

APPENDIX 1

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 28, 2013

Via E Mail address: LHJ2@pge.com

Lise Jordan
Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105

Re: CPSD Data Request 98

Dear Ms. Jordan:

Below please see data request 98 of the California Public Utilities Commission's (CPUC) Consumer Protection and Safety Division (CPSD) to Pacific Gas and Electric Company (PG&E). Please provide any objections to the data request below by March 29, 2013, and please provide responses to this data request by April 2, 2013.

Please contact me at 415 703 1973, if you have any questions regarding these data requests.

Thank you for your prompt attention to this matter.

Sincerely,

/s/ Darryl Gruen

Darryl Gruen
Staff Counsel

cc: Joseph Malkin
Courtney Linn
Jonathan Pendleton
Robert Cagen
Catherine Johnson
Margaret Felts

Pursuant to California Public Utilities Code sections 314, 581 and 582, the Consumer Protection and Safety Division (CPSD) of the California Public Utilities Commission (CPUC), hereby provides these data requests to Pacific Gas and Electric Company (PG&E).

Darryl Gruen
California Public Utilities Commission
505 Van Ness Avenue, Room 5036
San Francisco, California 94102
415 703 1086
djg@cpuc.ca.gov

Robert Cagen
California Public Utilities Commission
505 Van Ness Avenue, Room 4107
San Francisco, California 94102
415 703 1385
rcc@cpuc.ca.gov

I.11 02 016

CPSD Data Request 98

INSTRUCTIONS

Please answer the following Data Requests with written, verified responses pursuant to Public Utilities Code sections 581 and 582. Restate the text of each request prior to providing the response. For any questions, call or email Darryl Gruen, as listed above.

Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify CPSD as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition or an instruction is unclear, notify CPSD as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

DEFINITIONS

Unless the request indicates otherwise, the following definitions are applicable in providing the requested information.

1. "Document" or "documents" refers to all writings or records of every type in PG&E's possession, control or custody, including, but not limited to: testimony and exhibits, memoranda, correspondence, letters, reports (including drafts, preliminary, intermediate, and final reports), survey, written analyses, studies, summaries, pamphlets, books, charts, tabulations, notes, photographs, maps, bulletins, corporate or other minutes, diaries, transcripts, microfilm, microfiche, computer data, computer files, computer tapes, computer inputs, computer outputs and printouts, accounting statements, workpapers, engineering diagrams, speeches, and all other records. "Documents" includes copies of documents, including copies of documents containing handwritten notes. "Documents" also includes any attachments or appendices to documents.
2. "Relating to" means concerning, addressing, referring, discussing, commenting upon, analyzing, mentioning or involving in any way.
3. "Identify":
 - a. When used in reference to a person includes stating his or her full name, his or her most recent known business address and telephone number, and his or her present title or position;
 - b. When used in reference to documents includes stating the nature of the document (e.g., letter, memorandum), the date (if any), the title of the document, the identity of the author and/or the document, the location of the document, the identity of the person having possession, control or custody of the document, and the general subject matter of the document.
4. "CPUC" as used herein refers to the California Public Utilities Commission.
5. "CPSD" as used herein refers to the Consumer Protection and Safety Division of the CPUC.
6. "PG&E" as used herein refers to Pacific Gas and Electric Company and/or PG&E Corporation or its affiliates.

QUESTIONS

- 1) Did PG&E's letter to the NTSB on January 31st, 2013 take into account or include pipe segments that were reclassified after September 9, 2010, including but not limited to those subject to I.11 11 009?

- 2) Of the 898 misclassified segments at pages 56 58 of CPD's Investigative Report in I.11 11 009, how many of these 898 segments have "traceable, verifiable, and complete records" pursuant to the NTSB's Recommendation P 10 3 (Urgent) validating MAOP under 49 C.F.R. Subpart J section 192.505?
 - a. As of January 31, 2013?
 - b. As of March 14, 2013?
 - c. As of March 28, 2013?
 - d. Have any of these 898 segments been hydrostatically tested after September 9, 2010 pursuant to 49 C.F.R. Subpart J 192.505?

APPENDIX 2

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

PG&E Data Request No.:	CPUC_098-01		
PG&E File Name:	GasTransmissionSystemRecordsOII_DR_CPUC_098-Q01		
Request Date:	March 28, 2013	Requester DR No.:	098
Date Sent:	April 2, 2013	Requesting Party:	California Public Utilities Commission
PG&E Witness:		Requester:	Darryl Gruen

QUESTION 1

Did PG&E's letter to the NTSB on January 31st, 2013 take into account or include pipe segments that were reclassified after September 9, 2010, including but not limited to those subject to I.11-11-009?

ANSWER 1

PG&E objects to this Data Request as the evidentiary record is closed and this proceeding is now in the post-hearing briefing stage. In addition, the ALJ has already determined that the March 14, 2013, letter to the NTSB is subject to judicial notice for what it is.

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

PG&E Data Request No.:	CPUC_098-02		
PG&E File Name:	GasTransmissionSystemRecordsOII_DR_CPUC_098-Q02		
Request Date:	March 28, 2013	Requester DR No.:	098
Date Sent:	April 2, 2013	Requesting Party:	California Public Utilities Commission
PG&E Witness:		Requester:	Darryl Gruen

QUESTION 2

Of the 898 misclassified segments at pages 56-58 of CP&E's Investigative Report in I.11-11-009, how many of these 898 segments have "traceable, verifiable, and complete records" pursuant to the NTSB's Recommendation P-10-3 (Urgent) validating MAOP under 49 C.F.R. Subpart J section 192.505?

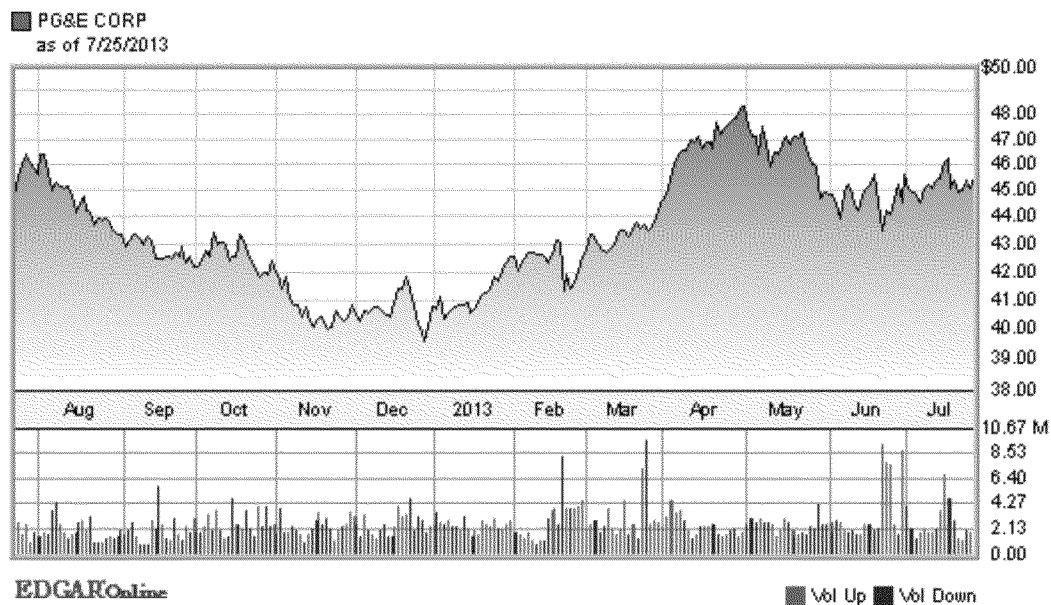
- a. As of January 31, 2013?
- b. As of March 14, 2013?
- c. As of March 28, 2013?
- d. Have any of these 898 segments been hydrostatically tested after September 9, 2010 pursuant to 49 C.F.R. Subpart J 192.505?

ANSWER 2

PG&E objects to this Data Request as the evidentiary record is closed and this proceeding is now in the post-hearing briefing stage. In addition, the ALJ has already determined that the March 14, 2013, letter to the NTSB is subject to judicial notice for what it is.

APPENDIX 3

PG&E STOCK PRICE FOR THE LAST YEAR



Source: <http://investor.pgecorp.com/phoenix.zhtml?c=110138&p=irol-stockChart>

APPENDIX 4

PG&E Stock Price from July 15, 2013 to July 26, 2013

Date	Open	High	Low	Close	Volume	Adj Close
7/26/2013	45.54	46.32	45.54	46.32	2395627	46.32
7/25/2013	45.04	45.65	44.99	45.61	1894100	45.61
7/24/2013	45.65	45.79	44.94	45.14	2038700	45.14
7/23/2013	45.21	45.56	44.92	45.52	1309200	45.52
7/22/2013	45.03	45.4	45.02	45.12	1381200	45.12
7/19/2013	45.59	45.68	44.99	45	2958400	45
7/18/2013	45.34	45.79	45.24	45.52	2805500	45.52
7/17/2013	45.61	45.89	45	45.14	4781000	45.14
7/16/2013	46.29	47.3	45.56	46.37	6905000	46.37
7/15/2013	45.56	46.42	45.21	46.19	3737600	46.19