13" dated October 4, 2011
Oii_DR_LegalDivision_005-002	For September 9, 2010, between 4 PM and 7 PM, identify all pipelines or pipeline sections in the PG&E system that were connected to the Milpitas terminal that were "packed" with gas. For each line identified, provide a record showing the pressure in 2 minute increments during the time period September 9, 2010, 4 PM to 7 PM.	9/7/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_005 Attachments to Questions 2, 3, 5 and 7" dated September 7, 2011

EXHIBIT E

OII_DR_LegalDivision_005-003	Provide all PG&E policies as of September 9, 2010 for storing and retrieving gas transmission records.	9/7/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_005 Attachments to Questions 2, 3, 5 and 7" dated September 7, 2011
OII_DR_LegalDivision_005-004	Provide copies of all current File Plans for PG&E records, including but not limited to records from offices, control rooms, terminals, stations, and document storage.	9/27/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_005 Attachments to Questions 4 and 9" dated September 27, 2011
OII_DR_LegalDivision_005-005	Identify the location and explain the purpose of pressure gauge L 107 Hdr4.	9/7/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_005 Attachments to Questions 2, 3, 5 and 7" dated September 7, 2011
OII_DR_LegalDivision_005-006	Provide all construction drawings of any and all portions of Line 132. Where such drawings have been previously provided, give detailed instructions for identifying and locating each one.	9/13/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CDs, "PG&E's Response to LegalDivision_DR_005 Attachments to Question 6 Volume 1 of 2, Volume 2 of 2" dated September 8, 2011
OII_DR_LegalDivision_005-007	Provide pipeline survey sheets printed from the GIS for each and all segments of Line 132.	9/7/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_005 Attachments to Questions 2, 3, 5 and 7" dated September 7, 2011
OII_DR_LegalDivision_005-008	For all transmission pipelines, provide completed Forms GD&TS 62-3237 Facility Upgrading Record (example at P2-1001, 2005), and equivalent forms used by PG&E during earlier or later time periods.	9/7/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_005-009	For Drawing No. 086868 provide Revisions 6-7, 12-16, 18-19 including all fractional versions, for instance, 16.3. Include the cover memo that was associated with each Drawing.	9/27/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_005 Attachments to Questions 4 and 9" dated September 27, 2011
OII_DR_LegalDivision_005-010	Provide copies of all filled out Requests of "Revise MAOP/MOP Transmission Lines," Form F4125, and equivalent forms used by PG&E during earlier or later time periods.	10/11/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_005 Attachments to Questions 10 and 11" dated October 11, 2011
OII_DR_LegalDivision_005-011	Refer to the January 1984 report of Bechtel Petroleum, entitled "Engineering Consulting Services for Pacific Gas and Electric Company", dated January 1984, Job 16253, Revision O. With respect to this document: Provide all other Bechtel revisions to the document and to any predecessor documents. Provide all documents and data that PG&E provided to Bechtel and that Bechtel provided to PG&E to aid in preparation of the document and any of its revisions and predecessor documents. Provide the agreement and correspondence between PG&E and Bechtel regarding the preparation and use of these documents. Refer to p. 13 that states "[d]uring the data collection process, the area engineers were sometimes confronted with the problem of missing records that prevented them from finding variable values." State what records Bechtel and or PG&E Engineers found missing and state all circumstances that prevented them from finding variable values? How were the "worst case values" (p. 13) calculated in the Bechtel analysis? Did line 132 or any portion of line 132 ever get "flagged" (p.13) as a transmission line - for which "high risk values justify the additional time and effort" of "extended research"? If yes, provide the names of the persons who so flagged line 132 or any portion of it, when the line was so identified, and provide their findings. If no, explain why the line was not so identified or flagged. Refer to Figure 5 of Appendix C. Did Bechtel's conclusions on this page cause PG&E to use leak records as an input to integrity management of transmission pipes? Why or why not? Did this Bechtel study include or lead to the development of a computer model? If yes, provide the model.	10/11/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_005 Attachments to Questions 10 and 11" dated October 11, 2011
OII_DR_LegalDivision_005-012	Has PG&E ever kept or used a "legacy leak database," or any database referenced by terms akin to "legacy leak database?" Has PG&E referred to any prior or existing database as its "legacy leak database" or any similar reference language? If so explain what the database is, when it was initiated, whether it is still in use, how PG&E used or uses it, and identify the data it consists of, and how and where it was or is kept. Is the term "legacy leak database" currently in use at PG&E. If not, is there currently a term or a database that has replaced the term or function "legacy leak database?"	9/7/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

OII_DR_LegalDivision_005-013	<p>PG&amp;E's response to Data Request No. 1, Question 7, regarding documents at the Mipitas Station, includes numerous photographs of empty folders. The following questions refer to the empty folders included in that response.</p> <p>Provide copies of every record that was in each of these folders as of September 9, 2010 at 6:00 p.m.</p> <p>State the name and position of every person who reviewed the contents of these folders beginning September 9, 2010 at 6:00 p.m. and state the date or dates of each review.</p> <p>State the name and position of every person who removed records from any these folders and identify the by date, author, title of document, and subject matter or by category, all documents that person removed and the date/s they were removed. (For this and the following questions, refer to a "category" of records only if the answers are identical for each item in the category. Also, if referring to categories of records, the categories must aggregate to represent 100% of all records from the folders so that no record is left unaccounted for.)</p> <p>State the location to which each of these records or categories of records was moved and the current location of each record or category.</p> <p>Identify on whose authority the documents were moved.</p> <p>State who is currently responsible for each record or record category removed from these file folders.</p> <p>State the reason or reasons for moving each record or record category that was removed.</p> <p>Is there a tracking record such as a "chain of custody" regarding the movement, locations and custodian/s of the materials removed from the file folders? If so, explain and provide copies of the chain of custody information.</p> <p>Was any original record that had been in these file folders removed from the custody of PG&amp;E? If yes, did PG&amp;E retain a copy of that record? If yes, identify to whom each</p>	10/4/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CDs. 1.) "PG&E's Response to LegalDivision_DR_005 Attachments to Questions 1 and 13" dated October 4, 2011 2.) ""PG&E's Response to LegalDivision_DR_005 Attachments to Question 13" dated October 4, 2011
OII_DR_LegalDivision_006-001	<p>The Legal Division hereby requests that PG&amp;E produce on or before October 3, 2011 the following document in its entirety, complete with any appendices.</p> <p>The 1958 revision of the American Society of Mechanical Engineers ("ASME") Section B 31.8, described on Page 1-6 of the "Pacific Gas and Electric Company's Response" for this proceeding, dated June 20, 2011.</p>	9/29/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_006 Attachments to Question 1" dated September 29, 2011
OII_DR_LegalDivision_007-001	<p>1. Provide for any and all transmission assets all Abnormal Incident Reports prepared since 1948 per the PG&amp;E Abnormal System Conditions Procedure for transmission pipelines. (Refer to P2-1401)</p>	10/24/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CDs. 1.) "PG&E's Response to LegalDivision_DR_007-Q1 Electronic Files" dated October 26, 2011 2.) "PG&E's Response to LegalDivision_DR_007-Q1 Hard Copy Documents" dated October 26, 2011
OII_DR_LegalDivision_007-002	Provide copies of all versions of PG&E Standard Practice 410-1 that predate 1965, including all earlier standards that may have been replaced by SP 410-1. (See P2-653, Gas Construction, Reporting Installation / Alteration for Engineering Record)	10/5/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_007-003	Identify all of the PG&E Divisions and personnel who had any responsibility for the design and installation of L-132, Segment 180 in 1956 (the Crestmoor Project).	10/5/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_007-004	Provide all records, including but not limited to maps, drawings and correspondence, and reports related to the failure of a girth weld at 1236 Mission Rd, South San Francisco, repaired 3/1/2010 (Leak no. 09-30255-1)	10/5/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD. "PG&E's Response to LegalDivision_DR_007 Attachments to Questions 4, 10, 11, 16" dated October 5, 2011
OII_DR_LegalDivision_007-005	Provide the detailed leak history information compiled by Bechtel and/or PG&E for use in calculating the Priority Value algorithm for the GPRP Transmission Line Priority Analysis through the most recent calculation	10/5/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_007-006	Provide copies of UO Standards S-4125.1, S-4432, and S-5351 in effect as of September 9, 2010.	10/5/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed



EXHIBIT E

Oii_DR_LegalDivision_007-007	Provide a list of the PG&E organizations that have had design, construction, operation and maintenance responsibility over L132, Segment 180 since 1948. a. For each organization identified, provide the dates of the period of responsibility and identify the manager in charge. b. For each date period identified for each organization, state the location (by name and address) where the records related to L 132, Segment 180 were/are stored. c. Provide all records in PG&E's possession related to line 132 and section 180 from 1948 to present. (Or provide references to documents already produced.)	10/19/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_007-008	GS Std. Practice 460.2-2, 1995 at p.2, states "Records, #4 The record of each inspection, repair or reconditioning of any section of pipe shall be filed in an easily retrievable manner for the life of the facility." a. Identify where these transmission pipeline records are/were stored per this Standard Practice. b. Identify the title (current and any former titles) of each record that might be generated in relation to each of the activities itemized in the above passage.	10/19/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_007-009	Per PG&E Standard Practice no. 463.7, dated 12/15/1969, "Pipeline History File, Establishing & Maintaining," the purpose and policy was "To provide a current and uniform history record for pipelines (and mains) that have a Maximum Allowable Operating Pressure (MAOP) resulting in a hoop stress equal to or greater than 20% of the Specified Minimum Yield Strength (SMYS)." a. Provide all versions of SP 463.7 from 1948 to present. b. Provide a list of all PG&E transmission pipelines subject to this Standard in 1969. c. Provide copies of the Pipeline History File, including underlying documents and correspondence, for each line identified.	10/19/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_007-010	Provide copies of all completed (or those partially completed containing any entries) of Form D - Indirect Inspection Tool Selection forms for Route 132, Segment 180. (or cite page numbers of files that have been provided) a. For each inspection identified by Form D, provide the results of the inspection (or cite page numbers of files that have been provided) b. Where and how long are these records kept?	10/5/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_007 Attachments to Questions 4, 10, 11, 16" dated October 5, 2011
Oii_DR_LegalDivision_007-011	Did the control valve at Half Moon Bay DFM on TL-132 and 132 trip when the line failed at San Bruno on September 9, 2010? a. Explain why it did or did not trip. b. How does PG&E keep records of this type of control valve event? c. Where and how long are these records kept? d. Provide all records kept concerning the trip and the reasons for it.	10/5/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_007 Attachments to Questions 4, 10, 11, 16" dated October 5, 2011
Oii_DR_LegalDivision_007-012	Provide copies of all Pipeline Survey Sheets for L132 from 1948 to present.	10/5/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_007 Attachments to Question 12" dated October 5, 2011
Oii_DR_LegalDivision_007-013	Identify the Valve Maintenance Person and his or her job position and title whose initials appear on valve maintenance records as "JJQF."	10/5/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_007-014	Describe how someone in the San Francisco Gas Control room would access the operating and maintenance history (record) of an automatic valve on a transmission line? If that process has changed since September 9, 2010, explain the process as it existed on September 9, 2010 and the current process.	10/5/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_007-015	Provide copies of all downrating and uprating pressure reports, and corresponding transmittal letters, submitted to the CPUC for all transmission lines from 1948 to present.	10/19/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_007 Attachments to Question 15" dated October 19, 2011
Oii_DR_LegalDivision_007-016	Provide all Form K: Remaining Life Determination records, including records of calculations and underlying data, for Lines 109 and 132. a. State where these records are stored b. Identify all of the people by title and organization who have access to these records.	10/5/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_007 Attachments to Questions 4, 10, 11, 16" dated October 5, 2011
Oii_DR_LegalDivision_008-001	Provide a complete copy of all San Francisco Gas Control Room Gas Logging System (GLS) data for the time period 6 AM Sept 9, 2010 through 6 AM Sept 10, 2010.	10/10/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_008 Attachments to Questions 1, 2, 3, 8, 9, 10, 14" dated October 10, 2011
Oii_DR_LegalDivision_008-002	Provide a current set of organizational charts for PG&E showing all subdivisions, including, but not limited to, sections, units, divisions, branches, companies, and organizations. Include on the organizational chart all management positions by title and the name of the person who is currently in that position.	10/10/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_008 Attachments to Questions 1, 2, 3, 8, 9, 10, 14" dated October 10, 2011
Oii_DR_LegalDivision_008-003	Provide a set of organizational charts for PG&E, as of September 19, 2010, showing all subdivisions, including, but not limited to, sections, units, divisions, branches, companies, and organizations. Include on the organizational chart all management positions by title and the name of the persons who held that position as of that date.	10/10/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_008 Attachments to Questions 1, 2, 3, 8, 9, 10, 14" dated October 10, 2011
Oii_DR_LegalDivision_008-004	Was construction occurring at the location of the San Francisco Gas Control Room on September 9, 2010? If yes, provide a detailed description of the construction project and how it impacted ongoing work in the Control Room. When was the project completed?	10/10/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

OII_DR_LegalDivision_008-005	Provide the names and titles of all of the employees who were in the San Francisco Control Room at any time between 5 PM and 7PM on September 9, 2010.	10/10/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_008-006	Does PG&E track the GIS records viewed by employees in the Gas Control Room? If yes, provide a complete record for September 9, 2010 through September 10, 2010?	10/10/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_008-007	Provide a copy of the Sharepoint System records for September 9, 2010 through September 10, 2010.	Withdrawn by CPUC Legal Division	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	N/A
OII_DR_LegalDivision_008-008	8.a. Do Gas Control Room operators have access to the PG&E GIS system? If yes, can they access an operating diagram that shows pipelines, valves and instruments (P&ID) of the Milpitas Terminal on GIS? If yes, provide a printout of the GIS operating diagram as it appeared on the evening of September 9, 2010 8.b. Do Gas Control Room operators have access to an operating diagram (P&ID) of the Milpitas Terminal on the SCADA system? If yes, provide a printout of the SCADA operating diagram as it appeared on the evening of September 9, 2010 8.c. Identify all changes made to the GIS and SCADA operating diagrams identified above of the Milpitas Terminal after the September 9, 2010 San Bruno incident and before any physical changes were made to the Milpitas Terminal. 8.d. For all diagrams identified above, state whether personnel at the Milpitas Terminal had access to those diagrams on September 9, 2010. Identify the personnel who had that access.	10/10/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_008 Attachments to Questions 1, 2, 3, 8, 9, 10, 14" dated October 10, 2011
OII_DR_LegalDivision_008-009	How many phone lines are there into the San Francisco Gas Control Room? Describe in detail how PG&E determined the times of the calls on the Control Room recordings.	10/10/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_008 Attachments to Questions 1, 2, 3, 8, 9, 10, 14" dated October 10, 2011
OII_DR_LegalDivision_008-010	Provide an operating manual for the DocuTrack (sp?) system used to track the location of engineering records.	10/10/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_008 Attachments to Questions 1, 2, 3, 8, 9, 10, 14" dated October 10, 2011
OII_DR_LegalDivision_008-011	Identify the present locations of all PG&E engineering construction drawings. For each location, identify the records currently stored or in use at that location.	10/10/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_008-012	Are Operating Diagrams stored in the electronic Engineering Library the same files assessable and accessed by Gas Control Room operators through the CITRIX system?	10/10/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_008-013	Describe the PLM Electronic Database for maintenance actions and provide a copy of the PLM database records for the periods October 6-19, 2009 and October 6-19, 2010.	10/11/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_008-014	Provide a printout of records currently stored in the IGIS Leak Database for Lines 101, 107, 109, 132 and 131.	10/10/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_008 Attachments to Questions 1, 2, 3, 8, 9, 10, 14" dated October 10, 2011
OII_DR_LegalDivision_008-015	Provide access by PUC consultants to the PG&E online Engineering Library.	11/5/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Access provided on 11/5
OII_DR_LegalDivision_008-016	16. Provide complete, unedited, and unredacted copies of all video recordings and audio recordings from the Gas Control Rooms in San Francisco and Brentwood for the period 4 PM September 9, 2010 through 6 AM September 10, 2010. For any recording that PG&E is unable to do so, provide an explanation, including date, time, person and authority for deletions or redactions, and circumstances under which they were done.	10/10/2011 Revised Response Completed on 3/9/12	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

OII_DR_LegalDivision_009-001	<p>Provide a revised Table 2A-3 (found starting on p. 2A-19 of PG&amp;E's June 20, 2011 Response) on or before October 12, 2011. In a revised table provide the following additional information for the first section of the table titled "Records Associated with Design and Construction of Gas Transmission Pipelines."</p> <p>a. In column one include the following items in addition to those currently listed:  1. Red-line as-built drawings  2. Final as-built drawings, updated (those with dates and initials)  3. Plat maps  4. Pipeline Survey Sheets  5. GIS  6. ELS  7. ECTS</p> <p>b. Provide an entry in each subsequent column that refers individually to each item in column one. If a subsequent column is not applicable to an item in column one, state the reason it is not.</p> <p>c. Modify the caption on column three as follows: "Which information from the record, if any, is contained in a Summary Record/Analytic Tool? In which tool is the information contained?"</p> <p>d. In column six, "typically accessed by," include references to Gas Control Room Operator – normal operations" and "Gas Control Room Operator –emergency operations," when applicable.</p> <p>e. Add a column headed, "How long record is retained" by PG&amp;E practice. If that practice has changed since 1945 to the present, identify the changes or changes and when they occurred.</p>	11/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_010-001	Please provide a list of all of PG&E's past (since 1928) and present storage yards for transmission or other pipe, valves and other construction materials and equipment. The list should include the name of each facility, its address, and the names of PG&E personnel who supervised the facility.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_010 Attachments to Questions 1 and 5" dated October 21, 2011
OII_DR_LegalDivision_010-002	Please identify, produce, and describe all records that document the storage, transport, installation, and use of PG&E assets used for past and present pipeline installations and realignments, including but not limited to purchased, wrapped, restored, salvaged, reused, sold and junked pipe, and valves. Such records should include, but not be limited to documentation of a piece of equipment being checked out of, or checked into any facility of PG&E or another party.	10/18/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_010-003	Please provide an index or list of those records referred to in question 2 above, which should include the name and address where those records are kept, as well as the names of PG&E personnel who controlled the facility.	10/18/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_010-004	Provide copies of all PG&E policies and procedures, past and present, for disposal of scrap pipe, i.e. any pipe taken off of PG&E books as no longer used or useful (i.e. waste). Identify all records that document final transportation and disposal of waste pipe.	10/18/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_010 Attachments to Question 4" dated October 18, 2011
OII_DR_LegalDivision_010-005	Provide copies of all PG&E policies and procedures, past and present, for the installation and reuse of pipe that has been taken out of service or has never been in service but was not manufactured for the specific project or anticipated use intended by PG&E	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_010 Attachments to Questions 1 and 5" dated October 21, 2011
OII_DR_LegalDivision_011-001	Please provide a list of all of the different types of documents and data PG&E will use to trace and verify the Maximum Allowable Operating Pressure on all of its lines. (For example, as built drawings would constitute one type of document.)	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_011-002	Does PG&E's ECTS data base contain all of PG&E's available documents and data that it has used previously to trace and verify the MAOP on all of its lines included in ECTS?	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_011-003	Does PG&E plan to include in the ECTS data base all of PG&E's available documents needed to trace and verify PG&E's MAOP for a particular pipeline?	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_011-004	If the answer to question 3 is yes, please provide the date that ECTS will contain all of the documents needed to trace and verify PG&E's MAOP for a particular pipeline.	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_011-005	If the answer to question 3 is no, please provide a list of the additional documents by type and source of document not included in ECTS but needed to trace and verify MAOP for a particular pipeline.	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_011-006	Can PG&E trace the physical origin location (e.g. office location), all locations of the documents after origin, and date of entry into ECTS of each document or data entry included in ECTS? Are the location and date of each document or data entry included and searchable in ECTS? If not, explain where and how such information is kept and available.	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_011-007	Please provide the exact chain of locations that each box of documents being used for MAOP verification and tracing existed from their inceptions until today's date. For example, if a particular set of boxes of documents was created in PG&E's Walnut Creek Office at 375 Wiget Lane, and transferred to the San Francisco Cow Palace on March 1, 2010, and then transferred to PG&E's Emeryville office on August 1, 2010, please articulate each of these facts so it is clear where the documents were created and their precise locations and durations in each step of the chain.	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_011-008	At what location or locations are the documents and data entered into ECTS physically kept?	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

OII_DR_LegalDivision_011-009	Please provide the location or chain of locations where PG&E intends to move these documents in the future. For example, please indicate whether and where a document will be placed in short or long term storage, or returned to one of its earlier locations.	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_011-010	Please provide the address and relevant room or storage unit of each location identified in response to question 9.	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_011-011	Please provide the date PG&E expects or plans to move each document to its future location or future locations.	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_011-012	For each type of documents identified in response to questions 2 through 5, please answer whether each type of document used to verify MAOP for a particular pipeline segment was assembled with all other documents used to verify MAOP for that same pipeline segment prior to September 9, 2010. If two or more types of documents that PG&E used to verify MAOP for the same pipeline segment were not assembled together, please explain why not.	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_011-013	Other than opening a particular box and looking at the files, how does PG&E know all of the files that are in a particular box?	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_011-014	Please identify and explain all procedures for managing documents asked about in questions 2 through 5 while they are being scanned. If a document exists that articulates such procedures, please provide it.	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_011-015	Please provide any written plans, instructions or policies that PG&E has developed to manage the records asked about in questions 2 through 5.	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_012-001	Please refer to all PG&E documents entitled, "PG&E Gas Operations Strength Test Pressure Report", with GM number 4701843, dated 10/31/1988. Please explain the discrepancy in the job descriptions among at least two documents that have the same number and same date on them.	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_012-002	For these same documents, please explain the discrepancy in the numbers among them in the boxes next to the title "Minimum Test Duration Under 30% SMYS (1 Hr. Min.) 30% SMYS & Over (8 Hr. Min.) Pre-installation Test (See 192.505(B) GO 112)".	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_012-003	For this particular pipeline replacement, was specified minimum yield strength ("SMYS") 30% or more?	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_012-004	If the answer to question 3 is yes, please explain why the box for one of these jobs indicates that only a four hour test was performed.	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_012-005	Please refer to the report entitled, "Pacific Gas and Electric Company Natural Gas Transmission Pipeline Rupture and Fire San Bruno, California, September 9, 2010", issued by the National Transportation Safety Board Report issued Monday, September 26, 2011. On page 109, please refer to the portion of the report states, "Leaks resulting from manufacturing defects are only considered in threat algorithms if they occurred on the segment in question or on an adjacent segment with the same pipe properties and within 1 mile of the leak. Leaks on more distant pipe segments of the same vintage, same characteristics, and same manufacturer are not considered." Who developed the algorithm referenced in this quote?	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_012-006	When was the algorithm referenced in question 5 developed and put into use by PG&E.	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_012-007	What, if any, was the rationale behind developing the algorithm referenced in question 5 in the way described in question 5? If there was no such rationale, please say so.	10/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_013-001	Please refer to the email sent from "Thomas, Rene [RAT9@pge.com]" to the service list of R11-02-019 on Friday, September 30th, at 4:10 p.m. Please refer to the attachment to this email entitled, "Q2-PGE Hydrostatic Test Schedule Overview 110930 v0 CPUC.pdf". Is the document provided in this attachment part of a larger document? If so, please provide the entire document electronically. If the full document is an Excel file, provide a complete, working copy of the Excel file, including all underlying notes, references, data and calculations. If the Excel file is linked to other Excel files, provide all linked excel files.	10/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_013 Attachments to Question 1" dated October 17, 2011
OII_DR_LegalDivision_013-002	Please provide column headings for the document referenced in question 1.	10/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD (same atts as for Q1)
OII_DR_LegalDivision_013-003	In each of the bottom 18 rows shown in gray of the document referenced in question 1, the box furthest to the right says "Records verified". Please explain what this term means.	10/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_013-004	Did PG&E keep a record that shows what records were specifically covered by those segments identified as "records verified"?	10/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_013-005	Please provide a list of the records that PG&E has that it used as a basis for providing a data entry of "records verified"?	10/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_013-006	Are the records requested in question 5 available under PG&E's ECTS database? If so, please provide instructions for how to access each record. If not, please indicate how to find each record.	10/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD (same atts as for Q1) "PG&E's Response to LegalDivision_DR_013 Attachments to Question 1" dated October 17, 2011
OII_DR_LegalDivision_013-007	Do any of the other entries in this attachment have records like the entries with the boxes indicating "records verified"?	10/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

Oil_DR_LegalDivision_013-008	If the answer to question 7 is yes, please provide a list showing which entries contain such records.	10/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_013-009	Please also provide a path in ECTS or instructions for finding such records.	10/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD (same atts as for Q1) "PG&E's Response to LegalDivision_DR_013 Attachments to Question 1" dated October 17, 2011
Oil_DR_LegalDivision_013-010	Are there any entries in this attachment that do not have records like the entries with the boxes indicating "records verified"?	10/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_013-011	If the answer to question 10 is yes, please provide a list showing which entries lack such records.	10/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD (same atts as for Q1) "PG&E's Response to LegalDivision_DR_013 Attachments to Question 1" dated October 17, 2011
Oil_DR_LegalDivision_013-012	Please explain why all entries identified in question 11 are lacking records. If PG&E cannot accurately provide the reasons for this, please say so.	10/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_014-001	What are the titles (i.e., Piping Plans, As-Builts, Construction Drawings, Plat Maps, Wall Maps, etc.) of the maps or drawings in PG&E files that show the location of welds, the orientation of each weld, and weld number on each segment of pipe? Provide an example of each type of drawing identified.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_014 Attachments to Question 1, 3, 4, and 6" dated October 21, 2011
Oil_DR_LegalDivision_014-002	Describe how PG&E tracks the source of pipe installed in each segment of a pipeline. Provide an example with all supporting documents.	10/28/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_014-003	Based on PG&E records, list the segments of pipe in the PG&E System that still contain pipe installed prior to 1961. For each segment identified, provide the installation date of the oldest piece of pipe and identify the record that is the source of that information.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_014 Attachments to Question 1, 3, 4, and 6" dated October 21, 2011
Oil_DR_LegalDivision_014-004	Identify (by pipeline, segment and other specific identifying data used by PG&E) all pieces of pipe removed by PG&E from its system since September 9, 2010, due to "indications of concern," as noted in the NTSB Report, page 84. For each piece of pipe identified, provide the date and project number of its original installation in the PG&E pipeline system. For each piece identified, provide the reference document PG&E used to determine the pipe-piece information.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_014 Attachments to Question 1, 3, 4, and 6" dated October 21, 2011
Oil_DR_LegalDivision_014-005	List the pipeline seam defects, by pipeline number and segment number, identified by PG&E as a result of using hydrostatic pressure testing. Provide the records used to identify the pipe segment for testing and the records that document the test results and subsequent repairs.	11/4/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_014-006	Provide all records related to a pipeline weld failure involving a fatality at Kaiser/Cupertino Hills location.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_014 Attachments to Question 1, 3, 4, and 6" dated October 21, 2011
Oil_DR_LegalDivision_014-007	Regarding ECTS Functionality for PUC access:  Since PG&E is continually adding documents to the ECTS data base, the PUC would like to have a "date scanned" field added to the screen results. Also, it would be helpful if the search results were presented in either numerical order (by MAOP# or ECTS#) or date scanned.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_014-008	Regarding ECTS Functionality for PUC access:  Please add a field to indicate duplicates, as discussed in the recent site visit to Emeryville.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_015-001	Refer to PG&E's data response to the NTSB 036-005A, Exhibit 2-A1 in the NTSB San Bruno docket. It states in Answer 5, amended, that "PG&E's practice of operating pipelines at the pressure needed to meet peak customer demand every five years has been limited to certain of its pipeline and has not been a system-wide practice" (page 1 of 3). With respect to this statement and practice:  A. Identify the person or persons at PG&E who developed the practice of operating pipelines at the pressure needed to meet peak customer demand every five years, and when did they develop the practice? B. Identify the person or persons at PG&E who approved the practice, and state the dates they did so. C. Provide a list of each pipeline that since 1970 has been operated at the pressure needed to meet customer demand to avoid a hydrostatic pressure test and the outage associated with the test, and provide the date of each such operation at that pressure. Provide the information regardless of whether PG&E's practice occurred before the PHMSA adopted its regulations in 2002 requiring a hydrostatic test under specified conditions and events. D. Provide all memos and communications written before September 9, 2010 that discuss the practice in any facet, that discuss its legality, or that discuss its benefits or risks. E. Provide all PG&E manuals, directives, and instructions on conducting the practice, and conditions to avoid it. F. Was Exhibit 2-A1 ever provided to the Commission or the staff in I. 11-02-016? If yes, identify where that document may be found. If no, explain why PG&E did not provide it to the Commission or its staff, although it was provided to the NTSB	11/28/2011 Supplemental Completed on 11/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CDs 1.) "Attachments to PG&E's Response to Legal Division_015, Q01-Q02" dated November 28, 2011 2.) "Attachments to PG&E's Response to Legal Division_015, Q01-Q02-Supp01" dated November 30, 2011

EXHIBIT E

Oil_DR_LegalDivision_015-002	Refer to PG&E's data response to the NTSB 036-005A, Exhibit 2-AI in the NTSB San Bruno docket. It states in the Risk Management Instruction RMI-06 that it will prioritize pipeline segments as high risk only if "they have operated over the maximum operating pressure (MOP) experienced during the preceding five years plus 10 percent of the historical operating pressure". With respect to this statement and practice: A. Identify the person or persons at PG&E who developed the practice, and state the dates they did so. B. Identify the person or persons at PG&E who approved the practice, and state the dates they did so? C. With respect to the 10% adder before prioritizing a pipeline as high risk, provide all memos and communications written before September 9, 2010 that discuss the practice, in any facet, that discuss its legality, or that discuss its benefits and risk. D. Before September 9, 2010, did PG&E inform PHMSA or the CPUC either in writing or verbally that it only prioritized pipeline segments as high risk if during the previous five years they have operated at MOP plus 10? If yes, provide all such written communications, and provide their dates, authors, and recipients if not shown on the face of the communications. If verbal, provide the date, speakers, and recipients, a summary of what PG&E told PHMSA or the CPUC, and provide all written material that memorializes such verbal communications. E. Has PHMSA or the CPUC ever approved of the 10% adder? If so provide the date, form (written or verbal), and summary of the approval. F. Before Instruction No. RMI-06 did PG&E adopt or use the practice of adding 10% or any other percentage to the MOP in order to avoid testing and testing outages? If so provide the date of the practice was adopted or commenced, summarize it, and provide all written matter pertaining to the practice. G. Assume PG&E had interpreted 49 CFR Section 192.917 (e)(4) to require prioritization of segments as high risk segments if 5 year previous MOP had been been	11/28/2011 Supplemental Completed on 11/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD 1.) "Attachments to PG&E's Response to Legal Division_015, Q01-Q02" dated November 28, 2011 2.) "Attachments to PG&E's Response to Legal Division_015, Q01-Q02-Supp01" dated November 30, 2011
Oil_DR_LegalDivision_015-003	Has PG&E ever located as-built drawings for the pipes that ruptured on September 9, 2010? If yes then produce them as part of PG&E's data, and identify all final, signed, and dated construction drawings that incorporate all as-built.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_015 Attachments to Questions 3 and 6" dated October 21, 2011
Oil_DR_LegalDivision_015-004	If the answer to number 3 is "no" then provide PG&E's assessment as to whether as-built drawings ever existed for the pipes that failed. Provide all facts and evidence that support PG&E's assessment.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_015-005	For each pipeline segment in its system since 1956 and until September 9, 2010, and for each year from 1956 to September 9, 2010, provide the highest pressure during that year reached on each such pipeline segment.	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_015-006	What records does PG&E have that demonstrate that before the pipes and pups at the rupture site were installed in 1956, all such pipes and pups were tested in compliance with the law at the time of installation or with engineering standards that existed at the time? Provide all such records.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_015 Attachments to Questions 3 and 6" dated October 21, 2011
Oil_DR_LegalDivision_015-007	Beside the ruptured pipe, has PG&E ever located as-built drawings for each and all pipes, valves, and other pipeline assets that make up line 132? If no, provide the location and length of each pipe that PG&E has not located as-built drawings for.	11/4/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; DVD "PG&E's Response to LegalDivision_DR_015 Attachments to Questions 7" dated November 4, 2011
Oil_DR_LegalDivision_015-008	Provide a table that identifies the portions or segments of each transmission pipeline currently operating in PG&E's system for which it has not located as-built drawings for each and every pipe or transmission line component in the transmission pipeline. In the table provide a pipeline by pipeline summary of the search PG&E made for the as-built documents.	11/4/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_015-009	For the 1988 weld leak on line 132, provide a table including the following information: A. The installation date of the pipe that leaked. B. The type of welds in the pipe, regardless of whether those welds leaked or failed. C. Describe and summarize how that 1988 leak was incorporated into PG&E's integrity risk model for line 132. Provide the date of incorporation into the model, and describe how that incorporation may be seen in the model.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_015-010	Have any pressure records for PG&E's pipelines been accidentally or intentionally deleted or corrupted at any time during the period from January 1, 2000 to today? If yes, provide a table showing: A. The records that were deleted or corrupted by time period, computer system, pipelines effected, and data lost, and PG&E attempts to retrieve the data. B. Summarize the circumstances by which the data was corrupted or deleted. C. Summarize how, if at all, PG&E incorporated the corruption or deletion of the data into its integrity management model.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_015-011	Does PG&E keep records showing both major and minor injuries sustained by workers around gas transmission lines or stations? If yes, provide a table showing the following: A. The location or locations of where the records are kept, and a description of how they are organized B. The year in which PG&E started keeping such records C. PG&E's retention policy and practice for such records D. For each year for which PG&E has kept full records, show the number of both major and minor injuries of workers who were working around transmission lines.	11/4/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_016-001	1) Prior to September 10, 2010, did PG&E have any written policies in place for tracking salvaged or reused pipe?	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

Oil_DR_LegalDivision_016-002	2) If yes, please provide copies of all such policies from before September 10, 2010.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_016-003	3) Prior to September 10, 2010, did PG&E have any written policies in place as to the re-use of salvaged or used transmission pipe?	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_016-004	4) If yes, please provide copies of all such policies before September 10, 2010	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_016-005	5) After September 9, 2010 did PG&E create any new policies or change any then existing policies for tracking salvaged or reused transmission pipe?	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_016-006	6) If yes, please provide copies of these policies.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_016-007	7) Please provide the dates that each of the policies provided in response to questions 2, 4, and 5 were created.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_016-008	8) In practice, and before September 10, 2010, has PG&E tracked transmission pipe that had been either salvaged or reused before September 10, 2010?	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_016-009	9) If yes, please describe the method or methods by which PG&E tracked such pipe.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_016-010	10) In practice, and after September 9, 2010, has PG&E tracked transmission pipe that had been either salvaged or reused after September 9, 2010?	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_016-011	11) If yes, please describe the method or methods by which PG&E tracked such pipe.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_016-012	12) Provide all records generated by PG&E as a result of tracking methods described in answers to questions 8 and 10 above.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_016-013	13) Has PG&E ever re-used transmission pipe that it has previously recorded as junked, salvaged, or identified for disposal in any other way? If so provide a table showing the following: A. Identification of each such junked, salvaged, or disposal identified pipe. B. The date of each such pipe's manufacture. C. The type of pipe and welds, the metal (e.g. X42) D. The pipeline number and segment or other source of the pipe in previous usage E. The number of years of usage. F. The reasons why each pipe was removed from service G. The place where each such pipe was re-used in PG&E service. H. The date on which each such pipe re-entered service. I. The reasons why each pipe was used again in service.	10/21/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_017-001	1. Provide a summary of the types of field notes kept by field engineers (for instance, changes to routing & materials, welding issues, inspections, problems and resolutions), from 1945 until the present. If that has changed during this period provide a list and date of the changes, and the reasons for each change identified.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_017-002	2. Identify a list showing all location(s) that field engineers notes are kept within the PG&E System for completed projects.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_017-003	3. Provide current and past PG&E procedures from 1945 that describe or list the documents and information that should be included in a Job Package for a major transmission pipeline construction project, in the following categories: a. Jobs that are, or have been performed in-house, b. Jobs that are, or have been performed by a contractor (Design, Procurement & Construction), and c. Jobs that have or have had the design provided by PG&E, and the construction performed by a contractor. d. Jobs that have other combinations in which certain portions are done by PG&E and others are performed by a contractor.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_017-004	4. For each category above provide an example Job Package.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_017-005	5. Have any types of documents in a Job Package not ultimately ended up in the final Job File?	12/15/2011 Supplemental Completed on 1/6/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_017-006	6. If the answer to question 5 is yes, please identify all such types of documents.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_017-007	7. If the answer to question 5 is yes, please also identify the final disposition/storage place or places of those documents. If there is more than one place of storage or disposition, please identify all such places for each type of document.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_018-001	After September 9, 2010, did PG&E issue an order or policy requiring that it not discard any of its records that are or may be related to the San Bruno rupture?	11/2/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD (same 6 as for Q2) "Oil Data Response Legal Division_018 Attachments" dated November 2, 2011
Oil_DR_LegalDivision_018-002	If so, please provide a copy of that order.	11/2/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "Oil Data Response Legal Division_018 Attachments" dated November 2, 2011

EXHIBIT E

OII_DR_LegalDivision_018-003	Please provide a spreadsheet that shows all of PG&E's records of transmission line pressures from each compressor station or receiving station. The spreadsheet should provide. a. The compressor station from which the transmission line pressure came. b. The receiving station that received the transmission line pressure. c. The date of the record illustrating point a or b or both. The date should be as early as PG&E's records reflect. d. The total amount of transmission line pressure identified in each record showing a, b, and c.	N/A	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Request Revised per DR 29
OII_DR_LegalDivision_018-004	Please provide PG&E's most up-to-date maps of the general territory, which PG&E currently serves or is currently ready to serve, complete with outlines of operating districts and showings of major transmission lines.	11/2/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; PG&E has previously provided hardcopies of the requested maps and can reproduce the hardcopies if requested
OII_DR_LegalDivision_018-005	Provide pressure trend charts in the most detail available printed from SCADA for the 2 weeks prior to September 10, 2010 for Lines 101, 109 and 132.	11/18/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "Attachments to PG&E's Data Response to Legal_018, Q5 and Q10" dated November 18, 2011
OII_DR_LegalDivision_018-006	For the operating lives of Lines 101, 109, and 132 provide all records that document the pressure swings under routine operating conditions.	N/A	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Request Revised per DR 29
OII_DR_LegalDivision_018-007	For the operating lives of Lines 101, 109 and 132, provide all records that document the highest and lowest operating pressures during periods when the lines were in service.	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_018-008	For the operating lives of lines 101, 109 and 132, provide records that document the design operating pressure range for each line. a. Provide the original and all subsequent revisions of Drawing Number 087950, including all Appendices and all prior and subsequent revisions of each appendix. b. Provide the original and all subsequent revisions of the Drawing Number 087712 and all appendices and all prior and subsequent revisions of each appendix.	11/14/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_018 Attachments to Question 8" dated November 14, 2011
OII_DR_LegalDivision_018-009	Provide all operating instructions, policies, guidelines, etc., that instruct operators on management of pressure swings, line packing and drawing down to meet demand, and management of gas supply emergencies involving loss of pressure in gas transmission lines.	11/2/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "OII Data Response Legal Division_018 Attachments
OII_DR_LegalDivision_018-010	Provide a list of PG&E PLE's, Project Managers and Field Engineers who work on Gas related projects. For each person identified, state their college degree, degree major, and field of professional registration.	11/18/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "Attachments to PG&E's Data Response to Legal_018, Q5 and Q10" dated November 18, 2011
OII_DR_LegalDivision_018-011	Confirm that the term PLE means Pipeline Engineer.	11/2/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_018-012	Provide the complete name and describe the purpose of each of the following data bases: SAP, PLM and GasFM (refer to PG&E's response to DR7 Q14). For each database, state how long the database has been used by PG&E, identify the people who have access to the database, and the state the types of records stored in the database.	11/2/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_018-013	Provide a list that identifies all past and present PG&E engineering and construction office locations.	11/2/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_018-014	For each location in the list provided in response to question 13, provide a summary of the types of records kept at the location. If any of those records has been moved, identify the current location of the records that were moved and the date(s) they were moved.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_018-015	Provide all past and present PG&E policies regarding the documentation of daily activities at the construction site during a transmission line construction project. If the policies do not state a document retention period, provide PG&E's policy regarding the retention of such records.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_018-016	Provide copies of all field engineer's field notes, field weld inspection results, and transfer tags for all past projects involving the installation and/or removal/salvage/or abandonment of transmission pipe on PG&E's lines 101, 109, 131, 153, 105A & N, and 132, 153, 153A, 210A, 300A, 301G, SP5, and DFM5.	11/23/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_018-017	Please find the document containing MAOP35400987. If this document is part of a larger file folder, please provide the entire file folder. If the document is part of a box of documents, please provide the entire box of documents. Please keep the documents in the order they currently exist.	12/1/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; DVD "Attachments to PG&E's Data Response to Legal Division_018, Q17" dated December 1, 2011
OII_DR_LegalDivision_Oral900-001	Oral request communicated by Robert Cragen during Kettleman Library visit for further Line 132 ECDA and Corrosion records and, in those instances where the records have already provided in the course of OII, designate where they can be found	11/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_Oral900 Attachments to Question 1" dated November 16, 2011



EXHIBIT E

OII_DR_LegalDivision_Oral900-002	Four shelves of risk management procedure archive documents to be produced.	10/28/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; hard drive "PG&E's Response to Oral Request 900 Question 2" dated October 20, 2011
OII_DR_LegalDivision_Oral900-003	Photograph of the records room (prior to MAOP effort)	10/28/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_Oral900-004	Drawing of the Records Center	10/28/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_Oral900-005	Provide documents in the ATS library from Section 522 that are associated with steel gas pipelines.	N/A	N/A	N/A
OII_DR_LegalDivision_019-001	Please provide a list showing all of the documents, including reports, from PG&E's facility in San Ramon that have fed into Phase 1 of PG&E's Maximum Allowable Operating Pressure ("MAOP") validation efforts.	1/19/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_019-002	Please provide electronic copies of all of the documents requested in question 1.	1/19/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_019-003	Please provide electronic copies of all of the San Ramon data base indexes.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; DVD "PG&E's Response to LegalDivision_DR_019 Attachments to Question 3" dated December 15, 2011
OII_DR_LegalDivision_019-004	Please provide electronic versions of all 1,300 Applied Technology Services "ATS" reports scanned in support of chapter 7 of PG&E's response filed in I.11-02-016 on June 20, 2011.	11/22/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CDs "Attachments to PG&E's Data Response to Legal Division_019-Q04 DVD 1 of 2, DVD 2 of 2" dated November 22, 2011
OII_DR_LegalDivision_020-001	1. The mile post at each point which the pipe leaked or failed.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_020-002	2. A spreadsheet showing all of the attributes provided about these points of pipe in PG&E's Geographic Information System ("GIS"). Please label this spreadsheet, "GIS Pipeline Attributes".	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to Legal Division_DR_020 Attachments" dated December 16, 2011
OII_DR_LegalDivision_020-003	3. A second spreadsheet that matches the one provided in response to question 2, except that it shows the actual attributes of these points of pipe. Please label this spreadsheet, "Actual Pipeline Attributes".	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_020-004	4. On both spreadsheets, please highlight in yellow each cell containing a value in response to question 3 that differs from its matching cell provided in response to question 2.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_020-005	5. On both spreadsheets, put an asterisk within each cell if the correctness of the value provided within that cell is uncertain.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_020-006	6. On both spreadsheets, please provide a legend that explains what the highlighted yellow cells and asterisks mean.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_020-007	7. Provide the highest pressure achieved during the hydrotest along the pipe with the leaks/ruptures referred to above.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

Oil_DR_LegalDivision_020-008	8. Provide the total length of time each pipe had been hydrotested immediately prior to the occurrence of each leak or rupture.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_020-009	9. Provide each plan PG&E had in place for water containment in the event of a failure during the test.	Withdrawn by CPUC Legal Division	N/A	N/A
Oil_DR_LegalDivision_020-010	10. Was PG&E or a contractor performing each test?	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_020-011	11. If a contractor was performing a particular test, please identify which line the contractor was testing, and the name of the contractor.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_020-012	12. How does PG&E plan to repair and retest the pipe that failed?	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_020-013	13. Does PG&E have a written plan or protocol for repairing and retesting pipes that fail hydrotesting? If so, please provide it.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_020-014	14. Please retain the piece of pipe that failed on L132 and refrain from any form of tampering with that piece of pipe. The one exception to this is that PG&E may take sample coupons for metallurgical testing.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

Oii_DR_LegalDivision_020-015	15. Please provide a copy of the failure analysis report relevant to these leaks/ruptures.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_020-016	16. For each point that leaked/ruptured, was the pipe re-used, re-conditioned, or new? Please provide all records that show PG&E's answer to this question.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to Legal Division_DR_020 Attachments" dated December 16, 2011
Oii_DR_LegalDivision_020-017	17. For the point along L132 that ruptured on November 6, 2011, please provide evidence that PG&E believes proves the pipeline ruptured at a dent. a) please confirm that another company or person caused the dent asked about in question 18. b) What date did the alleged third party dent this portion of the line? c) What date did PG&E learn of the dent in the line? d) At the time PG&E learned of the dent in the line, did PG&E evaluate the dent in any way? e) Provide all records that support the response to question 22. f) At the time PG&E learned of the dent in the line, did PG&E repair the dent in any way? g) Provide all records that show repairs made to this dent. h) At the time the person or company allegedly dented the line, did PG&E know this entity was present within its right-of-way and near this section of line? i) At the time the person or company that allegedly dented the line, did PG&E permit that entity to enter its right-of-way? j) Provide all records showing communications between PG&E and the person or	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to Legal Division_DR_020 Attachments" dated December 16, 2011
Oii_DR_LegalDivision_021-001	Does the PG&E accounting department or any other department maintain a comprehensive list of all work orders? If not, please indicate how far back in time a work order can be retrieved.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_021-002	Please provide a list of work orders for all jobs on Line 132, segment 180.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_021-003	Please provide a list of work orders for all jobs on the segment of L300b that ruptured during a pressure test on Monday, October 24, 2011.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_021-004	Please provide PG&E's written standards for keeping historical leak data, or if it has already been provided, please provide the reference for it.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_021-005	Please provide the pipeline survey sheet for the segment of L300b that ruptured during a pressure test on Monday, October 24, 2011.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_021-006	Please provide the leak history for the segment of L300b that ruptured during a pressure test on Monday, October 24, 2011.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_021-007	Q7a: Please identify all PG&E's electronic document catalogues that hold an index (metadata) relating to any PG&E gas project, asset or activity (including, but not limited to test results, leaks, inspections, job files, drawings, documents, reports, local office filing systems). Q7b: Please identify all PG&E's electronic document management systems that hold, or point to any documentation relating to any PG&E gas project, asset or activity (including, but not limited to test results, leaks, inspections, job files, drawings, documents, reports, local office filing systems). If this has been provided before, please provide the relevant reference. Q7c: Please identify all PG&E's electronic databases that hold index information, or pointers to actual documentation on any PG&E gas project, asset or activity (including, but not limited to test results, leaks, inspections, job files, drawings, documents, reports, local office filing systems). Q7d: Please identify all PG&E's historical catalogues, electronic document management systems or databases that are being retained as they contain data, documents or catalogues that were not migrated to their replacement systems.	12/29/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

OII_DR_LegalDivision_021-008	For each of the current systems (catalogues, electronic document management systems or electronic databases) detailed above please state the following: a. The system name b. The types of documentation that is indexed, referenced, pointed to, or held internally. c. The date the system was initially created d. The level of completeness of the metadata or document loading program necessary used to populate the system on an ongoing basis. Specifically, have all records and documents been added to the system, or is there still additional work to be done in areas such as cataloging, indexing, scanning. e. Was metadata, data or documents migrated from all previous Legacy Systems, or not? f. If the answer to subpart e is no for any of the previous Legacy Systems, please identify the names of these systems. g. If the answer to subpart e is no for any of these systems, please explain how the data, documents, or metadata catalogues that these systems hold can be accessed and in what timeframe? h. Does the system hold data, metadata, or documents relating to a specific time period or for the life of the asset? i. Is each system currently being maintained on a regular basis? j. For each system identified, please explain how complete each system is. Specifically, is there a backlog of work required to fully populate each system? k. If the answer to the second question in item j is yes, please indicate the types of documents and document volumes still to be added to each system, and state if these are historical or current documents.	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_021-009	Please provide a digital version (or scanned copy, if a digital version is not available) of the index to all PG&E gas-related Aperture cards (both sets).	12/29/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_021-010	Please review both sets of Aperture cards and provide a digital version if possible (or scanned version if not) of any aperture cards that provide any information regarding Line 132.	12/29/2011 Supplemental Completed on 2/7/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD 1.) "PG&E's Response to Legal Division DR_021-Q10 Attachments" dated December 29, 2011 2.) PG&E's Supplemental Response to CPUC_021-Q10 Attachments" dated February 7, 2012
OII_DR_LegalDivision_021-011	Please provide the names and qualifications of each of the people doing the document typing at the celerity office.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_021-012	Please provide copies of all of PG&E's current materials requisition forms	12/29/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_021-013	Please provide copies of all PG&E's policies, procedures and/or guidance (past and present) regarding the use of re-conditioned pipe and indicate how PG&E identify the vintage of this material separately from new pipe used in the same job.	12/16/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-001	For L132 segment 180, please confirm that a creek existed where the pipeline currently crosses Earl Avenue.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-002	Please provide the name of the creek that existed.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-003	Was this creek filled in with soil or other material after the 1948 pipeline was installed?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-004	If so, what year was the creek filled?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-005	Did PG&E do anything to Line 132 before the creek was filled, in order to prepare the line for the filling?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-006	If so, what?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-007	Did the filling of the creek impact Line 132 in any way?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-008	If so, please list all of those ways and explain how they impacted Line 132.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-009	Did PG&E perform any work on Line 132 directly as a result of the filling of this creek?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-010	If so, please explain such work and please provide all records that show such work.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-011	Please list all of the maintenance and capital work PG&E performed on this portion of Line 132 within the ten years after this creek was filled.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-012	Does PG&E have a profile drawing of the portion of L132 Segment 180 installed in 1948 that crossed the creek referred to above? If so, please provide this.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

OII_DR_LegalDivision_022-013	Please provide the name of the developer who filed the creek referred to above.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-014	Does PG&E have a profile drawing of the portion of L132 Segment 180 that had crossed the creek after the creek was filled? If so, please provide this.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-015	Please provide the depth of the 1948 pipeline immediately after the creek was filled.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-016	What year or years was Earl Avenue paved?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-017	Please provide the depth of the 1956 L132 under Earl Avenue immediately after Earl Avenue was paved.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-018	Please provide the depth of the 1956 L132 under Earl Avenue on September 9, 2010.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-019	Were there any other utility lines spanning this creek before Earl Avenue was paved?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-020	If so, please list such utility lines.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-021	Were any of these utility lines relocated when the creek was filled?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-022	Were any of these utility lines relocated when Earl Avenue was paved?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-023	If so, did relocation of any of these utility lines require PG&E to take any action regarding L132 Segment 180?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-024	Did any other elements of the geography or topography within the PG&E right-of-way along Line 132 Segment 180 change in any way since it was installed in 1948?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-025	If so, please provide the years of the change, and explain the change.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-026	If there were any other changes to the geography or topography within the right-of-way along L132 Segment 180 since the 1948 installation, did PG&E perform any actions in preparation or reaction to these changes?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-027	If there were any changes to the geography or topography within the right-of-way on L132 segment 180 since the 1948 installation, were they caused by PG&E? Were they caused by another entity? Please identify which entity caused each change.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-028	Does PG&E have any reason to believe that the filling of this creek impacted L132 in any way?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-029	If so, please explain.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-030	Does PG&E have any reason to believe that any other geographic or topographical changes provided in its data responses impacted L132 in any way?	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-031	If so, please explain.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-032	Provide all photos, documents, reports and data that PG&E currently possesses that identify, describe, map, or depict (during the period 1945 through 1965) the section of Line 132 that was initially a span near the current location of Earl Ave. in San Bruno and was later buried beneath the street.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_022-033	Provide a list of all maintenance actions, repairs, planned projects that were not completed, and construction projects that have occurred on Segment 180 since 1956. Identify each item by date and maintenance order, work order, psrs number, and/or project file number.	12/15/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-001	1. Provide full details of the quality assurance processes used to validate the pipeline-related datasets used to populate the Geographic Information System ("GIS").	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-002	2. Provide a listing of all the metadata tables (and attributes) used to hold pipeline and job related information in the GIS.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_023 Attachments" dated December 17, 2011
OII_DR_LegalDivision_023-003	3. Provide a description of all of the different sources of pipeline and job-related information used to cross-check and corroborate the pipeline-related data held in PG&E's GIS.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-004	4. Please identify and list any instances where more than one potential source of pipeline-related GIS information exists but was not used to corroborate the data used to populate PG&E's GIS? In the list, please be sure to identify all sources of information not used to corroborate this data.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

OII_DR_LegalDivision_023-005	5. For each instance on the list in response to the previous question, please explain why each listed source of information was not used.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-006	6. Is the original system that uses the bar codes found on PG&E's plat map drawings still available to staff?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-007	7. Is there an index for the system identified in the last question? If so, please provide a digital version of this index.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-008	8. Is there a master list showing all job files within PG&E?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-009	9. If the answer to the last question is yes, please provide a digital version of this list and any associated metadata, including, but not limited to job number date, pipeline number, milestone, and description.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_023 Attachments" dated December 17, 2011
OII_DR_LegalDivision_023-010	10. Please explain the job doc form fields on ECTS.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_023 Attachments" dated December 17, 2011
OII_DR_LegalDivision_023-011	11. How many records does PG&E's ECTS system hold that have Document types classified as "miscellaneous"?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-012	12. In the answer to the previous question, please provide the "as of date" in the answer.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-013	13. Why were these miscellaneous records in ECTS not classified as "non-PLM"?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-014	14. Please provide a table indicating the number of Leaks recorded for line 132 and their status/grade, by year since 1948. Please refer to IGIS, PC-Leaks, Mainframe Data and precursor hardcopy records to identify your answer. Please also identify whether the each leak came from IGIS or another source?	12/29/2011 Supplemental Completed on 1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-015	15. Please provide a table indicating the number of Leaks recorded on all PG&E transmission gas pipelines and their status/grade, by year since their installation. Please refer to IGIS, PC-Leaks, Mainframe Data and precursor hardcopy records to identify your answer. Please also identify whether each leak came from IGIS or another source.	12/30/2011 Supplemental Completed on 1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD. Emailed supplemental cover letter and 3 atts on 1 CD. "PG&E's Supplemental Response to CPUC_023-Q15 Attachments" dated January 20, 2012
OII_DR_LegalDivision_023-016	16. As of the date of PG&E's data response to this data request, state how many active leaks by grade PG&E has along all of its transmission lines.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-017	17. As of the date of PG&E's data response to this data request, identify the active leaks PG&E has along Line 132?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-018	18. Does PG&E's IGIS database record all of PG&E's current leaks that have not yet been repaired?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-019	19. Please confirm that IGIS only includes active leaks.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-020	20. Does PG&E have a protocol for checking to see if a leak identified in IGIS had been repaired at an earlier point in time? If so, please provide all such protocols.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_023 Attachments" dated December 17, 2011
OII_DR_LegalDivision_023-021	21. Does PG&E ever check to see if a leak identified in IGIS had been repaired at an earlier point in time? If so, what circumstances merited such checks, and what sources has PG&E used to see if a previous repair or previous repairs were made at the point of the leak?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-022	22. What, if any, criteria does PG&E use to determine whether to check to see if a leak identified in IGIS has been repaired at an earlier point in time?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-023	23. Does PG&E repair all leaks identified in IGIS? If not, what criteria does PG&E use to determine whether to repair a leak in IGIS?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-024	24. If PG&E does not repair all leaks identified in IGIS, does it have an internal protocol, policy or standard for monitoring such leaks? Please provide any such information.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-025	25. Does PG&E keep a definitive, master list of all repaired leaks on its system? If not, which records of repaired leaks has PG&E discarded and why?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-026	26. Does PG&E have any individual record retention guidelines or retention schedules beyond those identified in the corporate record retention policy? If so, please provide copies of all current and historical versions of them.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_023 Attachments" dated December 17, 2011
OII_DR_LegalDivision_023-027	27. What are all of the reasons a particular operation would need or want to retain records for longer than the required retention period articulated in the policy entitled Gov7001s?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

OII_DR_LegalDivision_023-028	28. Does PG&E have an Information Management Strategy document that explains how it planned to integrate gas information systems, documents and/or data?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-029	29. If so, please can you provide a copy of the current strategy document and all previous versions of them.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-030	30. Please provide all PG&E's policies to enable employees to access information systems for mobile media.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_023 Attachments" dated December 17, 2011
OII_DR_LegalDivision_023-031	31. Please provide a digital copy of policy USP9.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_023 Attachments" dated December 17, 2011
OII_DR_LegalDivision_023-032	32. Please provide the module entitled "IT security".	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "Attachment to Legal Division_DR_023-Q32 ISTS-9010WBT Document Standards Awareness Training" dated December 17, 2011
OII_DR_LegalDivision_023-033	33. Please provide copies of all training course materials, manuals and any other staff communications regarding the policy entitled Gov-7001S that have been provided to Staff within PG&E's gas department.	12/29/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-034	34. Please provide details of the number of staff trained on Gov-7001S, by year since its publication, and also express this as a percentage of the total number of staff to be trained.	12/29/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-035	35. How does PG&E monitor staff compliance with Gov-7001S? Please provide copies of all audit reports, monitoring forms and other supporting information.	12/29/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-036	36. Is PG&E planning to move from PSRS to another system?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-037	37. If so, when and why? Please explain how documents referenced in PSRS are protected from tampering, deletion or unauthorized editing. If there are any policies regarding this point, please provide them.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-038	38. Please explain why the decision was made not to OCR the documents scanned as part of the MAOP project or entered directly into ECTS.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-039	Are all of PG&E's laptops encrypted and regularly backed up?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-040	If so, what is the frequency of the laptop backup and what software is used to automatically undertake this task?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-041	Please provide copies of all information security protection policies (current and historical).	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_023-Q41 Attachments" dated December 17, 2011
OII_DR_LegalDivision_023-042	Please provide copies of the policies governing access to facilities and control of facilities where records are stored.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_023 Attachments" dated December 17, 2011
OII_DR_LegalDivision_023-043	Why was the decision made to move the bulk of PG&E boxes to Iron Mountain, immediately after the Cow Palace project? Who made this decision and what were the main drivers for this?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_023-044	Who in PG&E is responsible for the security of records stored at Iron Mountain?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

Oii_DR_LegalDivision_023-045	Was a security audit performed on the Iron Mountain facility before the 100,000 PG&E boxes were transferred to them?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_024-001	Provide a list of all databases that show where used and re-conditioned pipe exists in the transmission system. For each database, please provide a complete copy of the relevant data table and a description of the different database attributes used (including any codes or classification schemes used).	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_024-002	For every piece of re-conditioned pipe in the PG&E transmission system identified in PG&E's databases, provide a consolidated list that shows the following: a. The name of the data base showing the re-conditioned pipe. PG&E's Geographic Information System ("GIS") is an example of one type of data base. ) b. The location of the re-conditioned pipe on the system according to the data base (including Line number, segment, mile post and star/end coordinates) c. The year that the re-conditioned pipe was installed according to the data base. d. The age of the re-conditioned pipe according to (a) GIS and (b) any other secondary evidence (if so, please identify source and supply copies of the relevant records). e. Identify exactly which attributes were used in the database to identify the pipe as re-conditioned or if some other way was used to determine this. If other secondary evidence was used to identify the pipe as reconditioned please identify the source of this information and supply copies of the relevant records.	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD. "Attachments to PG&E's Response to CUPC_024-Q02" dated January 31, 2012
Oii_DR_LegalDivision_024-003	Provide a list explaining the different ways in which every piece of re-conditioned pipe in the PG&E transmission system is shown on any PG&E database.	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_024-004	Provide all of PG&E's standards for using re-conditioned pipe and standards for re-conditioning pipe between 1929 and 2011.	12/19/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_024-005	Please identify any additional (non-database) information sources relating to used and re-conditioned pipe (e.g. hardcopy reports, drawings, financial records etc) in the transmission system.	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_024-006	Please indicate if the sources provided in response to the previous question have been referenced as part of the GIS population exercise and/or MAOP project.	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_024-007	Please indicate if the non-database information identified in response to question 5 provides additional information regarding used and re-conditioned pile that is not currently in any PG&E system. Is so, please identify what plans are in place to utilize this information source.	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_025-001	We understand that as part of the MAOP project, PG&E has consolidated the majority of its gas-related job files from a range of different storage locations/offices into a single records management facility at Emeryville. In addition, we understand that more than one version of any given job file may exist, and that multiple examples of these 'duplicate' job files have been identified. With regards to this activity:  a) Provide a list of all storage locations no matter how large or small, where job files were originally located; the approximate number and age range of job files stored in each of these locations prior to any relocation or consolidation activity; and an estimate of the number of job files currently stored in each location (e.g. after any relocation activity).  b) Indicate on the list (from section (a)) for each location the approximate number of job files permanently transferred to Emeryville for processing, the number of files transferred to Emeryville for Scanning and then returned, and the number of job files that were not transferred, but scanned on site.  c) Excluding current/active jobs, please indicate the approximate number of job files that are still located outside of the Emeryville facility.  d) Provide a table illustrating the total number of job files identified to date; the number of job files held at Emeryville on the date of this request, the number of job files scanned (in full) to date; the number of job files planned to be scanned; the number of job files partially scanned.  e) Provide the number of 'unique' job numbers and a Comma Separated Values ("CSV") listing of them, identifying the start date or start year of the job, and the	12/19/2011 Supplemental Completed 1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed



EXHIBIT E

<p>Oii_DR_LegalDivision_025-002</p>	<p>2. We would like to understand the state of document and records management activities within PG&amp;E and its business units prior to 9th September 2010 and the document and records management activities undertaken post incident. As such, please provide the following information:</p> <p>a) Confirm if there is a business continuity/disaster recovery plan (BCP) in place, and state if it addresses both hardcopy and/or physical records across PG&amp;E's gas-related offices. Please confirm which sites it relates to; when the BCP Plan came into force and when it was last tested.</p> <p>b) Confirm if PG&amp;E maintains an up-to-date central hard copy archive of all pipeline related and/or safety critical engineering drawings and maps, or if this information is now retained only in an electronic format.</p> <p>c) Provide a list of all of PG&amp;E's past and present offsite records storage facilities. The list should include the name of each facility, its address, and the names of PG&amp;E personnel who supervised the facility.</p> <p>d) Provide copies of all past and present strategy papers, reviews, audits, presentations and/or discussion documents generated either internally or by third parties acting for PG&amp;E, regarding document management and record keeping in PG&amp;E gas-business offices, stations and offsite storage facilities (and those of other gas related PG&amp;E business units) from 1948 to present. Include any form of qualitative or quantitative assessment of PG&amp;E's document and record management activities. If some of these documents have already been provided, please provide references to them.</p> <p>e) Where specific recommendations for document and/or records management</p>	<p>1/3/2012 Supplemental (j) Completed on 1/24/2012. Supplemental (g) Completed on 1/30/2012. Second Supplemental (i) Completed on 2/15/12. Third Supplemental (i) completed on 2/24/12. Fourth supplemental (i) completed on 4/9/12. Fifth Supplemental (i) completed on 8/16/12</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed; CDs 1.) "PG&amp;E's Response to Legal Division_DR_025-Q02(i) Attachments" dated December 30, 2011 2.) PG&amp;E's Response to CPUC_025-Q02(g)Supp01 Attachments" dated January 30, 2012 3.) "PG&amp;E's Response to CPUC_025-Q02(i) Supp02 Attachments" dated February 15, 20112 4.) PG&amp;E's Supplemental Response to CPUC_025-Q02(i)Supp03 Attachments" dated February 24, 2012 5.) PG&amp;E's Fourth Supplemental Response CPUC_025-Q02(i)Supp04 Attachments" dated April 9, 2012</p>
<p>Oii_DR_LegalDivision_025-003</p>	<p>3. We would like to understand PG&amp;E's approach to the management of its documents and records and the cataloguing tools systems used/in active use. As such, please provide the following information:</p> <p>a) Provide details of the different document cataloguing systems (hardcopy or electronic) used by PG&amp;E since 1945 to control its documents and records.</p> <p>b) Indicate how many different document catalogues/tracking systems were in active use prior to September 9th 2010, and how each system was used to track the movements of records. Specify the periods they were in use, their relationship with each other and any relational links that exist between them.</p> <p>c) Explain the changes to indexing / cataloguing that were introduced with each new system and state if the existing index data (metadata) was re-used/migrated (from system to system), or re-catalogued.</p> <p>d) Confirm if PG&amp;E held a master index of all Job files prior to August 2010 and if not, what actions have been undertaken since then to develop one.</p> <p>e) Confirm what systems are currently used to log, track and trace all job files across the gas business? State if any of these systems hold a comprehensive list of job files, and if the comprehensive job file list was in place prior to September 2010, when was it introduced.</p> <p>f) If a tracking system exists, estimate the number of un-returned job-files (e.g. those checked-out, but not returned after more than 1, 2, 3, 5 or 5+ years).</p>	<p>1/23/2012 Supplemental Completed 2/8/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed cover letter and 28 atts on 1 CD. "PG&amp;E's Response to CPUC_025-Q03 Attachments" dated January 24, 2012. Emailed supplemental cover letter and 2 atts</p>
<p>Oii_DR_LegalDivision_025-004</p>	<p>4. Document Catalogues: Provide a complete electronic list (as a CSV file) of all job files recorded, catalogued or scanned in the following systems: - the Emeryville (Filemaker Pro) system - the Engineering Library System at Walnut Creek - the ETCS Document Management System - the PMRS system - any other job file catalogue or listing For each job file, please provide (where available) the Job Number, Box Number, Storage Location, Barcode, Date. Please also provide a list of any additional job file related metadata available for each system.</p>	<p>12/20/2011</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>

EXHIBIT E

OII_DR_LegalDivision_025-005	<p>5. Pipeline Information:</p> <p>a) Provide details of all of the different asset inventory/stock control system(s) used by PG&amp;E since 1920 to track its pipeline stock.</p> <p>b) Provide an itemized list of all salvaged, reconditioned and/or reused pipe identified in this system, or listed on paper copy records since 1929 and its current location in the transmission system.</p> <p>c) Consistent with past PG&amp;E data responses, please identify whether each item provided in the list in response to question 4(b) was salvaged, reconditioned, and/or re-used.</p> <p>d) Indicate how the age of the pipeline was identified in each of the GIS and pipeline-related databases prior to September 2010. State if separate attributes were used to record the age of the pipe and the installation date, or if a single date field was used (e.g. installation date) and the age of pipeline inferred/inherited from this date.</p> <p>e) Indicate how the age of the pipeline is now identified in each of the GIS, pipeline-related databases and Integrity Management Database systems (e.g. post September 2010). State if separate attributes are used to record the age of the pipe and the installation date, or if a single date field is used (e.g. installation date) and age of pipeline inferred/inherited from this date.</p>	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_025-006	<p>6. We understand that it was common practice within the industry to recondition salvaged pipe for re-use up to the 1960's. As such:</p> <p>a) Provide an estimate of the volume of re-conditioned pipeline present in the transmission system of 1920's, 1930's and 1940's vintage. Please state if this estimate is based upon actual pipeline manifests and pipeline age data or has been inferred from the installation date listed on the Job Files, or transcribed into the Integrity Management System.</p> <p>b) Provide details of the process used by engineers to assess the condition of reconditioned pipeline prior to its re-use.</p> <p>c) State whether any criteria was used as part of the process asked about in question 5(b). If so, please provide them.</p>	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_025-007	<p>7. Provide details of any contractors who have provided any records management services (e.g. offsite storage, scanning, destruction, consultancy) to PG&amp;E since 1945. For each contractor provide details of the services they have provided, and over what period.</p>	1/17/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_025-008	<p>8. Retention Policy. We would like to understand PG&amp;E's approach to records retention and the variation in document retention policies and procedures since 1948.</p> <p>a) State what if any changes have been made to PG&amp;E's document retention policies and practices since August 2010.</p> <p>b) State how PG&amp;E's document retention policies and practices have evolved over the period 1948-2011. Indicate the level of compliance to these policies over this time.</p> <p>c) Identify the process by which records were destroyed, the records held that detail the destruction activity, and the lists of records destroyed in accordance with the records retention policy and retention schedules.</p> <p>d) We understand that engineering records may have been destroyed or discarded during major periods of change within the Gas Business (e.g. reorganizations, office moves, re-locations) without reference to the retention policy or schedules. Please confirm if PG&amp;E has ever inadvertently destroyed or discarded engineering drawings or maintenance records. If so, please indicate the nature, type and vintage of the documents now missing and believed to have been destroyed.</p>	1/30/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_026-001	<p>"For the operating lives of lines 101, 109 and 132, provide records that document the design operating pressure range for each line."</p>	Withdrawn by CPUC Legal Division	N/A	N/A
OII_DR_LegalDivision_027-001	<p>Please provide the foreman's log referred to on Page 25, paragraph 3 of the "Pipeline Accident Report".</p>	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-002	<p>Please refer to the "Pipeline Accident Report", Page 39. This discusses devices designed to ensure that for gas pipelines operated at 60 psig or higher, pipeline pressure does not exceed MAOP plus 10 percent, or did not exceed the pressure that produces a hoop stress of 75 percent of SMYS, whichever is lower. Does PG&amp;E have records available to document that each of these devices were consistently in operation, and were operating properly on September 9, 2010?</p>	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-003	<p>If the answer to the prior question is yes, please provide these records.</p>	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-004	<p>Please refer to the "Pipeline Accident Report", Page 46, paragraph 2, which finds that pup 4 had elevated levels of phosphorous, copper, and tin, consistent with steel made from recycled scrap material. Did the chemical composition of pup 4 comply with PG&amp;E's own policies, practices or other internal guidance?</p>	1/20/2012 Supplemental Completed on 1/30/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

OII_DR_LegalDivision_027-005	Please provide all PG&E's policies, standards, and guidelines, pre September 10, 2010, pertaining to the chemical composition required of a pipe (a) before it can be re-conditioned and/or re-used by PG&E, and (b) before it can be placed into service if new.	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-006	Please refer to the "Pipeline Accident Report", Page 49, last full paragraph, second sentence, which says "The unwelded region and angular misalignment in the model based on the pup 1 seam created a crack-like geometry (that is, notch) leading to a severe stress and strain concentration". Does PG&E have any understanding from its records to explain how this misalignment occurred?	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-007	If so, summarize PG&E's understanding.	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-008	If the answer to question 6 is yes, please provide all records related to this question.	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-009	Please refer to the "Pipeline Accident Report", page 54, last paragraph. This paragraph refers to UPS work at the Milpitas Terminal being documented and approved as a one-time project. It also notes that normal function of the facility was not to be maintained. What was the explanation for why normal function of the Milpitas Terminal facility would not be maintained?	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-010	Please refer to the "Pipeline Accident Report", pages 60 and 61. Here, the report indicates that NTSB investigators reviewed PG&E's GIS data and pipeline survey sheets for Line 132 to determine how often assumed or unknown values were entered. Excluding the information provided in the NTSB report, have PG&E's GIS data and pipeline survey sheets for other transmission lines included assumed or unknown values?	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-011	Have PG&E's GIS data and pipeline survey sheets for transmission lines other than those referred to in the previous question included values that are left blank?	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-012	If the answer to either or both of the previous two questions is yes, identify the line number and segment containing an assumed, unknown, or blank value for each of the following categories. For each segment indicate whether the values a segment contains is assumed, unknown, blank, or incorporates some combination of these values. If the segment contains a combination of these types of values, please specify which types of values each segment contains. a. Pipe Wall Thickness b. Minimum depth cover c. Diameter of Pipe d. Length of the segment e. Seam type f. Whether the segment includes pups. g. Manufacturer of the pipe. h. Depth of ground cover over the pipeline. i. SMYS. j. Whether Pipe was seamless	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD. "PG&E's Response to GPUC_027-Q12 Attachments" dated January 20, 2012.
OII_DR_LegalDivision_027-013	State the number of miles of pipeline in PG&E's transmission system that have one or more assumed or unknown values in the GIS and the pipeline survey sheets.	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-014	Please refer to the "Pipeline Accident Report", page 69, last paragraph. Has PG&E performed each of the required semiannual self-assessments prior to September 10, 2010 with the requisite measures (including number of miles of pipeline inspected versus program requirements; number of immediate repairs completed; number of scheduled repairs completed; and number of leaks, failures, and incidents, classified by cause)?	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-015	If the answer to the previous question is no, provide a list of each pipeline segment for which the required semi-annual self-assessment was not done.	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-016	If the answer to the question 14 is no, provide the dates on which each assessment that was not done that was supposed to be done, and provide the reasons why each required assessment was not done or was not done in a timely manner.	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-017	Please provide all reports of all pre-September 10, 2010 self-assessments relevant to L132, segment 180.	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-018	Please refer to the "Pipeline Accident Report", page 83, first paragraph, which mentions guidelines provided by the Pipeline Rules of Thumb Handbook. Please provide a copy of this handbook or a reference to the document number for this handbook.	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-019	Has PG&E reviewed its records to determine the employees responsible for inspecting and/or installing the portion of L132, segment 180 that ruptured?	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-020	If so, has PG&E checked its records to determine the location and extent of the other components of its transmission system that were installed or repaired by these employees?	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_027-021	If PG&E has checked its records to determine all of the other components of its transmission system that were installed or repaired by employees responsible for inspecting and/or installing the portion of L132/segment 180 that ruptured, provide the results of this search.	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

Oii_DR_LegalDivision_027-022	Please refer to the "Pipeline Accident Report", page 112, third and fourth full paragraph of the page. The Report states that, "In accordance with CFR 192.917(e)(3), an operator may consider manufacturing- and construction-related defects not requiring assessment so long as operating pressure has not increased over the MOP experienced during the preceding 5 years. When a pipeline with a manufacturing- or construction-related defect is operated above the highest pressure recorded in the preceding 5 years, it must be prioritized as a high risk segment for assessment. According to section 6.3.2 of the integrity management supplement ASME B31.8S, 2004 edition, in that case, "pressure testing must be performed to address the seam issue. PG&E raised the pressure at the Mipitas Terminal to 400 psig in 2003 and 2008 to set a 5-year MOP for Line 132...Thus, this practice allowed PG&E to avoid seam integrity inspections it might otherwise have been required to collect. However, the PHMSA deputy associate administrator for field operations testified at the investigative hearing that it was not the intent for this rule to be used to avoid an assessment." Did PG&E request in writing a confirmation from PHMSA or from the CPUC verifying its interpretation of CFR 192.917(e)(3) at any point in time prior to September 10, 2010?	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_027-023	If so, provide all requests and responses.	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_028-001	PG&E has not yet produced indexes pursuant to this agreement. Legal Division requests that PG&E produce, by November 30, 2011, an index for each of the Legal Division data requests numbered 1 through 20 and that for each data request the index should include:  a) The number of the data request or portion of the data request that each response or partial response addresses, b) The date each response or partial response was provided, c) The form of each response or partial response (e-mail, hard copy, hard drive, DVD etc.), d) To whom each response or partial response was transmitted, e) Whether the data response is now complete, and f) If the response is not complete, indicate all portions of the response that are not yet complete and when each will be completed.	11/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_029-001	1. Data Request 18, question 3 requested the following: "Please provide a spreadsheet that shows all of PG&E's records of transmission line pressures from each compressor station or receiving station. The spreadsheet should provide: a. The compressor station from which the transmission line pressure came. b. The receiving station that received the transmission line pressure. c. The date of the record illustrating point a or b or both. d. The total amount of transmission line pressure identified in each record showing a, b, and c." DR 18, question 3 is now modified to request the same information as requested in letters a-d, but only for the period from September 2007 through September 2010.	Withdrawn by CPUC Legal Division	N/A	N/A
Oii_DR_LegalDivision_029-002	Data Request 18, question 16 requested the following: "Provide copies of all field engineer's field notes, field weld inspection results, and transfer tags for all past projects involving the installation and/or removal/salvage/or abandonment of transmission pipe on PG&E's lines 101, 109, 131, 153, 105A & N, and 132, 153, 153A, 210A, 300A, 301G, SP5, and DFM5." DR 18, question 16 is now modified to request copies of all field engineer's field notes, field weld inspection results, and transfer tags for all past projects involving the installation and/or removal/salvage/or abandonment of transmission pipe, but only on PG&E's transmission lines 101, 107, 109, 132 and 300b.	1/25/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_029-003	DR 18, question 6 had initially requested the following: "For the operating lives of Lines 101, 109, and 132 provide all records that document the pressure swings under routine operating conditions." This request is now modified to read as follows: For the operating lives of Lines 101, 107, 109, 132, and 300b provide records that document typical pressure swings under routine operating conditions for each 10-year period.	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_029-004	DR 18, question 7 had initially requested the following: "For the operating lives of Lines 101, 109 and 132, provide all records that document the highest and lowest operating pressures during periods when the lines were in service." This request is now modified to read as follows: For the operating lives of Lines 101, 107, 109, 132, and 300b, provide all records that document the highest and lowest operating pressures during periods when the lines were in service.	Withdrawn by CPUC Legal Division	N/A	N/A
Oii_DR_LegalDivision_029-005	Please provide to Legal Division all of CP&SD's past data requests in proceeding number R.11-02-019, along with all of responses to these data requests, provided in the same format as the original responses to CP&SD.	12/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed: An external hard drive with all prior CP&SD responses was provided that is also in response to 029-006 through 008. "GasTransmissionSystemRecord sOii_DR_CPUC_029-Q05-Q08 Attachments (All CP&SD Responses)"

EXHIBIT E

OII_DR_LegalDivision_029-006	Please provide to Legal Division all of CPSD's pending data requests in R.11-02-019.	12/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; Reference external hard drive provided for 029-005. "GasTransmissionSystemRecord sOII_DR_CPUC_029-Q05-Q08 Attachments (All CPSD Responses)"
OII_DR_LegalDivision_029-007	Please provide to Legal Division all of PG&E responses to the Data Requests identified in the previous question in the same format as the responses to CPSD. Produce these responses on December 5th, 2011 or on the date the responses are provided to CPSD.	12/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; Reference external hard drive provided for 029-005. "GasTransmissionSystemRecord sOII_DR_CPUC_029-Q05-Q08 Attachments (All CPSD Responses)"
OII_DR_LegalDivision_029-008	Please provide Legal Division with all of CPSD's future Data Requests in R.11-02-019, along with PG&E's responses on the day that the responses are provided to CPSD.	12/12/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; Reference external hard drive provided for 029-005. "GasTransmissionSystemRecord sOII_DR_CPUC_029-Q05-Q08 Attachments (All CPSD Responses)"
OII_DR_LegalDivision_030-001	List all of the Line Rupture Control Valves (LRCVs) in the PG&E transmission system. For each LRCV listed, provide the pipeline number, the approximate mile point location on the pipeline, the date installed and the reason the LRCV was installed in that particular location. (Ref Response to DR1 Q1b, LRCVs are unmanned Major Gas Facilities) Provide the LRCVs Operating Instructions that were available to the Control Room Operators on September 9, 2010.	12/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-002	Provide the names of the maintenance personnel and the maintenance supervisor who were headquartered at the Milpitas Terminal on September 2010. Specify the hours each person identified was present at the Milpitas Terminal on September 9, 2010 and summarize the work that person performed during that time.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_030 Attachments" dated December 17, 2011
OII_DR_LegalDivision_030-003	Provide a copy of the signed cover sheets for Drawing No. 089773, Rev 1, Rev 2, and Rev 3, including the version of Rev 1 updated in 2011 (PG&E FILE NAME: GasTransmissionSystemRecordsOII_DR_LegalDivision_001-Q0 (38)).	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_030 Attachments" dated December 17, 2011
OII_DR_LegalDivision_030-004	Who (by title) has the authority to edit Operating and Maintenance Instructions?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-005	Provide a copy of Gas Information Bulletin TD-4430B-002 dated 3/4/2011 (Change in Transmission Station Monitor Testing Procedure), listed on Page 8 of Supplemental Answer 1B, August 22, 2011.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_030 Attachments" dated December 17, 2011
OII_DR_LegalDivision_030-006	Provide PG&E Gas SCADA System Alarm Limits Policy and Procedures dated 4/28/08 and the prior version dated 07/19/00, listed on page 15 of Supplemental Answer 1B, August 22, 2011.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_030 Attachments" dated December 17, 2011
OII_DR_LegalDivision_030-007	Provide PG&E Gas Emergency Operations Plan dated 10/8/10, listed on page 16 of Supplemental Answer 1B, August 22, 2011.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_030 Attachments" dated December 17, 2011
OII_DR_LegalDivision_030-008	Provide TD-4413B-001, Changes to the Gas Incident Reporting Requirements, dated 3/08/08 listed on page 16 of Supplemental Answer 1B, August 22, 2011.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_030 Attachments" dated December 17, 2011
OII_DR_LegalDivision_030-009	On P. 19 of PG&E's DR1 Q1 Supplemental Response, PG&E states that not all 11 [facilities] contained the most recent revision [hard copy of Operating and Maintenance Instruction]. Was there a hard copy version of the most recent Operating and Maintenance instructions at the Milpitas Terminal ("Terminal") on September 9, 2010? If not, what version was on hand at the Terminal on September 9, 2010?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-010	Regarding PG&E's response to DR1 Q7, is it PG&E's position that the specific documents listed in the summary inventory (for example, "Emergency Plan Manual (December 2010)") were in the Milpitas Terminal when the documents were scanned and that the scans are included in the set of documents provided in response to DR1 Q7? If not, please identify documents on the summary inventory list that were not scanned.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-011	What is a Resource Management Center?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-012	Can PG&E employees access ECTS data by Pipeline segment number?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-013	Provide a detailed description and the manual or operating instructions for the PG&E risk management program database. (ref DR 1Q16 p.5)	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

## EXHIBIT E

OII_DR_LegalDivision_030-014	Provide copies of all versions past and present of S.P. 463.2, Abandonment of Gas Mains & Services.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-015	What is "GSAVE?" (See GasTransmissionSystemRecordsOII_DR_CPUC_007-Q12Atch58)	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-016	What is "JTM?" (see SB_HC_3963456, page 3)	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-017	In PG&E's response to DR3, Q4, PG&E refers to PG&E's ISTS organization. What does ISTS stand for? What is the relationship of the ISTS organization to the rest of PG&E? What is the purpose of ISTS? How long has ISTS existed?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-018	Please provide Attachments 1 and 2 to DR 3 Q4 again. This time please add the pipeline number and mile post for each leak identified.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_DR_023 Attachments" dated December 17, 2011
OII_DR_LegalDivision_030-019	Provide a copy of the Wall Map that includes Line 132 Segment 180. Please include both electronic and hard copy (in the size used by PG&E personnel) versions in response to this request.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD electronic copies of the 2 hardcopy maps delivered by hand prior. "PG&E's Response to LegalDivision_030 Attachments" dated December 17, 2011
OII_DR_LegalDivision_030-020	In PG&E's Response DR3 Q6 Set 2, many of the files present images that are totally black. Please check and verify that these images are indeed black and explain why they are included in the data set, or provide new files that show the images. Example -- DFRS-07-03.01	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_030 Attachments" dated December 17, 2011
OII_DR_LegalDivision_030-021	What specific conditions at the Milpitas Station lead PG&E to believe pressure readings for the outgoing lines from Milpitas would be inaccurate as stated in response to DR 5 Q 2 and DR 18 Q5?	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-022	Provide copies of all files cited by PG&E in response to DR7 Q7 that were not already provided in response to the OII or to CPUC Legal's data requests.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-023	Provide copies of Drawing 082482, Revisions 8, 9 and 10.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_030 Attachments" dated December 17, 2011
OII_DR_LegalDivision_030-024	Provide a summary list of all records currently stored at Bayshore.	1/6/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-025	In response to DR 10 Q1, PG&E did not list the Milpitas Storage Yard which, according to PG&E's transfer tag documents, received various shipments of pipe during the 1950's. Please answer yes or no to the following: is it PG&E's position that there never was a storage yard in Milpitas? Please provide a detailed explanation of PG&E's answer with PG&E's reasoning and any additional facts that PG&E has identified.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-026	N/A	N/A	N/A	N/A
OII_DR_LegalDivision_030-027	What are Long Seam Characterization Forms? Why are the Long Seam Characterization Forms not included in the ECTS data base? Provide copies of Long Seam Characterization Forms for Line 132, Segments 179-181, including all pipe in segment 180 prior to the San Bruno pipe failure.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-028	Provide all transmission Plats and Plans & Profile sheets found in EDMS for L-132, segments 179-181, including all pipeline in Segment 180 prior to the San Bruno pipe failure.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_030 Attachments" dated December 17, 2011
OII_DR_LegalDivision_030-029	Were all boxes at Beale St. that contained one or more documents relevant to the MAOP effort moved to Emeryville? If not, can PG&E determine if a document in ECTS came from a box that is still located in the 13th floor file storage area of the PG&E Beale St. Office in San Francisco? If yes, A) please explain how the determination is made, and B) whether PG&E is maintaining hard copies of these documents in the Emeryville storage facility?	12/19/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-030	Please provide a copy of the MAOP Binder (as referenced in PG&E's response to DR11 Q12) that included Line 132 as it existed prior to the MAOP validation process.	12/19/2011 Supplemental Completed on 1/6/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to LegalDivision_030-Q30 Attachments" dated December 19, 2011. Emailed supplemental cover letter.
OII_DR_LegalDivision_030-031	Explain the steps one would take to use a main line and tie-in weld map to determine the location and quality of a mapped weld in a pipe that is excavated after it has been covered and placed in operation.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_030-032	For each piece of pipe identified in PG&E's answer to DR 14 Question 4 attachment 1, please provide all inspection and analytical reports that explain the nature of the "indication of concern" and provide information regarding the quality of welds and/or the integrity of the piece of pipe.	12/17/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

<p>Oii_DR_LegalDivision_030-033</p>	<p>Refer to P3-27410, page 9, Maintaining Historical Records. Please provide copies of all data stored in network folders per section 9.0 for all segments for Lines 101, 107, 109, 132 and 300B. Please include word documentation on what was collected for the specific pipe segments, but exclude hard copy equipment information stored in the IM library.</p>	<p>2/1/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed; CD. "Attachments to PG&amp;E's Response to CPUC_030-Q33" dated February 1, 2012</p>
<p>Oii_DR_LegalDivision_031-001</p>	<p>Please refer to the data response provided in response to Data Request 14, Question 4. This question states, "Identify (by pipeline, segment and other specific identifying data used by PG&amp;E) all pieces of pipe removed by PG&amp;E from its system since September 9, 2010, due to "indications of concern," as noted in the NTSB Report, page 84. For each piece of pipe identified, provide the date and project number of its original installation in the PG&amp;E pipeline system. For each piece identified, provide the reference document PG&amp;E used to determine the pipe-piece information." In response to this question, PG&amp;E determined the date and project number of the original installation of each removed pipe piece from PG&amp;E's GIS database.  1. Please provide a spreadsheet that supplements the one provided in response to Data Request 14, Question 4. This spreadsheet should provide the following:  a. A first column that identifies the date each piece of pipe was removed by PG&amp;E from its system since September 9, 2010 due to "indications of concern" as noted in the NTSB Report, page 84. This column may use the same information provided in response to Data Request 14, Question 4.  b. A second column that shows the manufacture date of each pipe piece identified in the first column.  c. A third column that shows the actual date each pipe piece provided was originally installed, whether in its current location or elsewhere.  d. A fourth column that provides Bates numbers for each pipe piece identified the first column.  e. Please provide the original records that show the manufacture date of each pipe piece identified in the second column.  f. Please provide the original records that show the original installation date provided for each pipe piece in the third column.  g. Please stamp the records provided in response to questions e and f with the Bates numbers identified in the fourth column that match each pipe piece.</p>	<p>1/31/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed; CD. "Attachments to PG&amp;E's Response to CPUC_031-Q01 and Q02" dated January 31, 2012</p>
<p>Oii_DR_LegalDivision_031-002</p>	<p>Please refer to the data response provided in response to Data Request 14, Question 4. This question states, "Identify (by pipeline, segment and other specific identifying data used by PG&amp;E) all pieces of pipe removed by PG&amp;E from its system since September 9, 2010, due to "indications of concern," as noted in the NTSB Report, page 84. For each piece of pipe identified, provide the date and project number of its original installation in the PG&amp;E pipeline system. For each piece identified, provide the reference document PG&amp;E used to determine the pipe-piece information." In response to this question, PG&amp;E determined the date and project number of the original installation of each removed pipe piece from PG&amp;E's GIS database.   For each piece of pipe identified in PG&amp;E's response to number 1, provide (a) a summary of PG&amp;E's findings and comments pertaining to the pipe, and (b). provide all reports and written material, photos, videos, tests, and analyses, pertaining to the pipe. In the case of all, and in particular the video, please ensure that the data is complete and un-edited.</p>	<p>1/31/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed; CD. "Attachments to PG&amp;E's Response to CPUC_031-Q01 and Q02" dated January 31, 2012</p>

## EXHIBIT E

OII_DR_LegalDivision_031-003	<p>Please refer to the data response provided in response to Data Request 14, Question 4. This question states, "Identify (by pipeline, segment and other specific identifying data used by PG&amp;E) all pieces of pipe removed by PG&amp;E from its system since September 9, 2010, due to "indications of concern," as noted in the NTSB Report, page 84. For each piece of pipe identified, provide the date and project number of its original installation in the PG&amp;E pipeline system. For each piece identified, provide the reference document PG&amp;E used to determine the pipe-piece information." In response to this question, PG&amp;E determined the date and project number of the original installation of each removed pipe piece from PG&amp;E's GIS database.</p> <p>For each piece of pipe identified in PG&amp;E's response to number 1, provide the ECTS job number or other identification that is associated with the pipe removal.</p>	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_031-004	<p>Please refer to the data response provided in response to Data Request 14, Question 4. This question states, "Identify (by pipeline, segment and other specific identifying data used by PG&amp;E) all pieces of pipe removed by PG&amp;E from its system since September 9, 2010, due to "indications of concern," as noted in the NTSB Report, page 84. For each piece of pipe identified, provide the date and project number of its original installation in the PG&amp;E pipeline system. For each piece identified, provide the reference document PG&amp;E used to determine the pipe-piece information." In response to this question, PG&amp;E determined the date and project number of the original installation of each removed pipe piece from PG&amp;E's GIS database.</p> <p>For each piece of pipe identified in PG&amp;E's response to number 1, provide the names and job titles of all persons who examined, analyzed or tested the pipe, including but not limited to PG&amp;E employees, and outside contractors or consultants</p>	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_031-005	<p>Please refer to the data response provided in response to Data Request 14, Question 4. This question states, "Identify (by pipeline, segment and other specific identifying data used by PG&amp;E) all pieces of pipe removed by PG&amp;E from its system since September 9, 2010, due to "indications of concern," as noted in the NTSB Report, page 84. For each piece of pipe identified, provide the date and project number of its original installation in the PG&amp;E pipeline system. For each piece identified, provide the reference document PG&amp;E used to determine the pipe-piece information." In response to this question, PG&amp;E determined the date and project number of the original installation of each removed pipe piece from PG&amp;E's GIS database.</p> <p>For each piece of pipe identified in PG&amp;E's response to number 1, identify the location of where the pipe is being kept now, and identify the safeguards that PG&amp;E has undertaken to ensure that this evidence remains available for inspection and testing as needed.</p>	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_032-001	<p>Data Request 29, question 2 stated:          "Data Request 18, question 16 requested the following:          "Provide copies of all field engineer's field notes, field weld inspection results, and transfer tags for all past projects involving the installation and/or removal/salvage/or abandonment of transmission pipe on PG&amp;E's lines 101, 109, 131, 153, 105A &amp; N, and 132, 153, 153A, 210A, 300A, 301G, SP5, and DFM5."          DR 18, question 16 is now modified to request copies of all field engineer's field notes, field weld inspection results, and transfer tags for all past projects involving the installation and/or removal/salvage/or abandonment of transmission pipe, but only on PG&amp;E's transmission lines 101, 107, 109, 132 and 300b."</p> <p>This Data Request is further modified to the same subject matter and pipelines as articulated in DR 29 Q2, but only for the jobs file numbers identified in the attached excel spreadsheet, for a total of 46 job files.</p>	1/25/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD. "PG&E's Response to CPUC_032-Q01 Attachments
OII_DR_LegalDivision_033-001	<p>At P2-191 in its Index of Attachments to the June 20, 2011 Response, PG&amp;E produced an inter-departmental letter. This letter, dated May 17, 1951, states that a copy of the Federal Power Commission "Regulations to Govern the Preservation of Records of Public Utilities and Licensees," effective August 1, 1938, with amendments to January 1, 1951 is enclosed. Document P2-191 has a hand-written notation: "Superseded."</p> <p>Provide the regulations identified as the enclosure to the above-referenced letter and all subsequent FPC regulations or amendments on the subject of preservation of records of Public Utilities.</p>	12/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_033-002	<p>Provide the December 8, 1938 PG&amp;E letter that is referenced in P2-191 and is described as the letter that forwarded the previous regulations.</p>	12/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_033-003	<p>Provide all letters, memos, policy statements or directives between December 8, 1938 and May 17, 1951 that address the FPC regulations or PG&amp;E's preservation or destruction of records.</p>	12/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to Legal Division_DR_033-Q03 Attachments" dated December 30, 2011
OII_DR_LegalDivision_033-004	<p>Provide the document that superseded the May 17, 1951 letter.</p>	12/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed



EXHIBIT E

OII_DR_LegalDivision_033-005	Provide all subsequent letters, memos, policy statements or directives that supersede, amend or address preservation or destruction of records and that reference FPC regulations.	12/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_033-006	Did PG&E comply with or follow the early FPC regulations? If so, when did PG&E begin to comply with or follow these regulations? In its June 20, 2011 Response PG&E discusses partial exemptions for pipelines that already existed when state and federal pipeline regulations were adopted. PG&E concludes that, "logically, if these subparts do not apply retroactively to existing pipelines then the recordkeeping provisions associated with them do not either." (At p. 1-22.)	12/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_033-007	Provide all PG&E letters, memos, policy statements, directives or other writings that convey direction to PG&E staff about which PG&E records were exempted from record keeping provisions of state or federal pipeline regulations.	1/25/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_033-008	Provide all authoritative statements (for example, legal or regulatory opinions) that either support or contradict PG&E's interpretation that records of already existing facilities were exempted from recordkeeping provisions of state or federal pipeline regulations. In its Response of June 20, 2011, page 1-5, PG&E refers to the American Society of Mechanical Engineers' (ASME) first American Tentative Standard Code for Pressure Piping in 1935, to the ASME's first integrated pipeline safety code in 1952 and to a 1955 revision.	2/6/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_033-009	Provide the 1935 and 1952 ASME codes referred to on page 1-5. (The 1955 revision is an attachment to Data Response 15, Question 6.)	1/25/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to Legal Division_DR_033-Q09 Attachments" dated January 25, 2012
OII_DR_LegalDivision_033-010	PG&E states in response to Data Request 15, Question 6 that it believes in 1956 it was following ASME standard ASA B31.1.8-1955. When did PG&E begin to comply with or follow the ASME standards?	2/6/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_033-011	Provide all PG&E letters, memos, policy statements or directives that address preservation or destruction of records and refer to the 1935 or 1952 ASME codes or the 1955 revision.	2/6/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_034-001	1. Refer to PG&E Standard Practice No. 483.7, page 1, effective 12/15/69. With respect to this practice, provide the following: (a) A summary list with locations of all pipeline files kept and maintained in response to this standard practice (b) All memos and directives that pertain and refer to this standard practice. (c) The date or dates on which the practice was modified, and a summary of the modification or modifications. (d) All memos which pertain or refer to each such modification or proposed modification. (e) The date on which the practice was eliminated or superseded. (f) Provide all written material demonstrating that the practice was eliminated or superseded, and that it was done so on the date referred to in PG&E's response to 5 above. (g) How if at all did PG&E ensure that all information kept and maintained subject to the practice, would continue to be available to PG&E? (h) Was any information or were any documents ever kept or maintained by this practice ever discarded or destroyed by PG&E? If yes, identify and explain: 1) The information and documents that were discarded or destroyed. 2) The pipeline or pipelines that the documents and information pertained to. 3) The date of each discarding or destruction of documents and information. 4) The person or persons at PG&E who authorized the discarding or destruction of documents. 5) All written PG&E written material that authorizes the discarding of the documents and information	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_034-002	2. Refer to the January 1984 Bechtel Report Job 16253, revision 0. Provide a full and complete copy of this report, including but not limited to the table in Appendix B. If PG&E does not have the full and complete report please acquire it from Bechtel and provide it to us within the time required by this data request, and provide in PG&E's response whether the report was supplied by PG&E, by Bechtel, or by another source.	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_035-001	DR 18 Q 17 asks: "Please find the document containing MAOP05400987. If this document is part of a larger file folder, please provide the entire file folder. If the document is part of a box of documents, please provide the entire box of documents. Please keep the documents in the order they currently exist."  In response to this question, PG&E provided a virtual box that did not contain MAOP05400987. Please provide the box that contains MAOP05400987.	12/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

## EXHIBIT E

Oii_DR_LegalDivision_036-001	<p>PG&amp;E produced Document P2-1449, titled Memorandum of Understanding between California Gas Transmission (CGT) and Operations, Maintenance &amp; Construction (GC Gas), December 17, 2003.</p> <p>For questions 1-13, if any procedures or definitions are now different from what is stated in the 2003 document cited above, state the changes or revisions and the effective date of changes or revisions.</p> <p>On page 17 of the above document the following paragraph appears: "All as-builts should be dated and initialed (LAN ID) by person who marked-up the drawing."</p> <p>Question 1. State the job title/s of all persons who have responsibility and authority to mark-up an as-built drawing.</p>	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-002	Is this marked-up drawing referred to as a red-line markup?	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-003	<p>a) After the work is completed, is the marked-up drawing kept in hard copy form?</p> <p>b) If yes, how many copies are kept?</p> <p>c) If yes, state where hard copies/ies is/are kept.</p> <p>d) Explain changes in policy or practice over time, since 1950, with regard to marked-up drawings, distinguishing between marked-up (red-lined) and final. If terminology requires clarification, provide the clarification.</p>	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-004	<p>On page 17 of document P2-1449 the following paragraph appears: "Records scans and saves electronically as-built markups for pipeline drawings. Mapping links electronic as-built files to GIS database."</p> <p>Question 4:</p> <p>a) In what database were the scanned as-built markups saved in 1983?</p> <p>b) In what database were the scanned as-built markups saved in 2003?</p> <p>c) In what database are the scanned as-built markups saved in 2011?</p> <p>d) Explain any change regarding the process for scanning, saving and accessing as-built markups since 1983.</p>	1/25/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-005	<p>On page 18 of the above document, the following paragraph appears:</p> <p>"For all station work, Design Engineering/Drafting receives a copy of the as-built package and determines in conjunction with the Project Engineer if a maintained "numbered" record drawing set exists for the facility and needs to be updated. Note: New construction at stations with a maintained "numbered" record drawing set is sometimes accomplished utilizing sketches or "non-numbered" drawings and then later as-building the record drawing set."</p> <p>Question 5:</p> <p>a) What is a record drawing set?</p> <p>b) What is included in a record drawing set?</p> <p>c) Provide documents instructing staff regarding record drawing sets.</p>	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-006	Regarding the above text, explain the terms "numbered" and "non-numbered" where they refer to a "record drawing set." Provide documentation to support and illustrate these definitions, including written procedures regarding these terms, and copies of both numbered and non-numbered record drawing sets.	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-007	Referring to the above text, explain in detail, providing supporting documentation and written procedures, when and under what circumstances a record drawing set would need to be updated and also when one would not need to be updated.	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-008	Explain the process referred to as "later as-building the record drawing set" and provide illustrative documents, including written procedures for this activity.	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-009	<p>Also on page 18 of document P2-1449, the following paragraph appears:</p> <p>"For pipeline and station facilities with maintained numbered record drawing sets, Design Engineering/Drafting updates drawings in accordance with drawing as-built guidelines using field markups provided by constructor. Project Engineer reviews and approves updated drawings. Records distributes all as-built drawing sets. Drawing list for as-builts filed in job folder."</p> <p>Question 9:</p> <p>a) For which pipelines and station facilities are "numbered record drawing sets" maintained?</p> <p>b) What criteria are used to determine for which pipelines and facilities "numbered record drawing sets" should be maintained?</p> <p>c) If a record drawing set is not maintained locally for a pipeline or facility, are numbered record drawing sets for that pipeline or facility maintained elsewhere?</p>	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-010	Provide the "drawing as-built guidelines" referenced in the above text.	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

Oii_DR_LegalDivision_036-011	Regarding the above text, a) What is a field markup? b) What record or drawing does the constructor start with or use as a basis in order to prepare the field markup referenced above? c) What is the title of this record or drawing? Does the constructor start with the "final as-built drawing" as of that date? d) Where and how does constructor obtain the record or drawing that is used as the basis for the markup referenced above?	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-012	Regarding the statement in the above passage, "Records distributes all as-built drawing sets." a) Identify the title of the person in Records who distributes as-built drawing sets. b) State the locations to which Records distributes the as-built drawing sets.	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-013	On page 21 of the above-referenced document P2-1449 there is a flow chart titled "As-Builts/Job Close Process Flowchart. The flowchart includes a series of entries regarding as-built drawings. Three of the entries are: "Design Drafting updates record drawings as required," "PE reviews and approves as-built drawings," "Records issues drawings and sends completion notice to Close-Out Desk." The entry next in order states: "See Design Drafting/Records Flowchart for details."  Question 13: Provide the "Design Drafting/Records Flowchart" in effect in 2003, as referenced in the above-cited entry.	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-014	In response to Legal Division Data Request 9, Question 1, PG&E provided a revision to part of Table 2A-3. On p. 2A-10 of the revision, regarding red-line as-built drawings and also final as-built drawings, the chart states the records are retained for the "life of the facility."  Question 14: a) Does the above-referenced response mean that PG&E retains hard copies of the red-line as-built drawings for the life of the facility? b) If the retention practices have been different for this record over the course of time since 1950, please explain and state approximate time periods for any changes in practice. c) Does the above-referenced response mean that PG&E retains hard copies of the final as-built drawings for the life of the facility? d) If the retention practices have been different for this record over the course of time since 1950, please explain and state approximate time periods for any changes in practice.	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-015	Revised Table 2A-3 includes the category "Final as-built drawings updated (those with dates and initials)." In the column titled "How long is record retained by PG&E," Revised Table 2A-3 states, "Life of Facility - this record type applies to stations only."  Question 15: a) Regarding the category above, called, "Final as-built drawings updated (those with dates and initials)," state the term for and explain any other categories of final as-built drawings that are not updated and/or do not have "dates and initials." b) Provide responses for all information columns on revised Table 2A-3 for all categories of as-built drawings that are not "updated with dates and initials."	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-016	Revised Table 2A-3, p. 2A10, includes the category "Final as-built drawings updated (those with dates and initials)." In the column titled, "Purpose of Record," the revised table states, "Incorporates the results of the red-line into the final drawings."  Question 16: a) Is it currently PG&E practice to incorporate red-line as-built changes into a final as-built drawing? b) If the above response is "yes," state approximate dates and intervals for any time periods since 1950 during which the red-line information was not incorporated into a final as-built drawing. c) If PG&E is not currently incorporating red-line information into final as-built drawings, state when PG&E stopped the practice and provide approximate dates and intervals for any other time periods in which the practice was not in effect since 1950. d) Explain the reason/s for any changes in policy or practice regarding whether to incorporate red-line as-built changes onto final as-built drawings.	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_036-017	PG&E produced Document P2-1453, titled "CGT Specific Order Close Out Form," dated 11/15/2004. This form includes the instruction: "If As-Builts are not required, please submit a copy of the authorizing job estimate, sign off the foreman's page . . . and forward it to the Close Out desk for processing. This signed-off authorizing estimate or email will be treated as your As-Built."  Question 17: a) When was the procedure described above initiated? b) Is this procedure currently in effect? c) If the procedure has changed, provide dates for changes and all documents that address the changes. d) After a job is closed out without As-Builts using the process stated above, how will the next engineer designing a project find the drawings that reflect changes made or work accomplished on the facility that was subject of the closed out job?	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

OII_DR_LegalDivision_036-018	a) Regarding the passage above, what guidance did PG&E provide about determining whether as-builts are/were required? b) Provide any documents that state how to determine whether as-builts are/were required.	1/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_037-001	Please provide the Sharepoint records for the Milpitas clearances generated at any time during September 9 and September 10, 2010.	1/24/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_037-002	If any other documents recording Milpitas clearances were generated at any time during September 9 and September 10, 2010, please provide those records.	1/24/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_038-001	In Legal Division's DR 30 Q 25, Legal Division asks:  In response to DR 10 Q1, PG&E did not list the Milpitas Storage Yard which, according to PG&E's transfer tag documents received various shipments of pipe during the 1950's. Please answer yes or no to the following: Is it PG&E's position that there never was a storage yard in Milpitas? Please provide a detailed explanation of PG&E's answer with PG&E's reasoning and any additional facts that PG&E has identified.  In PG&E's response to Legal Div DR 30 Q 25, PG&E states that it is unable to respond because the transfer tags were not provided. For examples, please refer to the following documents which were identified in Legal Divisions "Notice and Disclosure of Safety Evidence and Companion Motion for Public Release of Evidence" filed and served on Wednesday, October 19th, 2011:  MAOP05266960 MAOP05266964 MAOP05266970 MAOP05266972 MAOP05267160 MAOP05267252 MAOP05396175 MAOP05439053	12/30/2011	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_039-001	The Legal Division hereby requests that PG&E produce on or before January 12, 2012 all requested information and documents. If there are any objections or problems with this data request, Legal Division requests them in writing within three business days of receipt of this Data Request.  Provide an estimate of the total number of pages PG&E had scanned into ECTS as of September 1, 2011. As of September 1, 2010, approximately what percentage of pages had been scanned of the total pages PG&E expects to ultimately scan into the ECTS data base	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_039-002	Did PG&E keep the pieces of pipe that had "indications of concern" and were removed from the system? A) If yes, where are they stored? B) Did PG&E perform any analyses on these pieces? C) If not, does PG&E intend to do any analyses on these pieces? D) If the answer is yes to B or C, provide a list of all records generated concerning the results of the analyses and state the pieces and systems within PG&E where these records will be stored.	1/16/2012 Supplemental Completed on 1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_039-003	Follow up on DR 18 Q 5. We are trying to understand the quality of the information being accumulated in the SCADA record system as it is available to operators in the Control Room. Please provide trending pressure charts (graphs) as they appeared on the SCADA screen viewed by the control room operators showing the finest detail available (for instance, second-by-second) for the following listed pressure devices from 17:15 through 19:00 on September 9, 2010. Please use a pressure range and line widths on the graphs that were available to operators at the time to show the best level of detail in changes in pressure. Please do not create graphs that could not have been created and viewed by a control room operator using the existing system on September 9, 2010. a. JSI_PT0001 Sr-Vst-X L132 D/S b. JSI_PT0004 Sr-Vst-X L109 D/S c. MMT_PT0040 Mlpts-Ter L109 d. MMT_PT0083 Mlpts-Ter L132 e. MMT_PT0084 Mlpts-Ter L101 f. NF1_PT0001 L101 Meter Site M-1 g. NF2_PT0001 L109 Meter Site M-1 h. NF3_PT0001 L132 Meter Site M-1 i. NSU_PT0001 Svin-Ave L109 U/S j. NMA_PT0030 Minn-Sta L132 U/S k. _____ ? Mlpts-Ter L107 Hidr	1/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_039-004	Provide the document that preceded Gas Control Plan dated 9/30/11 (which was provided as the file named GasTransmissionSystemRecordsOII_DR_CPUC_018-Q09Atrch03) and was in effect on September 9, 2010.	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_039-005	Is PG&E using microfilm or aperature cards to store new or updated records? If yes, please identify the types of records being stored or updated in this manner and state how they are being used by PG&E.	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_039-006	Provide a complete copy of the clearance package developed for the 2008 MOP Pressure Verification performed to establish the 400 MOP for Line 132.	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_039-007	Please provide a readable copy of P3-27334	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

Oii_DR_LegalDivision_039-008	Provide copies of Standard Practices 113-4 and 520.6-6	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_039-009	Provide a complete copy of Job File No. GM 120721.	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD. "PG&E's Response to Legal Division_DR_039-Q09 and Q13 Attachments" dated January 16, 2012
Oii_DR_LegalDivision_039-010	Provide complete copies of the Verint Service Level Agreement for Verint Witness Enterprise Voice Logger, Version 5.1 as published on 5/12/2011 and the previous version that was in place on 9/9/2010.	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_039-011	If a PG&E employee has a document on his desk that came from the ECTS database, please explain what identifying information on the document could he/she use to find the document in ECTS?	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_039-012	Please provide a copy of the MAOP spreadsheet (MAOP.xls) referenced in various documents in the MAOP binder recently provided in response to DR 30 Q 30 (Atch 16, e.g., see p. 52)	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_039-013	Files P3-27503, P3-27428, P3-27500, P3-27443, P3-27491 and 27441 were scanned in a micro-size that is unreadable. Please provide full size scans.	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD. "PG&E's Response to Legal Division_DR_039-Q09 and Q13 Attachments" dated January 16, 2012
Oii_DR_LegalDivision_039-014	Please review P3-27498 and provide the records intended in place of what was provided, which appears to be an ad to purchase software.	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_039-015	What is account number 1124 that appears throughout PG&E's accounting records in Job Files?	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_040-001	Will the leak data PG&E expects to provide on January 13 be provided in the table and information format Legal Division requested in Data request 23, Question 15? If the answer is anything other than an unqualified "yes", explain why not.	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_040-002	Can PG&E count by January 13, 2012 the total number of leaks it has had on each transmission line since its installation? If not, please explain why not.	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_040-003	Can PG&E count the total number of leaks each year classified by each status/grade it assigns to its leaks along each transmission pipeline by January 13, 2010? If not, explain why not.	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_040-004	Explain what PG&E means when it states that it "does not maintain the data in the format requested". State whether this means that PG&E maintains no data base that summarizes and keeps count of leak information by line and date.	1/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_041-001	Follow-up to DR 1, Q 6  PG&E provided as an attachment, a map "created from an archived snapshot." The map is not a detailed map showing Bay Area locations of pipe-type holders. Please produce a detailed map that is responsive to the request.  Data Request 1, Question 7 requested as follows:  Identify by title, date, version, and Bates numbers (for already produced documents) all records stored and maintained at the Milpitas Station as of September 9, 2010.	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_041-002	Follow-up to DR 1, Q 7  PG&E provided a summary inventory of Milpitas documents and an index of scanned documents from Milpitas saying that together these items "reflect substantially all known records or categories of records currently stored and maintained at the Milpitas Terminal."  PG&E qualified its response by saying that it lacked "certainty" that the scanned documents were all of the documents at Milpitas as of September 9 and that it could not state that the summary inventory was "exhaustive."  State whether PG&E has identified any additional records or categories that would be responsive to this request. If there are additional records, please produce them. Upon receiving the follow-up response, Legal Division intends to rely on PG&E's statement that the response to DR 1, Q 7 "reflect(s), substantially all known records or categories of records currently stored and maintained at the Milpitas Terminal." (It is noted that PG&E's response excluded vendor and manufacturer documents and these documents are not now requested by LD.)  Question 15 requested as follows:  Has Line 132 ever suffered a short-term upset of liquid? If yes, provide a copy of reports and dates for each event. (reference P2-390 Procedure for inspection for corrosion control and P2-391 In-line inspections)  PG&E responded as follows:	1/25/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

<p>Oil_DR_LegalDivision_041-003</p>	<p>Follow-up to DR 1, Q 15</p> <p>Does PG&amp;E state that the incidents identified in the response above represent all short-term upsets of liquid on Line 132? If PG&amp;E is aware of additional events, provide reports and dates for each.</p> <p>Footnote 1 to the above response states, "PG&amp;E will provide additional documentation regarding the October 2010 liquid discovery when it is available." Has PG&amp;E provided any additional documentation regarding the October 2010 liquid discovery? If yes, provide a reference. If not, please provide the additional documentation or state there is no additional documentation. Upon receipt of the response to this follow-up data request, Legal Division will assume the response to DR 1, Q 15 is complete.</p> <p>Data Request 3</p> <p>Data Request 3, Question 10 requested as follows:</p> <p>Identify all PG&amp;E policies and procedures PG&amp;E used in 1956 to determine the integrity of the salvaged 30" pipe used in the construction of segment 180 of L-132 when the pipe was relocated in 1956? Provide a copy of each policy and procedure identified.</p> <p>PG&amp;E's response included the following statement:</p> <p>PG&amp;E will provide any documentation that it may identify in its continuing records review that is responsive to this request.</p>	<p>1/31/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>
<p>Oil_DR_LegalDivision_041-004</p>	<p>Follow-up to DR 3, Q 10</p> <p>State whether PG&amp;E has identified additional documentation that is responsive to this request. If yes, provide the documentation. If PG&amp;E has not identified documentation provide a statement to that effect.</p> <p>Data Request 4</p> <p>Data Request 4, Question 14 requested as follows:</p> <p>Provide all metallurgical and failure analysis reports or other documents for any analysis that PG&amp;E did or contracted to be done for the 1963 failure of the transmission pipe near Alemany Blvd. in SF, and for the 1988 longitudinal weld leak on Line 132.</p> <p>PG&amp;E responded as follows:</p> <p>PG&amp;E has not located copies of any metallurgical or failure analysis reports for the gas incident in 1963 near Alemany Boulevard in San Francisco referred to in Attachment P7-7094 to PG&amp;E's June 20th Oil filing, or for the 1988 leak on Line 132 referred to in Attachment P7-7029.</p>	<p>1/25/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>
<p>Oil_DR_LegalDivision_041-005</p>	<p>Follow-up to DR 4, Q 14</p> <p>To date, has PG&amp;E located any metallurgical or failure analysis reports for the above-referenced 1963 and 1988 gas incidents? If so, produce those reports.</p> <p>If PG&amp;E has not located any metallurgical or failure analysis reports for the above-referenced 1963 and 1988 gas incidents, is there any basis for concluding that such analyses were done? If so, state each and every basis for such a conclusion and produce records to support the response. Upon receipt of the response to this follow-up data request, Legal Division will assume the response to DR 1, Q 15 is complete.</p> <p>Data Request 14</p> <p>Data Request 14, Question 2 requested as follows:</p> <p>Describe how PG&amp;E tracks the source of pipe installed in each segment of a pipeline. Provide an example with all supporting documents.</p> <p>PG&amp;E's response included the following statement:</p> <p>PG&amp;E understands the phrase "source of pipe" to mean the identity of the pipe manufacturer. PG&amp;E further understands the question to seek information about PG&amp;E's current practices.</p>	<p>1/31/2012 Supplemental Response Completed on 3/7/12</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>

EXHIBIT E

<p>Oii_DR_LegalDivision_041-006</p>	<p>Follow-up to DR 14, Q 2</p> <p>PG&amp;E's statement interpreting the question is not correct. The phrase "source of pipe" includes identifying the previous location of salvaged pipe when the pipe was salvaged from another pipe in the PG&amp;E system. The question seeks both past and present practices. Please respond to the question given this intended meaning.</p> <p>Data Request 14, Question 7 requested as follows:</p> <p>Since PG&amp;E is continually adding documents to the ECTS data base, the PUC would like to have a "date scanned" field added to the screen results. Also, it would be helpful if the search results were presented in either numerical order (by MAOP# or ECTS#) or date scanned.</p> <p>PG&amp;E responded as follows:</p> <p>This question was addressed during the CPUC site visit to the ATS Facility in San Ramon on October 13, 2011. PG&amp;E is working to add a "Date Scanned" field to the ECTS database. ECTS already possesses a query field entitled "Creation Date", which reflects the date that the image was uploaded into ECTS.</p>	<p>1/31/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>
<p>Oii_DR_LegalDivision_041-007</p>	<p>Follow-up to DR 14, Q 7 [</p> <p>PG&amp;E has not yet added the "Date Scanned" field to the results window available to PUC staff when accessing records in the ECTS database. Please add this field.</p> <p>Data Request 15</p> <p>Data Request 15, Question 2 included the following:</p> <p>Refer to PG&amp;E's data response to the NTSB 036-005A, Exhibit 2-AI in the NTSB San Bruno docket. It states in the Risk Management Instruction RM1-06 that it will prioritize pipeline segments as high risk only if "they have operated over the maximum operating pressure (MOP) experienced during the preceding five years plus 10 percent of the historical operating pressure". With respect to this statement and practice:</p> <p>A. Identify the person or persons at PG&amp;E who developed the practice, and state the dates they did so.</p> <p>B. Identify the person or persons at PG&amp;E who approved the practice, and state the dates they did so?</p> <p>C. With respect to the 10% adder before prioritizing a pipeline as high risk, provide all memos and communications written before September 9, 2010 that discuss the practice, in any facet, that discuss its legality, or that discuss its benefits and risk.</p> <p>PG&amp;E responded to Question 2 C as follows:</p>	<p>2/1/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>
<p>Oii_DR_LegalDivision_041-008</p>	<p>Follow-up to DR 15, Q 2 C</p> <p>To date, has PG&amp;E identified additional documents responsive to the request? If PG&amp;E has produced additional documents on a rolling basis, provide reference information for those documents. Upon receipt of the response to this follow-up data request, Legal Division will assume the response to DR 15, Q 2 C is complete.</p> <p>Data Request 15, Question 3 requested as follows:</p> <p>Has PG&amp;E ever located as-built drawings for the pipes that ruptured on September 9, 2010? If yes then produce them as part of PG&amp;E's data, and identify all final, signed, and dated construction drawings that incorporate all as-built.</p> <p>PG&amp;E's response attached one as-built drawing, but included the following statement:</p> <p>The attached as-built was not drawn to a level of detail that would depict the length and orientation of any of the pups.</p>	<p>1/25/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>

EXHIBIT E

<p>Oil_DR_LegalDivision_041-009</p>	<p>Follow-up to DR 15, Q 3</p> <p>Other than the attached as-built referenced above, which does not show detail of the length and orientation of the pups, has PG&amp;E located or identified any as-built or as-installed drawings or any other construction drawings, relating to the pipes that ruptured on September 9, 2010? If so, produce those drawings. Has PG&amp;E located or identified any microfilm containing any as-built or as-installed or other construction drawings relating to the pipes that ruptured September 9, 2010? If so, produce those drawings.</p> <p>Data Request 15, Question 4 requested as follows:</p> <p>If the answer to number 3 is "no" then provide PG&amp;E's assessment as to whether as-built drawings ever existed for the pipes that failed. Provide all facts and evidence that support PG&amp;E's assessment.</p> <p>PG&amp;E responded as follows:</p> <p>See response to CPUC 015-03</p>	<p>1/25/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>
<p>Oil_DR_LegalDivision_041-010</p>	<p>Follow-up to DR 15, Q 4</p> <p>The above response is unresponsive to the question because PG&amp;E states that the as-built produced in response to Question DR 15, Q 3, above, does not contain detail. Respond to the question whether detailed as-built drawings (or as-installed or other construction drawings) ever existed for the pipes that failed.</p> <p>If PG&amp;E does not believe any drawings ever existed for the pipes that ruptured on September 9, 2010, state an explanation for that belief. For example, is/was there a PG&amp;E policy to generate less documentation for projects that are/were performed by PG&amp;E at the company's expense?</p> <p>Data Request 15, Question 7 requested as follows:</p> <p>Beside the ruptured pipe, has PG&amp;E ever located as-built drawings for each and all pipes, valves, and other pipeline assets that make up line 132? If no, provide the location and length of each pipe that PG&amp;E has not located as-built drawings for.</p> <p>PG&amp;E responded as follows:</p> <p>PG&amp;E understands the term "as-built drawing" to refer broadly to any scaled drawing that represents the placement and configuration of gas pipelines as they exist in the field. This includes redlined design drawings, updated design drawings reflecting changes made in redline, plat sheets, and GIS generated maps. The accompanying DVD contains the current plat sheet maps covering all segments on Line 132 from Milpitas Terminal to Potrero Power Plant.</p>	<p>1/25/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>
<p>Oil_DR_LegalDivision_041-011</p>	<p>Follow-up to DR 15, Q 7</p> <p>Defining "as-built drawing" to include plat sheets and GIS generated maps does not state the intent of the question. Respond to this question using the term "as-built drawing" to refer to redlined design drawings and updated design drawings reflecting changes made in redline.</p> <p>Further, answer the following question:</p> <p>Is it correct to state that currently PG&amp;E can only identify as-built drawings for a particular pipeline segment by searching each job file associated with that segment?</p> <p>Data Request 15, Question 8 requested as follows:</p> <p>Provide a table that identifies the portions or segments of each transmission pipeline currently operating in PG&amp;E's system for which it has not located as-built drawings for each and every pipe or transmission line component in the transmission pipeline. In the table provide a pipeline by pipeline summary of the search PG&amp;E made for the as-built documents.</p> <p>PG&amp;E responded as follows:</p> <p>PG&amp;E understands the term "as-built drawing" to refer broadly to any scaled drawing that represents the placement and configuration of gas pipelines as they exist in the field. This includes redlined design drawings, updated design drawings reflecting changes made in redline, plat sheets, and GIS printouts.</p> <p>PG&amp;E is not currently in a position to create a list of segments for which it does not have as-built drawings (excluding GIS printouts). As described more fully in its March 15, 2011 filing, PG&amp;E is conducting a multi-year data gathering and MAOP validation project for its gas transmission network. See Report of Pacific Gas and Electric Company on Records and Maximum Allowable Operating Pressure Validation, R.11-02-</p>	<p>1/31/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>
<p>Oil_DR_LegalDivision_041-012</p>	<p>Follow-up to DR 15, Q 8</p> <p>Is it correct that the MAOP validation project will be completed at the end of 2013?</p>	<p>1/25/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>
<p>Oil_DR_LegalDivision_042-001</p>	<p>Refer to PG&amp;E's response to DR 30, Q. 31. There PG&amp;E references API 1104, as an industry standard pertaining to welding quality. With respect to the API, state whether PG&amp;E has ever met API standards to enhance gas transmission safety? In particular, please identify whether PG&amp;E has met particular API standards for record keeping. If yes, state or identify each standard PG&amp;E met or complied with, and the dates of compliance.</p>	<p>2/1/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>



EXHIBIT E

Oil_DR_LegalDivision_042-002	Refer to P2-1449. This document refers to a "MAOP Records Database". With respect to this data base: a. Identify and describe what the data base is. b. The period of its existence. c. Where and how it is kept. d. The kinds of records kept in it, and the dates of those records (does it contain data pertaining to MAOP that was in existence prior to the data base?). e. Identify the personnel (by function not name) that use the data base. f. Identify the number of records in the data base as of September 9, 2010.	1/25/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_042-003	If PG&E has not met certain API standards that pertain to gas transmission or record keeping, identify those standards and the dates they were in existence, and PG&E's reasons for non-compliance.	2/1/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_042-004	Does PG&E maintain now, or has it ever maintained, central data bases or data repositories, (excluding ECTS and Emeryville files), that permit PG&E to ascertain and access within a day the following information about transmission pipe in service: a. The location of all cast iron pipe. b. The location of all pipe installed more than 50 years ago. c. The location of all pipe joined with acetylene welds. d. The location of all pipe joined with mechanical couplings. e. The location of all pipe with a Joint Efficiency Factor of less than 1.0. f. The location of all Low Frequency ERW pipe. g. The location of all Flash Welded pipe. h. The location of all pipe by manufacturer. i. The location of all pipe that has been re-used or reconditioned. j. The date and location of all pipe manufactured. k. The grade, location, date discovered, and total number of all leaks discovered on a pipeline or segment. l. The location of HCA segments.	2/1/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_042-005	If PG&E has responded yes to any of the 3.a -3.l above, for each such response provide the name of the data base or repository.	2/1/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_042-006	Has PG&E ever had a program that paid bonuses, based on number identified leaks below PG&E specified targets or standards? If yes, state: a. The period when the program was in existence. b. The total yearly bonuses paid under the program to all employees, including management. c. Was PG&E's bonus program discontinued in about 2008, as reported in the SF Chronicle? If yes, explain why. d. Provide all memos and audits written before September 9, 2010 that discuss the effect of the program on leak accuracy data or on safety.	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_042-007	Please refer to PG&E's response to Legal Division Data Request 25, Question 2, Attachment 3. Refer to the following excerpts of this attachment shown in quotes and ensuing questions: a. "of the approximately 1,076 miles of pipe installed before June 30, 1970, 534 miles, or approximately 50%, had complete or partial pressure test records for the MAOP. 455 miles, or approximately 42%, had the MAOP established through records proving the historical operating pressure." Of the 42% of the approximately 1,076 miles of pipe installed before June 30, 1970 that had the MAOP established through records proving the historical operating pressure, how many of these miles of pipe were installed after 1954? b. "The 425 miles (of pipeline) . . . represent the pipeline miles installed before July 1, 1961 whose MAOP was established by the actual operating pressure experienced between June 1965 and July 1970." Of the 425 miles of pipeline installed before July 1961 whose MAOP was established by the actual operating pressure experienced between June 1965 and July 1970, how many of those pipeline miles were installed after 1954? c. "We have not yet located pressure test records for approximately 7% of the post July 1, 1970 portion of the 1805 miles of pipelines. We are continuing to collect and review our records." Does this statement mean that PG&E had not yet located pressure test records for approximately 126 miles of pipelines? (7% of 1805 miles). If not, for how many miles	2/1/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oil_DR_LegalDivision_042-008	Please refer to PG&E attachment P2-1449, which refers to an "MAOP Records Database". With respect to this database, please answer the following: a. What is it? b. How long has it existed? c. What types of records are in it? d. Who uses it? e. How many records were in it as of September 9, 2010?	1/25/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

OII_DR_LegalDivision_042-009	Please confirm that P2-309 is the latest version of A-36 and that PG&E is currently using this Standard Practice.	1/25/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_042-010	Provide all versions of Standard Practice 463-7 from 1956 to present.	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_042-011	Provide a copy of PG&E's current checklist for documents to be included in a master Job File or provide a reference to a document already provided.	2/1/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_042-012	In response to DR 1 Q 16, Supp 01-Atch 01, on page 11 of 38, PG&E identifies P2-378 as the 2011 Rev 7 of RMP-08. P2-378 is actually a Rev. 1, 2004. Please provide Rev 7, or an alternative reference to a document already provided.	2/1/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_042-013	In P3-21014, Baseline Assessment – Threats, 2007 Rev 3, Line 132 - Segment 180 is given a Manufacturing Threat status of "Yes". Please provide the underlying records that support this status.	1/31/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "Attachment to PG&E's Response to CPUC_042-Q13" dated January 31, 2012
OII_DR_LegalDivision_042-014	Provide the page of the Map Correction Log showing the most recent entries to the log.	Withdrawn by CPUC Legal Division	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	N/A
OII_DR_LegalDivision_043-001	Please explain why the records are missing from the recording.	2/6/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_043-002	If the records were deleted, please state the name of the person who edited the call record and the date and time the editing occurred.	2/6/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_043-003	If PG&E retained a copy of the original unedited record, or any part of it, please provide all such copies.	2/6/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_043-004	The records listed below are from the recording provided from the San Francisco Control Room for 9/9/2010. In the list below, the time and .wav file, and length of the call stated below is the call reflected in the record preceding the missing .wav file(s).  5:57:59 PM – 6079390000393874 16 seconds .wav file 6079390000393875 (Skips 875 and goes directly to 6079390000393876)  6:02:18 PM – 6079390000393876 52 seconds .wav files 6079390000393877-879 (skips 877 to 879 goes directly to 6079390000393880)  6:04:33 PM – 6079390000393882 1.17 min .wav file 6079390000393883 (Skips 883 goes directly to 6079390000393884)  6:11:56 PM – 6079390000393888 13 seconds .wav file 6079390000393889 (skips 889 and goes directly to 6079390000393890)  6:12:32 PM – 6079390000393892 7 seconds .wav file 6079390000393893 (skips 893 and goes directly to 6079390000393894)  6:15:12 PM – 6079390000393897 1.31 min .wav file 6079390000393898 (Skips 898 and goes directly to 6079390000393899)  6:20:13 PM – 6079390000393910 5 seconds .wav file 6079390000393911 (Skips 911 and goes directly to 6079390000393913)	2/6/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_043-005	Provide the name and job title of each PG&E employee or agent who has visually seen, between September 9, 2010 and November 10, 2010, any of the September 8-10, 2010 video tapes for either the Brentwood or San Francisco control room.	2/6/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_044-001	CP&SD understands that private plaintiffs re San Bruno are deposing an individual named Charles Tateosian, a former PG&E employee not retained as a PG&E consultant. With respect to his deposition, provide: A. A copy of the deposition transcript to date, and all exhibits attached. B. All memos or other documents that Tateosian brought to the deposition, regardless of whether attached to the deposition. C. All memos or other documents that Tateosian wrote while employed by PG&E and pertaining to gas pipeline safety, or to line 132 and other PG&E gas line integrity management, including but not limited to testing, maintenance, replacement, and prioritizing with other pipeline attention.	2/13/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; DVD "PG&E's Response to CPUC_044-Q01 Attachments" dated February 13, 2012
OII_DR_LegalDivision_044-002	Provide copies of the following documents: A. T.D. No. 2292 (1962) listed in the index response DR 19 Q. 3 Attach 36. B. TES Report # 126-81.2 (1981) listed in index response DR 19 Q. 3 Attach 34. C. 413.61.92 (8/12/11) L-132 listed in index response DR 19 Q 03. D. 413.61.76 (8/2/11) L-124A listed in index response DR 19 Q 03. E. 413.61.45 (11/4/96) listed in index response DR 19 Q. 03	2/1/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_044-003	Refer to PG&E's January 17, 2012 filing in I.11-11-009. Section 3.B. (pages 10-16) refers to GIS errors as part of the reason for Class change up. Those four errors are A. Application of the Cluster Rule B. Other (different structure used for clustering. C. Expansion – development. D. Well Defined Area E. Field verification.	2/1/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

Oii_DR_LegalDivision_045-001	Please provide all versions of PG&E's Standard Practice 460-1. If any versions of this Standard Practice are provided as attachments to any of PG&E's filings with the Commission, please identify the file title of all such attachments.	2/7/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_045-002	Please identify and provide PG&E's first internal PG&E policy that discussed class locations (here defined as any gas pipe in service with people living nearby).	2/7/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_045-003	If the first internal PG&E policy that discussed class locations is different from Standard Practice 460-1, please provide all versions of the policy.	2/7/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_045-004	Please identify and provide any and all PG&E internal policies that required pipeline testing in the event of a re-classification. If such policies are provided as attachments to any of PG&E's filings with the Commission, please identify the file title of all such attachments.	2/7/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_045-005	Please identify and provide any and all PG&E internal policies that required recordkeeping of pipeline testing results. If such policies are provided as attachments to any of PG&E's filings with the Commission, please identify the file title of all such attachments.	2/7/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_045-006	Did PG&E know when it installed L132 Segment 180 that a housing development would be developed in proximity to the pipe?	2/7/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_045-007	Please provide the classification of L132 Segment 180 from 1948 through to today in the following manner.  a. The classification of the segment. b. The dates that segment had that classification. c. The classification according to each of the following rules. Please also provide the applicable rule in each case.  • ASME standards • Code of Federal Regulations • PG&E internal policies	2/7/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_045-008	Please produce the Gas Test information for the 1961 gas pressure test for Line 132 Segment 180 as shown in your current (9/30/2011) GIS Pipeline Survey Sheet provided in response to DR 7 Q 12 attachment 83.	2/7/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_045-009	Please provide PG&E Company Gas Emergency Plan Appendix B-1, Communication Flow Diagram.	2/7/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_046-001	If the documents P2-3 and P2-230 are intended to be the same guidance, please identify which version is final.	2/15/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_046-002	Is the final version of these documents PG&E's most recent policies that prescribe how long different types of documents shall be kept?	2/15/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_046-003	If not, what is PG&E's most recent set of such policies?	2/15/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_046-004	Please provide an index in the form of a spreadsheet that shows the chronological order of all of PG&E's policies for keeping the complete variety of different kinds of records. The spreadsheet should be structured as follows: a. The rows should provide the requirements policies. -As-built records of facilities. (See P2-3 Rows 4, 83, and 242, and 261). -Drawings of Facilities. (See P2-3 Row 242). -Chemical Analysis. (See P2-3 Row 6). -Metallurgical Failure Analysis (See P2-3 Row 6). -Leak Survey Inspection & Report Form A (See P2-3 Rows 14 and 169). -Leak Survey Maps (See P2-3 Row 15). -Leak Survey Logs (See P2-3 Rows 16 and 210). -Gas Service Record (See P2-3 Row 11). -Engineering Reports (See P2-3 Row 43). -Engineering Records (See P2-3 Row 81). -Engineering Records Drawings (See P2-3 Row 82). -Emergency Shutdown Procedures (See P2-3 Row 121). -Report-Cathodic Protection (Pipeline) (See P2-3 Rows 163 and 182). -Anode Record (See P2-3 Row 166). -Leak or Test Failure Report (See P2-3 Row 168). -Corrosion Records (See P2-3 Row 186). -Inspection Records-Leak Repair or Pipe Exposure (See P2-3 Row 200). -Leak and/or Shut Down Inspection Report (See P2-3 Rows 201 and 226). -Line Patrol Reports (See P2-3 Rows 203 and 227). -Report-Inspection (See P2-3 Row 225). -Valve Maintenance Records (See P2-3 Row 236). -Asset History Records (See P2-3 Row 243). -Transmission Line Inspections, including Patrol maintenance reports, trouble reports,	2/15/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_047-001	PG&E did not provide records in response to DR 8, Q 7, but subsequently provided a limited response to Data Request 37, Question 1. Refer to PG&E document P3-10034, Bates number GTR0106035 et seq. The document is titled "Control Room Clearance Procedure" and is dated August 2009. The following questions refer to the procedures stated in document P3-10034: 1. Was this control room clearance procedure in effect on September 9 and 10, 2010?	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

## EXHIBIT E

OII_DR_LegalDivision_047-002	PG&E did not provide records in response to DR 8, Q 7, but subsequently provided a limited response to Data Request 37, Question 1. Refer to PG&E document P3-10034, Bates number GTR0106035 et seq. The document is titled "Control Room Clearance Procedure" and is dated August 2009. The following questions refer to the procedures stated in document P3-10034: 2. If this procedure was not in effect on September 9 and 10, 2010, provide a copy of the procedure that superseded it, along with all transmittal, explanatory and illustrative records or material related to the superseding procedure.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-003	The following questions assume the procedures stated in document number P3-10034, or similar procedures, were in effect in September 2010. If a revised or updated procedure had superseded document P3-10034 as of September 9 and/or 10, 2010, answer the following questions based on that new procedure and state with related records whether any response would have been different under the document P3-10034 procedures. 3. Provide a list of all applications for clearances for work to be done at the Milpitas Station that were in the Clearance SharePoint site at any time during September 2010.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-004	The following questions assume the procedures stated in document number P3-10034, or similar procedures, were in effect in September 2010. If a revised or updated procedure had superseded document P3-10034 as of September 9 and/or 10, 2010, answer the following questions based on that new procedure and state with related records whether any response would have been different under the document P3-10034 procedures. 4. Provide copies of the above applications that were in the Clearance SharePoint site on September 9 and/or September 10, 2010.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Attachments to CPUC_047 Attachments" dated February 16, 2012
OII_DR_LegalDivision_047-005	The following questions assume the procedures stated in document number P3-10034, or similar procedures, were in effect in September 2010. If a revised or updated procedure had superseded document P3-10034 as of September 9 and/or 10, 2010, answer the following questions based on that new procedure and state with related records whether any response would have been different under the document P3-10034 procedures. 5. Provide a list of all approved complete clearance packages for work planned or conducted at the Milpitas Station, that had been uploaded into the Clearance SharePoint site at any time during September 2010 pursuant to paragraph 2, A, 4 of document P3-10034.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-006	The following questions assume the procedures stated in document number P3-10034, or similar procedures, were in effect in September 2010. If a revised or updated procedure had superseded document P3-10034 as of September 9 and/or 10, 2010, answer the following questions based on that new procedure and state with related records whether any response would have been different under the document P3-10034 procedures. 6. Provide a printed copy of the Clearance SharePoint site showing all approved complete clearance packages, including operating maps and operating diagrams, for work planned or conducted at the Milpitas Station in the month of September 2010. Refer to paragraph 2.C, first bullet point of document P3-10034.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to CPUC_047 Attachments" dated February 16, 2012
OII_DR_LegalDivision_047-007	Document P3-10034, paragraph 2.C, bullet point 9 requires the Brentwood Gas Control Center to: "Print a copy of the completed clearance and file it for quality assurance (QA) purposes." State the current location of any copies of completed clearances for work conducted at the Milpitas Station in September 2010. If reference to "BGCC control room" in this procedure should now refer to the SF control room or other location, please answer the questions and state the applicable location.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-008	Provide a list of all work at the Milpitas Station in September 2010 for which a printed copy of the completed clearance should have been filed for QA purposes, pursuant to the procedure quoted in question 7, above.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-009	Provide copies of all printed material related to completed clearances for work conducted at the Milpitas Station in September 2010 that were filed for QA purposes pursuant to document P3-10034, paragraph 2.C, bullet point 9.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to CPUC_047 Attachments" dated February 16, 2012
OII_DR_LegalDivision_047-010	For any September 2010 work that required a printed file copy of the completed clearance, pursuant to document P3-10034, paragraph 2.C, bullet point 9, but for which no such file exists, state every reason that no file exists.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

OII_DR_LegalDivision_047-011	Provide every electronic copy that was retained on the Clearance SharePoint site for audit purposes for work conducted at the Milpitas Station in September 2010, pursuant to document P3-10034, paragraph 3, I.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to CPUC_047 Attachments" dated February 16, 2012
OII_DR_LegalDivision_047-012	For every clearance for work proposed or conducted at the Milpitas Station in September 2010, state the current location of the folder containing "the entire clearance package, including operating map(s), operating diagram(s), and other supporting documents referenced in the clearance" that was "placed in a folder labeled with the clearance number," as required by document P3-10034, paragraph 3, A.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-013	For every clearance for work proposed or conducted at the Milpitas Station in September 2010, state the current location of the folder containing the printed copy of "the entire clearance package," labeled with the clearance number as required by document P3-10034, paragraph 4, A. Provide copies of any clearance files in the BGCC control room, pursuant to document P3-10034, paragraph 3, I.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-014	Were any clearances initiated in Clearance SharePoint during the 48 hours of September 9 and 10, 2010? a. If yes, provide copies of all such clearances along with all related electronic and hard copy records. b. If no, explain why no clearances were initiated.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to CPUC_047 Attachments" dated February 16, 2012
OII_DR_LegalDivision_047-015	For every clearance for work proposed or conducted (regardless of when the clearance was initiated) at the Milpitas Station in September 2010, state whether an electronic copy was retained on the Clearance SharePoint site for audit purposes as required by document P3-10034, paragraph 3, I.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-016	Provide a list of every clearance regarding work at the Milpitas Station in September 2010 that was subsequently the subject of an audit as described in "Gas Clearance Quality Assurance Process," which is included in document P3-10034 as "Attachment 2."	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-017	Provide each audit and audit summary and, if created, the action plan for all clearances involving work conducted in September 2010, as required by P-3-10034 document entitled, "Completion of the Quality Assurance Review", Attachment 2, Page 6 of 7.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-018	Provide every "final quality assurance report with documentation of the completion" and every "final distribution of the quality assurance process summary" that was prepared for clearances for work planned or conducted at the Milpitas Station during September 2010. (Refer to page 7 of 7 in Attachment 2.)	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-019	P3-10034, "Quality Assurance Performance Review", Attachment 2, page 2 of 7, requires that the quality assurance process schedules should identify MS Outlook calendar information that pertains to each clearance. Please provide all such calendar information pertaining to each clearance for work planned or conducted at Milpitas in September, 2010.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-020	Provide a screen shot of the Master Clearance Board (any day when there are active clearances that can be seen on the Board), as described on P3-10034, "Control Room Clearance Procedure," Page 1.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to CPUC_047 Attachments" dated February 16, 2012
OII_DR_LegalDivision_047-021	Provide a copy of the complete Clearance Package archived for Job Order No. 30772051, Replace UPS System, Milpitas Terminal, completed during October 2011.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-022	P3-10034, "Quality Assurance Performance Review", Page 5 of 7 requires a "Review of Active Clearances". Provide all such reviews of clearances for work planned or conducted at Milpitas in September, 2010.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-023	Provide all information, explanations, data, documents, and records related to Clearance SharePoint that PG&E provided to the NTSB in its investigation of the San Bruno explosion.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to CPUC_047 Attachments" dated February 16, 2012
OII_DR_LegalDivision_047-024	When responses to the above questions are complete provide a statement confirming that PG&E has produced all Clearance SharePoint records and information that could reasonably be considered responsive to the above questions.	2/17/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-025	State the date when PG&E began using the San Francisco control room as the main control room and using Brentwood as the back up.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-026	Have any of the records requested in the questions articulated above been deleted from SharePoint or modified after they were input into SharePoint in final form.	2/17/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_047-027	If the answer to either of the above questions is yes, identify those records and explain the circumstances and reasons for the deletions or modifications.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_048-001	For each of the 132,000+ job folders in PG&E's Emeryville database, please provide the number that appears on the folder, the Job Number, the Box Number, the Source location, and the date on the folder if it appears on the folder.	2/15/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to CPUC_048-Q01 Attachments" dated February 15, 2012
OII_DR_LegalDivision_049-001	Please provide records kept by PG&E in accordance with SP 463-2 and also provide the letter and form referred to in P2-1408.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_049-002	Please provide a copy of Standard Practice 113-4, referenced in S.P. 520.6-11, Section 9, 4/15/64.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_049-003	Does PG&E have in its possession or know of the location of any of the 6 bound copies of Operating maps and details for the Department of Gas Operations (1969) itemized in the letter provided as P2-1461? If yes, where are they currently located?	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

Oii_DR_LegalDivision_049-004	Provide a copy of PG&E guidance that discusses how to use SharePoint for leak surveys.	2/15/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_049-005	What happened to the microfilm reels (16 mm film) referenced in the December 29, 1965 letter P2-1463, p. 2? The letter specifies that the microfilm reels contained Engineering Drawings and Record prints, which cover the additions to the Card Index since August 15, 1962 and that the reels were shipped to Caribou for protective storage.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_049-006	What happened to the 35 mm microfilm cartridges that contained North Bay Division Plat Sheets for Gas Department underground distribution and transmission lines and facilities referenced in the March 10, 1972 letter, P2-1463, p. 5 and 7? The letter specifies that these films were to be stored in the San Joaquin Vital Storage Area. This letter indicates new film would be sent annually. If PG&E discontinued this practice, when was it discontinued? If PG&E disposed of these films, please provide a copy of the letter or policy authorizing the disposal. If PG&E has these cartridges, where are they now?	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_049-007	Please provide the list of records that were destroyed in 1982 as a result of flooding. The list is referenced as an attachment to the letter provided as P2-1471.	2/15/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_049-008	Please provide a copy of, or reference to a file already provided, PG&E's "Risk Spreadsheet Process," which is filed in the Risk Management Files (File 7.1) as stated in P3-20702, Section 1.4.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_050-001	Data Request 45 Question 7 asked: "Please provide the classification of L132 Segment 180 from 1948 through to today in the following manner. a. The classification of the segment. b. The dates that segment had that classification. c. The classification according to each of the following rules. Please also provide the applicable rule in each case. • ASME standards • Code of Federal Regulations • PG&E internal policies" CPSD follows up with the following question. CPSD emphasizes that the above question asks about the classification of the pipeline beginning in 1948. To clarify, PG&E's answer to Question 7, parts A, B, and C should also apply to the section of L 132 installed in 1948, which was later replaced by the 1956 relocation project.	2/15/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_051-001	Data Request 16, Question 1 through 8:  These questions asked for responses and records regarding policies and practices relating to the tracking or reuse of salvaged or reused pipe.  Follow-up to DR 16, Q 1 through 8:  State whether PG&E has identified or provided any additional records that would be responsive to these questions. If there are additional records, please produce them or provide a reference. Otherwise, please state there are no additional records. Upon receipt of the response to this follow-up data request, Legal Division will assume the responses to DR 16, Q 1 - 8 are complete.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_051-002	Data Request 16, Question 8 requested as follows:  In practice, and before September 10, 2010, has PG&E tracked transmission pipe that had been either salvaged or reused before September 10, 2010?  PG&E's response included the following statement:  PG&E has not identified any centralized process of tracking such pipe.  Follow-up to DR 16, Q 1 through 8:  Please state whether the above response is correct to date. If PG&E has identified any further records or information responsive to this question explain and provide all relevant records or provide a reference. Otherwise, please state the above response is correct. Upon receipt of the response to this follow-up data request, Legal Division/CPSD will assume the response to DR 16, Q 8 is complete.	2/15/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

<p>Oii_DR_LegalDivision_051-003</p>	<p>Data Request 16, Question 13 requested as follows:</p> <p>Has PG&amp;E ever re-used transmission pipe that it has previously recorded as junked, salvaged, or identified for disposal in any other way? If so provide a table showing the following:</p> <ul style="list-style-type: none"> <li>a. Identification of each such junked, salvaged, or disposal identified pipe.</li> <li>b. The date of each such pipe's manufacture.</li> <li>c. The type of pipe and welds, the metal (e.g. X42).</li> <li>d. The pipeline number and segment or other source of the pipe in previous usage.</li> <li>e. The number of years of usage.</li> <li>f. The reasons why each pipe was removed from service.</li> <li>g. The place where each such pipe was re-used in PG&amp;E service.</li> <li>h. The date on which each such pipe re-entered service.</li> <li>i. The reasons why each pipe was used again in service.</li> </ul> <p>PG&amp;E's response included the following statement:</p> <p>PG&amp;E will supplement this data response with information on the instances of use of</p>	<p>2/15/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>
<p>Oii_DR_LegalDivision_051-004</p>	<p>Data Request 17, Question 5 requested as follows:</p> <p>Have any types of documents in a Job Package not ultimately ended up in the final Job File?</p> <p>PG&amp;E's response included the following statement:</p> <p>As a general matter, the answer is "no." The job package is included in its entirety within the master Job File. (PG&amp;E included a footnote detailing the contents of the job package.)</p> <p>Data Request 17, Question 5 (Supp.) requested as follows:</p> <p>Legal Division wishes to get a written definition of PG&amp;E of the term "Master Job Files."</p> <p>Follow-up to DR 17, Q 5:</p> <p>When PG&amp;E used the phrase "master Job File" in the initial response to DR 17, Q 5, what file was PG&amp;E referring to? Is there another term that could be substituted for "master" in the original DR 17, Q 5 response? In light of the original response to DR 17, Q 5, what is included in the file referred to as the "master Job File" other than the job package? Please explain in detail how a PG&amp;E engineer can identify which file contains original documents as opposed to other job files or folders "that may contain duplicate copies" of records.</p> <p>In light of PG&amp;E's statement that the term "master" has no fixed meaning in PG&amp;E's current gas engineering or construction practices, state whether there is/are another</p>	<p>2/17/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>
<p>Oii_DR_LegalDivision_051-005</p>	<p>Data Request 17, Question 7 requested as follows:</p> <p>If the answer to question 5 is yes, please also identify the final disposition/storage place or places of those documents. If there is more than one place of storage or disposition, please identify all such places for each type of document.</p> <p>Follow-up to DR 17, Q 7:</p> <p>Were the Walnut Creek engineering library job files (not the IM Library) considered to be the official files? Were the Walnut Creek files checked out by staff when needed, subject to document control procedures? Was there a word used to designate the Walnut Creek files, such as "official" or "master?" Is there currently a way to identify which records previously were filed in the file library in Walnut Creek and subject to document control procedures? Would those files be considered "master" files as the term is used in responses to DR 17 Q. 5 and Q. 7?</p>	<p>2/15/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>

EXHIBIT E

<p>Oil_DR_LegalDivision_051-006</p>	<p>Data Request 20, Question 7 requested as follows:</p> <p>Provide the highest pressure achieved during the hydrotest along the pipe with the leaks/ruptures referred to above.</p> <p>PG&amp;E'S response included the following:</p> <p>Notwithstanding our view that this question lies outside the scope of this proceeding, PG&amp;E responds as follows: Please see</p> <p>GasPipelineSafetyOIR_DR_DRA_017-Q05 and GasPipelineSafetyOIR_DR_DRA_017-Q05Atch01 (a copy of which is attached for your convenience).</p> <p>Follow-up regarding response to DR 20, Question 7:</p> <p>Please provide the attachment referenced in the above response.</p>	<p>2/15/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed; CD "PG&amp;E's Response to CPUC_051-Q06-Q08 Attachments" dated February 15, 2012</p>
<p>Oil_DR_LegalDivision_051-007</p>	<p>Data Request 20, Question 12 requested as follows:</p> <p>How does PG&amp;E plan to repair and retest the pipe that failed?</p> <p>PG&amp;E's response to DR 20, Q 12 and Q 13 included the following:</p> <p>Notwithstanding our view that this question lies outside the scope of this proceeding, PG&amp;E responds as follows: Please see PG&amp;E's response to</p> <p>GasPipelineSafetyOIR_DR_DRA_017-Q14, GasPipelineSafetyOIR_DR_DRA_017-Q15, GasPipelineSafetyOIR_DR_DRA_021-Q13, and GasPipelineSafetyOIR_DR_DRA_021-Q14 (copies of which are attached for your convenience).</p> <p>Follow-up regarding response to DR 20, Questions 12 and 13:</p> <p>Please provide the attachments referenced in the responses noted above.</p>	<p>2/15/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed; CD "PG&amp;E's Response to CPUC_051-Q06-Q08 Attachments" dated February 15, 2012</p>
<p>Oil_DR_LegalDivision_051-008</p>	<p>Data Request 20, Question 15 requested as follows:</p> <p>Please provide a copy of the failure analysis report relevant to these leaks/ruptures.</p> <p>PG&amp;E's response to DR 20, Q 15 included the following:</p> <p>Notwithstanding our view that this question lies outside the scope of this proceeding, PG&amp;E responds as follows: Please confer with Safety Branch to ascertain if it has requested the failure analysis report and, if so, if Safety Branch can share a copy with Legal Division. Please also see PG&amp;E's response to</p> <p>GasPipelineSafetyOIR_DR_DRA_021-Q04, SanBrunoGT-LineRuptureInvestigation_DR_CPUC_239-Q01, and SanBrunoGT-LineRuptureInvestigation_DR_CPUC_239-Q01Atch01-Atch08.</p> <p>Follow-up regarding response to DR 20, Question 15:</p> <p>Please provide the referenced attachment to DRA_21-Q04.</p> <p>If PG&amp;E prepared reports of failure analyses for the leaks/ruptures addressed in DR 20, Q 15, please produce them. If PG&amp;E did not do a failure analysis for any of these events, please state which were subject to a failure analysis and which were not. If any events were subject to a failure analysis, but PG&amp;E does not have a record of the analysis, in each instance, provide proof that there was an analysis and explain why there is no record.</p>	<p>2/15/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed; CD "PG&amp;E's Response to CPUC_051-Q06-Q08 Attachments" dated February 15, 2012</p>
<p>Oil_DR_LegalDivision_051-009</p>	<p>Data Request 20, Question 16 requested as follows:</p> <p>For each point that leaked/ruptured, was the pipe re-used, re-conditioned, or new? Please provide all records that show PG&amp;E's answer to this question.</p> <p>Follow up regarding DR 20 Q 16:</p> <p>In light of the statement that the job was "not likely" to utilize, reconditioned pipe, state whether there are any records that suggest a contrary conclusion.</p> <p>Regarding Attachment 6 to this response, please explain its relevance to DR 20 Q 16.</p>	<p>2/15/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>



EXHIBIT E

<p>Oil_DR_LegalDivision_051-010</p>	<p>Data Request 21, Question 1 requested as follows:</p> <p>PG&amp;E's response to DR 21, Q 1 included the following:</p> <p>PG&amp;E's accounting department maintains a comprehensive list of all work orders since May 1996. Prior to May 1996, and so far as PG&amp;E is aware, no department at PG&amp;E maintained a comprehensive list of all work orders. Some records which were prior to May 1996 were stored on microfiche. Some of the microfiche are stored at the Bayshore storage facility in Brisbane and some stored at 77 Beale St. on the 11th floor. The information on the microfiche includes reports that summarize a list of each active order for the given month and Job Transaction Recap reports that contain a separate one-page cost summary for each active order for the given month. The records at the Bayshore facility date from 1975 to 1986 and the records located at 77 Beale St. date from 1989 to 1995.</p> <p>Follow-up to Data Request 21, Question 1</p> <p>Is it correct to conclude from this answer that PG&amp;E has lists of work orders dating back to 1975 on microfiche in the Bayshore storage facility? If not, explain why not. Does PG&amp;E have all of its work orders? Please state any intervals for which PG&amp;E does not have work orders. For work orders that PG&amp;E has, please state where they are stored.</p>	<p>2/16/2012 Supplemental Response Completed on 3/12/12</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>
<p>Oil_DR_LegalDivision_051-011</p>	<p>Data Request 21, Question 2 requested as follows:</p> <p>Please provide a list of work orders for all jobs on Line 132, segment 180.</p> <p>Follow-up to Data Request 21, Question 2</p> <p>Please respond to the original question: Please provide a list of work orders for all jobs on Line 132, segment 180. If PG&amp;E intends to respond that it has identified only one work order related to Line 132 (#4017) and that it has not identified any others, please state this directly.</p>	<p>2/15/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>
<p>Oil_DR_LegalDivision_051-012</p>	<p>Data Request 21, Question 9 requested as follows:</p> <p>Please provide a digital version (or scanned copy, if a digital version is not available) of the index to all PG&amp;E gas-related Aperture cards (both sets).</p> <p>PG&amp;E's response to DR 21, Q 9 included the following:</p> <p>PG&amp;E's gas transmission organization maintains multiple (more than two) sets of gas-related aperture cards. In this context, the limiting term "both sets" appears to refer to (1) a set of aperture cards maintained at the Records Center in Walnut Creek and (2) a set of aperture stored until recently at PG&amp;E's Bayshore records storage facility. GasTransmissionSystemRecordsOil_DR_CPUC_021-Q09Atch01 is an index for the Bayshore set. The Company intends to provide an index to the Walnut Creek set on or before January 20, 2012.</p> <p>Follow up to Data Request 21, Question 9:</p> <p>PG&amp;E has not produced the index to the Walnut Creek set of aperture cards. Please produce these records.</p>	<p>2/15/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>
<p>Oil_DR_LegalDivision_051-013</p>	<p>Data Request 21, Question 10 requested as follows:</p> <p>Please review both sets of Aperture cards and provide a digital version if possible (or scanned version if not) of any aperture cards that provide any information regarding Line 132.</p> <p>PG&amp;E's response included the following statement:</p> <p>The Company is currently reviewing the Walnut Creek set. If that set includes any additional aperture cards related to Line 132 that depict information different from, or in addition to, the information contained in the attached images, the Company will provide those images as well.</p> <p>Follow up to Data Request 21 Question 10:</p> <p>Has PG&amp;E identified additional aperture cards related to Line 132 that depict information different from or in addition to the information contained in the pages referenced in the above response? If it has, provide those cards. If it has not, provide a statement that it has not. Upon receipt of the response to this follow-up data request, Legal Division/CPSD will assume the response to DR 20, Q 2 is complete.</p>	<p>2/15/2012</p>	<p>Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen</p>	<p>Emailed</p>

EXHIBIT E

Oii_DR_LegalDivision_051-014	Data Request 21, Question 11 requested the following:  Please provide the names and qualifications of each of the people doing the document typing at the Celery office.  PG&E's response included the following:  PG&E provided general statements about credentials, skills, and project training. PG&E also included a list of typists. The response did not provide the qualifications of each person doing the typing, as requested. Please provide the requested information.	2/15/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_052-001	In PG&E's response to LD data request 22, Q33, CPUC_100 is referenced (CPSD DR). A couple of the DR 100 responses were included and then there is a footnote that says all other CPSD data responses referenced in these responses are contained on the hard drive provided to LD on Dec 13, 2011. We have checked the hard drive and there are no files included for CPUC 100. It is also missing from the index provided as Response to LD DR 29 Q5 Atch 01. In fact, we also noticed that a number of DR numbers are missing from the HD assuming the responses were numbered sequentially. For instance, 1, 2, 5, 6, 8, 9, 12, 14, 16, 17, 20, 22,24-26, 30, 32-39, 40,47-49, 52, 54, 56-58, 64-69, 74, 79-80, 95, 98, 100-101 etc are missing (i.e. various numbers are missing through the entire set provided). Please provide the entire response to CPUC_100 as soon as possible. Please provide a complete index and set of files provided to CPSD per LD DR 29 Q5.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed; CD "PG&E's Response to CPUC_052 Attachments" dated February 16, 2012
Oii_DR_LegalDivision_053-001	No question #1	N/A	N/A	N/A
Oii_DR_LegalDivision_053-002	For all of these questions, please refer to PG&E Attachment entitled P2-2. Please also refer to the column of the document entitled "Retention Justification". For all requests to identify regulations, please do so using proper bluebook legal citation format.  Beginning on Page 2, please explain the following: a. Are the references to "FERC" followed by a number or number and letter sequence references to regulations? b. If so, please identify the regulations that each of these symbols represent. c. If not, please explain what these terms mean?	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_053-003	For all of these questions, please refer to PG&E Attachment entitled P2-2. Please also refer to the column of the document entitled "Retention Justification". For all requests to identify regulations, please do so using proper bluebook legal citation format.  On page 36, please refer to the term CES. a. Does the term CES refer to a regulation? b. If so, please identify which regulation CES refers to? c. If not, please explain what this term means?	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_053-004	For all of these questions, please refer to PG&E Attachment entitled P2-2. Please also refer to the column of the document entitled "Retention Justification". For all requests to identify regulations, please do so using proper bluebook legal citation format.  On pages 37 and 38, please refer to the terms S.P. 412.1, S.P.463-7, S.P. 463-6, S.P. 460.2-1. a. Please provide these standard practices? b. Are these standard practices retention requirements based upon a regulations? c. If so, please identify them. d. If not, please explain their basis.	2/16/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_054-001	The Legal Division/CPSD hereby request that PG&E produce as soon as possible the following clarifications, regarding Attachment 01 to Data Response 48, Question 01, as well as follow-up information requested, if available. Is the source location identified as "Walnut Creek" identical to the source location identified as "Wiget", or are these separate storage locations?	2/23/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

OII_DR_LegalDivision_054-002	The Legal Division/CPSD hereby request that PG&E produce as soon as possible the following clarifications, regarding Attachment 01 to Data Response 48, Question 01, as well as follow-up information requested, if available. Referring to the column entitled, "date", please clarify whether this is referring to the date the job folder was first opened, the date the job folder was closed, the date the last document was inserted into the job folder, or something else? If the date refers to something else, please specify.	2/23/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_054-003	The Legal Division/CPSD hereby request that PG&E produce as soon as possible the following clarifications, regarding Attachment 01 to Data Response 48, Question 01, as well as follow-up information requested, if available. Information in Attachment 01 was split into three parts. Parts 2 and 3 lacked a field identifying dates. Does PG&E have the missing dates for the approximately 75,000 folders in parts 2 and 3? If so, can PG&E provide a column complete with those missing dates?	2/23/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_055-001	With respect to the discontinuation of PG&E's pipeline files, provide the following information: A. The identity and title of the person who authorized their discontinuation, and the identity and title of the person who authorized their destruction or discard. B. The dates upon which this occurred C. Provide all documents which show each of these authorizations.	2/28/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_055-002	With respect to SMYS, provide the following information. A. Summarize how, as of September 9, 2010 PG&E kept records demonstrating compliance with CFR SMYS requirements. Identify in your answer the data base or data repository or system that contains the records.	2/28/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_056-001	Refer to Exh. 13 of the Tateosian deposition. The exhibit refers to a Bechtel prepared report referred to as "Review of the Transmission Priority Analysis (1994 Revision) for the Gas Pipeline Replacement & rehabilitation Program was issued. Provide a copy of that revision and each other revision of the document, including the first in the series and all subsequent revisions to the first.	2/24/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_057-001	Has PG&E ever classified a pipeline segment as high risk for a baseline assessment or a subsequent reassessment because the pipeline went above the maximum operating pressure experienced during the preceding five years?	3/2/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_057-002	Does PG&E have any document that gives authorization to exceed MAOP?	3/2/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_057-003	Does any PG&E document authorize setting operating valves, including monitor valves at pressures greater than MAOP?	3/2/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_057-004	Please identify the pipelines and segments that have operated above the maximum operating pressure experienced during the preceding five years.	3/2/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
OII_DR_LegalDivision_057-005	Identify the dates when the lines identified in response to question 4 exceeded the maximum operating pressure experienced during the preceding five years.	3/2/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed

EXHIBIT E

Oii_DR_LegalDivision_057-006	Please provide an example of one top 100 list for the highest risk assessment segments that come out of PG&E's integrity management model, with the year identified?	3/2/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_058-001	Please refer to PG&E attachment P2-195. In several instances, the retention period given for a particular record type is listed as "T". See for example, PG&E's reference to Power Plant Manuals on Page 17. What does the term "T" mean?	3/1/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed
Oii_DR_LegalDivision_059-001	Follow up to Data Request 28, Question 1 CPSD would like an update of the index received February 1, 2011 in response to Data Request 28, Question 1, to reflect all data requests made to date. Please be sure to include all of the information requested in Data Request 28, Question 1 (as shown above), provided in the same fashion as was provided in response to Data Request 28. Redaction of files CPSD requests to have copies of all data responses and their respective attachments that PG&E provided the Legal Division/CPSD in this proceeding with all of PG&E's proposed redactions	4/20/2012	Bob Cagen, Margaret Felts, Catherine Johnson, Darryl Gruen	Emailed