

December 23, 2013

Ms. Elizaveta Malashenko
Deputy Director, Office of Utility Safety
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Reference: Letter from Ms. Elizaveta Malashenko to Mr. Patrick Hogan, Dated
11/27/2013. PU Code Section 316(a) Violation.

Dear Ms. Malashenko:

I am writing to respond to the Notice of Violation (NOV) you sent on November 27, 2013 regarding PG&E's timeliness with SED staff data requests, asserting that PG&E has violated California Public Utilities Code Section 316(a) by not remitting SED staff data requests by the requested due dates.

First and foremost, I want to assure you that we take this matter very seriously and have taken immediate action to substantially improve the timeliness of our responses to SED staff data requests. On December 13, 2013, we met with ~~Raymond~~ Raymond Fugere to underscore the importance of this issue and to outline the steps we have taken both before and after the receipt of the NOV. Specifically, we have taken the following actions:

- Increased the number of personnel assigned to the centralized PG&E staff responsible for managing and responding to SED inquiries and regulatory submittals (final incident reports, data request responses, audit letter responses, customer complaint investigations, and site visits). The staff was first augmented in mid-November, prior to the receipt of the NOV, and then again in late-November.
- Increased communications within Electric Operations on the importance of providing timely responses and more visibility on data requests by supervisors of staff responsible for providing information for responses.
- Improved process that sets appropriate internal due dates and immediate escalation when internal deadlines are not met.

These actions have resulted in timely submittals to SED staff since November 25, 2013 and we are committed to continuing that trend.

PG&E will also implement the following actions in 2014:

- Develop a timeliness metric that tracks response times for all data requests by assigned staff, which will be reviewed by Electric Operations management on a periodic basis.
- Develop a standard set of questions for different incident types, based in large part upon previous data requests from SED staff, that will be used for development of the Final Report.

PG&E believes that the increase in resources, the process improvements, and the other actions discussed above will enable us to continue to meet SED response due date requests. We are also committed to continuing to make process improvements beyond these actions.

Please contact me at 415-973-9005 if you have any questions regarding this response.

Sincerely,

/s/

Patrick M Hogan
Vice President
Asset Management, Electric Operations

cc: Mr. Raymond Fugere, Program and Project Supervisor, CPUC, ESRB
Ms. Meredith Allen, Sr. Director, Regulatory Affairs, PG&E
Mr. Eric Back, Director, Compliance and Risk Management, PG&E
[Redacted], P.E., Manager, Distribution Compliance, PG&E
[Redacted], CPUC Compliance Supervisor, PG&E