

# **EXHIBIT H**

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Transmission System Records OII**  
**Investigation 11-02-016**  
**Data Response**

PG&E Data Request No.:	CPUC_007-07		
PG&E File Name:	GasTransmissionSystemRecordsOII_DR_CPUC_007-Q07		
Request Date:	September 20, 2011	Requester DR No.:	007
Date Sent:	October 19, 2011	Requesting Party:	California Public Utilities Commission (CPUC)
PG&E Witness:		Requester:	Bob Cagen

**QUESTION 7**

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.)

**ANSWER 7**

This question seeks information and records covering a 63 year time frame. Though it is focused on Line 132, Segment 180, the question touches most aspects of the gas organization's functions (design, construction, operation and maintenance). The request for "all records" relating to Line 132, Segment 180 from 1948 to the present is particularly broad and difficult to define. PG&E's response below and attached, which includes responsive documents or provides references to documents already produced, should be evaluated in light of these considerations.

**Subparts a. & b.**

There are numerous PG&E organizations involved in the "design, construction, operation and maintenance" of Line 132, Segment 180 over the past 55 years (Segment 180 was installed in 1956). Moreover, over the past 55 years, PG&E's organizational structure has gone through numerous revisions and changes, at all levels. For

example, organizational restructuring has occurred multiple times at the division, district, management and line employee levels. Similarly, reorganizations and reclassifications have over time shifted organizational responsibilities, as well as specific job classifications. Such changes have affected each of the numerous working groups and personnel whose work involves the design, construction, operation or maintenance of Line 132, Segment 180.

Given the breadth of the question, the numerous and varied groups and personnel involved, and the volume of organizational changes that have affected those groups over the past 55 years, it is impractical for PG&E to recount all of the organizations which have directly or indirectly been involved in the design, construction, operation and maintenance of Line 132, Segment 180.

To attempt to be as responsive as is reasonably feasible, PG&E refers below to several prior PG&E data responses, submitted in the Commission and NTSB proceedings related to the San Bruno accident, which contain information relevant to PG&E's current and historical organizational structure. Although personnel changes have occurred since some of these data responses were prepared and submitted, PG&E can provide current organizational charts with respect to any groups or personnel the Commission requests. Similarly, upon request PG&E will endeavor to provide historical information regarding specific working groups and/or personnel in which the Commission is interested for particular time periods.

The following data responses contain information regarding PG&E's organizational structure related to gas operations, maintenance, construction and/or engineering.

SanBrunoGT-LineRuptureInvestigation\_DR\_CPUC\_085-Q01

SanBrunoGT-LineRuptureInvestigation\_DR\_CPUC\_085-Q02

SanBrunoGT-LineRuptureInvestigation\_DR\_CPUC\_085-Q03

SanBrunoGT-LineRuptureInvestigation\_DR\_CPUC\_193-Q01

SanBrunoGT-LineRuptureInvestigation\_DR\_IRP\_006-Q01 ('IRP' refers to the Independent Review Panel)

SanBrunoGT-LineRuptureInvestigation\_DR\_IRP\_007-Q02

SanBrunoGT-LineRuptureInvestigation\_DR\_IRP\_007-Q06

SanBrunoGT-LineRuptureInvestigation\_DR\_IRP\_008-Q03.pdf

SanBrunoGT-LineRuptureInvestigation\_DR\_IRP\_012-Q03

SanBrunoGT-LineRuptureInvestigation\_DR\_OC\_001-Q031 ('OC' refers to Overland Consulting)

SanBrunoGT-LineRuptureInvestigation\_DR\_OC\_001-Q032

NTSB\_022-001

Subpart c.

Consistent with the language in the first part of CPUC\_007-07, and subparts a. and b., PG&E responds to subpart c. with respect to Line 132, Segment 180 (as opposed to Line 132 *and* Segment 180).

PG&E refers below to records related to Line 132, Segment 180 provided to the Commission in data responses and document productions in the OII proceeding, as well as to records PG&E provided to the NTSB during its investigation (records that are on the NTSB public docket, and records that are not on the NTSB docket but were provided to the Commission's representative as an NTSB party participant).<sup>1</sup> In addition, PG&E is currently in the process of producing additional records to the Commission that relate to Line 132, Segment 180, in connection with an oral request made at the site visit at PG&E's Walnut Creek facility on October 5, 2011. Finally, other CPUC and NTSB data responses, and documents submitted with PG&E's OII filings, not specifically identified below, contain records and information related generally to Line 132, and Segment 180 (e.g., NTSB and CPUC interview transcripts, narrative responses to data requests, records that apply to Line 132 generally).

OII Chapters and Accompanying Documents

Chapter 3

- (P1-1 ; P1-2)

Chapter 3A

- (P1-6, P1-7, P1-8)

Chapter 4

- (P5-1, P5-2, P5-3, P5-4, P5-5, P5-6, P5-7)

Chapter 5

- (P6-1, P6-2, P6-3, P6-4)

Chapter 6C

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<sup>1</sup> Either directly or through the NTSB party participant process, PG&E believes it has provided to the Commission all the documents that PG&E provided to the NTSB during its investigation. For the Commission's convenience, PG&E is preparing DVDs with copies of the NTSB data responses referred to herein, and will provide those DVDs on or before October 26, 2011.

- (P3-20018, P3-20053 – P3-20060\_3, P3-20702 – P3-20703, P3-21011 – P3-21018, P3-21035 – P3-21037, P3-24020 – P3-24268, P3-27179 – P3-27200)

#### Chapter 6D

- (P3-30001 – P3-30004, P3-30007, P3-30008, P3-30010, P3-30012, P3-30014, P3-30016, P3-30023, P3-30075, P3-30153, P3-30154)

#### Data Responses

CPUC\_091-003

CPUC\_091-004

CPUC\_091-005

CPUC\_091-008

CPUC\_091-013

CPUC\_127-009

CPUC\_OII\_LegalDivision\_003-002

CPUC\_OII\_LegalDivision\_003-005

CPUC\_OII\_LegalDivision\_003-009

CPUC\_OII\_LegalDivision\_003-011

CPUC\_OII\_LegalDivision\_003-018

CPUC\_OII\_LegalDivision\_003-020

CPUC\_OII\_LegalDivision\_004-011

CPUC\_OII\_LegalDivision\_004-015

IRP\_008-011

IRP\_010-015

IRP\_016-010

NTSB\_011-001 (NTSB Exhibit No. 2 -C)

NTSB\_004-001 (NTSB Exhibit No. 2 -G)

NTSB\_014-008 (NTSB Exhibit No. 2-I)

NTSB\_013-001-S1-Amended (NTSB Exhibit No. 2-K)  
NTSB\_036-004 (NTSB Exhibit No. 2-M)  
NTSB\_035-012 (NTSB Exhibit No. 2 -W)  
NTSB\_008-003 (NTSB Exhibit No. 2 -X)  
NTSB\_046-001 (NTSB Exhibit No. 2-Z)  
NTSB\_035-016-Amended (NTSB Exhibit No. 2-AF)  
NTSB\_008-004 (NTSB Exhibit No. 2-AP)  
NTSB\_001-002-S1 & 010-005 (NTSB Exhibit No. 2-AQ)  
NTSB\_001-005 (NTSB Exhibit No. 2-AW)  
NTSB\_011-010 (NTSB Exhibit No. 2-AZ)  
NTSB\_010-005-Amended (NTSB Exhibit No. 2-BA)  
NTSB\_026-001 (NTSB Exhibit No. 2-CL)  
NTSB\_069-001 (NTSB Exhibit No. 2-ED)  
NTSB Exhibit No. 2 -AX  
NTSB Exhibit No. 2 -DE  
NTSB Exhibit No. 2 -DV  
NTSB Exhibit No. 2-DW  
NTSB\_010-005-S-4 (NTSB Docket No. 267)  
NTSB\_014-008-S-1 (NTSB Docket No. 275)  
NTSB\_036-009 (NTSB Docket No. 285)  
NTSB\_054-008 (NTSB Docket No. 297)  
NTSB\_068-001 (NTSB Docket No. 311])  
NTSB\_035-016-Amended-2 (NTSB Docket No. 378)  
NTSB\_053-004 (NTSB Docket No. 396)  
NTSB Docket No. 326 (Geologic Hazards Report, 1992)

NTSB Docket No. 334 (Environmental Analysis, 1992)

***Responses to NTSB data requests not on NTSB Docket but provided to the Commission's representative as an NTSB party participant.***

NTSB\_001-003

NTSB\_001-003-S-1

NTSB\_001-003-S-2

NTSB\_001-004-Amended

NTSB\_001-011

NTSB\_001-012

NTSB\_001-013

NTSB\_001-013-S-1

NTSB\_001-013-S-2

NTSB\_003-001-S-9

NTSB\_008-004-S-1

NTSB\_008-004-S-2

NTSB\_008-004-S-3

NTSB\_008-004-S-4

NTSB\_010-005-S-1

NTSB\_011-005

NTSB\_013-003

NTSB\_016-003

NTSB\_033-005

NTSB\_035-009

NTSB\_046-001

NTSB\_050-003

NTSB 050-004

NTSB 089-002

NTSB\_Field\_ 001-002-Amended

NTSB\_Field\_ 001-005

NTSB\_Field\_ 001-006

NTSB\_Field\_ 001-007

NTSB\_Field\_ 001-008

NTSB\_Field\_ 001-011

NTSB\_Field\_ 001-013