

From: Halligan, Julie
Sent: 1/24/2013 10:28:31 AM
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Michelle (Law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=MLW3); Smith,
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Cc:

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| Redacted |
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Bcc:
Subject: FW: Overdue Discovery Priority List

Hi Bruce,

We are pleased to hear that PG&E has refocused on responding to Safety and Enforcement Division's discovery requests. While the scope and timing of the audit may not have been what PG&E expected, SED coordinated both aspects with Assigned Commissioner Florio and assigned ALJ Bushey. We have also coordinated with ALJ Pulsifer. We recognize that PG&E, like the Commission, continually faces competing demands on its resources. The timing for this audit was driven in part by the pendency of PG&E's General Rate Case application, as well as the availability of our audit consultant.

Given the extended delays that we have been presented with to date, SED requests that PG&E respond to the high priority questions identified in the attachment by February 1, 2013.

In addition, we expect PG&E to answer all questions that were submitted prior to December 17 by February 8. The December 16 set will have been outstanding for 58 days on February 8 and most of the questions will have been outstanding for longer than that. PG&E is expected to commit to answering the questions submitting on december 28 and January 11 by February 15.

Discovery submitted after January 11 should be responded to within 10 business days. Overland has not sent out any new discovery since January 11 but another set may be ready to send out by the middle of week.

SED believes these dates are very generous to PG&E considering how long the questions have been outstanding. As you can imagine, we need the information by the indicated dates to keep the audit process moving along expeditiously. Thank you for your assistance and cooperation.

Best,

Julie Halligan, Deputy Director

Office of Utilities Safety and Reliability

Safety and Enforcement Division

California Public Utilities Commission