

I.12-01-007

PG&E'S REQUEST FOR OFFICIAL NOTICE

EXHIBIT 6

Records Ex. PG&E-6
(CPSD's Response to PG&E's Data Request No. 12)

Investigation: 11-02-016
Exhibit No.: PG&E 6
Date: 3/5/12

PACIFIC GAS AND ELECTRIC COMPANY

CPSD's Response to PG&E's Data Request No. 12



REFERRING TO THE REBUTTAL TESTIMONY OF JULIE HALLIGAN

Q 19: CPSD writes on p. 1: "CPSD expects gas utilities to use best engineering practices available even without specific prescriptive laws or regulations mandating every engineering practice that PG&E must undertake to keep its system safe." Please identify all general orders, resolutions, regulations, correspondence or communication in which CPSD and/or the Commission communicated this expectation to utilities.

As one example, see *Carey vs. PG&E*, Decision No. 99-04-029. In particular, footnote 9 states, "The Commission is not bound by accepted industry practices in assessing the reasonableness of a PG&E's conduct. 'Evidence of accepted industry practices will often be relevant to a reasonableness inquiry, but compliance with such practices will not relieve the utility of the burden of showing that its conduct was reasonable.'"

CPSD objects to providing additional rules or regulations as unduly burdensome. PG&E has access to Commission requirements and the probative value of this question is substantially outweighed by the burden on CPSD staff to answer this question any further.

Q.20: On p. 3, footnote 8, CPSD refers to Section II.B. Please clarify where the referred discussion can be found in Ms. Halligan's testimony.

This reference should be to Section III, lines 16-18 and footnote 5.

Q.21: On pp. 4-5, please indicate the source of the block quote that begins on line 29 of page 4.

The source of this quote is *Carey vs. PG&E*, Decision No. 99-04-029 at Page 6.

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PG&E'S REQUEST FOR OFFICIAL NOTICE

EXHIBIT 7

Records Ex. PG&E-61

(PG&E's Response to the CPSD's Reports: Records Management Within the Gas Transmission Division of PG&E Prior to the Natural Gas Transmission Pipeline Rupture and Fire, San Bruno, California, September 9, 2010; Report and Testimony of Margaret Felts; and Testimony of Witnesses) (excerpted pages 3-60 and 3-61 (PG&E/Cowsert-Chapman))

Investigation: 11-02-016 _____
Exhibit No.: _____
Date: _____
Witnesses:

**PACIFIC GAS AND ELECTRIC COMPANY'S
RESPONSE TO THE CONSUMER PROTECTION AND SAFETY
DIVISION'S REPORTS:**

**RECORDS MANAGEMENT WITHIN THE GAS TRANSMISSION
DIVISION OF PG&E PRIOR TO THE NATURAL GAS TRANSMISSION
PIPELINE RUPTURE AND FIRE, SAN BRUNO, CALIFORNIA,
SEPTEMBER 9, 2010**

AND

REPORT AND TESTIMONY OF MARGARET FELTS

TESTIMONY OF WITNESSES



1 more detailed leak information and by changes in regulatory reporting
2 requirements. We produced the earliest-located revision of this document
3 (dating back to 1979) in our June 20, 2011 OII response as P2-1152.

4 With few exceptions, we have retained A-Forms either in job files or in
5 separate files located at approximately 70 of our local offices. In the course
6 of this proceeding, we have been collecting and digitizing A-Forms from
7 local offices, as well as A-Forms stored in job files (collected as part of our
8 MAOP Validation Effort). Thus far, we have collected, digitized, and stored
9 over 30,000 documents in the Documentum database.

10 In the 1970s, we began to enter information from our A-Forms into
11 electronic recordkeeping leak systems. In the early 1970s, we developed a
12 mainframe computer program to track leak repairs across the service
13 territory. Field personnel transmitted leak and repair data to this central
14 database on a monthly basis.

15 In the late 1980s, we developed a program called PC Leaks to
16 decentralize the data collection efforts of the mainframe program. Local PC
17 Leaks systems were set up at the division level. If a division had multiple
18 districts, each district would have a PC Leaks system; and if a district had
19 multiple offices, each office would have a system. Employees entered leak
20 information directly into these local systems. Once a month, programmers
21 uploaded information from the local PC Leaks systems to a mainframe
22 database system. The mainframe held information indefinitely. The local
23 systems held information until they reached capacity, if ever.

24 In 1999, we developed a new leak and repair tracking database called
25 the Integrated Gas Information System (IGIS). We migrated data for open
26 leaks (that is, leaks that had not yet been repaired) from PC Leaks to IGIS.
27 IGIS improved on our previous PC Leaks and Mainframe Leaks systems by
28 allowing IGIS users to access all leak data across PG&E's service territory
29 (whereas PC Leaks was a desktop application that could only provide data
30 entered at the local office).

31 IGIS allows us to record, update, retrieve, and report information
32 regarding gas leak locations, readings, repairs, incidents, inspections, and
33 dig-in data for all gas transmission and distribution facilities. These IGIS
34 capabilities also apply to gas pipe inspections not associated with gas leaks.

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PG&E'S REQUEST FOR OFFICIAL NOTICE

EXHIBIT 8

**Records Reporter's Transcript Volume 1
(September 5, 2012) (excerpted pages 74, 80, 82-83, 85,
146, 161 (CPSD/Halligan))**

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA**

ADMINISTRATIVE LAW JUDGE AMY YIP-KIKUGAWA, presiding.

Order Instituting Investigation on the
Commission's Own Motion into the
Operations and Practices of Pacific Gas and
Electric Company with Respect to Facilities
Records for its Natural Gas Transmission
System Pipelines.

EVIDENTIARY
HEARING

Investigation
11-02-016

REPORTER'S TRANSCRIPT
San Francisco, California
September 5, 2012
Pages 1 – 176
Volume – 1

Reported by: Lynn A. Stanghellini, CSR No. 3489
Alejandrina E. Shori, CSR No. 8856
Thomas C. Brenneman, CSR No. 9554

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
505 Van Ness Avenue, San Francisco, California 94102

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1 don't have it memorized verbatim.

2 Q No, it does not, but I'm asking, is
3 it your understanding that Section 451
4 incorporates this expectation that you've
5 expressed that a utility will use best
6 engineering practices?

7 A I think 451 does incorporate the
8 expectation that each utility will use the
9 best industry practices available for their
10 systems.

11 Q And you say industry practices,
12 right? Is that correct?

13 A Well, they certainly must follow
14 industry standards. If there are practices
15 that are unique to a utility that are
16 different from the uniform standards, they
17 may also use those.

18 Q Okay. So my understanding is that
19 it is CPSD's plan on a going-forward basis to
20 participate more actively in ratesetting
21 cases for utilities in California; is that
22 correct?

23 A That is an initiative that we have
24 just begun.

25 Q So can the utilities in California
26 expect that in those rate proceedings CPSD
27 will be advocating for rate recovery
28 sufficient to allow utilities to use the best

1 just articulated two different ways?

2 A Well, certain -- if there was any
3 distinction I was trying to make is that it
4 is that utility operators are differently
5 situated, and there may be some practices
6 that are appropriate and available for some
7 utilities and not for others depending on
8 their situation.

9 Q Could it depend on the timeframe as
10 well? Best practice available today may not
11 have been available to the industry, say, 50
12 years ago?

13 A Certainly.

14 Q To CPSD's understanding does the
15 standard best engineering practices equate to
16 perfect engineering practices?

17 A No. Well, I wouldn't -- perfect
18 engineering practices. Is there such a
19 thing?

20 Q How do you articulate the
21 difference between the definition of best
22 engineering practices from the definition of
23 good engineering practices as those terms are
24 used in your testimony?

25 A The distinction that I was making
26 in attempting to clarify my testimony was
27 that when a utility has a choice of a couple
28 of different options to take that I would

1 testimony:

2 CPSD expects gas utilities to use
3 best engineering practices available
4 even without specific prescriptive
5 laws or regulations mandating every
6 engineering practice that PG&E must
7 undertake to keep its systems safe.

8 And then PG&E asks:

9 Please identify all general orders,
10 resolutions, regulations,
11 correspondence or communications in
12 which CPSD and/or the Commission
13 communicated this expectation to
14 utilities.

15 Do you see where I'm reading from?

16 A I do.

17 Q And in your response you refer to a
18 case, *Carey versus PG&E*. And I note that
19 *Carey versus PG&E* is one of the changes that
20 was made to your revised testimony. In other
21 words, your revised testimony now adds a
22 discussion of that case?

23 A It adds a citation to that case. I
24 believe the case was quoted previously, but
25 the citation was omitted. The revision added
26 the citation.

27 Q Okay. Thank you. So is it your
28 view that your reference to *Carey versus PG&E*

1 in response to this data request is
2 responsive to the question that was asked?

3 A The *Carey versus PG&E* cite was the
4 one that we provided in response, yeah.

5 Q Right. And you quote from that
6 decision to say that:

7 Evidence of accepted industry
8 practices will often be relevant to
9 a reasonableness inquiry, but
10 compliance to such practices will
11 not relieve the utility of the
12 burden of showing that its conduct
13 was reasonable.

14 Do you see that?

15 A Yes.

16 Q Is it your belief that accepted
17 industry practices is the equivalent of best
18 industry practices?

19 A I don't think they're synonymous.

20 Q How are they different?

21 A There may be an accepted industry
22 practice that's applicable to the entire
23 industry, but there may be something more
24 appropriate for a given utility.

25 Q So your reference in response to
26 this data request to *Carey versus PG&E* is not
27 responsive to the question that asks you to
28 identify these general orders and the like

1 substantially outweighed by the
2 burden on CPSD staff to answer this
3 question any further.

4 Do you see that?

5 A I do.

6 Q Let me try and ask the question a
7 little bit differently. Are you as you sit
8 here today aware of any general order,
9 resolution, regulation, correspondence or
10 communication in which CPSD or the Commission
11 communicated an expectation that gas
12 utilities will use best engineering
13 practices?

14 A I can't think of one as I sit here,
15 no.

16 Q Bear with me. I was embarrassed by
17 the size of this binder. I didn't want to
18 have to haul it up here, but now I've got to
19 put it away.

20 I want you to turn now to page 2
21 again of PG&E's Exhibit No. 2. This is the
22 redlined version of your rebuttal testimony.
23 And I want to refer again to subparagraph A
24 in which in the revision you lined out the
25 word "appropriate" and replaced it with the
26 word "the best" or the words "the best." Do
27 you see that?

28 A I do.

1 with General Order 112 attached. Do you
2 recall being asked questions about that --

3 A I do.

4 Q -- decision?

5 And this is a standard -- this
6 is -- the decision basically has mandated
7 that the ASME standards be adopted by
8 the Commission and followed by the utilities;
9 correct?

10 A That's correct. It -- yeah.
11 That's correct.

12 If you look in the general
13 provisions of the General Order, it changes
14 the provisions of ASA B31.8 that changes them
15 generally from a "should" to a "shall". It
16 makes the provisions mandatory.

17 Q Okay. If you could turn to page 12
18 of the decision. This is Decision 61269.
19 Even though we adopted standards, we also had
20 some requirements for the utilities above and
21 beyond the standards. Could you read what
22 paragraph 7 and 8 state in that decision on
23 page 12.

24 A Paragraph 7 states:
25 Public utilities serving or
26 transmitting gas bear a great
27 responsibility to the public respecting
28 the safety of their facilities and

1 existing installations insofar as design,
2 fabrication, installation, established
3 operating pressure and testing are concerned?

4 A That's correct.

5 Q By these rules, that refers to GO
6 112, which I think you testified earlier is
7 an adoption of the ASME B31.8 standard,
8 correct?

9 A That's correct. That's what
10 General Order 112 did.

11 Q So in your construction, not
12 withstanding this provision, the ASME B31.8
13 standards did apply to the design,
14 construction and testing of facilities
15 installed before July 1, 1961, correct?

16 A 451 did apply, and it is a
17 reasonable expectation under 451 to assume
18 that the utilities would have followed B31.8
19 and kept their pressure testing records.

20 Q In the course of your redirect you
21 referred to continuing violations in trying
22 to explain how you had revised the scope of
23 the violations. Do you remember that
24 testimony?

25 A I do.

26 Q Can you provide an example of a
27 continuing violation?

28 A No, I can't. I would have to look

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PG&E'S REQUEST FOR OFFICIAL NOTICE

EXHIBIT 9

**Records Reporter's Transcript Volume 2
(September 6, 2012) (excerpted pages 243-44
(CPSD/Felts))**

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA**

ADMINISTRATIVE LAW JUDGE AMY YIP-KIKUGAWA, presiding.

Order Instituting Investigation on the
Commission's Own Motion into the
Operations and Practices of Pacific Gas and
Electric Company with Respect to Facilities
Records for its Natural Gas Transmission
System Pipelines.

EVIDENTIARY
HEARING

Investigation
11-02-016

REPORTER'S TRANSCRIPT
San Francisco, California
September 6, 2012
Pages 177 – 358
Volume – 2

Reported by: Alejandrina E. Shori, CSR No. 8856
Ana M. Gonzalez, CSR No. 11320
Thomas C. Brenneman, CSR No. 9554
Wendy M. Pun, CSR No. 12891

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
505 Van Ness Avenue, San Francisco, California 94102

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<u>Witnesses:</u>	<u>Direct</u>	<u>Cross</u>	<u>Re-Direct</u>	<u>Re-Cross</u>	<u>By ALJ</u>
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1 controls. What we would have been able to
2 see at least on two of the dashes or the
3 computers what was being viewed, if anything,
4 was being viewed. So there is quite a bit of
5 information that we could have obtained that
6 would have covered the entire time that
7 people were present in the facility.]

8 Q And that's why you say, had there
9 been that video, it would have been within
10 this description of a record related to the
11 incident?

12 A Yes.

13 Q In your testimony -- oh, sorry. I
14 forgot Resolution L-403. Would you take a
15 look, please, at PG&E-27.

16 A Okay.

17 Q This is the Resolution L-403 that
18 you were referring to in your testimony?

19 A Yes.

20 Q And if you would, please, turn to
21 page 12 of that exhibit. In paragraphs 16
22 and 17 the Commission ratified the two
23 preservation directives that had been
24 contained in the Executive Director's
25 September 13th letter, correct?

26 A Yes.

27 Q And the language in Resolution
28 L-403 is, with respect to what is to be

1 preserved, records related to the San Bruno,
2 here it's called explosion, substantively the
3 same as the Executive Director's?

4 A Yes.

5 Q Correct? Didn't expand it, didn't
6 contract it?

7 A No.

8 Q Correct?

9 You also refer in your supplemental
10 testimony to a September 11th, 2010
11 communication from PG&E's General Counsel.
12 Do you recall that?

13 A Yes.

14 Q And that communication from PG&E's
15 General Counsel to the entire company was
16 about preserving records, correct?

17 A Yes.

18 Q And that predated by two days the
19 Executive Director's directive, right?

20 A Yes.

21 Q And that directive from the General
22 Counsel was thorough?

23 A Very.

24 Q One would say extremely?

25 A Yes.

26 Q It was unambiguous?

27 A Yes.

28 Q And you have no criticism of it?

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

ADMINISTRATIVE LAW JUDGE AMY YIP-KIKUGAWA, presiding.

Order Instituting Investigation on the
Commission's Own Motion into the
Operations and Practices of Pacific Gas and
Electric Company with Respect to Facilities
Records for its Natural Gas Transmission
System Pipelines.

EVIDENTIARY
HEARING

Investigation
11-02-016

REPORTER'S TRANSCRIPT
San Francisco, California
September 7, 2012
Pages 359 – 497
Volume – 3

Reported by: Lynn A. Stanghellini, CSR No. 3489
Alejandrina E. Shori, CSR No. 8856
Ana M. Gonzalez, CSR No. 11320

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
505 Van Ness Avenue, San Francisco, California 94102

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1 Q It is long. And it requires a
2 great deal from the written procedures that
3 operators put together as part of their
4 emergency plan, correct?

5 A Yes, it does.

6 Q And Subpart A requires that the
7 procedures provide for at least 11 different
8 things, correct?

9 A Yes.

10 Q And then it has a number of other
11 mandates in Subparts B and C; is that right?

12 A Yes.

13 Q In your rebuttal testimony, CPSD-4
14 at page 15, line 21, you acknowledge, quote:

15 PG&E points out that its gas
16 emergency plan meets regulatory
17 criteria.

18 A Yes.

19 Q Do you see that?

20 A Yes.

21 Q You don't take issue with that, do
22 you?

23 A No.

24 Q But you conclude that
25 notwithstanding that that it is too difficult
26 to use and therefore unsafe; is that right?

27 A Which line are you looking at?

28 Q I was paraphrasing.

I.12-01-007

PG&E'S REQUEST FOR OFFICIAL NOTICE

EXHIBIT 11

Records Reporter's Transcript Volume 5
(September 11, 2012) (excerpted page 795 (PG&E/De
Leon))

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA**

ADMINISTRATIVE LAW JUDGE AMY YIP-KIKUGAWA, presiding.

Order Instituting Investigation on the
Commission's Own Motion into the
Operations and Practices of Pacific Gas and
Electric Company with Respect to Facilities
Records for its Natural Gas Transmission
System Pipelines.



EVIDENTIARY
HEARING

Investigation
11-02-016

REPORTER'S TRANSCRIPT
San Francisco, California
September 11, 2012
Pages 661 – 848
Volume – 5

Reported by: Ana M. Gonzalez, CSR No. 11320
Thomas C. Brenneman, CSR No. 9554
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PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
505 Van Ness Avenue, San Francisco, California 94102

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<u>Witnesses:</u>	<u>Direct</u>	<u>Cross</u>	<u>Re-Direct</u>	<u>Re-Cross</u>	<u>By ALJ</u>
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1 a minute again.

2 Q Would it help if I rephrased the
3 question?

4 A This whole statement sounds like a
5 very broad, a very broad statement that tries
6 to say -- that tries to say that anything
7 that an operator does, he's going to be
8 guilty of not -- of not assuring the safety
9 of the pipeline. It sounds like -- I'm
10 looking at the three sentences. It sounds
11 like it's a very, very broad statement that
12 sort of goes against what I've always said is
13 that you should have regulations for those
14 areas of a pipeline that might result in a
15 failure. And to just broadly tell someone,
16 well, you got to do it right, and if it
17 fails, you didn't do it right, is that what
18 this is saying?

19 Q Well, I'll leave that to you.

20 A I think this is a very broad
21 statement that I find troubling to agree
22 with.

23 Q Okay. And from what you were just
24 saying, it sounded like your view is that
25 pipeline operators should be held to
26 particular rules and only those particular
27 rules. Is that your view?

28 A I think that's more or less, yes.

I.12-01-007

PG&E'S REQUEST FOR OFFICIAL NOTICE

EXHIBIT 12

**Records Reporter's Transcript Volume 7
(September 13, 2012) (excerpted page 1086)
(PG&E/Phillips)**

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA**

ADMINISTRATIVE LAW JUDGE AMY YIP-KIKUGAWA, presiding.

Order Instituting Investigation on the
Commission's Own Motion into the
Operations and Practices of Pacific Gas and
Electric Company with Respect to Facilities
Records for its Natural Gas Transmission
System Pipelines.

EVIDENTIARY
HEARING

Investigation
11-02-016

REPORTER'S TRANSCRIPT
San Francisco, California
September 13, 2012
Pages 1032 – 1199
Volume – 7

Reported by: Lynn A. Stanghellini, CSR No. 3489
Alejandrina E. Shori, CSR No. 8856
Thomas C. Brenneman, CSR No. 9554

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
505 Van Ness Avenue, San Francisco, California 94102

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Morning
Noon

1 MR. MORRIS: Of her rebuttal.

2 ALJ YIP-KIKUGAWA: Okay. That's
3 CPSD-4.

4 MR. MORRIS: Right.

5 Q At line 16 to 22 Ms. Felts refers
6 to a review of 18 CFR Part 225 2012 reveals
7 that it is a subchapter -- it is in
8 Subchapter F, accounts, Natural Gas Act, and
9 is immediately after Part 201 uniform system
10 of accounts. Therefore, although it
11 discusses the preservation of records of
12 natural gas companies, it is only concerned
13 with retention policies for ratemaking
14 documents. Do you agree with that statement?

15 A No, sir, I don't.

16 Q Okay. She then says, this is
17 considered by Section 225.23, schedule of
18 records and periods of retention, which is
19 followed by table of contents. And her table
20 of contents talks about general accounting
21 records, plant depreciation records, tax
22 records. Can you please tell me what you
23 disagree with her statement?

24 A If you go to Exhibit 221, PG&E's
25 Exhibit 221, and you look at Resolution 570
26 and you look on the second page where it
27 discusses GO 112-C, 570 talks about reports
28 on operations, maintenance studies, location

I.12-01-007

PG&E'S REQUEST FOR OFFICIAL NOTICE

EXHIBIT 13

Records Reporter's Transcript Volume 10
(September 17, 2012) (excerpted pages 1509-1533
(PG&E/Cochran))

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA**

ADMINISTRATIVE LAW JUDGE AMY YIP-KIKUGAWA, presiding.

Order Instituting Investigation on the
Commission's Own Motion into the
Operations and Practices of Pacific Gas and
Electric Company with Respect to Facilities
Records for its Natural Gas Transmission
System Pipelines.



EVIDENTIARY
HEARING

Investigation
11-02-016

REPORTER'S TRANSCRIPT
San Francisco, California
September 17, 2012
Pages 1412 – 1570
Volume – 10

Reported by: Lynn A. Stanghellini, CSR No. 3489
Ana M. Gonzalez, CSR No. 11320
Thomas C. Brenneman, CSR No. 9554

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
505 Van Ness Avenue, San Francisco, California 94102

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1 Ms. Jordan.

2 MS. JORDAN: Thank you, your Honor.

3 ALJ YIP-KIKUGAWA: He is here so I am
4 going to actually swear him in first.

5 KERRY COCHRAN, called as a witness
6 by Pacific Gas and Electric Company,
7 having been sworn, testified as
8 follows:

9 ALJ YIP-KIKUGAWA: For the record could
10 you please state your full name, spelling
11 your last name and also your place of
12 employment.

13 THE WITNESS: Kerry Cochran,
14 C-o-c-h-r-a-n. I work at Pacific Gas and
15 Electric Company.

16 MS. JORDAN: Thank you, your Honor.

17 DIRECT EXAMINATION

18 BY MS. JORDAN:

19 Q Good afternoon, Mr. Cochran.

20 We're going to ask you a few
21 questions around the Brentwood video camera.
22 But I would like to get a bit of information
23 first.

24 So what is your -- how long have
25 you been at PG&E?

26 A I have been at PG&E 41 years.

27 Q And what is your position at PG&E?

28 A I am currently the physical
security supervisor.

1 Q How long have you been in that
2 position?

3 A Since about March of this year.

4 Q And prior to that?

5 A Prior to that I was the senior
6 physical security specialist.

7 Q And how long have you been in this
8 line of business for PG&E?

9 A For PG&E I have been since 2003.

10 Q And prior to that?

11 A Prior to that I have had a history
12 for over 30 years in the security industry.

13 Q So what are your responsibilities
14 in your current position?

15 A Currently I supervise five newly
16 hired security specialists that oversee
17 physical security at Pacific Gas and
18 Electric.

19 Q When you say physical security, can
20 you describe what that entails at PG&E.

21 A At PG&E, basically it is security
22 of buildings, fences, doors, locks, hardware,
23 camera systems, alarm systems, access
24 control, physical security of nature, of
25 boundaries and so on.

26 Q Are you familiar with the cameras
27 that have been installed at the Brentwood gas
28 facility?

1 A Yes, I am.

2 Q And how many cameras are there?

3 A Six.

4 Q Can you describe what the purpose
5 of those cameras are?

6 A The purpose of those cameras that
7 are installed at Brentwood are for security
8 alarm system there on the facility.

9 Q What is -- as a security alarm
10 system, what are they intended to perform?

11 A Once an alarm system is activated,
12 it draws the attention of a security operator
13 to that facility and they can use that video
14 to look at the facility and determine whether
15 or not it's an actual intrusion or if it's a
16 rabbit hitting the fence or some other object
17 that is in the yard or in a building.

18 Q You said there were six cameras at
19 Brentwood?

20 A Yes.

21 Q Can you give us a little bit more
22 detail of how those cameras operate with
23 respect to PG&E's corporate security
24 organization?

25 A Typically, in all our facilities
26 where we have intrusion detection and we have
27 cameras, they work in conjunction with each
28 other so that if there is an alarm that is

1 activated, typically we don't make a blind
2 call to law enforcement for response. We
3 would use, in the case of Brentwood, the
4 video to look at the facility and try and
5 find out if it was a valid alarm or if it was
6 nuisance or false alarm. And that's the
7 primary purposes for security.

8 Q So you mention there were six
9 cameras. How many are actually viewing the
10 Brentwood gas control terminal?

11 A The inside, or the outside of the
12 facility?

13 Q Why don't you describe each of the
14 six cameras briefly.

15 A There are currently five cameras
16 that are outside looking at the perimeter
17 yard and makeup of the facility. There is
18 currently one that is inside looking at just
19 the control room, and to give us an idea of,
20 again, if there is any intrusion based upon
21 an alarm.

22 MS. JORDAN: Your Honor, if we can get
23 that -- I just want to be able to see the
24 room as we discuss this.

25 (Camera shot depicted on screen)

26 MS. JORDAN: Q Behind you,
27 Mr. Cochran, can you describe what you see
28 there in that camera shot.

1 A Basically in this particular camera
2 shot here it is just giving you an overall
3 wide angle view of the main control room
4 that's at Brentwood with the intent of seeing
5 anybody that may be just walking around or
6 within that area.

7 Q And how does that camera work?

8 A It's a fixed camera. And it just
9 sits there and gives you the view that you're
10 looking at right now at any given time.

11 Q And is it an audio camera?

12 A No, there is no audio connected to
13 that whatsoever.

14 Q And does it run all the time, or is
15 it motion activated?

16 A It could be either.

17 Q Is there a way to zoom in or zoom
18 out, or is it --

19 A No. That camera is entirely fixed.
20 There is no pan, tilt, zoom capability of
21 that particular camera.

22 Q And how does it record? What does
23 it record onto?

24 A It records onto a digital video
25 recorder.

26 Q So when the CPSD requested the
27 video record from the Brentwood control room
28 from the September 9th, 2010 date, what did

1 you do to assist in providing that response?

2 A Based on the first data request I
3 went in and made a technical review of the
4 digital video recorder to ascertain if there
5 was any recorded video available for that
6 day.

7 Q How did you do that?

8 A I have a remote software program
9 that allows me to log into the device and
10 change screens and to go a specific icon,
11 type in a date or a date and time and have it
12 retrieve that information and give me an
13 indication of whether the video is there or
14 not.

15 Q And what did you do specifically to
16 this -- to help in this response?

17 A In that particular case I did just
18 that. I connected remotely to the digital
19 recorder on site and requested the date and
20 time that was in the data request, and the
21 information returned back was that there was
22 no video available for that day.

23 Q Did you do anything to verify that
24 that was the case?

25 A I basically went to another camera
26 just to make sure, basically typed in the
27 same information, date and time, and also
28 retrieved no information for that particular

1 day.

2 Q So what did you conclude from that
3 checking?

4 A Basically, it gave me the immediate
5 indication that there was no video for any of
6 the cameras there on that particular day,
7 that the video -- that the request was too
8 old and the video had been overwritten.

9 Q And why would you had thought that
10 it had been overwritten?

11 A Typically we don't store data any
12 longer than 30 to 60 days on most all of our
13 devices just because of storage capacity.

14 Q And subsequent to that did it come
15 to your attention that conclusion was
16 inaccurate?

17 A Yes, it did. There was another
18 data request, of a more technical nature, to
19 find out how the digital recorder and the
20 cameras were programmed, and as such we went
21 into a different section of the software that
22 allows programming and found that there was a
23 programming error made when the camera was
24 installed.

25 Q And what did you do at that point?

26 A Actually, I just reported back, and
27 we left the configuration in the manner that
28 I found it.

1 Q So the programming -- what was the
2 conclusion you drew after you determined that
3 there was a programming error?

4 A Well, we went and asked our
5 integrator who does our installations can you
6 look into this any further. They did. It
7 was a human error that the technician just
8 made a mistake and didn't check the box when
9 they installed that particular camera.

10 Q And had you ever experienced that
11 kind of error in the other facilities at
12 PG&E, other camera facilities at PG&E?

13 A No. This would have been the first
14 time.

15 Q How many cameras approximately does
16 PG&E have in its system?

17 A I'd say approximately between 1500
18 and 2000 cameras.

19 Q Then does PG&E routinely check its
20 security cameras for functionality, or how
21 does -- what kinds of review do you perform?

22 A Typically, our security control
23 center does do a check, but it only indicates
24 live video. It does not -- there is no way
25 or there is no requirement for them to go
26 back and check that everything is recording.
27 It needs to be done in a whole different
28 manner than just checking if there's live

1 video.

2 Q In your years in corporate security
3 have you experienced times when there was
4 recording -- strike that. Is it in your
5 normal course of business you rely on those
6 videos for them to function?

7 A Yes, we do.

8 Q And do they typically?

9 A On the most part, yes, they do.
10 They are prone to failure just like any other
11 electronic device.

12 MS. JORDAN: Your Honor, I believe
13 that's the information that Mr. Cochran has
14 on this topic. I'm not sure if you have more
15 questions.

16 ALJ YIP-KIKUGAWA: I have some more. I
17 don't know if Mr. Cagen -- do you have any
18 questions?

19 MR. CAGEN: I do have a few.

20 ALJ YIP-KIKUGAWA: I will let you go
21 first.

22 CROSS-EXAMINATION

23 BY MR. CAGEN:

24 Q Good afternoon, Mr. Cochran. I
25 think we've met before.

26 A Yes.

27 Q During site visits. But I
28 represent CPSD. And I do have some questions

1 for you today.

2 You mentioned I think that there is
3 an alarm that is activated when the camera is
4 turned on in circumstances where you don't
5 expect to see somebody in the place; is that
6 right?

7 A I don't believe that's correct the
8 way you are stating your question.

9 Q Okay. You mentioned that an alarm
10 is sometimes activated. Do you recall that?

11 A Yes.

12 Q Under what circumstance is the
13 alarm activated?

14 A Should the alarm be functioning,
15 should it be turned on, so in other words, it
16 will detect an activation of an intrusion
17 device, we would expect the device to
18 initiate an alarm upon a broken window, a
19 forced door, something of that nature.

20 Q And then does the camera turn on
21 only when motion activates it?

22 A It can be.

23 Q And in this instance, it was not
24 activated at all; is that right?

25 A That's right, it was not programmed
26 to be active.

27 Q Are you saying that the camera was
28 not on either during that day?

1 A No. The camera was on. It was
2 functioning because we could see live video
3 when I went to meet the initial data request
4 and I viewed the camera.

5 Q Do you have -- where is this
6 picture shown normally during live feed?
7 Does that go to Fairfield or some other
8 place?

9 A Normally it's not shown. Fairfield
10 would, if they received an alarm, they would
11 use software at their location to go and look
12 at the video at that particular location.

13 Q Was there anyone at Fairfield at
14 PG&E's facility there, who looked at the
15 Brentwood control room on September 9th,
16 2010?

17 A Not that I'm aware of.

18 Q Did you check to see that?

19 A I don't believe we had a data
20 request for that, so I wouldn't have done
21 that.

22 Q Well, I'm talking about the
23 company's own investigation of the incident.
24 Do you know whether anybody from PG&E talked
25 to anybody at Fairfield to see and determine
26 what they had noticed, if anything, about
27 what was happening in Brentwood on
28 September 9th, 2010?

1 A There was no alarm from the
2 facility, so therefore there was nobody went
3 and viewed that video.

4 Q Do you know this for a fact?

5 A That is the procedure.

6 Q Well, suppose somebody in Fairfield
7 became aware of the problem that was
8 occurring and wanted to view whatever was
9 happening in Fairfield, could they arrange
10 for that live, despite the fact that there
11 was no alarm, or was that beyond their
12 capability?

13 A If they were requested, they could
14 do that. However, they are not trained to
15 respond to operational needs. They are
16 trained to respond to security needs.

17 Q Did you attempt to find out whether
18 anybody at the Fairfield facility or
19 elsewhere was asked by anybody at PG&E to
20 monitor the situation by video at Brentwood?

21 A Not that I'm aware of.

22 Q Can the alarm go off even if
23 recorder is not hooked up or working?

24 A Yes, it can.

25 Q Did it ever go off in Fairfield --
26 did it ever go off? Did the alarm ever go
27 off at any time for camera -- associated with
28 camera six?

1 A They are two separate independent
2 systems, so I can't answer that question
3 based on the way you're asking me.

4 Q All right. Before September 2010
5 did the alarm ever go off at the Fairfield --
6 I'm sorry -- at the Brentwood facility?

7 A There's multiple alarms at that
8 facility. The alarm that's on the building
9 was upgraded prior to them unmanning that
10 facility. So there will be no record of an
11 alarm going off there prior to that because
12 the alarm wasn't installed.

13 Q When was the alarm installed?

14 A I would have to go back and look at
15 my records. I don't have the date with me.

16 Q Was the alarm installed before or
17 after September 9, 2010?

18 A Shortly before.

19 Q And when you say shortly before,
20 are you talking about a matter of days or
21 months or what?

22 A Again, I would have to go back and
23 look at my records to see what the time frame
24 was.

25 Q Well, can you tell by looking at
26 your data responses that talk about the
27 installation date of the camera?

28 A They will be fairly close.

1 Q And that was May 2010; is that
2 correct?

3 A If that's what the data request is
4 indicating, that is probably correct.

5 Q All right. And after that point do
6 you know whether there was ever an alarm
7 associated with the Brentwood facility before
8 September 10th -- September 9th, 2010?

9 A Again, there are multiple systems
10 at that location, and I am sure there was an
11 alarm from the Brentwood facility. Where in
12 the Brentwood facility, I would have to look
13 and see which alarm point went into alarm.

14 Q If you had an alarm -- so you think
15 that at someplace or at some time before the
16 September 9th, 2010, date an alarm would have
17 sounded someplace in the Brentwood facility;
18 is that correct?

19 A Yes.

20 Q And do you have a log of how many
21 times and the dates on which that occurred?

22 A Providing we kept that as a history
23 report, I could produce that.

24 Q I'm asking you at this point
25 whether you did keep that kind of thing as a
26 history report?

27 A I can't answer that question right
28 now. I don't have the logs available to look

1 at them.

2 Q What's your standard procedure in
3 that regard? Do you have one?

4 A Depending upon what it is. We do
5 have a daily operational report that security
6 center fills out that each operator gives a
7 line-by-line item of what transpires at any
8 facility and how they responded.

9 Q So you could produce a log if they
10 currently exist of alarms at the Brentwood
11 facility; is that correct?

12 A Yes.

13 Q All right. Is one of the things
14 that you do when you receive an alarm at a
15 facility like Brentwood is review recordings
16 to ascertain whether you can find out the
17 cause of the alarm and who, if at all, may
18 have triggered it?

19 A What type of recordings would you
20 be referring to?

21 Q Video recordings.

22 A No. Some facilities do not have
23 video. So if we got an alarm from that
24 facility, we would not be able to review the
25 video.

26 Q Exactly. I'm asking in the case of
27 an alarm at Brentwood which does have both
28 video cameras and recorders whether you would

1 typically review the recording as a security
2 officer to try to understand the reason for
3 the alarm going off?

4 A That is the procedure, when you
5 receive an alarm from a location, if it has
6 video, you will go to live view and ascertain
7 if you see any movement. And if it has the
8 capability of bringing back recorded video, a
9 procedure would be to go back approximately
10 5 minutes and review the video just prior to
11 the alarm.

12 Q And you are stating today that you
13 have never seen a video recording of the
14 Brentwood facility on or about September 9th,
15 2010; is that correct?

16 A That is correct.

17 Q Just to understand a little bit
18 better in which instances the alarm is
19 tripped, Mr. Cochran, is it when someone
20 breaks a window, or what other events might
21 trigger the alarm to go off in a place like
22 Brentwood?

23 A Typically that system is designed
24 to be an intrusion detection system to detect
25 unauthorized access to the building.

26 Q By the way, which contractor -- are
27 you familiar with the contractor who did the
28 job of installing the camera and setting up

1 the recording?

2 A I am.]

3 Q What is its name?

4 A The company, the firm is Acme
5 Security.

6 Q Have they done a lot of work for
7 PG&E?

8 A They've worked for PG&E since 1987.

9 Q And they regularly install these
10 cameras?

11 A Yes, they do.

12 Q And alarm systems; is that right?

13 A Yes.

14 Q And they also regularly install the
15 video recording system; is that also correct?

16 A Yes, they do.

17 Q I think you were saying that, and
18 correct me if I'm wrong, that this was the
19 only occasion upon which you did not find
20 that they had turned on a recorder as they
21 were supposed to do; is that right?

22 A This is my only time that I am
23 familiar with that they have failed to
24 program properly. Again, they have been
25 working for PG&E since 1987, and I only can
26 attest for the time that I've been directly
27 involved with them.

28 Q Do they do all the work in that

1 regard? I mean are they kind of your main
2 contractor for that purpose, or do you use
3 others in different areas, or how does that
4 work?

5 MS. JORDAN: Your Honor, I just ask Mr.
6 Cagen to be clear about that work. What is
7 he talking about?

8 MR. CAGEN: Q That work is the
9 installation of security systems.

10 A PG&E has had a number of vendors
11 over the years.

12 Q Would you say they've done work,
13 more work than any other of PG&E's vendors?

14 A Over what timeframe? I need to
15 have a reference.

16 Q Let's say from 2000 to 2010.

17 A I would say they are the primary
18 vendor during that timeframe.

19 Q You mentioned that when you first
20 went to the -- to look at the recording you
21 put in a request for the date; is that right?

22 A There's a particular spot in the
23 software when you're retrieving recorded
24 video you put in a date and a time. It's a
25 field that I can put in one date or two days
26 consecutively in a timeframe, a 24-hour
27 timeframe or a three hour, whatever I
28 request.

1 Q So you did that, and as I
2 understand it, the return was no data for
3 that date?

4 A That's correct.

5 Q Did you say that you were able to
6 get no data from the other cameras also?

7 A That is correct.

8 Q And that was the other five cameras
9 at the installation at Brentwood?

10 A I won't say all five. I'll say one
11 of the other cameras. It was just a sanity
12 check, if you will, see if there was any
13 recording.

14 Q See if there was any what?

15 A Any recording.

16 Q So you checked one of the five
17 cameras?

18 A I checked Camera No. 6. When I saw
19 that there was no data there, I checked one
20 of the other cameras.

21 Q And there was no data there?

22 A There was no data there either.

23 Q And what did you take that to mean,
24 the fact that there was no data on the other
25 camera?

26 A That the hard drive was already
27 overwritten because the data was too old.

28 Q So do all the cameras go into a

1 single recording instrument, or are they
2 separated from each other, each with their
3 separate recording?

4 A They all go into a single digital
5 recorder that's archived on to a hard drive.

6 Q So basically you were trying to get
7 material off of the hard drive; is that
8 right?

9 A Yes.

10 MR. CAGEN: Thank you, Mr. Cochran.
11 That is all the questions I have, your Honor.

12 ALJ YIP-KIKUGAWA: Okay. Mr. Long.

13 MR. LONG: No questions, your Honor.

14 ALJ YIP-KIKUGAWA: And Mr. Yang.

15 MR. YANG: No questions, your Honor.

16 EXAMINATION

17 BY ALJ YIP-KIKUGAWA:

18 Q Okay, Mr. Cochran, thank you for
19 coming in today. Couple of questions that I
20 have.

21 Do you recall receiving a directive
22 from Corporate Affairs about preserving
23 records shortly after the San Bruno incident?

24 A I do.

25 Q Did you or your supervisor feel
26 that that would have applied to the
27 recordings made at any of the PG&E facilities
28 that you had security?

1 A No, we did not recognize that as a
2 data request for security matters.

3 Q And you didn't make any further
4 inquiries to Corporate Affairs to see if it
5 would be covered?

6 A No, we did not.

7 Q Okay. You had made a comment that
8 said that when you did the search for -- on a
9 specific date, it said no date -- no video
10 available. Do you get that same response if
11 it comes from a live feed and you try to
12 retrieve video?

13 A No. Live feed is just that, your
14 Honor. It is -- it is right now live feed
15 this moment versus recorded, which is
16 something that has happened in the past.

17 Q Okay. And if you had put in a
18 request for a camera that you know is a live
19 feed camera, would that request come back as
20 no video available?

21 A If it is, for example, if it is
22 today at this time within the last hour and
23 the hard drive is not full forcing the system
24 to write over itself, I could make that
25 request for the live data for two minutes ago
26 and I would get that data back.

27 Q Okay. And then when you, going to
28 the Acme Security Company, when they

1 installed the system in Brentwood, were you
2 with them or did you oversee the installation
3 or verify that it was done or anything like
4 that?

5 A I was not with them. I was at the
6 facility at various times, and yes, I do go
7 back and check that they have installed the
8 equipment that was asked to be installed.

9 Q Okay. At that time do you also do
10 a verification that the program is the way
11 it's supposed to be?

12 A No.

13 Q No, you didn't?

14 A No, not at that time.

15 Q Okay. And this is going back to
16 something that I had mentioned this morning.
17 I have a security system at home. Every time
18 before I go on vacation I call the security
19 company and I run a check to make sure it
20 really is working. For the video cameras,
21 and I know you said that this is, you know,
22 only, you know, this is the only incident
23 where it hadn't been programmed the right
24 way, do you have a regular schedule or is
25 there a procedure to do a verification to
26 make sure that the record -- the systems are
27 recording given that these are electronic
28 devices and could break down?

1 A No, not for recorded video. Only
2 for live video to make sure the system is
3 functioning and transmitting the data.

4 Q So for all of this -- how many of
5 the current systems are actually recording
6 versus, you know, right now of all those
7 cameras?

8 A There's 183 digital recorders
9 within the PG&E system.

10 Q And of those 183 right now you
11 don't know if any of them are broken?

12 A Not unless we go out and do a --
13 perform a maintenance schedule on them.

14 Q How often do you do the maintenance
15 schedule?

16 A Once a year.

17 Q And when you do that schedule, you
18 don't do anything else in terms of
19 verification?

20 A All they do is go through, and
21 there's a little checklist that just checks
22 to make sure the cameras are functioning, the
23 power supplies are turned on, and that they
24 are recording at that particular moment.

25 Q And did you do that with the
26 Brentwood cameras at any time within the
27 past, you know, well, from the time they were
28 installed until now?

1 A Only when we got the data request.

2 Q So for two years, almost two years
3 from the time they were installed you didn't
4 do a maintenance or anything, the annual
5 maintenance?

6 A That's correct.

7 Q Why is that?

8 A Because we're in the process of
9 creating a maintenance schedule and a
10 maintenance requirement.

11 Q I see. Okay. The programming, you
12 were saying it was a programming error. Did
13 you go back and review all of the other
14 cameras that were supposed to be recording to
15 verify that it only was that one camera that
16 was in error?

17 A We -- I personally did a spot check
18 of various locations. They were all
19 programmed correctly.

20 Q Okay. Is that something that Acme
21 should have been doing when they turned the
22 system over to you to verify that everything
23 had been programmed properly?

24 A Yes.

25 Q And did they provide something to
26 you to say that that was the case?

27 A Typically no. There is a job
28 sign-off that we'll go through, just a short

1 checklist that everything is functioning and
2 installed as required or requested.

3 ALJ YIP-KIKUGAWA: I see. Okay.
4 Great. That's all I have as questions.

5 MS. JORDAN: I have no questions.

6 ALJ YIP-KIKUGAWA: Okay. Great.

7 Thank you very much, Mr. Cochran.
8 You're excused.

9 And we are off the record.

10 (Recess taken)

11 KRIS KEAS

12 resumed the stand and testified further
13 as follows:

14 ALJ YIP-KIKUGAWA: Back on the record.

15 We are back with Ms. Keas now.

16 MR. CAGEN: Thank you. I, your Honor,
17 have two documents here that I'd ask, from
18 data responses, and these are portions or
19 attachments to data responses, be marked as
20 CPSD next in order with your permission.

21 ALJ YIP-KIKUGAWA: All right.

22 MR. CAGEN: One is simply labeled
23 Analysis of PG&E's Records-Draft.

24 ALJ YIP-KIKUGAWA: Okay.

25 THE WITNESS: Thank you.

26 MR. CAGEN: You're welcome.

27 ALJ YIP-KIKUGAWA: We'll mark that as
28 CPSD-49.

I.12-01-007

PG&E'S REQUEST FOR OFFICIAL NOTICE

EXHIBIT 14

**Records Reporter's Transcript Volume 12
(September 19, 2012) (excerpted pages 1894, 1905-06,
1913 (PG&E/Lee))**

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA**

ADMINISTRATIVE LAW JUDGE AMY YIP-KIKUGAWA, presiding.

Order Instituting Investigation on the
Commission's Own Motion into the
Operations and Practices of Pacific Gas and
Electric Company with Respect to Facilities
Records for its Natural Gas Transmission
System Pipelines.

EVIDENTIARY
HEARING

Investigation
11-02-016

REPORTER'S TRANSCRIPT
San Francisco, California
September 19, 2012
Pages 1749 – 1915
Volume – 12

Reported by: Lynn A. Stanghellini, CSR No. 3489
Thomas C. Brenneman, CSR No. 9554

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
505 Van Ness Avenue, San Francisco, California 94102

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1 look into what the real failure is. Is it --
2 that would trigger in our evaluation
3 criteria. Besides other pipe that qualified
4 for manufacture threat, we also looking at
5 maintenance records seeing if it's any long
6 seam failure, leak or something that we need
7 to look into it. So we would look into what
8 the specific about the weld quality, what
9 causing the leak.

10 MR. CAGEN: Your Honor, I would like to
11 hand out the next exhibit, mainly for the
12 attachment on the end of it.

13 ALJ YIP-KIKUGAWA: This is marked as
14 CPSD-54.

15 (Exhibit No. CPSD-54 was marked for
16 identification.)

17 MR. CAGEN: Q Would you turn to the
18 last page, please, and tell me whether you've
19 seen this communication before. It is dated
20 March 1, 1989.

21 A The last page?

22 Q Yes, on the back.

23 A I seen it afterwards, yes.

24 Q You did not see this memo
25 beforehand; is that correct?

26 A That's correct.

27 Q And beforehand, I mean at any time
28 before September 9th, 2009.

1 The cracks are pre-service
2 defects, i.e., they are
3 from the original
4 manufacturing of the pipe
5 joint.

6 So would you agree that that has
7 not been found to be at least in this memo as
8 a corrosion leak?

9 A Agree.

10 Q All right. And would you agree
11 that it is a leak that had you known about it
12 might raise questions in your mind as to
13 whether there were manufacturing defects in
14 other portions of Line 132?

15 A The longitudinal weld typically
16 always going to find some minor cracks. It's
17 typical. It depends on whether it meets the
18 service purpose or not, even though it exists
19 when it was manufactured, but it has a
20 different meaning of a manufactured threat in
21 the integrity management language here.
22 Integrity management is longitudinal threat
23 have to meet certain threshold. Over the
24 past history the pipe, the long seam has tend
25 to be weaker in certain level to qualify for
26 the manufactured threat.

27 You know, probably all the DSAW
28 pipe will have some faults. I think that

1 would be metallurgist call whether that
2 actually be kind of broader witness issue and
3 it doesn't meet for service. And to qualify
4 that for manufactured threat is not just it
5 existed during the manufacture time.

6 Q I understand. However, wasn't this
7 pipe section replaced by PG&E?

8 A Yes.

9 Q So it was not deemed fit for
10 further service; is that correct?

11 A I wouldn't say it not fit for
12 service because they couldn't identify
13 actually where the leak coming from. I think
14 we have different way to repair the pipeline.
15 They choose to replace a section. They
16 choose to replace a section at the time.

17 MR. CAGEN: Thank you. That does
18 complete my questioning, your Honor.]

19 ALJ YIP-KIKUGAWA: Thank you.

20 Mr. Long.

21 MR. LONG: No questions.

22 EXAMINATION

23 BY ALJ YIP-KIKUGAWA:

24 Q I have a real quick question for
25 you, Mr. Lee.

26 Mr. Lee, looking in this second
27 document from CPSD, you talked about A and H
28 Forms. I know what an A Form looks like.

1 Q That's fine.

2 I wanted to then turn you back to
3 the document that the ALJ asked you about.

4 A Okay.

5 Q That is the 1989, March 1, 1989,
6 memo concerning the analysis done on the
7 piece of pipe cut out of line 130 in
8 connection with the 1988 leak.

9 A Yes.

10 Q Does this report -- you commented
11 on this report in response to the ALJ's
12 questions that it was not -- that probably
13 all DSAW will have some flaws. Do you
14 remember that?

15 A Yes.

16 Q Is there anything in this report
17 that indicates that those inherent flaws in
18 that vintage DSAW pipe had grown in service?

19 A Are you asking me reading this rule
20 here?

21 Q Reading that report as an integrity
22 management engineer looking at this, would it
23 indicate to you that there was any growth of
24 these flaws that are identified as preservice
25 while the pipe was in service?

26 A No.

27 MR. MALKIN: I have nothing further,
28 your Honor.