

CPUC ENERGY DIVISION DATA REQUEST

Please respond to the following questions and request for information by COB September 30, 2013. Send the completed data request to: cpe@cpuc.ca.gov . Call Eugene Cadenasso at (415) 703-1214 with any questions.

1. Please provide copies of the e-mail or other notification of the discrepancy between the field conditions and the PG&E documented specifications on Line 147 discovered on or about October 18, 2012, discussed in paragraphs 26 and 27 of the *Verified Statement of PG&E Vice President of Gas Transmission Maintenance and Construction in Response to Ruling of Assigned Commissioner and Assigned Administrative Law Judge* (hereafter “Johnson Statement”). In your response, provide the entire e-mail chain including all recipients, cc’s, bcc’s, forwards and any responses.
2. Please provide the pipeline engineer’s e-mail notification dated November 14, 2012, referenced in paragraph 33 of the Johnson Statement. In your response, provide the entire e-mail chain including all recipients, cc’s, bcc’s, forwards and any responses.
3. Please produce all documents (including but not restricted to e-mails, correspondence, meeting agendas, notes and other writings) indicating that PG&E senior management listed below were informed of the existence or potential existence of any discrepancies between PG&E’s Pipeline Features List (PFL) or other pipeline specifications records and what has been discovered in the field. Your response should include, but is not limited to the monthly Pipeline Safety Enhancement Plan executive meetings and the monthly gas operations meetings mentioned by Mr. Kirk Johnson at the September 6, 2013 Order to Show Cause Hearing (RT Vol. 16B:2480-81.) For the purposes of this data request, please limit your response to the timeframe of October 31, 2011 to the present time:
 - a) M. Kirk Johnson, Vice President, Gas Transmission Maintenance and Construction
 - b) Jesus Soto Jr., Senior Vice President, Gas Transmission Operations
 - c) Nick Stavropoulos, Executive Vice President, Gas Operations
 - d) Christopher (Chris) P. Johns, President
 - e) Anthony F. Earley Jr., Chairman of the Board, Chief Executive Officer and President of PG&E Corporation
4. Please produce the February 22, 2013 e-mail referenced in paragraph 65 of the Johnson Statement, wherein PG&E contacted Commission staff to arrange a meeting regarding PG&E’s one-class-out analysis. In your response, provide the entire e-mail chain including all recipients, cc’s, bcc’s, forwards and any responses.
5. Please produce copies of all documents (including but not restricted to e-mails, correspondence, meeting agendas, notes and other writings) evidencing the meeting or other contact that occurred between PG&E employees and CPUC SED Staff on March 20, 2013, noted

in the Johnson Statement paragraph 66. Please also provide all documents provided by PG&E at the March 20th meeting.

a) Please provide any documents which provide acknowledgement or guidance from SED regarding the topics discussed at the March 20th meeting, including the discovery of discrepancies between pipeline records and conditions in the field, the corrected pipeline specifications for Line 147, or the application of the one-class out analysis.

6. In addition to the two-page document attached to the Johnson Statement, please provide documentation that describes in detail PG&E's "one-class-out" policy discussed in the Johnson Statement.

a) Is the "one-class out" practice a standard, accepted practice or is it a PG&E interpretation of safety regulations?

b) In your response, please describe how the one-class-out policy was initiated, and whether the policy was developed by government agency, industry group or by PG&E? Please identify all portions (including the location and length of each pipeline segment) that are operated under the "one-class-out policy.

c) What percentage of PG&E's gas transmission pipeline (on a mileage basis) is operated under the "one class out" policy?

7. Please provide documentation in tabular and graphical form showing the daily average and maximum operating pressure from October 2012 through April 2013 for Lines 101, 132A and 147.

8. Slide 5 of the presentation identified as Exhibit OSC-4 shows the possibility of curtailments if all pressure restoration orders are suspended. Is PG&E currently developing a curtailment plan and will it be provided to the Commission? When is the curtailment plan expected to be completed?

If you claim that any of the above-requested documents are privileged, please provide a privilege log, indicating the title, author, recipient(s), date, and subject of the document, and the privilege asserted, holder of the privilege and the facts supporting the privilege.

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