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

Order Instituting Investigation and Order to
Show Cause on the Commission's Own
Motion into the Operations and Practices of
Pacific Gas and Electric Company with
Respect to Locate and Mark Practices and
Related Matters.

Investigation 18-12-007
(Issued December 14, 2018)

**MOTION OF PACIFIC GAS AND ELECTRIC COMPANY FOR LEAVE TO
FILE UNDER SEAL THE CONFIDENTIAL VERSION OF ITS 90-DAY REPORT
AND RESPONSE TO LOCATE AND MARK OII DIRECTIVES 1 TO 9, WITH
PROPOSED REDACTIONS IDENTIFIED; [PROPOSED] RULING**

ALEJANDRO VALLEJO
JONATHAN D. PENDLETON

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-2916
Facsimile: (415) 973-5520
E-Mail: jonathan.pendleton@pge.com

Dated: March 14, 2019

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

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

Order Instituting Investigation and Order to Show Cause on the Commission's Own Motion into the Operations and Practices of Pacific Gas and Electric Company with Respect to Locate and Mark Practices and Related Matters.

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MOTION OF PACIFIC GAS AND ELECTRIC COMPANY FOR LEAVE TO FILE UNDER SEAL THE CONFIDENTIAL VERSION OF ITS 90-DAY REPORT AND RESPONSE TO LOCATE AND MARK OII DIRECTIVES 1 TO 9, WITH PROPOSED REDACTIONS IDENTIFIED; [PROPOSED] RULING

Pursuant to Rules 11.1 and 11.4 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) respectfully files this Motion for Leave to File Under Seal (Motion) the confidential version of its 90-day Report and Response to Locate and Mark OII Directives 1 to 9 (90-day Report and Response), which contains confidential information in an Appendix and certain Exhibits.

Specifically, the material PG&E seeks to protect in the confidential version of its 90-day Report and Response is contained in the confidential, unredacted versions of Appendix E and Exhibits 5, 14, 16, 18, 20, 22, 24, 27-28, 30, 34, 36, 44-46, 48-50, 52-56, 58 and 60.^{1/}

This Motion is made pursuant to General Order 66-D, Section 3.3, Commission Decision ("D.") 17-09-023, and the Administrative Law Judge's Ruling on Redaction of Information in the Investigative Report of the Commission's Safety and Enforcement Division (Ruling), issued on February 25, 2019 in this proceeding.

PG&E's Confidentiality Declaration in support of this Motion is provided at Attachment A.

^{1/} PG&E is filing the public version of its 90-day Report and Response concurrently with this Motion for Leave to File Under Seal. In the public version, PG&E has redacted the confidential information from the identified Appendix and Exhibits.

The confidential version of PG&E's 90-day Report and Response, with its proposed redactions to the identified Appendix and Exhibits highlighted, is being filed concurrently with this Motion and provided to the Commission's Docket Office in hard copy and on an archival CD-ROM. Pursuant to Rule 11.4 of the Commission's Rules of Practice and Procedure and the Ruling, PG&E asks the Commission to treat this material as confidential.

For the reasons described above, PG&E requests that the Commission grant this Motion to file the confidential version of PG&E's 90-day Report and Response, with its proposed redactions to the identified Appendix and Exhibits highlighted, under seal.

As required by Rule 11.4(a), a proposed ruling granting this Motion is attached (see Attachment B).

Respectfully Submitted,

JONATHAN D. PENDLETON

By /s/ Jonathan D. Pendleton
JONATHAN D. PENDLETON

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-2916
Facsimile: (415) 973-5220
E-Mail: jonathan.pendleton@pge.com

Dated: March 14, 2019

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT A

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

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY**

1. I, Richard Knoeber, am a/the Compliance Specialist, Gas Operations Support Team (GOST) of Pacific Gas and Electric Company (“PG&E”), a California corporation. Melvin Christopher, the Vice President, Gas Transmission & Distribution Operations of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
6111 Bollinger Canyon Road
Mailstop BR1Y4B
San Ramon, CA 94583

2. Title and description of document(s): Please see “Exhibit B” for a chart identifying which documents contain confidential information.
3. These identified documents contain confidential information that either (1) based on my information and belief, has not been publicly disclosed, or (2) reveals the identities of potential witnesses. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
<input checked="" type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data</p> <p>(Protected under PUC § 8380; Civ. Code §§ 1798 <i>et seq.</i>; Gov't Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)</p>	See Exhibit B
<input checked="" type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history; and statements attributed to the individual</p> <p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Gov't Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M.)</p>	See Exhibit B
<input checked="" type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical energy infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113</p> <p>(Protected under Gov't Code § 6254(k), (e), (ab); 6 U.S.C. § 131; 6 CFR §29.2; 6 CRF §29.8(g))</p>	See Exhibit B
<input type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data</p> <p>(Protected under Civ. Code §§ 3426 <i>et seq.</i>; Gov't Code §§ 6254, <i>et seq.</i>, e.g., 6254(e), 6254(k), 6254.15; Gov't Code § 6276.44; Evid. Code §1060; D.11-01-036)</p>	
<input type="checkbox"/>	<p>Corporate financial records</p> <p>(Protected under Gov't Code §§ 6254(k), 6254.15)</p>	
<input checked="" type="checkbox"/>	<p>Third-Party information subject to non-disclosure or confidentiality agreements</p> <p>(Protected under Gov't Code § 6254(k); <i>see, e.g.</i>, CPUC D.11-01-036)</p>	See Exhibit B
<input type="checkbox"/>	<p>Other categories where disclosure would be against the public interest (Gov't Code § 6255(a)):</p>	

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on this 13th day of March, 2019 at San Ramon, California.

**Richard
Knoeber** Digitally signed by
Richard Knoeber
Date: 2019.03.13
17:32:21 -07'00'

Richard Knoeber,
Compliance Specialist, Gas Operations Support
Team (GOST)
Pacific Gas and Electric Company

**EXHIBIT B TO THE DECLARATION SUPPORTING CONFIDENTIAL
DESIGNATION ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY**

The following page contains an index identifying documents containing confidential information. Following the index, there are a series of charts detailing the basis for confidential treatment and where the confidential information is located on each identified document.¹ Furthermore, the accompanying confidential versions of the identified documents also denote the location of confidential information through the use of green boxes around the information.

¹ For uniformity, constructive pagination of all identified documents begins on the first page following the exhibit cover sheet, starting with page 1. This is even in cases in which internal pagination existed within the document.

INDEX

Document	Confidential Information
PG&E's 90-Day Report and Response to Locate and Mark OII Directives 1 to 9	No Identified Confidential Information.
Appendix A – L&M Chronology	No Identified Confidential Information.
Appendix B – Compliance Plan	No Identified Confidential Information.
Appendix C – SED Report Contested Statements	No Identified Confidential Information.
Appendix D – Guidepost Contested Statements	No Identified Confidential Information.
Appendix E – Outline of Witnesses	Confidential Information. See page 8.
Exhibit 1 – PG&E Code of Conduct, 2018	No Identified Confidential Information.
Exhibit 2 – Excerpt of PHMSA Guidelines for States in Pipeline Safety Program	No Identified Confidential Information.
Exhibit 3 – Common Ground Alliance Website, “About Us” Page	No Identified Confidential Information.
Exhibit 4 – Excerpt of 2018 Dig-in Data Summary	No Identified Confidential Information.
Exhibit 5 – Quality Assurance Audit Nonconformance Report, March 10, 2010	Confidential Information. See page 9.
Exhibit 6 – Damage Prevention SAR Presentation, September 16, 2013	No Identified Confidential Information.
Exhibit 7 – 2018 After-Hours Ticket Activity Log	No Identified Confidential Information.
Exhibit 8 – Common Ground Alliance Website, “Board of Directors” Page	No Identified Confidential Information.

Document	Confidential Information
Exhibit 9 – USA North 811 Minutes of Board of Directors Meeting, April 26, 2017	No Identified Confidential Information.
Exhibit 10 – Excerpt of Common Ground Alliance Website, “Best Practices Guide”	No Identified Confidential Information.
Exhibit 11 – USA North 811 Minutes of Board of Directors Meeting, July 26, 2017	No Identified Confidential Information.
Exhibit 12 – AGA Peer Review Program 2016 Brochure	No Identified Confidential Information.
Exhibit 13 – Irth Solutions Website, “Utilisphere” Page	No Identified Confidential Information.
Exhibit 14 – Internal Audit Tracking Sheet for the 2010 Audit	Confidential Information. See page 10.
Exhibit 15 – PG&E Response to SED Question, Index Number 10707	No Identified Confidential Information.
Exhibit 16 – Irth Solutions Work Order to Remove Voicemail, January 14, 2013	Confidential Information. See page 11.
Exhibit 17 – Excerpt of Gas Operations Keys to Success Report, June 2012	No Identified Confidential Information.
Exhibit 18 – Excerpt of Gas Operations Keys to Success Report, June 2013	Confidential Information. See page 12.
Exhibit 19 – Excerpt of Gas Operations Keys to Success Report, July 2014	No Identified Confidential Information.
Exhibit 20 – Excerpt of Gas Operations Keys to Success Report, May 2015	Confidential Information. See page 13.

Document	Confidential Information
Exhibit 21 – Excerpt of Gas Operations Keys to Success Report, June 2016	No Identified Confidential Information.
Exhibit 22 – Excerpt of Gas Operations Integrated Planning Documents, October 2017	Confidential Information. See page 14.
Exhibit 23 – Excerpt of PG&E Gas Operations Keys to Success Report, February 2017	No Identified Confidential Information.
Exhibit 24 – QPIC Dashboard, August 2015	Confidential Information. See page 15.
Exhibit 25 – Excerpt of PG&E Gas Operations Keys to Success Report, March 2013	No Identified Confidential Information.
Exhibit 26 – Email re: IBEW Agreements, March 8, 2017	No Identified Confidential Information.
Exhibit 27 – Email re: Employees Temporarily Reassigned to L&M, June 4, 2015	Confidential Information. See page 16.
Exhibit 28 – Excerpt of PG&E Gas Operations Keys to Success Report, March 2013	Confidential Information. See page 17.
Exhibit 29 – L&M Device Replacement Brochure, May 2015	No Identified Confidential Information.
Exhibit 30 – Preparing for Daily Work Procedure, October 2013	Confidential Information. See page 18.
Exhibit 31 – Updated Bates White Report	No Identified Confidential Information.
Exhibit 32 – Email re: Supervisor Reaction to Late Tickets, March 28, 2017	No Identified Confidential Information.
Exhibit 33 – PG&E Response to SED Question, Index Number 10279	No Identified Confidential Information.

Document	Confidential Information
Exhibit 34 – AGA Peer Review Action Plan	Confidential Information. See page 19.
Exhibit 35 – L&M SAR Presentation	No Identified Confidential Information.
Exhibit 36 – PG&E Code of Conduct, 2013	Confidential Information. See page 20.
Exhibit 37 – Email re: Late Tickets and STIP, December 14, 2012	No Identified Confidential Information.
Exhibit 38 – Email re: L&M Staffing, December 14, 2012	No Identified Confidential Information.
Exhibit 39 – Performance Evaluation Goal and Competency Rating Standards	No Identified Confidential Information.
Exhibit 40 – PG&E Supplemental Response to SED Question, Index Numbers 10707.15-18	No Identified Confidential Information.
Exhibit 41 – [Intentionally Omitted]	N/A
Exhibit 42 – [Intentionally Omitted]	N/A
Exhibit 43 – [Intentionally Omitted]	N/A
Exhibit 44 – PG&E Supplemental Response to SED Question, Index Number 11481	Confidential Information. See page 21.
Exhibit 45 – General Rate Case Exhibit 43, 2017	Confidential Information. See page 22.
Exhibit 46 – Short Term Incentive Plan Scorecard, 2017	Confidential Information. See page 23.
Exhibit 47 – Excerpt of En Banc Meeting Transcript, September 24, 2015	No Identified Confidential Information.

Document	Confidential Information
Exhibit 48 – Email re: Zero Late Ticket Expectation, May 4, 2015	Confidential Information. See page 24.
Exhibit 49 – Email re: Zero Late Tickets, July 23, 2015	Confidential Information. See page 25.
Exhibit 50 – Email re: L&M Resources, October 26, 2012	Confidential Information. See page 26.
Exhibit 51 – SAR Presentation, November 22, 2013	No Identified Confidential Information.
Exhibit 52 – Late Ticket Quality Management Review Meeting Invitation, May 24, 2016	Confidential Information. See page 27.
Exhibit 53 – Meeting Invitation to Discuss AGA Findings, March 31, 2017	Confidential Information. See page 28.
Exhibit 54 – Bates White Late Ticket Logic SED Presentation	Confidential Information. See page 29.
Exhibit 55 – IrthNet Past Due Ticket Listing Statement of Work	Confidential Information. See page 30.
Exhibit 56 – IrthNet Enhancements Presentation	Confidential Information. See page 31.
Exhibit 57 – L&M Gap Training Presentation	No Identified Confidential Information.
Exhibit 58 – 2016 L&M Audit	Confidential Information. See page 32.
Exhibit 59 – Quality Management Late Ticket Review, April 18, 2018	No Identified Confidential Information.
Exhibit 60 – L&M Quality Management Presentation, December 2018	Confidential Information. See page 33.
Exhibit 61 – SAR Presentation, February 4, 2019	No Identified Confidential Information.
Exhibit 62 – List of L&M-related Supervisors and Managers	No Identified Confidential Information.

Document	Confidential Information
Exhibit 63 – Dig-in Investigation Procedure	No Identified Confidential Information.

Confidential Redacted Sections from Appendix E.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Appendix E – Outline of Witnesses	1-2	Employee names.	Personal identifying information.

Confidential Redacted Sections from Exhibit 5.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 5 – Quality Assurance Audit Nonconformance Report, March 10, 2010	1	Employee names.	Personal identifying information.
	3	Third party names; customer address.	Customer-specific data; personal identifying information.
	4	Third party name and customer address	Customer-specific data; personal identifying information.
	5-6	Third party names.	Personal identifying information.
	8-9	Third party names.	Personal identifying information.
	12	Third party name.	Personal identifying information.

Confidential Redacted Sections from Exhibit 14.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 14 – Internal Audit Tracking Sheet for the 2010 Audit	1-3	Employee names.	Personal identifying information.
	4	Employee names and telephone number.	Personal identifying information.

Confidential Redacted Sections from Exhibit 16.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 16 – Irth Solutions Work Order to Remove Voicemail, January 14, 2013	1	Employee Name.	Personal identifying information.
	2	Third party name and title.	Personal identifying information.

Confidential Redacted Sections from Exhibit 18.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 18 – Excerpt of Gas Operations Keys to Success Report, June 2013	2	Benchmarking data.	Third-party information subject to nondisclosure/confidentiality agreements.

Confidential Redacted Sections from Exhibit 20.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 20 – Excerpt of Gas Operations Keys to Success Report, May 2015	12	Employee names.	Personal identifying information.

Confidential Redacted Sections from Exhibit 22.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 22 – Excerpt of Gas Operations Integrated Planning Documents, October 2017	4-5	Benchmarking data.	Third-party information subject to nondisclosure/confidentiality agreements.
	10-11	Benchmarking data.	Third-party information subject to nondisclosure/confidentiality agreements.

Confidential Redacted Sections from Exhibit 24.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 24 – QPIC Dashboard, August 2015	1	Employee names.	Personal identifying information.

Confidential Redacted Sections from Exhibit 27.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 27 – Email re: Employees Temporarily Reassigned to L&M, June 4, 2015	1	Employee names.	Personal identifying information.

Confidential Redacted Sections from Exhibit 28.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 28 – Excerpt of PG&E Gas Operations Keys to Success Report, March 2013	2	Benchmarking data.	Third-party information subject to nondisclosure/confidentiality agreements.
	6-7	Employee names.	Personal identifying information.
	9-10	Employee names.	Personal identifying information.

Confidential Redacted Sections from Exhibit 30.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 30 – Preparing for Daily Work Procedure, October 2013	3	Customer addresses.	Customer-specific information.

Confidential Redacted Sections from Exhibit 34.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 34 – AGA Peer Review Action Plan	3	Employee name.	Personal identifying information.

Confidential Redacted Sections from Exhibit 36.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 36 – PG&E Code of Conduct, 2013	20	Emergency phone number.	Facility, security, or critical energy infrastructure data.

Confidential Redacted Sections from Exhibit 44.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 44 – PG&E Supplemental Response to SED Question, Index Number 11481	1	Employee name.	Personal identifying information.

Confidential Redacted Sections from Exhibit 45.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 45 – General Rate Case Exhibit 43, 2017	13-16	Benchmarking data.	Third-party information subject to nondisclosure/confidentiality agreements.

Confidential Redacted Sections from Exhibit 46.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 46 – Short Term Incentive Plan Scorecard, 2017	2-3	Benchmarking data.	Third-party information subject to nondisclosure/confidentiality agreements.

Confidential Redacted Sections from Exhibit 48.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 48 – Email re: Zero Late Ticket Expectation, May 4, 2015	1	Employee names.	Personal identifying information.

Confidential Redacted Sections from Exhibit 49.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 49 – Email re: Zero Late Tickets, July 23, 2015	1	Employee names and contact information.	Personal identifying information.

Confidential Redacted Sections from Exhibit 50.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 50 – Email re: L&M Resources, October 26, 2012	1	Employee names.	Personal identifying information.

Confidential Redacted Sections from Exhibit 52.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 52 – Late Ticket Quality Management Review Meeting Invitation, May 24, 2016	1	Employee name.	Personal identifying information.

Confidential Redacted Sections from Exhibit 53.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 53 – Meeting Invitation to Discuss AGA Findings, March 31, 2017	1	Employee names and contact information.	Personal identifying information.

Confidential Redacted Sections from Exhibit 54.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 54 – Bates White Late Ticket Logic SED Presentation	5-6	Customer information.	Customer-specific information.
	8-9	Customer information	Customer-specific information.
	13	Customer information	Customer-specific information.

Confidential Redacted Sections from Exhibit 55.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 55 – IrthNet Past Due Ticket Listing Statement of Work	4	Third party name.	Personal identifying information.
	5	Third party name and title.	Personal identifying information.

Confidential Redacted Sections from Exhibit 56.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 56 – IrthNet Enhancements Presentation	5	Customer address.	Personal identifying information.
	8	Customer address.	Personal identifying information.
	11-13	Customer address.	Personal identifying information.
	21-22	Employee names and phone numbers.	Personal identifying information.

Confidential Redacted Sections from Exhibit 58.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 58 – 2016 L&M Audit	2-3	Employee names.	Personal identifying information.
	5-6	Employee names.	Personal identifying information.
	7-8	Employee names and contact information.	Personal identifying information.

Confidential Redacted Sections from Exhibit 60.

Name of Document	Page Number	Description of Redaction	Reason for Redaction
Exhibit 60 – L&M Quality Management Presentation, December 2018	8	Employee names.	Personal identifying information.
	11	Employee names.	Personal identifying information.
	22	Employee names.	Personal identifying information.

ATTACHMENT B

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

Order Instituting Investigation and Order to
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**[PROPOSED] RULING GRANTING MOTION OF PACIFIC GAS AND
ELECTRIC COMPANY FOR LEAVE TO FILE UNDER SEAL THE
CONFIDENTIAL VERSION OF ITS 90-DAY REPORT AND RESPONSE TO
LOCATE AND MARK OII DIRECTIVES 1 TO 9, WITH PROPOSED
REDACTIONS IDENTIFIED**

In accordance with its Rules of Practice and Procedure, the California Public Utilities Commission ("Commission") has considered the motion of Pacific Gas and Electric Company ("PG&E"), filed on March 14, 2019, for leave to file the confidential version of its 90-day Report and Response to Locate and Mark OII Directives 1 to 9 and supporting Appendices and Exhibits, with PG&E's proposed redactions highlighted, under seal ("Motion").

The Commission rules as follows:

1. PG&E's Motion is granted. The protected material is the confidential, unredacted version of PG&E's 90-day Report and Response to Locate and Mark OII Directives 1 to 9, as described in the Motion.

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2. The confidential, unredacted version of PG&E's 90-day Report and Response to Locate and Mark OII Directives 1 to 9 shall remain under seal and shall not be made accessible or disclosed to anyone other than the Commission staff except on the further order or ruling of the Commission, the Assigned Commissioner, the Assigned Administrative Law Judge ("ALJ"), or the ALJ then designated as Law and Motion Judge.

Dated _____, 2019 at San Francisco, California.

Administrative Law Judge