

# **ATTACHMENT A**

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



May 7, 2014

Via E-Mail address: [LHJ2@pge.com](mailto:LHJ2@pge.com)

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

**Re: CPSD Data Request 99**

Dear Ms. Jordan:

Below please see data request 99 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 May 14, 2014, and please provide responses to this data request by May 19, 2014.

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](mailto: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](mailto:rcc@cpuc.ca.gov)

**I.11-02-016**

**CPSD Data Request 99**

**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

For this next set of questions, refer to Data Request Joint 001-01, which was jointly requested by CPSD and TURN on July 19, 2012. PG&E's response was sent August 30, 2012. Provide a current update to the spreadsheet accompanying this data response ("Spreadsheet").

1. Specifically, If PG&E has located additional documents or data, demonstrating that for any line entry in the exhibit, PG&E has located the additional hydrotest data<sup>1</sup> that PG&E contends demonstrates that the company met all legal requirements at time of installation, then PG&E should provide the following information as amendments to the Spreadsheet shown via tracked changes:

- a. Identify each such line entry by segment mileage location and by date of installation.
- b. Identify and describe, for each line entry that has been changed by an amendment to the data response, the additional information that PG&E has located.
- c. Provide the date that PG&E learned of the information, and how it did so.

2. Provide the updated Spreadsheet in native file format.

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SED emphasizes the need for additional information located, and not known to PG&E at the time the exhibit was prepared, to ensure that PG&E understands that it has not waived any rights to positions it may have or take that no party has demonstrated any violation of law based on the information now in the exhibit.

# **ATTACHMENT B**

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**From:** Jordan, Lise (Law) <LHJ2@pge.com>  
**Sent:** Wednesday, May 14, 2014 4:10 PM  
**To:** Gruen, Darryl; Courtney Linn (Law) (clinn@orrick.com); Johnson, Catherine A.; Margaret Felts; 'Paul Duller'; Pendleton, Jonathan (Law); Morris, Harvey Y.; 'Alison North'; Cagen, Robert; Malkin, Joseph M.  
**Subject:** RE: I.11-02-016 Safety and Enforcement Division Data Request 99

Dear Mr. Gruen:

We received your email dated May 7, 2014, attaching Consumer Protection & Safety Division (now the Safety and Enforcement Division or SED) Data Request 99 in I.11-02-16 (the "Records OII Proceeding"). Data Request 99 asks PG&E to update a spreadsheet containing information concerning hydrotesting data. PG&E initially provided this data on August 30, 2012 in response to CPSD and TURN's Joint Data Request 001-Q01. In its response to Joint Data Request 001-Q01 PG&E explained that the request sought information that was the subject of, and being gathered through, PG&E's then on-going MAOP Validation effort.

PG&E does not believe Data Request 99 is timely or appropriate. Hearings in the Records OII Proceeding concluded on January 18, 2013, and the final exhibits were admitted into the record at a status conference on January 22, 2013. While we appreciate that SED has broad discovery rights, through Data Request 99 you have sought discovery in a specific adjudicatory proceeding. The record in that proceeding is closed and discovery is no longer available to any of the parties, including Legal Division and SED.

As we explained during our May 8, 2014 telephone call, SED recently completed its review of PG&E's MAOP Validation effort and reported its results. See [https://www.pge.com/regulation/PSEP-Update/Reports/SED/2014/PSEP-Update\\_Report\\_SED\\_20140425\\_303366Atch04\\_304079.pdf](https://www.pge.com/regulation/PSEP-Update/Reports/SED/2014/PSEP-Update_Report_SED_20140425_303366Atch04_304079.pdf). Related information is available through the ongoing Gas Safety Rulemaking (R.11-02-019) and other gas proceedings.

Sincerely,

Lise H. Jordan | Attorney | Pacific Gas and Electric Company  
415.973.6965 office

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**From:** Gruen, Darryl [<mailto:darryl.gruen@cpuc.ca.gov>]  
**Sent:** Wednesday, May 07, 2014 11:41 AM  
**To:** Courtney Linn (Law) (clinn@orrick.com); Johnson, Catherine A.; Jordan, Lise (Law); Malkin, Joseph M (Law); Margaret Felts; 'Paul Duller'; Pendleton, Jonathan (Law); Morris, Harvey Y.; 'Alison North'; Cagen, Robert  
**Subject:** I.11-02-016 Safety and Enforcement Division Data Request 99

Good Morning:

Attached, please find the Safety and Enforcement Division's Data Request 99 in I.11-02-016. Please let me know if there are questions.

Darryl Gruen  
Staff Counsel  
California Public Utilities Commission  
505 Van Ness Ave. - San Francisco, CA 94102  
(415) 703-1973 - [djg@cpuc.ca.gov](mailto:djg@cpuc.ca.gov)



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PG&E is committed to protecting our customers' privacy.

To learn more, please visit <http://www.pge.com/about/company/privacy/customer/>

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