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ATTACHMENT A

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)	Investigation
Operations and Practices of Pacific)	18-12-007
Gas and Electric Company with)	
Respect to Locate and Mark Practices)	
and Related Matters.)	

DEPOSITION OF KATHERIN MACK

REPORTER'S TRANSCRIPT
San Francisco, California
March 6, 2019
Pages 1 - 171

Reported by: Jason Stacey, CSR No. 14092
Shannon Ross, CSR No. 8916
Rebekah DeRosa, CSR No. 8708

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1 BE IT REMEMBERED THAT, by Subpoena
2 of the Witness, and on Wednesday, March 6,
3 2019, commencing at the hour of 10:00 a.m.
4 thereof, at the offices of the CALIFORNIA
5 PUBLIC UTILITIES COMMISSION, 505 Van Ness
6 Avenue, Room 2200, San Francisco, California
7 94102, before REBEKAH L. DE ROSA, CSR No.
8 8708, JASON A. STACEY, CSR No. 14092 and
9 SHANNON M. ROSS, CSR No. 8916, personally
10 appeared

11 **KATHERIN MACK,**
12 called as a witness herein, who, being first
13 duly sworn, was thereupon examined and
14 interrogated as hereinafter set forth.

15 * * * * *

16 MR. GRUEN: On the record.

17 So if we could go around the room
18 and identify ourselves for the record,
19 indicating our names and titles, and I'll
20 start.

21 My name is Darryl Gruen. I'm the
22 Staff Counsel at the Public Utilities
23 Commission of California representing the
24 Safety and Enforcement Division.

25 MR. BRUNO: And I'm Kenneth Bruno,
26 Program Manager, Gas Safety and Reliability
27 Branch for Safety and Enforcement Division.

28 THE WITNESS: Katherin Mack, Expert

1 Auditor for PG&E.

2 MR. PENDLETON: John Pendleton. I'm
3 Senior Counsel with PG&E's Law Department.

4 MR. MEE: Charles Mee, Senior Utilities
5 Engineer for ESRB, stands for Electric Safety
6 and Reliability Branch, for SED. It's the
7 Safety Enforcement Division of CPUC.

8 MR. CHAN: Wai Yin Frankie Chan, Senior
9 Utilities Engineer for Gas Safety and
10 Reliability Branch of Safety Enforcement
11 Division.

12 MR. GRUEN: Great.

13 EXAMINATION

14 BY MR. GRUEN:

15 Q Okay. And Ms. Mack, if I could --
16 if you could, just so we're clear for the
17 court reporters, could you spell your name
18 for the record, as well?

19 A K-a-t-h-e-r-i-n M-a-c-k.

20 Q Thank you. Okay. And -- and your
21 address, please?

22 A My home address?

23 Q Your work address, if you happen to
24 know it.

25 A Carpenter Road, Modesto.

26 Q Okay.

27 A I can't remember offhand the
28 numbers.

1 Q Okay. That's fine.

2 A Okay.

3 Q That's fine. Okay. Now that
4 there's a formal locate and mark proceeding,
5 this is a formal deposition of you regarding
6 locating and marking practices of Pacific Gas
7 & Electric Company. Unlike the last time, we
8 examined you under oath, and I asked you
9 questions and the Safety and Enforcement
10 Division asked you questions without PG&E
11 counsel present. This time, there is a
12 formal proceeding, and as a result, PG&E has
13 a right to have counsel present at this
14 deposition, and so we recognize and see
15 Mr. Pendleton as -- as counsel for PG&E here
16 today. The information used in this
17 deposition may be used as evidence in the
18 Commission's locate and mark proceeding,
19 the -- the Order Instituting Investigation
20 that the Commission has opened.

21 Are you familiar with the Order
22 Instituting Investigation that's been
23 opened --

24 A Yes.

25 Q -- at this time? Okay.

26 Please answer Safety and
27 Enforcement Division's questions -- that is,
28 questions that I might ask, Mr. Bruno,

1 Mr. Chan or Mr. Mee -- any of the four of us
2 might ask directly. We may ask certain
3 questions very broadly, which will give you a
4 chance to add to your answers or answer as
5 broadly as you wish in those cases, as broad
6 as the question asks; but, please keep your
7 questions (sic) directly responsive to the
8 questions that we ask.

9 Do you understand that?

10 A Yes.

11 Q Okay. If you do not understand a
12 question that we ask today, either because we
13 have not articulated it well or we have
14 poorly phrased it, either ask that the
15 question be repeated or just say you do not
16 understand the question. Please do not
17 speculate or guess about what questions we
18 are asking. Do you understand that?

19 A Yes.

20 Q Okay. Great. And just a bit of
21 context about why we are here today. So
22 paraphrasing the instructions from the
23 administrative law judge, we had asserted
24 initially -- SED had asserted and asked in
25 its -- asserted when the Commission opened
26 the OII that certain of PG&E's locate and
27 mark practices on the natural gas side
28 merited an investigation, and that was the

1 basis for the Commission opening the
2 investigation. It was focusing on locate and
3 mark practices pertaining to natural gas.
4 Since the OII, or the Order Instituting
5 Investigation, opened, the administrative law
6 judge, through instructions, asked whether
7 Safety and Enforcement Division would make
8 similar assertions about PG&E's locate and
9 mark practices on the electric side. So with
10 that, our understanding from PG&E -- and
11 Mr. Pendleton, you can correct us here. Our
12 understanding from PG&E was that PG&E's gas
13 operations division focused on locate and
14 mark issues, both for natural gas on the
15 transmission and distribution side, as well
16 as electric distribution, that their gas
17 operations division was focusing on that, and
18 that, therefore, PG&E's efforts, their focus
19 in some of the documentation that PG&E
20 produced for us, covered electric
21 distribution in addition to natural gas.

22 Mr. Pendleton, did I state PG&E's
23 position correctly, or is there anything that
24 you want to add?

25 MR. PENDLETON: No. That's consistent
26 with what we stated at the law and motion
27 hearing.

28 MR. GRUEN: Okay.

1 MR. PENDLETON: Yes.

2 MR. GRUEN: Very good.

3 Q So that's just background,
4 Ms. Mack, for -- for why we're here today, is
5 to focus a bit more on whether the locate and
6 mark issues that SED, Safety and Enforcement
7 Division, identified when the Commission
8 opened its investigation -- whether some of
9 the facts you say today, some of the
10 testimony you give today, will inform SED as
11 to whether it will assert that PG&E's locate
12 and mark practices apply on the electric
13 side. Do you understand that?

14 A Yes.

15 Q Okay. Let me just, if -- if I can,
16 the following comes from General Order 112
17 (f) Section 302.1, and this is regarding PG&E
18 not being able to retaliate against its
19 employees for any safety-related information
20 that the employees share with Safety
21 Enforcement Division. So that's -- I'm just
22 going to read it and ask you a couple of
23 questions about whether PG&E has, in any way,
24 retaliated against you and -- if you
25 testified in a certain way today. Okay?

26 So in addition to other statutes --
27 I'm sorry. General Order 112 Section 302.1
28 says:

1 "The utility has no right to
2 retaliate against an employee for
3 notifying the California Public
4 Utilities Commission," and it says
5 specifically "In addition to other
6 statutes, which provide remedies
7 for retaliation against
8 Whistleblowers (e.g., the
9 California Whistleblower Act,
10 California Labor Code
11 Section 1102.5), or any other
12 remedy an employee may have in a
13 court, the Commission prohibits
14 California natural gas utilities
15 from retaliating against any
16 employee, who reports, in good
17 faith, unsafe conditions to the
18 Commission. For purposes of this
19 regulation, the Commission retains
20 the option to impose penalties and
21 any other remedies provided under
22 the California Public Utilities
23 Code for any natural gas utility,
24 which the Commission finds violates
25 this regulation."
26 Let me just say, SED is not
27 asserting that PG&E has retaliated against
28 you or any of your colleagues at this point

1 in time. But, I do want to ask you a few
2 questions related to what I just read
3 regarding retaliation.

4 Do you understand?

5 A Yes.

6 Q Okay. Has anyone threatened or in
7 any way insinuated retaliation against you
8 for appearing today and providing any
9 information?

10 A No.

11 Q Has anyone threatened or in any way
12 insinuated retaliation against you for
13 disclosing any facts truthfully, honestly,
14 completely and to the best of your knowledge?

15 A To the Commission?

16 Q Yes.

17 A No.

18 Q Okay. What about to anyone else?

19 A I mean I'm not sure what you mean.

20 Q Okay. I just -- I asked it because
21 of the way that you answered the question,
22 "to the Commission?" So let me -- let me
23 restate it.

24 Has anyone threatened or in any way
25 insinuated retaliation against you for
26 disclosing any facts truthfully, honestly,
27 completely and to the best of your knowledge
28 to anyone outside of the Commission related

1 to locating and marking -- PG&E's locating
2 and marking practices?

3 A I mean I --

4 MR. GRUEN: Let's go off the record for
5 just a second.

6 (Off the record.)

7 MR. GRUEN: Let's go back on the
8 record. Okay.

9 Q Has anyone, in any way, advised you
10 about how to answer the questions you provide
11 today?

12 A No.

13 Q Okay. Did you talk with anyone
14 about this examination under -- I'm sorry,
15 this deposition today?

16 A Yes.

17 Q Who?

18 A I talked to PG&E attorneys
19 yesterday.

20 Q Okay.

21 A And friends and family --

22 Q Okay.

23 A -- you know, just that I had to
24 come up --

25 Q Okay.

26 A -- in general conversation.

27 Q But, you didn't receive any advice
28 from anyone --

1 A No.

2 Q -- on -- on what to tell us or
3 anything of that sort?

4 A No.

5 Q Okay. At this point, this is
6 just -- I'm going to share a subpoena. This
7 is a subpoena for you to appear today that I
8 understand Mr. Pendleton received on your
9 behalf. So we served him requiring that you
10 appear today. I'm just going to send --
11 share it with Mr. Pendleton to see if he
12 recognizes it as an accurate signed document
13 that required your appearance today. Okay?

14 A Okay.

15 Q Okay.

16 MR. PENDLETON: I do recognize this.

17 MR. GRUEN: Okay. And this appears to
18 be a true and accurate copy of the signed --
19 of the signed subpoena that was served upon
20 you for the appearance of Ms. Mack today?

21 MR. PENDLETON: Yes.

22 MR. GRUEN: Okay. Very good.

23 I'd like to ask that this be marked
24 as Exhibit 1.

25 Let's go off the record for a
26 moment.

27 (Exhibit No. SED-01 was marked for
28 identification.)

1 (Off the record.)

2 MR. GRUEN: Back on the record.

3 Mr. Bruno, do you want to ask
4 questions at this point?

5 MR. BRUNO: Yes, Mr. Gruen. Thank you.

6 EXAMINATION

7 BY MR. BRUNO:

8 Q Good morning, Mrs. Mack. This
9 is -- I'm Kenneth Bruno, program manager of
10 Gas Safety and Enforcement Division. I just
11 wanted to ask you a few questions regarding
12 to what extent, if any, electric facilities
13 were involved in locate and mark issues
14 identified previously by the Safety and
15 Enforcement Division, and when I say that,
16 what I'm referring to is the Safety and
17 Enforcement Division filed a staff report in
18 an Order Instituting Investigation.

19 Are you familiar with the staff
20 report?

21 A No.

22 Q Are you generally familiar with the
23 locate and mark issues in the Order
24 Instituting Investigation against --

25 A Yes.

26 Q -- PG&E?

27 And at this point, is it your
28 understanding that -- that it involves both

1 gas and electric or, in other words, your --
2 the scope of the proceeding, as you
3 understand it, the Order Instituting
4 Investigation in the PG&E locate and mark
5 practices, does that involve both gas and
6 electric?

7 A Electric tickets? I'm going to
8 say, "Yes."

9 MR. PENDLETON: For -- for the clarity
10 of the transcript, if I may, Ken --

11 MR. BRUNO: Yes, sir.

12 MR. PENDLETON: -- when we talk about
13 electric facilities, it may be helpful to
14 talk about both electric distribution and
15 electric transmission facilities. At the law
16 and motion hearing, PG&E made that
17 distinction, that the electric distribution
18 was handled by one group, and electric
19 transmission by another, so that when the
20 questions are asked, if -- if we just say,
21 "electric," it might get confusing on the
22 transcript. So I -- if you could, I would
23 suggest asking about each.

24 MR. BRUNO: Understood, Mr. Pendleton.
25 I -- I -- I agree with you. I -- I was
26 planning to get to that level of detail --

27 MR. PENDLETON: Okay. Thank you.

28 MR. BRUNO: -- and -- and I think it's

1 an important distinction to get to that
2 granularity.

3 Q Ms. Mack, could you briefly explain
4 the process, as you understand it, when
5 somebody calls 811? What happens at PG&E as
6 it relates to locate and mark?

7 A Okay. So during the timeframe that
8 we're talking about, tickets would go, you
9 know, one of four ways. So the electric
10 transmission would get tickets, the -- in
11 places where we were electric only, they
12 received tickets, then gas distribution would
13 receive tickets, and then gas transmission
14 would receive tickets; so handled by four
15 different entities.

16 Q Thank you, Ms. Mack. Does that
17 mean that when an excavator or whomever calls
18 811, four separate tickets are -- are
19 generated at PG&E?

20 A Only if there's facilities in those
21 areas.

22 Q And how is that determined, whether
23 or not there are facilities in those areas?

24 A Through maps that PG&E provided to
25 811.

26 Q Okay. So my understanding, then,
27 is that when an excavator or -- or whomever
28 calls 811, the 811 facility will look at

1 previously supplied data, and make the
2 decision if they should generate an electric
3 transmission, electric only ticket, gas
4 distribution or gas transmission ticket?

5 A Yes.

6 Q Okay. Thank you, Ms. Mack.

7 In the four categories just
8 described, electric transmission, electric
9 only, gas distribution, gas transmission,
10 those would indeed be four separate distinct
11 tickets?

12 A Yes.

13 Q And who would be -- what would
14 happen next in terms of the process at PG&E?

15 A So in -- the folks that got the
16 ticket, they would be locating, you know, the
17 facilities that were on their ticket. I mean
18 I don't know how deep you want to go into the
19 process, but I mean if it's gas, they're
20 going to go out there and locate, you know,
21 secondary, and if there's prime in their
22 ticket, they're going to go out and try to
23 get ahold of -- you know, if they can locate
24 it without a QEW, they will. But, if they --
25 if the primary -- there's very little primary
26 that they can locate without using a QEW, so
27 they go and get a QEW -- you know, request
28 that, and have him locate it.

1 If it's electric only ticket --
2 that would be like in the north and in the
3 south, we have areas where we don't have gas,
4 so the electric folks would be handling those
5 tickets. That would either be a supervisor
6 that's a locate and mark electric -- all
7 electric side handling it, or there would be
8 maybe the -- the same guy that handled
9 electric, electric supervisor, you know,
10 he -- there might not be a separate
11 supervisor for it. He might be handling it.
12 But, those were strictly under the electric
13 department in the north and south.

14 And then electric transmission, I
15 mean, of course, they handled theirs.

16 And then gas transmission,
17 backbone, they handled their tickets.

18 So, yes, four separate tickets.

19 Q Okay. Thank you, Ms. Mack. I
20 think I'll -- I'll probably dive into each
21 one of those --

22 A Okay.

23 Q -- in a bit. Bear with me one --
24 one moment here.

25 Using the term QEW or the -- the
26 letters QEW, could you -- could you please
27 elaborate and explain what that is?

28 A It's a Qualified Electrical Worker.

1 So it's required that -- anything over
2 600 volts, it's required that electric -- you
3 know, we can't -- locators cannot get into
4 those facilities or break the plane or hook
5 up to anything, so it's required that they
6 use the QEW to locate those facilities.

7 Q Okay. So a -- a QEW is a -- if you
8 will, a subject matter expert for electric
9 facilities for both electric transmission and
10 electric distribution, anything over
11 600 volts?

12 A I don't think that they're
13 qualified in electric transmission.

14 Q I see.

15 A They're -- yeah. They're -- they
16 work on primary.

17 Q I see.

18 A They have electric transmission
19 folks that work on the electric transmission
20 side.

21 Q Okay. All right. With respect to
22 reporting structure, we've talked about
23 electric transmission, electric only tickets,
24 gas distribution and gas transmission.

25 Could you briefly explain your
26 understanding of where that fits
27 organizationally, who do they report to, are
28 they all in one group, et cetera?

1 A No, they're all four different
2 groups.

3 Q And is -- is it -- is it accurate
4 that electric reports to the electric
5 operations?

6 A Yes.

7 Q Does that mean that electric
8 distribution and electric transmission
9 reports -- it reports to something equivalent
10 to electric vice president?

11 A Yes.

12 Q How about for locating and mark --
13 marking practices?

14 A In those areas that it's electric,
15 that -- they report to the electric side of
16 the house.

17 Q And --

18 A And electric transmission reports
19 to electric side of the house in all areas.

20 Q Okay. And then just -- just for
21 sake of closing this out, gas distribution,
22 gas transmission obviously reports to gas
23 operations?

24 A Well, at that time, transmission
25 was separate up to a certain degree in the
26 file. When you got to president level, yeah.
27 But, I mean they had their own directors and
28 they had their own -- you know, so high, they

1 were separate.

2 Q Okay.

3 MR. GRUEN: Can I just clarify?

4 THE WITNESS: I'm sorry.

5 MR. GRUEN: That's okay. You're doing
6 fine.

7 At that time, can you just specify
8 what point in time you -- you meant when you
9 said, "at that time"?

10 THE WITNESS: All the way up to 2017.

11 MR. GRUEN: Okay.

12 THE WITNESS: So there -- there's been
13 changes. In 2016, gas distribution started
14 to work towards locating the gas
15 transmission. And the same thing for
16 electric; you know, they started working
17 towards putting gas folks to locate some of
18 that stuff in 2017. So that's why you say
19 during that timeframe, because there's been
20 changes along the way that changed that.
21 But, from all the way up until about 2017,
22 the -- it was as this is.

23 MR. GRUEN: Okay.

24 MR. PENDLETON: Again, for the sake of
25 the transcript, do you mind if I interject
26 for a moment, because Katherin's using the
27 term "gas transmission."

28 I may be wrong, but do you need to

1 specify between backbone and local
2 transmission? You're just saying, "gas
3 transmission" generally, and I want to make
4 sure the transcript is accurate.

5 THE WITNESS: Yeah. So the difference
6 between backbone and local transmission --
7 yeah. If it was backbone, it would go to the
8 transmission department, which is a separate
9 entity, reporting structure. Local
10 transmission, then that was handled by
11 distribution.

12 BY MR. BRUNO:

13 Q Okay. All right. Thank you,
14 Ms. Mack.

15 I -- I think -- I think I -- I do
16 appreciate the clarity, Mr. Pendleton. I
17 think we need a little more specifics here,
18 because I -- I am trying to reconcile the
19 statement PG&E made at the law and motion
20 hearing. And I -- I guess what we need to
21 explore is to -- where do the locators
22 reside?

23 MR. PENDLETON: If I -- if I could ask
24 just one question, I think that might help to
25 clarify that point.

26 In -- in areas where PG&E has gas
27 facilities, what group within PG&E performs
28 locate and mark for electric -- electric

1 distribution?

2 THE WITNESS: Well, the gas folks do it
3 for -- with the help of electric in gas
4 areas. If it's in the areas where gas is
5 not, north and south, those areas, Santa
6 Maria, up in that Humboldt area, all -- I
7 don't know how far up that goes; but, those
8 areas are electric areas, so they handle all
9 the locate and mark in those areas, the
10 electric side of the house does.

11 MR. BRUNO: Okay. Could we go off the
12 record?

13 MR. GRUEN: Yeah.

14 (Off the record.)]

15 MR. GRUEN: Back on the record.

16 Q So, Ms. Mack, while we were off the
17 record, we just discussed a couple of points
18 of clarification with regards to who -- in
19 instances where gas service and electric
20 service is provided and a ticket is for both
21 gas and electric -- who the different workers
22 report to. So those are the nature of the
23 questions that I'm going to ask you.

24 So let's say -- with that in mind,
25 let's say we're talking about a service area
26 where PG&E provides both gas and electric
27 service and you've got a ticket that requires
28 electric distribution to be located and

1 marked.

2 In that instance, which division
3 within PG&E does the electric locator report
4 to? Does it report to Gas Operations,
5 Electric Operations, or somewhere else?

6 A So the ticket goes to the gas
7 locating team; right? The gas locating team
8 is going to look at the ticket and decide if
9 they need a QEW. So the QEW that they're
10 going to use to perform that locate reports
11 to the electric side of the house.

12 Q Okay.

13 A So what they would do is they would
14 locate the gas portion, the locator would.
15 And then they would -- you know, different
16 areas have different ways of facilitating
17 that electric that help from the electric
18 side of the house.

19 Q Okay. And so the QEW -- while the
20 QEW reports to the electric side --

21 A Yes.

22 Q -- in that instance, does the
23 locator of the electric line report to the
24 Gas Ops side in that case?

25 A It's kind of confusing. Let me
26 just say that the gas locator gets the
27 ticket; right?

28 Q Okay.

1 A Decides he needs the electric help.
2 He makes arrangements with the electric side
3 of the house, the electric supervisor. They
4 make arrangements for the electric person who
5 reports to the electric side of the house to
6 come over and hook up and perform that
7 function on the electric side. He works
8 hand-in-hand with the gas locator. So
9 they're both on the job.

10 But the electric person reports to
11 the electric side, and the gas person reports
12 to the gas side. PG&E cannot have an
13 electric person reporting to the gas house.
14 It's against the contract.

15 Q Okay. Just another clarification.
16 You said, "Performs that function." I just
17 want to clarify specifically the work of the
18 function that you're talking about.

19 So when you say the QEW performs
20 that function, what exact function in that
21 instance is the QEW performing?

22 A They're opening the electric
23 facility, they're hooking up the locating
24 machine, they're telling the gas locator,
25 "You know, hey, here's what you have. Here's
26 where it goes." All that kind of function.
27 And they're hooking up the lines that the
28 locating machine so it can be located.

1 Then generally the locator will
2 then note the ticket. You know, use --
3 they'll check the box "QEW," or check the box
4 "Primary Electric," and they will make notes
5 on there who they used on the electric side
6 of the house.

7 Q And is the -- which of those two
8 employees or someone else, the QEW, the
9 locator, or someone else is actually doing
10 the location of the electric facility in the
11 instance you just described?

12 A They're both doing it. The
13 electric guy is hooking up. He's telling him
14 where it's at. And the gas locator is using
15 the machine. So it's kind of in tandem.
16 Now, that's in gas and electric areas.

17 Q Yes --

18 A Two -- well, yeah.

19 Q Go ahead.

20 A Well, there's some exceptions in
21 San Francisco.

22 Q Okay. We'll get to that. But then
23 the -- from PG&E's perspective, who is it who
24 is considered handling that locate? The gas
25 locator, the QEW, or both?

26 A Both.

27 Q And --

28 A That's why they put their names on

1 the ticket.

2 Q Both names are on the ticket in
3 that instance. And so both of those -- then
4 we've got the locator for the gas who's
5 reporting to Gas Ops, the QEW whose done some
6 of the locating work reporting to Electric
7 Ops; is that right?

8 A Yes. And then in San Francisco if
9 we borrow electric locators if we need them,
10 they locate the ticket themselves and they
11 close it. They do it all. And they report
12 to the electric side of the house.

13 Q Electric locators locate gas lines
14 in San Francisco?

15 A No. In San Francisco, the gas
16 worker would go out and perform the gas
17 locate. And the electric person that they
18 borrowed would just have his own folder with
19 his own tickets, and he would locate all the
20 electric, close the ticket, do the whole
21 thing, and he reports to electric.

22 So it's a little bit different over
23 there. Because there's so much underground
24 electric that, you know, they're not going to
25 work -- I mean, I'm not going to say they
26 never work in tandem. Sometimes they do, but
27 it's not always the case. You see both
28 scenarios there where you have an electric

1 guy with his own folder just taking care of
2 tickets, taking care of the electric. He
3 opens them, he closes them, he does
4 everything. But then you also might have
5 them working in tandem too where he's hooking
6 up and he's doing this. It just depends on
7 the locator and how much skill they have in
8 getting in the computer and closing the
9 tickets. It depends on a lot of other
10 things.

11 Q I follow.

12 MR. GRUEN: Off the record.

13 (Off the record.)

14 MR. GRUEN: Back on the record.

15 BY MR. BRUNO:

16 Q All right, Ms. Mack, I do have a
17 question with respect to the exception you
18 just described in San Francisco. So going
19 back to the 811 call.

20 811 gets called, 811 makes a
21 decision. Let's assume this is a San
22 Francisco ticket.

23 A Mh-hm.

24 Q 811 makes the decision if it's gas
25 and electric based on their maps; is that
26 accurate?

27 A So the only difference in -- okay.
28 For San Francisco, you know, they're going to

1 go -- they go to a folder based on area. So
2 the ticket itself -- unless it's gas
3 transmission -- those go to a different
4 folder. But gas and electric are going to go
5 to the same folders.

6 But the way San Francisco has their
7 folders set up, so what they do is they know
8 areas that are heavily mostly underground
9 electric where they need -- you know, they're
10 going to need a QEW. And those tickets will
11 go to an area in those folders.

12 So they have -- like, say they have
13 eight folders or ten folders. So, you know,
14 say -- I'll just throw some names out there.
15 Don't take it for sure. Say it's Castro
16 Valley or Castro Street. You know, they're
17 going to say, "Okay. This is a heavy
18 underground electric. So those tickets in
19 this area all go into this folder. In this
20 area, they all go into this folder." And
21 they've set them up to know what's heavy
22 underground.

23 So then what would happen is a gas
24 locator would be assigned the folders that
25 were heavily gas. And then if he has the
26 occasional ticket that he needs electric on,
27 then he's going to get the QEW, or he's going
28 to do his part. Then he's going to take the

1 ticket over and send it to the other folder
2 that is primarily an electric ticket.

3 Then when, you know, the electric
4 guy does the ticket, he closes it out. So
5 then it works the same. If it goes to an
6 electric folder and he's done his electric
7 part, then he's going to send the ticket over
8 to the gas folder who then locates the gas.

9 Not very efficient. But that's
10 what they have done on San Francisco. I
11 don't know if that's changed or not. But
12 from the time I was there until 2017, that's
13 the way it was handled.

14 Q Okay. Thank you, Ms. Mack. I'm
15 going to restate what I think you said, and
16 let me know if I'm right or wrong. In San
17 Francisco the process is the same. 811
18 generates a -- let's just say hypothetically
19 in San Francisco they generate an electric
20 and gas ticket. The gas person is still
21 responsible for calling out the electric QEW
22 if needed?

23 A So there's only one ticket, though,
24 for San Francisco tickets.

25 Q All in one ticket?

26 A Yes.

27 Q So it's a combined ticket?

28 A It's a combined ticket in San

1 Francisco.

2 Q Okay. Always? If it's in San
3 Francisco, it's a combined ticket?

4 A Yes. Unless it's transmission.
5 That's different.

6 Q And the gas person will still make
7 the decision if they need a QEW?

8 A Well, not always. Because if it
9 goes into these folders that, you know, we
10 have like four IBEWs at that time. We had
11 hiring hall QEWS that were working in San
12 Francisco from two to four at any given time.
13 And so they were electric workers. And
14 sometimes they would do it.

15 So it was either them or it was
16 somebody from the Electric Department that
17 was assigned that folder.

18 Q And who puts things in the folder
19 if you will?

20 A So generally they have a person
21 that's a senior in the department, the
22 locator who then sorts the tickets. But
23 they're already pre-sorted. So they might go
24 in there and sort some more. But they're
25 sorted by area already.

26 Q Okay.

27 A But they still do some sorting
28 after that.

1 Q So in San Francisco one ticket is
2 generated for gas and electric, it is sorted,
3 it goes into folders. If there needs to be
4 an electric distribution locate, that will be
5 handled by an electric person standalone.
6 There will not be a gas person also on that
7 job?

8 A The gas person will locate the gas.

9 Q Right.

10 A And they'll locate the secondary.

11 Q The gas person will locate the gas.
12 The electric person will locate the electric,
13 but they won't be in tandem?

14 A Not necessarily. It might just be
15 an electric person's folder. If we have --
16 so what happens is anything the gas guy
17 couldn't locate, he's going to put over into
18 this electric person's -- the QEW's folder.
19 And that was somebody that was either a
20 hiring hall person or somebody that works for
21 the electric side of the house and that we
22 borrowed. And that at that time, they'll
23 work that folder and take care of those
24 tickets.

25 BY MR. GRUEN:

26 Q Can I ask a quick followup on that
27 if I can? I thought I had heard you say that
28 sometimes the order is the other way. Where

1 the electric guy --

2 A It could be.

3 Q -- will do the work first.

4 (Crosstalk.)

5 Q Just for the record -- I think
6 we're on the same page but just correct me if
7 I'm wrong. If the electric guy goes first
8 and cannot identify certain things that need
9 to be located, then the electric guy can also
10 refer the rest of the work to the gas guy,
11 and the gas guy then puts it in his folder to
12 complete work? Did I understand you
13 correctly?

14 A Yes.

15 Q Okay.

16 A The electric guy will put it in the
17 gas guy's folder if he's done. He'll say,
18 "Okay. I've done my part. I'll ship it over
19 to you."

20 Q Yes, I follow. Is there a rhyme --
21 a rationale as to whether the gas guy or the
22 electric guy goes first?

23 A No.

24 Q Okay. It's just who happens to be
25 available?

26 A Yeah. Who got the ticket. Whose
27 folder it's in. Like I said, if it's a heavy
28 underground electric, it's going to, you

1 know, be in a QEW's folder already. And he
2 might say, "There's nothing for me to locate
3 there." And he's going to ship it over to
4 gas if there's gas to locate on there.

5 Q And this is all San Francisco?

6 A That's how San Francisco is.

7 Q Understood. Thank you.

8 MR. PENDLETON: Just for clarity, you
9 said, "All of San Francisco." I think you
10 were saying that these folders are for
11 certain areas of San Francisco; is that
12 correct? Just to make sure the transcript's
13 clear.

14 THE WITNESS: It's all San Francisco.
15 That includes South San Francisco, San
16 Francisco. Anything under the jurisdiction
17 of San Francisco Division. So that's also
18 South San Francisco.

19 MR. PENDLETON: Okay.

20 THE WITNESS: I know they're split up
21 now. But that's how it was then.

22 MR. GRUEN: Let's go off the record.

23 (Off the record.)

24 MR. GRUEN: Back on the record.

25 Q So while we were off the record, I
26 understood -- and please correct me on this,
27 Ms. Mack -- except for San Francisco, PG&E's
28 territory -- except for San Francisco and

1 except for electric-only parts of PG&E's
2 territory. So all the other parts of PG&E's
3 territory that would serve both gas and
4 electric where a ticket was called in, it was
5 called into the Gas Operations Division, and
6 then a locator who worked under the Gas
7 Operations Division would then determine
8 whether to call in for help from an electric
9 employee in order to locate the ticket? Do I
10 have that right so far?

11 A Yes.

12 MR. PENDLETON: One clarification.
13 Putting aside electric transmission. Because
14 that would be my understanding is separate.

15 BY MR. GRUEN:

16 Q Is that accurate? That this isn't
17 -- what I just described does not apply to
18 electric transmission; is that right?

19 A Right.

20 Q Okay. Let's stay with
21 Mr. Pendleton's clarification that we're not
22 talking about electric transmission here.

23 But when we talk about San
24 Francisco now, the difference is that the
25 notification could -- it would still go to
26 the Gas Operations Division, but Gas
27 Operations Division has certain electric
28 locators helping. And so the gas -- so the

1 ticket might be given to those electric
2 workers who worked under the Gas Operations
3 Division. Did I did get that right?

4 A Not all of them work for the gas.

5 Q Okay. In San Francisco a ticket
6 could be given to the Gas Operations Division
7 -- an electric worker who helped with the Gas
8 Operations Division, or an electric worker
9 who worked for the Electric Operations
10 Division?

11 A Yes.

12 Q And then if it was a ticket that
13 involved both gas and electric, whoever
14 started first whether it was an electric
15 worker, they would then hand it off to the
16 gas worker to complete the locate. If it was
17 given to a gas worker first, they would give
18 it to the electric worker to complete the
19 locate?

20 A Yes.

21 Q Okay. Thank you. Thank you, Ms.
22 Mack.

23 Mr. Bruno?

24 BY MR. BRUNO:

25 Q Yes. Thank you, Mr. Gruen. Thank
26 you, Ms. Mack.

27 I want to go back to the process
28 really quick and drill down into these

1 categories one last time hopefully. The
2 process when somebody calls 811 you
3 previously stated, Ms. Mack, that 811 would
4 look at maps or the equivalent and make a
5 decision how many tickets to generate.

6 Would they also subcategorize the
7 tickets into the categories of electric
8 transmission, electric only, gas
9 distribution, gas transmission local, gas
10 transmission distribution? Or is that a PG&E
11 function?

12 A Well, the four categories that we
13 talked about earlier were separated because
14 they wouldn't get a ticket unless it was
15 identified that there was gas transmission or
16 electric transmission. You know, or in the
17 area of electric only. The maps told, you
18 know, 811 whether -- what was in what area.
19 Those -- they were separated at that point at
20 that higher level.]

21 Q Great. Thank you.

22 So 811 will categorize it into
23 those four categories?

24 A Yes.

25 Q And then it sounds like there is a
26 subcategory for gas transmission: One being
27 gas transmission local, and one being gas
28 transmission distribution; is that accurate?

1 A So I was trying to remember what
2 year that that switched over. So originally
3 the gas distribution locators only located
4 distribution. So at some point they started
5 locating the local transmission, and it was
6 hit and miss which areas did it and which
7 areas didn't do it.

8 So at that time, there were still
9 two separate tickets identified at the higher
10 level.

11 Q Uh-huh.

12 A That all went to the same backbone
13 people. Gas transmission, like, all the
14 tickets went there. Right.

15 Q Okay.

16 A Then at some point, that's when the
17 distribution side of the house started
18 locating the local transmission. I know
19 that's confusing --

20 Q Right.

21 A -- but I'm trying to get exactly
22 how it worked.

23 MR. PENDLETON: For clarification of
24 the terminology, as I understand it, gas
25 transmission is divided into local
26 transmission, and then backbone transmission.
27 The backbone transmission is really just the
28 Redwood Path and the Baja Path, the major

1 transmission lines that come from out of
2 state and then bring gas down, you know, into
3 the local transmission system. I think the
4 term -- those are the two categories of gas
5 transmission.

6 MR. BRUNO: I appreciate that. I think
7 I used the wrong term, which made a hard
8 topic even more confusing; so I appreciate
9 that distinction, Mr. Pendleton.

10 Q Ms. Mack, what I'm going to do is,
11 I'm going to say a category, and if you
12 wouldn't mind describing the category, and
13 then the second part, who was responsible for
14 locating and marking in that category.

15 So the first category I would like
16 to talk about is gas distribution. Could you
17 briefly describe what that is and who is
18 responsible for locating and marking.

19 A So that would be the gas
20 department. They're responsible, our locate
21 and mark department of the gas side of the
22 house. That would include secondary electric
23 and gas facilities, services and mains, and
24 local transmission.

25 Q And the locator and marker for
26 those facilities just described, that is a
27 gas operations locate and marker?

28 A Yes.

EXAMINATION

BY MR. GRUEN:

Q Can I ask a clarification, if I can, because we're using the term "local transmission." I think Mr. Bruno asked about gas distribution and part of your answer included local transmission. So I'm not clear if local transmission is considered to be part of the gas distribution function.

A So I was explaining that earlier. It's difficult because you're talking about, you know -- like, my understanding is from 2013 to 2017. So at some point during that time, and this is probably where this gets confusing, but in the beginning gas distribution only located mains and services; okay. They did not locate any transmission. None.

Q Okay.

A At some point - I was trying to figure out when - they started locating local transmission in some areas that were more comfortable with it.

Q Okay.

A And then under 2017, they started locating backbone. So that's probably where it gets confusing is the time frame during that it was handled different at different

1 points.

2 Q And just for clarity on terms - I
3 want to be sure - did Mr. Pendleton's
4 description of "backbone transmission"
5 sound -- did that sound accurate to you, when
6 he described "backbone transmission"?

7 Or if you prefer, would you like to
8 explain to us in your own words what backbone
9 transmission is.

10 A No. That's fine.

11 Q So his description sounded right to
12 you?

13 A Yes.

14 Q And "local transmission" then, what
15 does that term mean?

16 A So that would be everything coming
17 off the backbone and feeding into the mains,
18 you know, and secondaries.

19 Q Everything except for distribution
20 or does local transmission include
21 distribution as well?

22 A No. It does not. So it feeds into
23 the distribution.

24 Q Yes. I'm clear. Thank you.

25 So, then, your description was the
26 gas distribution locators, then, took on
27 responsibilities to locate and mark at some
28 point in time local transmission?

1 A Yes.

2 Q Then at a later point in time --

3 A Much later.

4 Q -- much later backbone
5 transmission?

6 A Right.

7 MR. GRUEN: I'm clear. Thank you.

8 Mr. Bruno.

9 MR. BRUNO: Thank you, Mr. Gruen.

10 EXAMINATION

11 BY MR. BRUNO:

12 Q Ms. Mack, you know, I am interested
13 in both the time that you can speak of and
14 your knowledge of other times. So, for
15 instance, gas transmission backbone, who was
16 responsible for locating and marking those
17 facilities based on the time you can speak
18 of?

19 A Gas transmission.

20 Q Okay. Gas distribution, who was
21 responsible for the locating and marking
22 during the time you can speak of?

23 A For the majority of that time gas
24 distribution.

25 Q And for the other period of time,
26 would that be the local transmission?

27 A That would be gas transmission,
28 yes.

1 Q Okay. The category electric
2 transmission, could you just briefly describe
3 to your knowledge what that is.

4 A I can't think off the top of my
5 head what, you know, volts that's over, but
6 when it's deemed transmission facilities,
7 then the electric transmission department out
8 of San Francisco handles that, and they go
9 anywhere to locate that facility.

10 Q I want to make sure I understood
11 you. You said when it's deemed electric
12 transmission, San Francisco dispatches?

13 A It's not distribution -- it's not
14 out of the gas house. It's a separate
15 department. It just happens to be in San
16 Francisco.

17 Q It's a systemwide, electric unit
18 housed in San Francisco?

19 A Yes. Yes.

20 Q But will mark electric transmission
21 throughout the territory?

22 A Yes.

23 Q Thank you very much.

24 Who are you locators and markers
25 for that group?

26 A They're electric transmission
27 employees.

28 Q Okay. Then the category of

1 electric only, my understanding of that
2 category is, it's electric distribution with
3 no gas in the area; is that accurate?

4 A Yes.

5 Q Who is responsible for the locating
6 and marking of electric-only areas?

7 A Electric employees from the
8 electric house.

9 Q Electric employees --

10 A Under the electric side of the
11 house.

12 Q Under the electric side of the
13 house.

14 A Gas had nothing to do with it
15 really.

16 Q Okay.

17 A Well, I won't say they had nothing
18 to do with it. That's not a good statement,
19 but the electric side of the house supervised
20 it, managed it.

21 Q Okay. Do you have anything else on
22 the categories, Mr. Gruen?

23 MR. GRUEN: No, not at this time. Go
24 ahead.

25 MR. BRUNO: Okay.

26 Q Ms. Mack, I appreciate you going
27 through all those categories. It was a
28 little painstaking, but it was my confusion

1 and, obviously, not yours.

2 I would like to talk about the
3 process now a little bit about -- really a
4 hypothetical situation. A natural gas --
5 let's call it a ticket. 811 was called. A
6 ticket was generated for gas distribution and
7 electric distribution. I understand that
8 hypothetical to be a gas locator and marker
9 would be responsible for making
10 determinations of what needs to be marked and
11 who he needs to help him.

12 A Yes.

13 Q So that process. Let's just say
14 the ticket is in Fresno. I'm just picking an
15 area.

16 A Uh-huh.

17 Q PG&E gas locator-marker goes out
18 there; marks the gas facilities for
19 distribution; makes a determination whether
20 or not they need QEW for the electric.

21 A Yes.

22 Q So let's assume they don't need a
23 QEW; what happens?

24 A They're going to locate the
25 facilities and close the ticket.

26 Q They'll locate the facilities.
27 They'll follow the procedures; locate the
28 facilities, and close the ticket?

1 A Yes. Uh-huh.

2 Q What if that gas person determines
3 they need a QEW?

4 A That might be handled different in
5 different areas; so if it's --

6 Q And if I may, I'm trying to just
7 narrow it to just Fresno at this point.

8 A Okay. So probably Fresno, they're
9 going to notify the electric supervisor that
10 they need help, and they'll tell him, you
11 know, how much time they're going to need
12 them for and where to meet them at and what
13 time to meet them.

14 And the electric side of the house
15 might have help or might not have somebody
16 available, and they might try to negotiate
17 that to a different time or date. And then
18 they work that out between them, and then
19 meet on site, and then the electric guys, you
20 know, going to open it up or do whatever he
21 needs to do, hookup the equipment, and the
22 gas guy will put the marks on the ground.

23 Q Okay. Ms. Mack, based on your
24 experience, how does that coordination -- how
25 does it work?

26 Is it efficient? Is the electric
27 side responsive? Do they readily come out
28 and meet or are there issues with timing and

1 whatnot?

2 A That's been a nightmare since I can
3 remember. For years it's been an issue for
4 getting QEWs to come out. It's not been
5 something that's been smooth for sure.

6 Q When you say "a nightmare," could
7 you elaborate a little bit.

8 A Well, I mean, I think there's no
9 ownership on the electric side of the house
10 to provide the service. You know, it's a gas
11 function; so locators are kind of at the
12 mercy of the electric side to try to get the
13 body. And I think for whatever reasons many
14 of them, the electric side, doesn't like to
15 locate. The electric side didn't have the
16 manpower. Maybe they have their own stuff
17 going on. They're behind.

18 They got, you know, all these
19 things to do. There's a lot of reasons they
20 didn't provide the help to the gas for the
21 locate.

22 Q Understood. That's a trying
23 situation. I'm curious. What would the
24 response be of the locator when they have
25 determined that they need an electric QEW,
26 but they have trouble getting one?

27 A Well, I mean, unfortunately, there
28 was some good responses and some not-so-good

1 responses. So, I mean, if it worked out
2 perfectly, they would, you know, go and not
3 get the help and report it to a supervisor.

4 And during my time as
5 superintendent there, I have a lot of
6 complaints in this area and really tried to
7 work a lot with the electric side of the
8 house and with my management and with even
9 senior leadership, you know, to try to
10 resolve that issue.

11 You know, we tried to resolve that
12 issue. We tried to work out some service
13 letter of agreements with the electric side
14 and where they would provide the service or
15 on paper they had to provide it so that I had
16 something so say, Hey, you know, your
17 leadership said you need to provide this
18 service.

19 But, unfortunately, during my time
20 there, I was never able to resolve the QEW
21 issue at all. Even if, you know, we get all
22 the head nods, that, yeah, we're going to do
23 it, it never materialized at the bottom
24 level, at the locator level.

25 So, unfortunately, sometimes they
26 would just go indirect, which, you know,
27 isn't a good way to perform that with
28 electric services.

1 At times we caught them using
2 poles, what QEW calls hot sticks to locate
3 the facilities, which they're not allowed to
4 use those. They would go ahead and get in
5 and do it. They would, you know, put wide
6 paths around. They'd put a mark here and
7 here. They see a manhole there. So I'm
8 like, well, okay. They might do that, you
9 know, to say that's where -- because,
10 unfortunately, the electric maps don't have
11 measurements on them.

12 Gas maps, at least they can say,
13 Well, I got indirect, and it matches the
14 maps, so I'm probably right.

15 But with electric maps, there's no
16 footage, so there's nothing to say. Yeah,
17 you know, that's probably it.

18 So there was a lot of things they
19 did. None of them which were probably the
20 best thing. And sometimes they got so
21 frustrated in San Francisco. So many
22 times -- I mean, it was probably the biggest
23 nightmare over there not having electric.

24 I mean, those IDW employees, they
25 would, like, leave because they were so
26 frustrated, and, you know, they had like 300
27 tickets in their folder and they couldn't get
28 all that work done.

1 And that's why I say it was a
2 nightmare for the QEW portion. Really, I
3 feel like the electric should have taken over
4 that because then they would have some
5 ownership in it, and they'd have to perform
6 the work, but I don't know.

7 Q Okay. Thank you, Ms. Mack. That
8 was very helpful. I'm going to try to unpack
9 just a little bit of it. I think I heard you
10 say that when it worked -- when there was an
11 issue and it worked right, the gas
12 locator-marker would notify their direct
13 supervisor?

14 A Yeah.

15 Q And, then, to your knowledge, how
16 did that get over to electric if at all?

17 A So I had a lot of meetings with the
18 electric side of the house on the issue. It
19 didn't help immediately. So I shouldn't say
20 it worked perfect, but at least it brought
21 the -- you know, the higher -- the more we
22 brought it up -- and so then I ended up
23 having meetings with the, you know, higher
24 levels, directors, and things, to try to get
25 that resolved.

26 Q I see.

27 A A service level agreement to try to
28 really bring some awareness to the fact that,

1 hey, it's a real safety issue not having the
2 QEWs out there, and this is what's happening.

3 Like I said, I don't think -- no
4 matter what we did, it didn't get the QEWs on
5 the site. It would work for a minute and
6 then it wouldn't work.

7 The first time there's stuff going
8 on, you know, they're pulling electric guys
9 back. You know, like, San Jose or Cupertino,
10 I don't know how many times I worked with the
11 local supervisor there to say: Okay. I'm
12 going to provide somebody twice a week, two
13 full days a week, I'm going to provide a QEW
14 for you guys.

15 And so then locators were putting
16 all their tickets off for these two days, you
17 know, and then a guy calls in sick or they
18 need him. And it's like, oh, you got all
19 these tickets sitting and waiting for QEWs
20 and you can't get the locate done. That's
21 why I say "nightmare."

22 Q No. I appreciate the description.
23 It sounds like one to me as well. After a
24 complaint was made to the supervisor for the
25 longer-term solution, what happens on the
26 ground? What happens on Fresno that day? I
27 think you said, go indirect and hot sticks?

28 A Those aren't legal ways. That's

1 something they do that they weren't supposed
2 to do.

3 Q By "they," you mean the gas
4 locator?

5 A Yes.

6 Q Okay. So the gas locator in this
7 situation, theoretically, has marked the gas
8 facilities. They've called in a QEW. The
9 QEW doesn't show up. And now they're going
10 to get the job done if you will; is that
11 right?

12 A I'm not saying that's what happened
13 100 percent of the time. I'm saying those
14 were some of the scenarios that could happen.

15 Q So could you describe "go indirect"
16 and "hot sticks" just in that hypothetical
17 situation.

18 A So "indirect" would be that they,
19 you know, put their -- they have a way of
20 doing it. They put the machine in a place
21 where they think the services are or the
22 facilities are by, you know, signs - either
23 manholes or services or whatever - and then
24 they use their machine and a signal to try to
25 pick it up and see where it's at underground
26 and so that would be an indirect way of doing
27 it. And then the hot stick is where they
28 actually open up the box and use these long

1 poles to hookup to concentrics or, you know,
2 use the ring, put the ring on the facilities.
3 So they're doing what the QEW would do if he
4 was out there.

5 Q And based on your experience, this
6 scenario we're describing has actually
7 happened before?

8 A Yes.

9 Q Is it something that has happened
10 more than once based on your time?

11 A Yes. I think it happened more in
12 some yards than others. The more heavier the
13 electric need, the more heavier you probably
14 saw hot sticks in trucks.

15 Q Just in terms of, you know, when
16 the gas locator was sort of, you know, going
17 in the direction of going indirect or hot
18 sticks without a QEW, could you give me some
19 context? Like, is this a weekly thing, a
20 daily thing? Approximately, how many times
21 do you think this has occurred, you know,
22 over a given time period?

23 So however you want to answer that.
24 Like, if you want to think about an area and
25 how frequent it was or...

26 A So I think, like, if you were
27 talking about an area like Oakland, it would
28 happen daily. If you're in an area like

1 Fresno, you know, not so much. Certainly not
2 daily.

3 Stockton, you know, it probably
4 happened, you know, weekly at least, you
5 know. Like I said, it depends on -- I would
6 say the number of times it happened directly
7 correlated with the amount of underground
8 facilities.

9 Q That makes sense.

10 A Primarily.

11 Q So a direct correlation between the
12 density of the electric facilities --

13 A How much overhead and how much
14 underground you have. That's where you're
15 going to see more use.

16 Q Sure. Would the gas locator in
17 these scenarios - the scenarios being based
18 on your experience when they went indirect or
19 used hot sticks without a QEW - were they
20 qualified to do that?

21 A No. I mean, they are qualified to
22 do indirect locates, but they're not
23 qualified to use hot sticks. Indirect is it
24 not a -- I mean, if OQ to locate, you're OQ
25 to locate indirect. It's not a different OQ,
26 but hot stick is -- that's part of the QEW.
27 Nobody should be doing hot sticks until
28 you're a QEW.

1 Q And based on your opinion, are
2 there safety concerns there?

3 A Yes. I mean there's a reason they
4 have QEWs. They're trained to look for bare
5 wires, things touching each other. There's a
6 million things in there that they're trained
7 to look at and not use a hot stick if they
8 see it. I actually in Oakland brought in a
9 QEW one time to talk to the locators about
10 these things and why they shouldn't use hot
11 sticks. You know, I would find them in their
12 trucks, you know, but they were getting them.
13 They would order them. They would get them
14 from the electric guys and they would get
15 them, so...

16 MR. GRUEN: I have a few follow-ups.

17 EXAMINATION

18 BY MR. GRUEN:

19 Q I think you had said initially that
20 indirects, you weren't supposed to do an
21 indirect; did I track that correctly?

22 A No. I'm not saying you can't do an
23 indirect. I'm saying for locate and mark,
24 it's like the last course. You shouldn't do
25 that as your first option because it's not
26 the best way to locate because if you're
27 going indirect, you could be picking up
28 anything - telephone, water.

1 It could be anything that you're
2 putting marks on the ground for. So it's not
3 your first choice, you know. It's a last
4 choice, not a first choice.

5 Q Understood.

6 A Especially in some areas where you
7 have like a mess down there.

8 Q Were indirects -- to your knowledge
9 were indirects being done other than as a
10 last choice?

11 A Well, yes. Other than -- you know,
12 I think they used them for electric a lot of
13 times when we should have had a QEW if that's
14 what you're asking.

15 Q Thank you.

16 Just so I understand that, that's
17 to say that it was done instead of -- an
18 indirect was done in certain instances
19 instead of getting a QEW out there?

20 A Yes. Or trying to backfeed it off
21 a secondary, something like that, which is
22 not a good way to do it either. You know,
23 hooking up to a service and trying to pick up
24 the primary, but, again, you know, you're
25 going to run off on all kinds of stuff.
26 That's how we get inaccurate locates,
27 mismarks.

28 Q And with the hot sticks, under no

1 circumstances, was that supposed to be done;
2 is that right?

3 A Not by a gas locator.

4 Q But it was?

5 A Yes.

6 Q Let me ask you, in cases where an
7 indirect was done without a QEW, without
8 getting a QEW out there, or a hot stick was
9 used, would you view those instances as a
10 proper basis to show a ticket is complete?

11 A To get the job done, yes. To close
12 the ticket out, yes.

13 Q So a ticket that used an indirect
14 instead a QEW or a hot stick was properly
15 closed out?

16 A I'm not sure what you're saying
17 with that. That's kind of odd question.

18 Q I'm trying to get at whether if
19 PG&E's locators did not follow proper
20 procedure for getting a QEW out there when
21 they were required to in these kinds of
22 instances.

23 A Yes. That was not the right --
24 they're not following procedure.

25 Q So since they don't follow
26 procedure in this these instances - I think
27 we've established that - in those instances,
28 is the ticket properly closed out when PG&E

1 isn't following procedure to get its QEW out
2 there in your view?

3 A Well, the work wasn't performed
4 right, so... I mean...

5 Q Okay.

6 A The work wasn't performed right,
7 and they didn't follow procedure, but the
8 ticket is closed. I'm not sure.

9 Q You're answering my question.
10 That's helpful. Thank you.

11 Is the ticket -- in those instances
12 to your knowledge, did the ticket show that
13 it did not get a QEW out there even though
14 the locator was required to do so by PG&E's
15 procedure?

16 A Well, whenever a locator used a
17 QEW, they'd put in the ticket: "I used" and
18 they put their name. And they did that to
19 help protect themselves; so they would say
20 they used somebody.

21 Q And when they didn't use a QEW, but
22 they were required to, to your knowledge did
23 the locator input that information on the
24 ticket?

25 A Would they put in there, "That I
26 didn't use a QEW"?

27 Q Yes.

28 A No. They're not going to put

1 anything. They're just going to mark gas,
2 mark electric, you know, close the ticket
3 out.

4 Q Do you have a sense, just building
5 on Mr. Bruno's questions, about how often in
6 different areas from 2012 to February of
7 2017, could you estimate approximately how
8 often a QEW was not used to locate and mark
9 when it was, in fact, required to be used?

10 A I wouldn't be able to give you that
11 number. I can tell you, like I said earlier,
12 that it's going to happen, like, daily in
13 towns like Oakland, San Francisco, San Jose,
14 Cupertino. Anything bay-area-ish, it
15 happened daily, or even Stockton.

16 In areas like, you know, Fresno,
17 Merced, places that were mostly overhead
18 facilities, it wouldn't have happened as
19 much. I can't give you numbers.

20 Q That's helpful. I understand.

21 A Uh-huh.

22 Q To your knowledge, was use of hot
23 sticks or indirect, those techniques you
24 talked about where a QEW wasn't used --

25 A Or a backfeed from secondaries.

26 Q Can you say what a "backfeed from
27 secondary" means?

28 A They hookup to a secondary service

1 and try to backfeed to get the primary from
2 that way. It was just another way they would
3 do it to try to locate it.

4 Q Without using a QEW --

5 A Without using a QEW.

6 Q -- when QEW was required?

7 A Needed.

8 Q When needed. Thank you for the
9 clarification.

10 To your knowledge was there any
11 documents that discussed the problems you're
12 telling us now within PG&E sharing the
13 problem of these techniques being used to
14 locate and mark without a QEW even though a
15 QEW was needed?

16 A Yes. I mean I had gone to, like I
17 said, throughout that time I really tried to
18 work with the electric side of the house. I
19 don't remember what year we came up with that
20 service-level agreement, but that was all
21 because of that.

22 There were some complaints from the
23 electric side of the house. Maybe some of
24 the employees would see employees, you know,
25 breaking the plane of a facility that they
26 shouldn't have been in, and there was some
27 complaints about that. There was some
28 dig-ins where, you know, it was clearly

1 mismarked. So it kind of came up in some of
2 those instances. I don't know how many,
3 when, dates, all that kind of stuff.

4 I can just say that there was many
5 discussions even with myself and others about
6 that with my leadership and with the electric
7 side of the house.

8 Q Can you be specific when you talk
9 about your leadership? Who do you mean?

10 A I would speak to Joel Dickson and
11 John Higgins. They were pretty much my main
12 sources for that kind of stuff.

13 MR. GRUEN: Thank you, Ms. Mack.

14 Mr. Bruno.

15 EXAMINATION

16 BY MR. GRUEN:

17 Q Ms. Mack, I do want to go back to
18 the notations on the ticket. Mr. Gruen had
19 established that if a QEW was called out and
20 showed up, that would be noted on the ticket?

21 A Yes.

22 Q If work was done by the gas person
23 without a QEW, they wouldn't mark about the
24 QEW. My question is, what if they had called
25 out a QEW, but the QEW didn't show up, and
26 then they went to one of these other
27 techniques of going indirect or hot sticks,
28 would the fact that they called a QEW and

1 they didn't show up appear on the ticket?

2 A I'm not going to say that it always
3 would show up, but I'm saying it probably
4 would because the original notes the locator
5 because he's delaying the ticket; right.

6 He's probably not able to locate
7 the ticket within the 48 hours. So he's
8 probably more than likely putting that note
9 in there to say: Waiting on electric. You
10 know, then he would have to, then, either
11 locate it or get the QEW.

12 So there would be some notation on
13 there unless in the beginning he just knew he
14 wasn't going to get it, and he didn't even
15 bother. Then he might just locate it.

16 So there might not be a note in it
17 in that instance because frustration kicks
18 in: I'm not going to get it; so I'm not
19 going to even ask.

20 Q So a search of the comments might
21 be fruitful in that regard?

22 A Yes. Yes. Especially in larger
23 places, it might be more prevalent or obvious
24 when they needed them, and didn't get them.]

25 Q Great. Thank you, Ms. Mack.

26 Why would a gas locator do this?
27 And by "this," what I mean is why would a gas
28 locator -- you know, they're -- up until some

1 point, they're following procedure. I -- you
2 know, "I'm marking the gas facility. I need
3 a QEW." QEW doesn't show up. "Now I'm going
4 to go indirect or hot sticks." Why? Why
5 would a gas locator do that, based on, you
6 know, your -- your experience?

7 A I think it's a combination of
8 reasons. I think that, you know, they feel
9 an obligation to the contractor. You know,
10 they -- they have relationships with these
11 folks out there. These folks are trying to
12 get their work done. Their people are
13 waiting, you know. I think that's one
14 reason, that they work hand in hand with
15 them. They know they need to get the marks
16 on them. They don't want them getting hurt,
17 you know, because they know that the
18 potential for that guy to go out there and go
19 ahead and do it, if he doesn't have marks,
20 might happen. So he wants to -- he wants to
21 do that for the contractor.

22 I think his -- the other part of it
23 is his folder gets blasted. He gets more and
24 more tickets. If he doesn't close these out,
25 it's not going to stop. He's going to keep
26 getting more tickets.

27 The other way, you know -- some of
28 them might feel they want to get the job

1 done, you know. They feel that obligation to
2 finish it, pressure for good numbers, you
3 know, to keep the costs down, that kind of
4 thing.

5 Like I said, I just don't think
6 there's one answer to it. I think, you know,
7 there's a lot of reasons that they perform
8 that. Some of them were -- felt comfortable
9 doing the -- using the hot stick, you know.
10 So they thought "Well, I can't get a QEW.
11 I'm okay. I -- I know how to use this, you
12 know. I'm just going to do it, you know, get
13 the work done."

14 Q I appreciate listening to some of
15 those categories.

16 Were they ever worried about being
17 late, the ticket not being marked within the
18 48-hour period?

19 A Oh, sure. I mean that's definitely
20 another category in its own, you know. They
21 want to get that ticket -- got to get it done
22 within 48 hours, what reason are they going
23 to put on there, you know. Because
24 sometimes -- I mean, you know, legally, they
25 should have -- if they can't renegotiate it,
26 they got to locate it. Contractor says, "I
27 can't wait, you know. I -- I'm doing this
28 work in 48 hours, you know." They've got to

1 get it done.

2 Q Right. And -- and when you say,
3 "obligation to contractors," I -- I guess
4 what we're saying there is time is money, and
5 they're waiting to start their work?

6 A Uh-huh. Yes.

7 Q Theoretically, they've already bid
8 the job?

9 A Yeah.

10 Q And the sooner it gets marked, the
11 sooner they can get to work, and get the job
12 done?

13 A Right.

14 Q Some of the reasons, such as don't
15 want to get hurt --

16 A Don't want the contractors to get
17 hurt.

18 Q So -- so that would speak to --
19 I -- I guess they were -- I guess some of
20 these gas locators were -- were confident
21 that they could -- they could do the work of
22 a QEW?

23 A I think sometimes they were; not
24 always.

25 Q And just in -- in terms of -- you
26 mentioned pressure for good numbers. Could
27 you elaborate on that a little bit?

28 A Well, so, you know, your yard has,

1 you know, been typically, you know, locating
2 at this cost level, say, you know, so many
3 dollars per ticket, you know, your team does
4 it at, you know, 88 -- I'm just throwing a
5 number out there, \$88 a ticket. Well, you
6 know, next year, you're going to be asked to
7 do it, you know, a percentage less than that.
8 You know, now you're \$70 a ticket, and then
9 you're \$60 a ticket, and then you're \$50 a
10 ticket, and then you're \$30 a ticket.
11 There's -- you know, there's always that
12 expectation that you can do better, you can
13 do faster, you can do -- you know, so then
14 the locators and the supervisor have that
15 pressure to get it done faster, get it done
16 faster. So --

17 Q Right. Understood.

18 Ms. Mack, how about -- how about
19 any pressure to not be -- for tickets not to
20 be late, just similar to what we -- we saw in
21 the gas side, when -- when the -- when we
22 opened the Order Instituting Investigation?

23 A Yeah. So when a -- so we could use
24 a instance like -- say, it's a ticket that is
25 electric ticket. I'm just going to strictly
26 talk about electric; so if it's a gas or
27 electric ticket, but it needs the electric
28 locate from the QEW. Okay?

1 Q Sure.

2 A There's no delay button for, you
3 know, "Oh, I didn't get a QEW." Right? So
4 that's not a -- a reason. So what's a
5 locator going to do if they can't locate this
6 ticket in 41 hours -- 48 hours? You have the
7 same scenario. You have that where it's like
8 "Okay. This ticket can't be late. I can't
9 get a QEW within the timeframe, so what am I
10 going to do with this ticket?" So it can't
11 be a late ticket. You know, those tickets
12 were never counted as late, none of those
13 that were delayed due to QEW -- not having a
14 QEW; but, they are. So they're still going
15 to use the exact same scenarios that we
16 talked about with the -- the other one; you
17 know, the renegotiated ticket, you know, left
18 a message, those kind of things, to stop the
19 clock when it doesn't really, you know, stop
20 the clock, or use phase ticket when really
21 that didn't fall into the phase ticket
22 category, because it's just a smaller job,
23 it's just a single service or two or -- you
24 know, I think at that time, our phase ticket
25 had to be more than a block or more than a --
26 you know, I think it was a block at that
27 time. So they were still using the same, you
28 know, approach to prevent the ticket from

1 being late.

2 Q Thank you, Ms. Mack.

3 A And it's not like -- they were
4 handled the exact same way as -- as the
5 other --

6 Q I'm sorry. Could you say that --

7 A They were handled in the same way
8 to prevent it from being late.

9 Q Okay. And just, if you could,
10 why -- why does a locator care if they're
11 late?

12 A Well, like we talked before, it's
13 like zero was the number. You can't have any
14 late tickets, you know. You're going to feel
15 pressure from your supervisor, who felt
16 pressure from their superintendent, who felt
17 pressure from their director to make sure
18 they had no late tickets. You know, I think
19 supervisors were probably the most vulnerable
20 of the scenario, because, you know, there's
21 always threats of being fired under -- for
22 them, you know. I felt like they were the
23 most -- took the biggest hit for late
24 tickets. So then the locators would want to
25 not get their supervisor in trouble, you
26 know.

27 Q Would you say this pressure for no
28 late tickets was a -- embedded in the culture

1 of PG&E?

2 A Well, I mean I think that it
3 happened when there were metrics surrounding
4 something.

5 Q And by "metrics surrounding
6 something," do you mean late ticket metrics
7 or something like that?

8 A Yeah. So if you give a -- you have
9 a metric that the -- you know, zero's the
10 number, you know, then your -- and that's in
11 your, you know, director's, you know,
12 program or his, you know, end of the year
13 evaluation and your supervisor's and your
14 superintendent's, and, you know, that's part
15 of the metric that they're, you know --
16 promotion or, you know, evaluation or STIP or
17 anything else is based on that, you know, I
18 think that there's more pressure to make sure
19 that that happens; not only -- if the
20 supervisor doesn't want it for himself,
21 they -- they want it for the superintendent.
22 They don't want their superintendent in
23 trouble. The superintendant doesn't want
24 their director to get in trouble. Somehow,
25 there's more pressure. It depends. You
26 know, then it depends on the superintendent
27 and supervisor.

28 I felt like in locate and mark we

1 had pressure that I have never felt in any
2 other place in PG&E at that time. So I mean
3 I don't know why it was there. I had spoken
4 to people, and they'd say, "I don't know
5 where that pressure's coming from. It's not
6 coming from --" you know, from them. So for
7 some reason, my leadership absolutely felt
8 that, you know, they put pressure to make
9 sure that that was absolute. But --

10 Q Ms. Mack, do you -- do you -- do
11 you have any information to suggest that
12 somebody's performance evaluation was tied to
13 a late ticket metric?

14 A Well, yes. It was on our
15 performance evaluation.

16 Q And by "our," you mean supervisors
17 or --

18 A Supervisors, superintendents. I
19 don't know if it was on my director's, but I
20 know it was on mine as a superintendent. It
21 was on mine as a supervisor when I was
22 supervising locate and mark. It was on all
23 the supervisors' metric. It was on their
24 performance evaluation.

25 Q How about the locator and markers?

26 A So they're -- they're union
27 employees, so it did not affect them. The
28 only way it would be -- affect them is, you

1 know, that could be monitored, and they could
2 be written up for not, you know, making
3 contact or whatever, having too many late
4 tickets, whatever.

5 Q Okay.

6 A But, they wouldn't -- I don't know
7 of a case that a IBEW employee was ever
8 terminated or anything like that for late
9 tickets.

10 Q And then Ms. Mack, with respect to
11 your performance evaluation, are you
12 suggesting if you had late tickets in your
13 group, or people that reported to you, you
14 would receive less compensation?

15 A Yes. I mean I was asked to go
16 over -- I had a counterpart. I was the south
17 superintendent, and there was a north
18 superintendent. And my director would --
19 would make me go over to the -- to the north
20 and fix areas that were having late tickets,
21 to go train, supervise, mentor, coach, do
22 whatever, you know, in that other person's
23 area to make sure that it was fixed.

24 Q And just -- just speaking to your
25 own -- I guess your performance evaluation,
26 late is late. It doesn't matter if it's
27 because of electric or gas. Whatever causes
28 something to be late will be a negative mark,

1 I guess, on -- on your evaluation?

2 A Yes. I mean I would -- I received
3 phone calls from my director saying, "You
4 know, what's wrong with that supervisor? You
5 know, do I need to fire him, you know,
6 because he had two late tickets."

7 Q Right.

8 A You know, and I'm like "No, no, no,
9 no, you know. Let me talk to him." I'm just
10 trying to, you know, manage it.

11 Q Ms. Mack, just -- if you could
12 speak to your experience, the magnitude of --
13 so I'm specifically zeroing in on when a
14 ticket was -- was put in a category so it
15 would not go late, whether it would be a
16 phase ticket, a renegotiated ticket, what
17 have you.

18 Could you just, based on your
19 experience, roughly break that down between
20 the culprit? Was it an electric causing this
21 or -- or was it other gas reasons causing it?

22 A Oh, I think it depends on the area.

23 Q Okay.

24 A I think in -- if you're talking
25 San Francisco, it was a lot caused by not
26 having QEWS. I mean I can remember a time we
27 had 300 late tickets because we didn't have
28 QEWS to perform the work. In other areas, it

1 might be something completely different. The
2 manpower, you know, was the biggest culprit,
3 I think, in most areas. Well, that's the
4 issue, even with electric. It was manpower
5 issue. We didn't have the people, and we
6 didn't control it, either. That made it
7 worse, because we had to -- you know, it
8 wasn't like, you know, you had people working
9 together to -- you know, like if -- for gas,
10 at least the supervisor had options. "Oh, I
11 could call another supervisor. You got
12 anybody to come work for me on Saturday? You
13 got any --" you had at least some options.
14 The electric, you didn't have nothing. You
15 could call that guy; either he would give him
16 to you or wouldn't give him to you. So I
17 think it -- it -- as far as whether it was
18 electric or not was depending on how much
19 electric there was in that area, whether that
20 was the bigger culprit than, you know, the
21 other reasons, just not having gas guys, you
22 know.

23 Q Right. Understood. Thank you,
24 Ms. Mack. And I -- I do appreciate the
25 effect that it kind of depends on the area
26 we're speaking of. You know, I'm -- I'm
27 going to throw a number out there.

28 If we're talking 20,000 late

1 tickets, would you suspect at least hundreds
2 of those are because of electric issues?

3 A So are you talking -- so are you
4 talking that -- that got performed and
5 located that needed it, or are you talking
6 that were held and waited? I'm not sure
7 what --

8 Q Yeah. Let me -- let me kind of
9 withdraw that -- that question. I -- I
10 should -- I should get a little more
11 foundation going there for that.

12 MR. GRUEN: Can I do a little bit of
13 follow-up?

14 MR. BRUNO: Yes. Yes, please.

15 EXAMINATION

16 BY MR. GRUEN:

17 Q A couple of things. One is -- all
18 right. Let me -- let me try and ask the
19 follow-up on Mr. Bruno's point.

20 I think we've asked a couple of
21 times about how -- how many tickets might
22 have -- how many tickets weren't done --
23 didn't show up as late -- let me ask it this
24 way.

25 Do you remember talking to us
26 about -- I think the last time you were here,
27 you asked the term inappropriately documented
28 was kind of what you used to describe when a

1 ticket was shown as -- did not show up as
2 late, even though it was.

3 A Uh-huh.

4 Q Does that -- am I characterizing
5 that correctly?

6 A Yes.

7 Q Does that refresh your
8 recollection?

9 A Uh-huh.

10 Q Okay. And that was from your last
11 time you spoke with us in the Examination
12 Under Oath. Isn't that right?

13 A Yes.

14 Q Okay. So if I use that term,
15 inappropriate documentation, I'm just trying
16 to use that as a term --

17 A Uh-huh.

18 Q -- that we might use to commonly
19 understand one another.

20 So if -- let's just say that there
21 were, in 2013 -- just to pull out a number,
22 just to get a percentage, out of every
23 hundred tickets that were inappropriately
24 documented, how many were inappropriately
25 documented because of -- of a problem getting
26 a QEW out to help with the locate? Do you
27 have a sense of that?

28 A So again, I mean I think you're

1 talking about different areas. I'll just use
2 an example. I'll pick two areas.

3 So if I was to say in Oakland, I
4 would say probably 50 percent of the tickets.
5 If I was to say Fresno -- now, you're just
6 talking about just because electric, or
7 you're talking about in general?

8 Q I'm -- I'm saying how many tickets
9 were inappropriately documented just the way
10 we talked about it before, because there was
11 a need to get a Qualified Electric Worker to
12 help with the locate, but one could not be
13 had?

14 A I would think, in Oakland, it
15 was -- saying 50 percent of the tickets would
16 not be overstating the number.

17 Q Okay. What about Fresno?

18 A Fresno would be very low, you know.
19 I -- there's not that much underground in
20 Fresno, so it's mostly downtown and in those
21 areas. So I -- I would hate to, you know --

22 Q Okay.

23 A It's not like I get all the calls
24 there, so it's hard for me.

25 Q And we're asking you to make your
26 best estimation. I don't want to --

27 A Yes. It's very, very hard to do
28 that.

1 Q I don't want to put you in a spot
2 where you can't.

3 A Yeah.

4 Q Understood. Do you have a sense of
5 maybe some of the other areas that have more
6 underground electric?

7 A Yeah. So I would say if you talked
8 about, you know, San Jose, you know, again --

9 Q Yes.

10 A -- you're talking probably
11 50 percent of the tickets.

12 Q I follow.

13 A Oakland, you know, probably even
14 higher than 50 percent of the tickets.
15 San Francisco, absolutely probably, you know,
16 80 percent of the tickets. If you're
17 talking, you know, areas in the Bay Area,
18 you're talking a high number percentage of
19 the tickets. So, you know, the locator in
20 those areas, they're going to make a note on
21 that ticket when they first get it.

22 Q Okay.

23 A So out the door, you've probably
24 got -- you know, the majority of the tickets
25 have a note on them when they first get it.
26 They -- they open up the folder, they're just
27 going to go note every single ticket --

28 Q Yeah.

1 A -- you know, to prevent a late
2 ticket. You know, "I might miss that. Let
3 me just make a note, you know." So --

4 Q Yeah. I follow.

5 A -- I mean I tried to -- I really
6 tried to get -- stop that by having --
7 training seniors to look in the folders. So
8 the senior would then -- that was his job in
9 the morning before he ever went out was to
10 look at the folders and make those phone
11 calls, so it was actually getting done. It
12 wasn't like we didn't try to address this.

13 Q Yes.

14 A You know, I mean I -- the
15 seniors -- I went around the yards, trained
16 them all to go in the folders, look at the
17 tickets, make the phone call to the
18 contractor, and then put a good note in
19 there, you know, correct note in there.
20 So --

21 Q Thank you.

22 A -- that was another way to, you
23 know, try to manage it.

24 Q Yes. Follow-up, also, on
25 Mr. Bruno's point about performance
26 evaluation, you had -- certain supervisors
27 reported directly to you in your role as
28 superintendent. Isn't that right?

1 A Yes.

2 Q Did those supervisors who reported
3 to you have in their performance evaluations
4 one objective of zero late tickets?

5 A Yes.

6 Q And were they -- did their
7 compensation also depend upon whether they
8 met that objective or not?

9 A So it could have. I mean PG&E's,
10 you know, look at that isn't one -- you fail
11 at one, you fail at all, you know. So, you
12 know, they tried to look at the whole piece
13 of pie, you know. It was a piece of it, but
14 it wasn't all of it. So I -- you know, so
15 say --

16 Q Yes.

17 A -- you know, obviously, if they
18 were really just terrible in that area, it's
19 hard to fight that battle to your -- because
20 my -- I would have to explain every one of my
21 direct reports why I rated them. You know,
22 you go into this room, and you talk about it.
23 You say what you did. And so, you know, if
24 they were rated, you know, really bottom out
25 of the -- like I said, it's hard to fight
26 that. But, you know, if they were rated
27 really good in everything else, that gives
28 me, you know, points to be able to say, "Hey,

1 yeah. Maybe just that one area, but, you
2 know, look at this, this, this and this," you
3 know. So like I said, they don't just look
4 at one thing and say, "Well, you're bad, you
5 know, because you scored low in that."

6 Q Okay. Was -- I follow.

7 Was the performance evaluation
8 objectives -- did it -- was this a factor in
9 some of the pressure you had described that
10 locate and mark employees or supervisors were
11 feeling in order to meet the objective of
12 zero late tickets?

13 A Well, I think it was a piece of it,
14 but I think it was more than that. I think
15 it -- a lot of it just came from those phone
16 calls that we'd get from Joel, you know. It
17 was just those, you know, "Somebody had a
18 late ticket. Oh, my God." You're calling
19 your supervisor right away, "What happened?
20 What happened," you know, because you know
21 the next phone call is going to be from Joel
22 saying, "I saw that late ticket, you know, on
23 that report." So --

24 Q Yeah.

25 A -- you already want to be ready
26 with that explanation, because then, you
27 know, he's calling you, you know, saying,
28 "What's wrong with that supervisor" or

1 whatever, you know.

2 Q Uh-huh.

3 A It was craziness; craziness.

4 Q Okay. You've mentioned Joel a
5 couple of times, and I think I understand
6 you're talking about Joel Dickson?

7 A Yes.

8 Q And he was the director of locate
9 and mark at the time that we're talking
10 about, the locate and mark -- is it
11 department? He was the director of the
12 locate --

13 A Yes.

14 Q -- and mark department?

15 And that was from what dates,
16 approximately, do you know?

17 A I want to say maybe 2014 on. I --

18 Q Okay.

19 A Guessing.

20 Q Okay.

21 A '14 or '15. Yeah, I think it was
22 '14.

23 Q Okay.

24 A Maybe -- maybe even '13.

25 Q Understood. I won't hold you to
26 that.

27 A Yeah, somewhere one of those years.

28 Q But, that's based -- that -- your

1 estimation of the time that he started is
2 based on your professional relationship with
3 him in the locate and mark department.
4 Right?

5 A Yes.

6 Q Okay. And you mentioned earlier
7 talking with Joel Dickson about the problems
8 with acquire -- with getting a QEW out to
9 help with the ticket when one was needed.

10 A Uh-huh.

11 Q Did I understand that right?

12 A Yes.

13 Q And when you talked with him about
14 that, how many times did you mention that
15 problem or communicate that problem with him,
16 to him, approximately, would you say?

17 A Oh, I don't know; too numerous for
18 me to count. I mean I had, you know,
19 numerous conversations with him about that.

20 Q Did he ever talk about doing
21 anything to you to address the problem with
22 getting QEWs out there when they were needed?

23 A Yeah, he did. I mean he
24 actually -- he's the one that told me to go
25 get the -- the service level agreement, you
26 know, with them.

27 Q Okay.

28 A And so, I did do that. It didn't

1 help, but I did it. You know, we had the
2 meetings, and, you know, the goal was get
3 upper leadership's buy-in to providing this
4 service, and get them to sign off on it, so
5 then, when we needed it, we would take this
6 piece of paper to say, "Hey, your leadership
7 has signed off saying you're going to provide
8 this service to us."

9 Q I follow.

10 A So I mean that was his idea to do
11 that.

12 Q And did you tell him that the
13 services agreement idea did not work?

14 A Yes.

15 Q And what did he say in response to
16 that?

17 A You know, he told me to go meet
18 with the supervisors, the local supervisors,
19 which I did. I met with the San Jose
20 supervisor; in fact, I met with her there for
21 a while regularly, you know. Once a -- every
22 three weeks or two weeks, I was either
23 meeting with her or calling her up on the
24 phone. And, you know, it was always the
25 same. It's like, you know, they would --
26 "I'm going to provide it," but then, you
27 know, it could be pulled, and not show up, or
28 whatever reason, they need them. You know,

1 it was just not a priority. They didn't have
2 any buy-in to provide that service or any
3 consequences for not providing it, I think,
4 is the bottom line. We're like the bottom of
5 the totem pole for them.

6 Q Could -- could Mr. Dickson have
7 done anything to raise your status on the
8 totem pole so that the electric operations
9 people made more QEWS available?

10 A I think that the problem could only
11 be solved by senior leadership. I think that
12 was -- I think that -- at the supervisor
13 level and the superintendent level, I think
14 we did everything we could. I mean we
15 begged, we borrowed, we -- I did the service
16 level agreement. I met with the electric
17 supervisors. I did -- every time something
18 had failed, I was out there at that office.
19 I think we did everything we could at that
20 level. I think it -- that's the only place
21 it could have been resolved, is at director
22 level and above. And I think it even had to
23 go higher than that. I don't think it could
24 have even been resolved, because I met with
25 the directors on the electric side of the
26 house to resolve this. It didn't help. So I
27 think it had to go higher. I think that
28 that's the only way it could have been

1 resolved --

2 Q Yes.

3 A -- is through the senior
4 leadership.

5 Q Did you ever mention that to
6 Mr. Dickson --

7 A Yes.

8 Q -- what you just told us?

9 A Yes. I'm not sure, you know, what
10 happened at that level. I -- you know, our
11 push was either two ways, either meet with
12 the IBEW group and work with them to get our
13 locators, QEW, you know, qualified. That was
14 one resolution. If they don't agree to that,
15 then get them to let us hire QEWs that work
16 for the gas side of the house so they can't
17 be pulled. That was the other res- -- you
18 know, proposal. And then, you know, one of
19 those -- something like that, along those
20 lines.

21 And then eventually, I think 2017,
22 there was some agreement to hire a few -- to
23 open positions for QEWs that work for the gas
24 side of the house. I don't know -- I think
25 they -- I don't know if they actually worked
26 for gas or if they still worked for electric,
27 but they were assigned to us, so they're our
28 people, we can't -- you know, those

1 positions. But, my understanding is that
2 they struggled to fill those positions.

3 Q Do you know approximately when in
4 2017 that happened?

5 A I don't.

6 Q Okay.

7 A Sometime middle -- middle 2017, I
8 think.

9 Q Okay. To your knowledge, did
10 Mr. Dickson himself ever approach the
11 electric operations people asking them to
12 assign QEWS to help the gas locators?

13 A I think he -- I think he did meet
14 with them to try to resolve the issue, too.

15 Q He told you --

16 A I believe he tried --

17 Q I'm sorry. Go ahead.

18 A I do believe he tried to resolve
19 the issue. I think he tried to -- I think he
20 met with them. I don't know. It didn't
21 have -- it didn't -- whatever he did do, it
22 didn't resolve the issue.

23 Q Okay. He -- did he tell you that
24 he met with them about the issue?

25 A No, he didn't. I just -- it felt
26 like he did, because the -- my service level
27 agreement had to be signed off by a director,
28 so I assume he -- he had to have had

1 conversations for me to set that meeting up
2 with them. So he had to have at least talked
3 to -- spoke to director level.

4 Q Who was Mr. Dickson's counterpart
5 at the director level who oversaw the QEWS?

6 A Oh, gosh, I don't remember.

7 Q Okay. Would -- to your knowledge,
8 was -- I understand you saying that the QEWS
9 who worked on the electric side had -- you
10 were at the bottom of the totem pole, so QEWS
11 would get reassigned.

12 Were there any repercussions for
13 QEWS not coming out -- within PG&E, were
14 there any repercussions for QEWS not coming
15 out to help with the locate --

16 A No.

17 Q -- when requested?

18 A No. And that was the problem.
19 There was no consequences for the electric
20 side of the house for not providing that
21 service.

22 Q To your knowledge, did
23 Mr. Dickson -- because I understand you
24 believe -- it sounds like you have reason to
25 believe that Mr. Dickson approached the
26 director of the electric operations division
27 who oversaw the QEWS. Did I get that right?]

28 A Yes.

1 Q And when -- it sounds like you also
2 have reason to believe that after talking
3 about the QEW problem we've been discussing,
4 nothing happened, nothing improved. To your
5 knowledge, did Mr. Dickson ever raise the
6 issue to his supervisors?

7 A I don't know.

8 Q Okay. One other question if I may
9 for just --

10 MR. PENDLETON: Can we go off the
11 record for one second?

12 MR. GRUEN: Absolutely. Off the
13 record.

14 (Off the record.)

15 MR. GRUEN: Back on the record, please.

16 Q Do you remember talking about the
17 different techniques and efforts used to mark
18 without a QEW even when one was needed? I
19 think you mentioned hot sticks and indirects
20 and maybe back paths. Did I say that term
21 right?

22 A No. Now you got me confused.

23 Q Okay. But you know what I'm
24 talking about?

25 A Yes.

26 Q You remember talking about that?
27 Were there -- to your knowledge
28 were there any dig-ins that resulted from

1 marks that were done using those techniques?

2 A Yeah. I mean, we had dig-ins from
3 incorrect marks for sure. I do specifically
4 remember the one in San Jose. I know we had
5 issues with it whenever they used -- maybe
6 some failed QCs over it, you know, things
7 like that. They say, "Well, I used
8 indirect."

9 Or I -- you know, or they would,
10 you know, use -- you know how the poles have,
11 kind of, you know, lines coming down? Have
12 you ever seen those gray conduits other than?

13 Q Yes. I believe I have.

14 A Okay. So the locaters might
15 unscrew those, again, which they're not
16 supposed to unscrew those. They'd unscrew
17 those and they'd use their ring. That was a
18 better way of doing it but still something
19 they weren't supposed to do. You know, if it
20 came down to the bottom, they'd have a big
21 fat ring, they could just put it over the
22 whole thing. That was the legal way to do
23 it.

24 But a lot of times that part they
25 wouldn't be able to do that because it was
26 either all underground or covered. So they
27 have to unscrew those things.

28 MR. PENDLETON: So the transcript is

1 clear, your question I think was whether she
2 specifically knows of any instances when
3 those techniques were used that resulted in a
4 dig-in? I think that's what you asked.

5 MR. GRUEN: That's correct.

6 MR. PENDLETON: And then you were
7 answering. But I wanted to make sure the
8 transcript is clear. Did you answer that?

9 THE WITNESS: I think I did. The one
10 that comes to the top of my head is the one
11 in San Jose. I really -- I'm not saying
12 they're weren't others. But off the top of
13 my head, I wouldn't be able to tell you this
14 happened then or that happened then. I don't
15 remember.

16 BY MR. GRUEN:

17 Q But San Jose you're certain about?

18 A Yes.

19 Q Okay. And in San Jose was anyone
20 hurt as a result of that dig-in?

21 A I do believe there was.

22 Q How many people do you know?

23 A I think it's just the digger.

24 Q The digger was hurt. Was the
25 digger killed?

26 A No.

27 Q Okay.

28 A I think he was just hurt. It's

1 been a while. So I just remember there was
2 an incident with his backhoe and hit it and
3 the guy had not used an electric worker to
4 locate it.

5 Q But had indicated that the ticket
6 was complete and the mark was done?

7 A Yes.

8 Q I follow. Do you know
9 approximately when that was?

10 A No.

11 Q Okay. I was just informed. I
12 think the term that I was struggling with was
13 "back feed"?

14 A Yes. Back feed. After you said
15 the other one, you had me confused.

16 Q I didn't mean that. I'm sorry for
17 the confusion.

18 A Back feed.

19 Q Back feed was another, kind of,
20 technique that was used to do a mark when a
21 QEW was needed but could not be had; is that
22 right?

23 A Yeah.

24 Q Okay. Great.

25 MR. GRUEN: Mr. Bruno, do you want -- I
26 am mindful, Mr. Pendleton, of your request.

27 Mr. Bruno, do you have any more
28 questions before we take a break?

1 MR. BRUNO: Yeah. No let's go ahead
2 and take a break now. We can come back and
3 get little more done before 1:00 p.m.

4 MR. GRUEN: Off the record.

5 (Off the record.)

6 MR. GRUEN: Back on the record.

7 Mr. Bruno, do you want to continue?

8 BY MR. BRUNO:

9 Q I have a couple questions here, Ms.
10 Mack, perhaps tightening up a few things and
11 asking you some additional questions.

12 So, you know, I hear I guess two
13 categories of what I'll consider issues or
14 problems. One was the zero late tickets goal
15 and subsequent pressures. The other was it
16 sounds like we're talking about a scarcity of
17 qualified electrical workers --

18 A Yes.

19 Q -- and resources. With respect to
20 zero late tickets and the subsequent
21 pressures in evaluations, was senior
22 leadership aware of this to your knowledge?

23 A Of the pressure? Or of the --

24 Q Of the pressure and of the goal?

25 A Of the goal definitely. But I mean
26 I did meet with them -- John Higgins about
27 the pressure, and I had my supervisors meet
28 with him about that.

1 Q And do you know how high up of Gas
2 Operations knew about it?

3 A I don't.

4 MR. PENDLETON: Just to be more
5 specific when you say "about it." What are
6 you referring to?

7 MR. BRUNO: Yes. Thank you,
8 Mr. Pendleton.

9 Q The goal of zero late tickets and
10 the fact that PG&E employees were graded on
11 that goal?

12 A Yes. I mean, I did speak with --
13 like I said I spoke with John Higgins who is
14 Joel's boss about that. He had told me he
15 didn't know where that pressure came from.

16 Q In your professional opinion, was
17 that goal a feasible goal?

18 A No.

19 Q In your opinion did that goal and
20 metric did it help -- did it help management
21 understand how the Locate and Mark Operations
22 were performing?

23 A No.

24 Q And why not? Why wouldn't a late
25 ticket metric help Locate and Mark managers?

26 A Well, I mean, specifically that
27 particular one and the way that things were
28 managed in the Locate and Mark Department

1 created the inappropriate documentation of
2 the tickets. So it was not an accurate, you
3 know, number who had zero. Probably nobody
4 had zero. So it created a, you know, false
5 number. So it didn't help management
6 understand the problems that we were having.
7 You know, well, if you've got zero late
8 tickets, you don't have a manpower issue.
9 You know. I think that was the bottom line.

10 For gas it was the problem they
11 didn't have the manpower to get the work,
12 which generated potential late tickets, which
13 generated the problem with the metric. So it
14 did not bring that to light if there'd been a
15 thousand late tickets, which you might --
16 2,000 -- I mean, you can see the difference
17 between, you know, 2010, '11, '12, the number
18 of late tickets compared to after that. You
19 know, and Joel took leadership of that and
20 the focus was put on late tickets, you know,
21 rather than what's driving it.

22 Q Absolutely. So I guess my question
23 would be: Had the metric been accurate, it
24 may have been informative to address the
25 resource problem?

26 A Yes. Yes.

27 Q And based on your opinion, the
28 reason the number was not accurate -- I -- it

1 sounds like the -- I guess "pressure" is the
2 word.

3 A Yeah. Because, you know, the
4 problem was is that my director, Joel
5 Dickson, it didn't matter what the problem
6 was. So if I go and say, "Hey, this guy has,
7 you know, not enough manpower to get the work
8 done."

9 "Well he must not be getting -- he
10 must not be managing his people very well.
11 He's not a very good supervisor."

12 So, you know, you could never say
13 that, "Hey, this is needed to get this work
14 done."

15 You know, "Well, why isn't he, you
16 know, doing this?" You know.

17 And I tried to come up with some
18 tools for the supervisors. I gave them -- I
19 came up with seven things you could do if you
20 had work you couldn't get done.

21 First, make phone calls; second,
22 you know, use overtime extended days; third,
23 reach out to your other supervisors and ask
24 them if they have anybody they can spare.
25 Maybe they're light that day. Fourth, you
26 know, do a blitz on the weekend where you
27 just get everybody you can to come and
28 locate. You know, so there were all those

1 things that they could do. But the bottom
2 line is I could come up with all of the
3 things in the world for them to do, and, you
4 know, sometimes that would solve the problem.
5 But, you know, the supervisors around them
6 were probably just as shorthanded.

7 Locate and Mark was a high turnover
8 job. Nobody wanted to work there. It was an
9 easy place to get in the door to PG&E. But
10 as soon as they got there, they left because
11 of the pressure. Not only the pressure to
12 more, more, more. But do it and don't get a
13 dig-in.

14 And then you had QC. If you have
15 any miss-marks and then you had the pressure
16 of no late ticks. So there was too much
17 stress. That's the Number 1 thing we heard
18 when somebody was leaving was stress, stress,
19 stress, stress, stress. You know, and so I
20 think that that caused a lot of the late
21 tickets too. You know, it was just the
22 constant.

23 Q To your knowledge, Ms. Mack, did
24 either the vice president of Gas Operations
25 or the president of PG&E know about this
26 issue? This issue being pressure on late
27 tickets and inaccurate or false numbers?

28 A Well, I mean, I brought it to John

1 Higgins' attention for sure at that level.
2 And I know there was a SAR that it was
3 discussed in that. And all those other
4 things, the QEW and the other things. So
5 that was higher up. You know, but a lot of
6 times that we would ask for the money I would
7 say, "Hey, this is how much money we need to
8 function this year."

9 And, you know, it would be cut in
10 half. And it would take -- and it would be
11 approved and then taken away. It's like, you
12 know, you'd have all these contractors and
13 the company's trying to save money and they'd
14 say, "You can't use any contractors."

15 Well, you can't get the work done
16 without contractors in heavy seasons when
17 contractors are out there digging like crazy.
18 You know, from July, June to November, that's
19 heavy for Locate and Mark. You need twice as
20 many people than you do during the winter
21 months. So you'd have to use contractors for
22 that.

23 I can remember twice where they'd
24 say, "No more contractors." They'd just get
25 rid of all of them. Then you're like, "Well,
26 how am I going to get this work done?" It's
27 just I don't know.

28 Q Ms. Mack, I want to ask you about

1 another metric called "hit rate." And that's
2 I think defined as damages per thousand
3 tickets. Are you familiar with this metric?

4 A I am.

5 Q What is your opinion on a condition
6 where the hit rate is going down but you
7 still have this problem. This problem being:
8 Goal of zero late tickets, scarce resources,
9 and making employees change records that
10 shouldn't be changed?

11 I guess what I'm asking you is:
12 The scenario described there of, you know,
13 zero late tickets, pressure, scarce
14 resources, all the while your hit rate is
15 going down. I want to ask your opinion on
16 that.

17 A Well, I mean, I worked a lot with
18 that team. In fact I did bullets throughout
19 the system to get that hit rate down. So I
20 came up with a presentation, and I went
21 around to the system and did a lot of
22 awareness about it. So I would meet with the
23 -- I would go to the yard, and I'd meet with
24 the supervisor there, with crew supervisors,
25 and we'd take, like, six people and we'd go
26 out and we'd just look for people digging
27 that were -- that didn't have a USA. We'd
28 pass out pamphlets, education. You know, we

1 would go look at ticket and look to see if
2 they were late. We'd do all those kinds of
3 things to try to really hit it in these
4 blitz. I think that was one big way that we
5 brought that. And that year we brought it
6 down a lot by doing those blitz. Education
7 to contractors. Don't dig without marks. I
8 think that's a big reason that the hit rate
9 went down.

10 Q Understood. Ms. Mack, what I'm
11 going to ask you to do is assume that you
12 didn't do all that education. All the --

13 MR. GRUEN: Can I just jump in just a
14 quick clarification?

15 Q Which year was that that you're
16 referring to the education?

17 A I think that was I want to say
18 2016. But --

19 Q That's your best recollection?

20 A '16, '17. Just before I left to go
21 to the SGO team. Because I was in charge of
22 both that team and the Locate and Mark
23 manager. I was superintendant for both
24 teams.

25 Q Okay. Thank you. Excuse me?

26 BY MR. BRUNO:

27 Q Ms. Mack, thank you for describing
28 the additional activities. I think you

1 called them blitz or education to drive the
2 hit rate down.

3 What I want to ask you is your
4 professional opinion and subject matter
5 expert opinion had you not done all that
6 extra, you know, blitz activities, education,
7 what would -- would you expect your hit rate
8 to -- what effect on the hit rate would you
9 expect given the goals zero late tickets, the
10 scarce resources, the improper locations, et
11 cetera?

12 A Right. I think that would
13 definitely affect the hit rate. You'd have
14 more miss-marks, you'd have more contractors
15 digging without marks. You know, those types
16 of things would be happening.

17 They also utilized a team. A dirt
18 team would go out and be looking for that
19 kind of stuff too. That was a different
20 team. But yeah.

21 Q Do you -- based on your experience,
22 do you know if senior leadership, the vice
23 president of gas operations, were looking
24 myopically at the hit rate?

25 MR. PENDLETON: You may want to clarify
26 what you mean by that. "Myopically at the
27 hit rate."

28 BY MR. BRUNO:

1 Q Yes. Ms. Mack, do you think the
2 hit rate's metric got more visibility by
3 senior PG&E leaders such as vice president of
4 gas operations and higher?

5 A That got huge. I mean, it was a
6 big board in the division -- not the
7 division. In the San Bruno that had -- in
8 San Ramon that would have the number up
9 there. What the percentage was and how many
10 hits, you know. So it was a big deal. It was
11 a big thing. Everybody was walking by could
12 see, you know, whether it was going up or
13 down or -- it was a big deal.

14 They spoke to their efforts that
15 they were, you know, they had done a lot of
16 work in educating. So I think that they
17 were, you know, proud of it. Because they
18 had done a lot of work of educating the
19 contractors and stuff like that. So it felt
20 that their efforts were paying off.

21 Q I agree. I mean, my opinion is
22 that that's a proud metric. But to put
23 things in context, the other important metric
24 would be how many tickets were shown as not
25 late when actually they were.

26 A Yeah. You know, I just wonder -- I
27 mean, I don't know. Maybe it's a culture
28 thing, you know. I just -- PG&E, don't bring

1 bad news. I don't know. It's like Joel -- I
2 know -- I still remember, you know, showing
3 him the percentage. You know, when I was
4 with SGO, I was really -- we were working
5 with contractors to try to pick the top
6 things that would -- locate and mark I was
7 working with that -- the top things that
8 would -- they -- that we could really make
9 change on.

10 And I said, "The Number 1 thing is
11 late tickets. Let's do something about
12 this," right?

13 So he said, "Okay." He's a
14 contractor good with numbers, good with
15 everything. He said, "Well, let's do this.
16 Let's do a report. You were -- I'm going to
17 have you look at so many tickets."

18 Now, this was after Joel got on the
19 phone to locators and said, "Don't do that
20 anymore."

21 But the expectation of the zero was
22 still there. So it's like -- it's just, "I'm
23 checking that box. I said don't do it. So
24 I'm protected." That's what it felt like.

25 Because when I did this thing, you
26 know, I showed him, "Hey, Number 1 if you
27 have this many -- if you're down employees by
28 this much, here's how many late tickets you

1 can expect. And, oh, by the way I did a
2 little, you know, survey. I looked at --"

3 Randomly, I took four folders and I
4 looked at, you know, like, I don't remember
5 how many tickets I looked at. You know, 40
6 tickets in each of the folders. And, you
7 know, of those, you know, I don't remember
8 what the exact number was. But it was like,
9 you know, 30 percent of them had, you know,
10 still incorrectly documented tickets in them.

11 And, you know, he was so angry.
12 It's like bringing him bad news. I was not
13 supposed to tell him that, you know. He
14 said, "What do you want me to do with that?"
15 And threw it up and, you know, left the
16 meeting and refused to meet with me ever
17 again, and I was laid off.

18 You know, it's like I don't know
19 if, you know, what happened with his
20 leadership. But he was certainly, "Don't
21 bring me bad news." You know. I don't know.
22 I just don't know. It's a question you'd
23 have to ask him.

24 I never had a problem bringing
25 something up to John Higgins. He was very
26 open. And I did. I brought stuff to his
27 attention. You know, what he did with it, I
28 don't know. But I did. He was very open and

1 he would say you know, "Let's work through
2 this." He seemed to be very open to having
3 those conversations unlike Joel. But John
4 Higgins was open to having them. And I do
5 know that the problem wasn't solved. But he
6 was open, you know, and wasn't angry about
7 hearing the message.]

8 Q Understood. Thank you, Ms. Mack.

9 I also want to ask you your
10 opinion, your professional opinion, on the
11 condition where we have these -- you know, we
12 have a situation where there are late
13 tickets. There's tickets that are adjusted
14 so that they don't appear to be late, and
15 then there's gas people doing QEW work.

16 In your opinion, did that lead to
17 increased potential risk of an incident?

18 A Absolutely. Yes. Definitely. I
19 mean that's, you know, definitely.

20 MR. BRUNO: Thank you, Ms. Mack.

21 EXAMINATION

22 BY MR. GRUEN:

23 Q And why do you say that?

24 A Well, because -- I mean, so, you
25 know, the way a dig-in is -- I saw it
26 numerous times. Say, we didn't go out there
27 and locate it in time, within the 48 hours,
28 and a contractor dug.

1 Well, you know, it would be
2 documented as "dug before marked"; right?
3 But -- and because we -- you know, we would
4 hold them accountable for digging without
5 marks, but in reality what caused it, we
6 didn't get out there and mark within the 48
7 hours, but the contractors were still billed
8 for those dig-in. So it definitely was the
9 root cause of it -- even though -- okay. The
10 contractor dug without marks.

11 Do you know what I'm saying?

12 Q Yes. I follow that.

13 I'm going to ask you, if you can -
14 it may be difficult - put that into numbers,
15 during your tenure. How often did PG&E bill
16 an excavator for a dig-in when PG&E was late
17 on the mark?

18 A No. I would not be able to put
19 that into a number. I mean, any dig-in
20 that -- any dig-in that happened that was not
21 marked, you know, within 48 hours pedoes
22 (sic).

23 (Reporter clarification.)

24 THE WITNESS: Billed. Any dig-in
25 without marks, but the ticket was already due
26 would be -- fall into that category, you
27 know.

28 MR. GRUEN: You mentioned a term. I

1 thought you said "P.O.'d"? I may have missed
2 the term. I'm sorry.

3 THE WITNESS: Hmmm.

4 MR. GRUEN: Do you want to continue,
5 Mr. Bruno?

6 MR. BRUNO: Yes. I'll ask one more
7 question, and then I think Mr. Mee will have
8 a question or two.

9 EXAMINATION

10 BY MR. BRUNO:

11 Q Ms. Mack, I want to go back to a
12 different category that we described as
13 electric transmission. To your knowledge any
14 issues on locating and marking in electric
15 transmission?

16 A Timely. I mean, okay, so a ticket
17 is due within 48 hours. So they're only one
18 team and they're in San Francisco. So
19 getting them to get to even Oakland, you
20 know, or somewhere else was, you know -- I
21 mean, first of all, getting somebody to
22 answer the phone, and then, you know, getting
23 them scheduled, that took longer than 48
24 hours.

25 Q Thank you, Ms. Mack.

26 In that category of electric
27 transmission, would the ticket -- do you have
28 any knowledge that the tickets were changed

1 to not look late, or do you just not know?

2 A I think it's a combination. I
3 think when it came to electric department
4 managing the folders and electric
5 transmission managing the folders, I don't
6 think they had the pressure that the gas had
7 to do that, but at least early on, I think
8 that they a lot of times locate them late,
9 you know, and didn't worry or not care that,
10 you know, putting a note in there to make
11 sure that it wasn't late. I think that came
12 later on.

13 You know, when numbers started
14 showing up on reports that electric
15 department had late tickets or electric, you
16 know, or transmission. A lot of times they
17 just wouldn't even close them. They just
18 leave them open, you know, with no
19 documentation or anything. It may have been
20 located or may not have been located. You
21 know, so it was tough to tell.

22 So I don't think that -- then I
23 would go out and meet with them. Not
24 electric transmission so much, but definitely
25 gas transmission, you know, and electric
26 distribution. Absolutely, I'd go out there
27 and meet with them.

28 And I'm like: You guys have 200

1 tickets in your folder, and, you know, you're
2 charging us 15 hours a day to locate, but we
3 don't see anything getting located or closed.

4 You know, they changed supervisors
5 and did some stuff. You know, I think they
6 would just -- they had problems inaccurately
7 documenting tickets, too, because they
8 weren't really going out and locating them
9 for the different reasons, not for the
10 lateness because I don't think that they
11 cared about that. I don't think that they
12 had the pressure for the lateness.

13 Q Ms. Mack, I wanted to ask you -- I
14 appreciate the response, but I want to ask
15 you one more time, and I'm going to just ask
16 you to be disciplined to only answer about
17 electric transmission.

18 A Okay.

19 Q To your knowledge was there any
20 manipulation of the late ticket on electric
21 transmission so that it did not appear late?

22 A Okay. So are you talking about a
23 ticket that we found electric transmission
24 on?

25 Q No. I'm talking about 811 gets a
26 locate; they generate an electric
27 transmission ticket.

28 A Uh-huh.

1 Q I'm asking, to your knowledge were
2 there issues with the integrity of the
3 information on that ticket.

4 A So I don't know because they
5 would -- I mean, if they made notes, I have
6 no way of knowing whether they really called
7 somebody or not. Whether they really delayed
8 a job, I have no idea.

9 The only way I can say is if a
10 distribution person needed an electric
11 transmission guy, that would have been
12 inappropriately documented because they're
13 not going to say, Oh, this is late because I
14 need a...

15 You know, they're going to check
16 one of those boxes we talked about. So
17 that's just the distribution. The electric
18 transmission, I have no way of knowing. I
19 mean, know they had late tickets. I know
20 they had issues, but I don't know what
21 they -- how they -- if they incorrectly
22 documented or not.

23 MR. GRUEN: Do you know who would know
24 the answer to that question?

25 THE WITNESS: No.

26 MR. GRUEN: Colleagues?

27 THE WITNESS: No.

28 BY MR. BRUNO:

1 Q Ms. Mack, I do want to explore that
2 scenario you just described. So you have an
3 electric distribution locate that calls for a
4 transmission; is that what you said?

5 A So we would maybe the -- you know,
6 I've seen this scenario happen a lot in
7 Oakland where they go out to perform a locate
8 and they see electric transmission, and
9 they're like, Whoa, wait a minute. You know
10 that's not marked. Something's wrong here.

11 And so they would call the electric
12 transmission department and say, Hey, I need
13 you guys out here.

14 So that's why I'm saying then
15 they're going to delay that ticket. That's
16 why I'm saying that scenario would happen
17 where they would do one of those
18 inappropriate ways to delay the ticket.

19 Q Understood. But that would be a
20 locate or mark under gas operations?

21 A Yeah, but there should have been a
22 ticket going to electric transmission. So
23 that's why I say, I have no way of knowing
24 how they handled their tickets. And, you
25 know, sometimes they would be closed, but the
26 marks wouldn't be out there. So that's why
27 I'm saying I have no way of knowing how they
28 functioned that area because we had nothing

1 to do with them.

2 Q Right. And really that's all I was
3 asking. I don't expect you to have all the
4 answers for the company. I just wanted to
5 know based on your experience on electric
6 transmission. I think you answered it.

7 MR. GRUEN: If I may, a couple other
8 things.

9 MR. BRUNO: Yes.

10 EXAMINATION

11 BY MR. GRUEN:

12 Q I think you had mentioned earlier
13 that you talked to Joel Dickson, something
14 like this, what I noted down was the number
15 one improvement that could be made was to
16 tackle late tickets, to address late tickets;
17 did I get that right?

18 A I was speaking with the contractor.
19 So we were coming up with what were going to
20 be our top, maybe, 7 to 10 things we were
21 going to work on, and then we presented it to
22 Joel Dickson, and he could either give us a
23 thumbs up or thumbs down on whether to tackle
24 that, or do things that I had listed.

25 Q And in the case of late tickets, he
26 gave a thumbs down --

27 A To some of them.

28 Q -- or a "what do you want me to do

1 with this"?

2 A No. That was -- you're talking
3 about a specific presentation that I
4 presented to him. That's different. I
5 presented to him something that was more
6 informational.

7 Because he said, That's not
8 happening anymore. And I said, Well, yeah,
9 it is, and here's why: Every time you have a
10 lag in support, you know, in manpower, here's
11 how many late tickets you can expect, and
12 here's proof that it's still going on.

13 So that was a presentation that I
14 did to him, you know, when I was with SGO so
15 that's two different things.

16 Q I see. Then that presentation that
17 quantified the expected late ticket increase
18 correlated to manpower reduction, what was
19 his reaction to that?

20 A That's when he threw it on the
21 table and said: What do you expect me to do
22 with that?

23 Q And to your knowledge - this may
24 sound a little bit silly - to your knowledge
25 did he pass that issue onto his senior
26 management?

27 A I have no idea.

28 Q Were you provided with an

1 opportunity in his reaction to present that,
2 to give that presentation about late tickets
3 and the correlation between manpower and late
4 tickets to other senior management?

5 A No. That became a big deal. He
6 actually went to the person that was over SGO
7 and asked why I presented that to him, and,
8 you know, she kind of back-tracked on it, and
9 it was a big deal anyway. And we did have
10 approval to present it to him, prior
11 approval, and like I said, I worked
12 hand-in-hand with the contractor on it.

13 We got the approval. We did show
14 it to him, but he was very upset about that,
15 and then, basically, like I said, refused to
16 meet with me after that.

17 Q When you say you got approval to
18 show that information to him, who gave you
19 that approval?

20 A The person that was managing the
21 SGO department, Anne Beech.

22 Q And Anne Beech had coordinated with
23 Joel Dickson ahead time in order to get
24 approval?

25 A No. So it was approval from her.
26 So we presented it to her and said, This is
27 what we are going to present to him because
28 she was the one over SGO. So we presented to

1 her, and said, Hey, this is what we're going
2 to show to him. She said, Thumbs up.

3 So we set the meeting up, and it
4 was me and the contractor. Presented to him.
5 He was like a change management kind of
6 person. He's not change management. He was
7 a numbers guy, program. He did all of our --
8 you know, put everything into stuff for us,
9 all those skills that we didn't have.

10 Q And it sounds like - not being
11 inside the process - with approval from Anne
12 Beech from SGO, you would have reason to
13 expect that with that approval it was okay to
14 share this information with Joel Dickson?

15 A Yes.

16 Q Why would you expect that to be the
17 case?

18 A Why would I expect the --

19 Q Anne Beech's approval to give you
20 the go-ahead to present information like
21 this, the late tickets, to Joel Dickson.

22 A I mean, so her -- this program was
23 to, you know, streamline, you know, all the
24 different entities of PG&E within the gas
25 department.

26 Q Uh-huh.

27 A And so everything that we did, we
28 presented to her first. Like, we had weekly

1 meetings or, you know, things like that. We
2 always, you know, showed her our presentation
3 first, and then presented it to the -- they
4 considered him the customer or the client at
5 that time. So it was like, you know, you
6 just don't -- she's approving everything, you
7 know, and it could be -- it's not just
8 because of -- you know, it's what's in it,
9 but it's also everything. Do you have all
10 your ducks in a row? Do you have everything
11 in it? It's not just, Oh, don't show it to
12 him because it's a safety -- it's not like
13 that. It's let get this packaged. Let me
14 see the package and make sure you have
15 everything in there, and that's the approval
16 part of it.

17 Q I follow.

18 This was the process in place, if
19 you will, to get approval to present him?

20 A Yes.

21 Q You had done regularly within the
22 realm of locate and mark?

23 A No. Within the realm of SGO. So
24 at that point I was working for SGO as an SME
25 for locate and mark.

26 Q And SGO to clarify terms --

27 A Super Gas Operations.

28 Q SME is Subject Matter Expert?

1 A Yes.

2 Q And so SGO, you had gotten approval
3 from Anne Beech in your role at SGO to
4 present certain other information to Joel
5 Dickson before?

6 A Yes.

7 Q And that included locate and mark
8 information?

9 A Always locate and mark. I was only
10 working for SGO for locate and mark.

11 Q When you had gone through the
12 process of getting Anne Beech's approval to
13 present to Joel Dickson before and you had
14 presented to Joel Dickson, had you ever seen
15 him react like this before, the way he did
16 when you presented the relationship between
17 manpower and late tickets?

18 A I've seen him behave badly before,
19 but I think -- I think it was worse that time
20 because -- umm, well, I think for a lot of
21 reasons. It was just worse that time
22 definitely.

23 Q If Joel Dickson had agreed with the
24 presentation, recognized it as a problem, and
25 had been -- I'm going to use the term
26 "supported" --

27 A Yeah.

28 Q -- on this. I don't mean to be

1 presumptuous in using that term, but I hope
2 you understand what I mean by that.

3 If he had said something to the
4 effect of, Gee, Katherin, this is a problem.
5 What can we do to fix it? Something like
6 that. What would you have expected to come
7 out of that kind of conversation if that had
8 been his reaction?

9 A Well, I would have expected that
10 the next steps would have been, Hey, here's
11 why we put so much importance on our next
12 conversation, why these things are so
13 important to do as next steps.

14 Because we'd picked out like, you
15 know, five or six things that were all
16 about -- that was supposed to be the
17 precursor. It was like, Here's why this is
18 important.

19 And I think that's what we were
20 going for. I kept telling my counterpart --
21 or the contractor, I was like, No. No. This
22 is going to be bad. But he's like, No. No.
23 I know you want to fix this. I want to help
24 you. I hear it from the employees. You
25 know, he like had a passion for it now, too,
26 because he'd been to the yards with me. So
27 he knew. He recognized that was a really big
28 issue.

1 And he wanted fix it as bad as I
2 did. So I think that's why he really wanted
3 to, too, as well to show Joel. But we walked
4 out of that room and I knew it was going to
5 be bad. Bad for me. I just knew.

6 Q And you described to us the
7 consequences. And I appreciate you walking
8 us through that. I know that may be
9 difficult. I'm not trying to get you to
10 relive a difficult experience although it is
11 very helpful for us. So we appreciate that.

12 If I can, when you went through the
13 process of getting Anne Beech's approval to
14 present to Joel before and he accepted an
15 idea that you had presented to him, what
16 happened?

17 Can you think of an example where
18 you presented a locate and mark issue that
19 needed fixing or improvement and he said
20 something like: Yes. I'm on board with
21 this.

22 A Yeah. I mean, there was other
23 issues where, you know, he readily accepted
24 them.

25 Q And what happen when he did?
26 What would be the next step?

27 A He would just say, Yeah. You know,
28 give his approval. And we would put it into

1 action. Whether it was a policy or
2 procedure, we would work on it and come up
3 with something -- or maybe it was -- whatever
4 it was, you know.

5 Q Maybe I ought to be specific. It
6 sounds like maybe you have a thing or two in
7 mind. Can you give us an example.

8 A Sure. Like changing Earthnet to
9 sort tickets better or changing Earthnet to
10 allow for different, like, notation. Like,
11 instead of being these three things, maybe
12 there is four things on it instead.

13 So it would be -- but we'd, like,
14 to have to pay. Maybe it was like \$2,000 or
15 \$5,000 to change Earthnet to give us more
16 information. That would be a good example
17 that he would be like: Yeah, get that
18 created.

19 Q Would he report that up, something
20 like that, up to his management as well?

21 A I have no idea.

22 Q But you were given authority to
23 move forward with making that happen?

24 A Yes.

25 MR. PENDLETON: For clarification, when
26 you started asking this, Katherin was talking
27 about her time in SGO, and these changes that
28 you're discussing, did these all happen when

1 you were in SGO or are you talking about all
2 the time that you worked with Joel? I was a
3 little unclear.

4 THE WITNESS: These ones we're talking
5 about, that was when I was just with SGO.

6 MR. GRUEN: Thank you. Understood.

7 Q What was the reaction with the
8 Earthnet scenario you described? When you
9 had his approval, who was affected by that
10 within the locate and mark office? All
11 locators? Or all locate staff?

12 Where I'm trying to go with this is
13 based on his decision or thumbs up or the
14 reaction we saw here, how many people were
15 affected by that in the locate and mark
16 division?

17 A Well, every change affects the
18 whole locate and mark. Whether it was
19 supervisors or employees or -- all those
20 changes affect everybody.

21 Q And the reaction from the manager
22 of the locate and mark division like what he
23 had, wasn't just a consequence to you, then,
24 but to everyone in PG&E's locate and mark
25 division; is that accurate?

26 A Well, yes, because, you know, what
27 that does is then he's upset with
28 different -- you know, like, say, the four

1 divisions that, you know, I did the review
2 on, you know, that would go against them.

3 I mean, it's on paper, that, you
4 know, that they were doing this. And so, you
5 know, I'm sure they got phone calls after
6 that, you know.

7 MR. GRUEN: Thank you.

8 I want to just turn over -- I think
9 we'll have more after lunch, but I wanted to
10 pass the baton to Mr. Mee and give him an
11 opportunity. Thank you for patiently
12 waiting. I know Mr. Mee has a few questions
13 he'll direct to you.

14 Mr. Mee, do you want to go ahead
15 with questions.

16 EXAMINATION

17 BY MR. MEE:

18 Q Thank you for the opportunity. I
19 just wanted to basically get some
20 clarification about -- and at PG&E you have
21 only one software or database, what you call
22 Earthnet?

23 A Yes.

24 Q So you talk about four kind of
25 tickets: Transmission, electric
26 transmission, electric only, gas transmission
27 and gas distribution?

28 A Yes.

1 Q Maybe I'll just focus on the
2 electric only because that one is kind of
3 comparable to the gas distribution and gas
4 transmission. So for the electric only,
5 based on your knowledge or experience whether
6 or not there are lots of late tickets, and
7 then the gas distribution because of the zero
8 late ticket policy added to the gas
9 distribution, and so the electric only
10 because they report electric whether or not
11 their late tickets numbers are more than the
12 late ticket numbers out of the gas
13 distribution.

14 A I think that early on, we
15 definitely had a high amount of late tickets
16 because I was tasked by Joel to go out to
17 these areas because they had hundreds of late
18 tickets.

19 Q When you said "this area," you're
20 talking about --

21 A The electrical areas because they
22 would show up on a report. So was tasked
23 with going up there and just see what is
24 going on. I would go up there; I would train
25 the electric supervisor; have meetings with
26 the employees.

27 Sometimes it was that they didn't
28 know how to use the computer or they didn't

1 use the computer. They were still printing
2 out hand tickets and just going out and
3 locating them and not putting them in the
4 system. So sometimes the tickets were
5 actually located timely. They were just not
6 documented. Other times they weren't located
7 at all depending on what was going on.

8 So I went up there. Like I said, I
9 did a lot of training with them to resolve an
10 issue and get them to understand what they
11 needed to do to get the documentation in
12 Earthnet and set those expectations about
13 late tickets.

14 And so, I think, eventually Joel's
15 mind-set about the importance of late tickets
16 definitely ended up, you know, having that
17 same expectation because they knew they
18 couldn't have any late tickets.

19 Eventually, the gas department took
20 over those areas. They took over the
21 southern region tickets. I don't know if
22 they ever did them in Humboldt. That was
23 probably in 2017 that they started to take
24 over those.

25 Q Yeah, my question was, before they
26 took over --

27 A Yeah.

28 Q So you said that the late ticket

1 number -- the number of late tickets had been
2 decreased?

3 A So in the beginning, there were a
4 lot, and then in the end they would be
5 decreased, yes.

6 Q Because of the training?

7 A Yeah.

8 Q Or because of the pressure?

9 A I think both.

10 Q Okay.

11 A I think some areas they just
12 weren't documenting. They were actually
13 located timely, and especially up north, I
14 think it was a combination. I think a lot of
15 times they were located on time and just not
16 documented because they didn't use computers
17 then -- and for whatever reason.

18 And I think they did have some of
19 the same issues where people were pulled
20 because they're QEWS, but not -- I don't
21 think it was as much as San Francisco or
22 Oakland. So I think it was a combination.

23 So I think after, you know, they
24 were informed about the situation, about, you
25 know, late tickets and what the expectation
26 was and documentation and all that, I think
27 there was that expectation that they should
28 have zero late tickets as well.

1 Q How about for the other group, the
2 electric transmission; do they have that same
3 pressure -- no.

4 Before I ask you that question, as
5 to the electric transmission, their number of
6 late tickets are more than the gas
7 distribution?

8 A No. Their numbers are -- there's
9 not as many tickets in electric transmission.
10 In comparison, they are a very small amount.

11 Q Let me ask the question again: The
12 percentage of the late tickets there compared
13 to the gas distribution; which one is higher
14 and which one is lower?

15 A I'm sorry. Say that again.

16 Q As to the electric transmission,
17 the percentage of the late tickets compared
18 to the percentage of the late tickets as to
19 the gas distribution.

20 A Less.

21 Q So they are less?

22 A In electric transmission? They
23 don't have that many tickets, so, yeah.

24 Q Okay.

25 A And that number was excluded from
26 the locate and mark metrics --

27 Q Okay.

28 A -- gas transmission for whatever

1 reason.

2 MR. PENDLETON: Do you mean electric
3 transmission?

4 THE WITNESS: I'm sorry.

5 The electric transmission numbers
6 were excluded from the reports in Earthnet
7 and so they weren't included in that.

8 MR. MEE: Okay. Thank you.

9 MR. GRUEN: I see it's just after 1:00
10 and so why don't we go off the record.

11 (Whereupon, at the hour of 1:00
12 p.m., a recess was taken until 1:55
p.m.)

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1 AFTERNOON SESSION - 1:50 P.M.

2 * * * * *

3 MR. GRUEN: Let's go back on the
4 record.

5 EXAMINATION

6 BY MR. GRUEN:

7 Q Okay. Starting picking back up,
8 Ms. Mack, before we had left, I think we had
9 asked you a couple things. One is about --
10 one was about the performance evaluations
11 that had zero late ticket objectives on them.

12 A Uh-huh.

13 Q And I think you had identified --
14 you had mentioned that your performance
15 evaluations had that --

16 A Uh-huh.

17 Q -- as superintendent -- in your
18 role as superintendent --

19 A Uh-huh.

20 Q -- and that your -- the supervisors
21 who worked under your purview also had that
22 performance objective. Did I get --

23 A Yes.

24 Q -- all of that right? Okay.

25 A Uh-huh.

26 Q And do you know which other
27 performance evaluations of locate and mark
28 supervisors also had zero late ticket

1 objectives? Were there any others, that you
2 know of?

3 A All supervisors do.

4 Q Within the locate and mark
5 department?

6 A Yeah.

7 Q Understood. Okay. Do you know who
8 made the decision to include that objective
9 in those performance evaluations, who within
10 PG&E made that decision?

11 A So, for me, it came from Joel. It
12 came from him; but, I don't know if that came
13 from above him or not.

14 Q Okay. All right. I think, if --
15 if I can -- let's go off the record for a
16 minute.

17 (Off the record.)

18 MR. GRUEN: Back on the record.

19 While we were off the record, we
20 noted that we want to capture, as a data
21 request, the following question: Who within
22 PG&E made the decision to include the
23 performance objective of late -- zero late
24 tickets for locate and mark supervisors,
25 including Ms. Mack's former role, that of
26 superintendent, including for the -- the
27 director, assuming that the director of
28 locate and mark had a performance evaluation

1 that included the zero late ticket objective,
2 and -- and any other supervisors who had them
3 who worked for -- for Ms. Mack.

4 Q For you, Ms. Mack.

5 A Yeah. I never saw Joel's.

6 Q Okay.

7 A So I would just know about mine and
8 the other superintendent of the north and all
9 the supervisors. So that's the only level.
10 I don't know about Joel's, if they had zero
11 or not.

12 Q I follow.

13 A Okay.

14 Q Understood.

15 If -- if Joel Dickson's performance
16 evaluation did, in fact, have a zero late
17 ticket objective, we would like to know who
18 made the decision to include that.

19 Let me ask you this, having said
20 that, though: Would it be common practice
21 for someone above the level of the employee
22 to decide whether an -- an objective gets
23 included in a performance evaluation?

24 A Yes. They come -- they're
25 cascading.

26 Q Okay.

27 A So he gave us ours.

28 Q And so if Joel Dickson had a

1 performance evaluation objective of zero late
2 tickets, who would have been immediately
3 above Joe -- Joel at the time?

4 A That would have been John Higgins.

5 Q Oh, John Higgins. John Higgins
6 could have made the decision to include that?

7 A I can't speculate on that.

8 Q I understand. But, it had to have
9 been someone at least on John Higgins' level?

10 A Well, it's -- I don't know.

11 Q Okay.

12 A Because I don't know if he creates
13 his own or if John tells him what to put in
14 his. I know, for us --

15 Q Yeah.

16 A -- we were told what went in ours.

17 Q Understood. I am -- the last thing
18 I want to do is try and get you to speculate.

19 A Yeah. I just don't know.

20 Q I think I tripped over that, and
21 you're -- I'll stop asking that, because we
22 just want information. Understood. That's
23 great.

24 Okay. Do you know who made the
25 decision to include the performance
26 evaluation objective for your -- your -- of
27 zero late tickets for your performance
28 evaluation?

1 A Joel did.

2 Q Joel did?

3 A Joel Dickson, yeah.

4 Q What about for your staff, the
5 other supervisors?

6 A Joel Dickson. He told us that zero
7 was the number for -- for all of us.

8 Q Okay. And regarding -- regarding
9 the -- do you know if John -- just to ask --
10 I may be tripping over the speculation wire
11 again.

12 But, did John Higgins have that
13 same objective of zero late tickets in his
14 performance evaluation --

15 A I have --

16 Q -- do you know?

17 A -- no idea.

18 Q You don't know. Yeah. I follow.

19 Okay. So we were talking a little
20 bit about the consequences of the decision
21 that Joel Dickson made in response to your
22 recommendation -- not a recommendation, but I
23 think you're drawing the relationship between
24 limited man -- man-hours and -- and late
25 tickets --

26 A Uh-huh.

27 Q -- and the impact on other
28 employees within the locate and mark

1 department, and I -- I just want to
2 understand better the impacts of that
3 decision-making, decisions like that, on the
4 entirety of the locate and mark employees,
5 everyone from yourself to other supervisors,
6 everyone under the purview of Mr. Dickson.

7 A Uh-huh.

8 Q So a decision like -- if he
9 responded -- if I'm saying this incorrectly,
10 please correct me, if I'm wrong.

11 When he -- when Mr. Dickson says,
12 "Hey, Katherin, what do you want me to do
13 with this information" when you presented the
14 relationship between limited man-hours and
15 late tickets, what was the decision that
16 resulted from that interaction that he made,
17 or group of decisions?

18 A Well, I mean he laid me off just
19 shortly after that. So I don't know what --
20 I mean I don't think anything became of that,
21 if that's what you're asking me, of that
22 particular report, because he just had a
23 phone call, you know, that says, "Don't do
24 that." But, I don't know what -- after I
25 left that organization, locate and mark, I
26 can't speculate what they did or didn't do.

27 Q Do you -- understood. Thank you.
28 And again, if I've tripped over the

1 speculation --

2 A Yeah.

3 Q -- part, I don't mean to.

4 The -- the -- do you know if the
5 reason -- or a reason that he laid you off
6 was because you made the presentation drawing
7 the relationship between late tickets and
8 man-hours?

9 A I think that that was a piece of
10 it. I think that the constant, you know,
11 bringing stuff to his attention, trying to
12 make those changes thing, that was -- I think
13 it all led up to it, definitely.

14 Q And why do you think so?

15 A Because it put me on his bad side.

16 Q Okay.

17 A You know, "Don't bring me bad
18 news," you know, kind of thing.

19 Q Understood. Had he mentioned
20 anything prior to that time about laying you
21 off?

22 A No. In fact, I had a meeting with
23 him when he first met me over on SGO, and he
24 said, "You know, don't worry about this. I'm
25 going to put you over there. You're going
26 to -- you know, I've got your back," blah,
27 blah, blah, you know, that kind of
28 conversation, you know. "We'll bring you

1 back when this SGO thing is done." So -- and
2 then --

3 Q Had you ever gotten -- when you had
4 worked for Joel as your direct supervisor,
5 had you ever received any poor or -- or
6 mediocre performance evaluations during that
7 time?

8 A No. In fact, I got usually exceeds
9 in most things, or meets. I've -- like I had
10 said before, my last one, the only time I've
11 ever been in any kind of, you know, trouble
12 at work, was I had referred my son-in-law
13 over to -- for a recommendation, and I did
14 not realize at the time that the company had
15 changed the policy about you can't have
16 anybody work under you. And I had gave
17 his -- his resume to -- recommending him to
18 one of -- somebody for a job, and it was like
19 two layers down from me, and I just didn't
20 realize that it was a -- policy had changed
21 two years prior to that, and I just didn't
22 realize. And that's the only time I had ever
23 got in any trouble. I think he sat me down
24 and talked to me and, you know, gave me a
25 oral conversation or something like that.
26 That's the only time I ever, in my history,
27 can think of a time I got --

28 Q And that experience was prior to

1 when you were laid off, approximately?

2 A That was a year.

3 Q A year prior. And had you received
4 performance evaluations between that -- that
5 time and when you were laid off?

6 A I had never had a bad performance
7 review after that, no.

8 Q So you had several exceeds
9 expectations performance reviews after that
10 time?

11 A After -- so I was with SGO during
12 that time, that year --

13 Q Okay.

14 A -- so I didn't receive -- he didn't
15 even give me one after -- after --

16 Q Okay.

17 A -- because it was all around that
18 timeframe they would have been due.

19 Q Okay.

20 A And then I think he laid me off,
21 instead of giving me a performance review --

22 Q Uh-huh.

23 A -- or it was just before. However,
24 I got normal --

25 Q Okay.

26 A -- STIP and all that kind of stuff.
27 I wasn't --

28 Q Okay.

1 A -- penalized in any way.

2 Q And in your role as a
3 superintendent, had you had occasion to go
4 through either a termination process or some
5 sort of discipline process of any of your
6 employees?

7 A Yes.

8 Q I'm asking, because I want to
9 understand your familiarity with PG&E's
10 process for disciplining or letting employees
11 go. So it sounds like you have some
12 familiarity with that.

13 A Yes.

14 Q Is that right?

15 A Yes.

16 Q Okay. And so do you have a general
17 understanding, at a fairly high level, before
18 one is laid off, are there any steps
19 procedurally that have to happen that PG&E
20 has to do before one is laid off?

21 A Well -- and I think this was a
22 different scenario, and I --

23 Q Okay.

24 A Because PG&E was laying off quite a
25 few people at that time.

26 Q Okay.

27 A There was, you know, several
28 hundred, and I'm just put into that pool.

1 Q Okay. And --

2 A So there wasn't any, you know -- it
3 wasn't like "You're fired because you have a
4 poor performance" or anything. It was
5 just -- I personally -- and this is my own
6 personal opinion. I think it was just an
7 opportunistic -- it's like that happened
8 probably the wrong time, you know, that they
9 were laying off people, and it was easy to
10 put me into that group.

11 Q Okay. I follow. Okay. Thank you.

12 Regarding the pressure that you --
13 I think we talked a little bit about it this
14 morning and probably the last time you were
15 here, as well, where we were asking you
16 questions.

17 Pressure to have zero late tickets,
18 did that pressure come from Joel Dickson?

19 A Yes.

20 Q Do you know if the pressure came
21 from John Higgins, as well?

22 A I don't know.

23 Q Okay.

24 A Because the few conversations I had
25 with John, I never -- he never relayed that
26 to me or -- you know, in fact, the
27 conversation I had with him is "I don't know
28 what's driving that."

1 Q Okay. Do you know if anyone in the
2 chain of command above Joel Dickson had given
3 that -- the sort of pressure that you're
4 describing, to have zero late tickets?

5 A I don't know. Because I tried to
6 find out what was driving that --

7 Q Okay.

8 A -- and I -- I never did find out if
9 it was higher or not.

10 Q Okay.

11 A It's a question you'd have to ask
12 Joel --

13 Q Yeah.

14 A -- you know.

15 Q Okay. Understood. And when --
16 so -- so this was from Joel in his position
17 as director of the locate and mark
18 department. Is that right?

19 A Yes.

20 Q And when -- in his position as
21 director, he's exerting pressure -- it's upon
22 yourself and other sup- -- people at the
23 superintendent level, your other counterpart?

24 A And my supervisors.

25 Q And -- and who are those? What are
26 their titles?

27 A They're supervisors, gas operations
28 supervisors.

1 Q Okay. And how many of them are
2 there?

3 A I think at the time I had nine.

4 Q Okay.

5 A And then there was probably eight
6 on the other -- the south -- the north side.

7 Q Okay. How many --

8 A Maybe 16 total, 17 total, something
9 like that.

10 Q Okay. And then how many
11 superintendents were there?

12 A Two for just locate and mark. It
13 was a north and a south.

14 Q And then how about other
15 supervisors, how many other supervisors in --
16 in locate and mark?

17 A There were just the seven -- the 17
18 total.

19 Q I'm not using the right term.
20 There are supervisor -- people who do
21 supervising who answer to you. Who were your
22 direct reports?

23 A So nine supervisors reported to
24 me --

25 Q Yes.

26 A -- and eight supervisors reported
27 to the north superintendent.

28 Q Got it. And the -- you and the

1 north superintendent reported to whom?

2 A Joel Dickson.

3 Q I misunderstood. Okay. I got you.

4 And that's -- that makes up the
5 pool of supervisors in the locate and mark
6 division who reported to a superintendent, to
7 yourself or your counterpart, and who then
8 reported to Joel. Is that right?

9 A Yes.

10 Q Okay. And then below the
11 supervisors who reported to you and your
12 counterpart were the locators?

13 A Yes.

14 Q Got it. I'm clear. Okay. So
15 when -- when -- when -- at the director level
16 when Joel Dickson made the decision like --
17 when he made a decision to -- I guess it
18 would be a decision to not increase manpower,
19 because -- let me back up.

20 You recall presenting to him the
21 relationship between limited manpower and
22 late tickets?

23 A Uh-huh.

24 Q Okay. So did you have a
25 recommendation as a result of that
26 presentation?

27 A Well, that presentation was just to
28 show him that -- the result of not having the

1 manpower and how many late tickets he would
2 get, and that it was still going on. So that
3 wasn't the, you know, presentation for fixing
4 anything. That was just --

5 Q Okay.

6 A -- information. Later, we did some
7 things to try to, yeah, make some
8 recommendations.

9 Q What were those?

10 A So changes in Earthnet. I don't
11 know if I can remember all ten of them.
12 There was like ten, I think, or 14; you know,
13 training, using -- adding senior locators to
14 every yard, providing training for senior
15 locators. I can't remember what else --

16 Q That's okay.

17 A -- was on that list. Yeah.

18 Q Understood. Thank you. Of those
19 recommendations, can you give an example of a
20 recommend -- recommendation that Joel Dickson
21 decided to adopt?

22 A The senior locator training
23 program.

24 Q Okay. And so when Joel Dickson
25 decided to adopt the senior locating --
26 locator training program, excuse me, what
27 happened?

28 A It wasn't a senior late ticket. It

1 was just senior training.

2 Q Maybe I misstated that.

3 A I understand. I just --

4 Q I'm sorry.

5 A -- wanted to make sure you knew it
6 wasn't just about the late tickets.

7 Q Understood.

8 A Yeah.

9 Q And it's helpful. I'm getting a
10 little bit afield from late tickets, but the
11 reason I'm going here is because I want to
12 understand the impact of his decision --

13 A Uh-huh.

14 Q -- on the locate and mark division.

15 A Uh-huh.

16 Q So he decided to -- you train
17 the -- adopting the late -- the -- the locate
18 and mark senior locator training program.
19 And so then the senior locators were trained?

20 A Yep. We -- they put together a
21 program that met with different groups and
22 the other superintendent, and they ended up
23 putting together a training program, and
24 they, you know -- I don't know if it's still
25 in play --

26 Q Okay.

27 A -- or anything like that, but I
28 know that they did -- that did grow to

1 fruition; at least, up until I left, they
2 were working on that and getting that put
3 together and scheduling the first class. I
4 don't know if it ever happened. It's after
5 my --

6 Q Okay.

7 A -- tenure there.

8 Q But, you saw this --

9 A Happen.

10 Q -- in the making --

11 A Yes.

12 Q -- for all senior locators?

13 A Yes.

14 Q How many of -- people were that --
15 was that, approximately?

16 A So I'm guessing maybe 40.

17 Q Okay.

18 A But, I'm totally -- somewhere in
19 that realm.

20 Q I don't want you to --

21 A Yeah.

22 Q -- speculate. That's helpful.

23 A Yeah.

24 Q That's helpful.

25 So what did -- did -- to your
26 knowledge, was there ever a recommendation to
27 increase staff -- the number of staff?

28 A Well, I mean we tried a number of

1 ways to put that on paper, to say how much it
2 needed; but, you know, I think it had to do
3 with the budget. I mean I think they would
4 give you so much to fund it, and then take it
5 away or whatever. I think that it didn't
6 matter what the number was that you needed.
7 It -- you know, it was how much you were
8 approved for and, you know, what the budget
9 was, you know, if they had to cut it or if
10 you could use, you know, contractors or not
11 use contractors or -- so I mean I think they
12 always knew the need, but being able to
13 supply that was a different --

14 Q Why do you think that was that --
15 that the budget was not paying attention to
16 the need, if I'm stating that fairly? Am I
17 getting that right? I want to be sure,
18 because I -- I -- I just -- if -- if the
19 decision to budget a certain amount --

20 A Take and use it for other things.

21 Q Okay.

22 A I mean I -- just the way it
23 happened.

24 Q Okay. But, is -- am I saying it
25 fairly and is it a fair characterization, in
26 your mind, that the budget did not take into
27 account the need for enough locators to
28 avoid -- to have zero late tickets?

1 A Well, I don't think it took -- I
2 think that's correct, that it didn't take the
3 need to have enough to cover all the tickets;
4 but, I also think that, even if we got that
5 money, a lot of it was taken away sometimes.

6 Q Okay.

7 A So I think both scenarios happened.

8 Q And who made the decision to take
9 the money away?

10 A I -- that came above Joel's head.

11 Q Do you --

12 A I can remember some conversations
13 about that. So I would just hear "Well, they
14 took 5,000 in the budget," five -- you know,
15 whatever, you know.

16 Q Okay.

17 A 11,000, whatever it was, "and so we
18 have to, you know, cancel those bids or not
19 use contractors," or whatever the case may
20 be.

21 Q Do you know who above Joel's head
22 made the decision?

23 A Huh-uh.

24 Q You don't know?

25 A No, I have no idea who made that
26 decision.

27 Q How did you learn about that?

28 A From Joel.

1 Q From Joel. I follow.

2 A Yeah.

3 Q Okay. Thank you. Did PG&E do any
4 trainings -- remember, we were talking about
5 inappropriate documentation --

6 A Earlier.

7 Q -- earlier in -- do you have
8 that -- that concept in mind and the
9 definition that we used from this morning?

10 A Uh-huh.

11 Q Okay. Did PG&E do any trainings to
12 teach its locators, including contractors, to
13 not inappropriately document tickets?

14 A Well, I -- I mean their initial
15 training -- I mean they were trained how to
16 properly do it, you know, and if it came up,
17 you know, for some reason, they certainly
18 were talked to again. So they were chain --
19 they were trained how to properly do it. I
20 don't know if that's --

21 Q Were they --

22 A -- what you're saying when you --

23 Q It's similar. Were -- did the
24 training talk about what -- talk about what
25 would happen if they inappropriately
26 documented tickets?

27 A I don't believe that was in the
28 training, per se --

1 Q Okay.

2 A -- exactly like that. I mean it
3 was more about how to do it, not how not to
4 do some things.

5 Q Okay. Did you -- were you part of
6 the training?

7 A No.

8 Q Okay.

9 A I mean I definitely worked hand in
10 hand with -- with the training folks that
11 came up with the training, you know. They
12 would call me and -- but, I wasn't a part of
13 the training. That's a whole other
14 organization that provided that training.

15 Q Okay. Were the -- at the time of
16 doing the training when you were there were
17 the trainers aware of the inappropriate
18 documentation problem that you identified
19 this morning?

20 A They were not heavily involved in
21 that.

22 Q Okay.

23 A I think more who was involved with
24 that would be the QC department. They were
25 heavily involved with that, because they
26 would see when they'd go out and do the
27 reviews, you know, about -- they would see
28 the --

1 Q Yeah.

2 A -- you know, that there was --

3 Q QC. I'm thinking Jennifer

4 Burrows --

5 A Yes.

6 Q -- when you say, "QC."

7 A Yes.

8 Q Okay.

9 A That's exactly who.

10 Q Okay. So they would see the
11 inappropriate documentation problem --

12 A Yes.

13 Q -- you're talking about?

14 A Uh-huh.

15 Q I follow.

16 A And I know she had conversations
17 with Joel, as well.

18 Q Do you know if she had
19 conversations about the inappropriate
20 documentation problem with anyone above
21 Joel's level?

22 A I don't know who else she did. I
23 know she had it with her leadership --

24 Q Yeah.

25 A -- and Joel. I'm not sure who.
26 You'd have to ask her that.

27 Q I -- I can.

28 Let's go off the record a moment.

1 (Off the record.)

2 MR. GRUEN: Back on the record.

3 Just off the record, we have a data
4 request, whether Jennifer Burrows --
5 B-u-r-r-o-u-g-h-s, I believe. I could stand
6 corrected on that.

7 Q Does that sound right?

8 MR. PENDLETON: I believe --

9 THE WITNESS: It doesn't sound right.

10 MR. PENDLETON: I believe it's
11 B-u-r-r-o-w-s.

12 MR. GRUEN: Okay. Thank you for the
13 correction.

14 If Jennifer Burrows communicated
15 about the inappropriate documentation problem
16 that Ms. Mack described this morning with
17 PG&E leadership; if so, whom, and when?

18 Q Okay. I wanted to harken back
19 to -- I think you described it as a big deal
20 in San Ramon there being a -- a big board
21 that showed dig-in reductions and the efforts
22 to achieve those. Did I get that right?

23 A Uh-huh.

24 Q Just for the record, that's a
25 "Yes"?

26 A Yes. Sorry.

27 Q Okay. Great. Thank you. And I'm
28 just -- am I gleaning that right in

1 understanding that there was nothing
2 comparable to that for efforts to reduce the
3 number of late tickets?

4 A No.

5 Q Okay.

6 MR. PENDLETON: Just so there isn't a
7 double negative there, because -- you may
8 want to clarify the record.

9 MR. GRUEN: Absolutely. Thank you. I
10 appreciate that. I'll -- I'll restate that.
11 I appreciate that.

12 Q So was there something similar to
13 the big board you described that said,
14 "reduce late tickets" or "achieve zero late
15 tickets" or anything like that?

16 A No.

17 Q Okay.

18 A Other than the pressure.

19 Q Other than the pressure, yeah.
20 But -- but --

21 A No "how are we going to fix this"
22 and doing all that stuff, no. Huh-uh.

23 Q Okay. And the pressure -- just
24 since you mention it, was there pressure to
25 reduce the dig-ins in the same way that there
26 was pressure to reduce the number of late
27 tickets?

28 A They're not the same kind of

1 pressure. I don't think anybody felt like
2 "Hey, if we don't fix this or lower this,
3 we're going to be fired." You know, I think
4 it was more about the accomplishment and the
5 dedication and the safety and, you know, that
6 kind of thing. It was different.

7 Q Uh-huh. In your opinion, does
8 reducing the number of late tickets in any
9 way excuse or -- in any way excuse having the
10 number of late tickets that PG&E did?]

11 A I'm not sure what you're asking me.

12 Q Let me withdraw it. I think --
13 actually I'm just -- I'm -- bear with me a
14 second.

15 Oh yeah, here's the question: To
16 your knowledge, was the problem of qualified
17 electrical workers being needed before
18 certain tickets could be completed -- let me
19 back up.

20 Do you remember us talking about
21 that?

22 A Yes.

23 Q Okay. Was that problem of
24 qualified electrical workers being needed
25 before certain tickets could be completed,
26 was that raised to PG&E leadership?

27 A Yes.

28 Q Was that raised -- I think you

1 answered it had been raised to Joel Dickson's
2 attention if I got that right?

3 A Yes.

4 Q Was that raised to John Higgins'
5 attention?

6 A Yes.

7 Q Was that raised to anyone else's
8 attention who was senior in the rank in the
9 chain of command to John Higgins?

10 A It was raised in the SAR that came
11 out.

12 Q And the SAR, who oversaw the SAR?

13 A Jesus.

14 Q Jesus Soto?

15 A Yeah.

16 Q And when was this SAR prepared to
17 your knowledge?

18 A I can't remember what the dates are
19 now.

20 Q Okay.

21 MR. GRUEN: That's another data request
22 if we can. So when was the SAR that Ms. Mack
23 is referring to that was overseen by Jesus
24 Soto prepared?

25 When was the first one prepared that
26 identified the problem of qualified
27 electrical workers being needed before
28 certain tickets could be completed?

1 THE WITNESS: The other senior
2 leadership would have been on the electric
3 side --

4 (Reporter clarification.)

5 THE WITNESS: Sorry. Electric side of
6 the house.

7 BY MR. GRUEN:

8 Q And can you speak to the level?
9 Would it have been Joel Dickson's counterpart
10 on the electric side of the house?

11 A Yeah. It was a little higher than
12 that.

13 Q Okay.

14 A Probably at least another level
15 higher. I was trying to think of who I met,
16 but I can't remember.

17 Q John Higgins' counterpart on the
18 electric side?

19 A Yes.

20 Q And just for my refreshing my
21 memory, what was John Higgins' title? Do you
22 happen to remember?

23 A I don't know.

24 Q That's okay.

25 A No.

26 Q Your memory is so good that I'm
27 asking very detailed questions, and you're
28 answering most of them. So I appreciate it.

1 You're being very helpful.

2 Did the goal of -- so you remember
3 us talking about the objective of zero late
4 tickets on performance evaluations that we
5 just talked about?

6 A Yes.

7 Q Okay. Were there any -- given
8 those objectives, were there any
9 accommodations made for getting qualified
10 electrical workers to achieve the goal of
11 zero late tickets? The objectives that were
12 in these performance evaluations?

13 A No.

14 Q Okay. All right. A couple of
15 questions if I can about do you -- bear with
16 me one moment.

17 Do you have -- I want to just
18 followup. I think just off the record as he
19 was leaving, Mr. Bruno had asked a broad
20 question about where things stand today. So
21 I just want to capture that and see if you
22 can shed any light for us about -- I believe
23 you're not in the Locate and Mark Program
24 anymore?

25 A Right.

26 Q So I get that this is -- that your
27 knowledge may be a little bit limited or a
28 little bit removed, if you will, from the

1 time you were in the Locate and Mark Program.
2 So to the extent you can answer if you can.

3 Do you have a sense, if any, of the
4 things, the concerns that you've identified
5 in this interview have they been addressed?
6 Or are some the issues that you've identified
7 still concerns today to your knowledge?

8 A So I'm not involved in the program
9 anymore at all. So the only knowledge I have
10 is, you know, folks that may have called me
11 that are still within the organization still.
12 So it would just be what they told me. Not
13 my firsthand knowledge.

14 Q And I'll stop there. We don't want
15 to go there.

16 What -- let me just -- so regarding
17 corrective actions, I think Mr. Bruno
18 mentioned that to you just after the end of
19 the morning section. So SED, Safety and
20 Enforcement Division, would like to ask you
21 about your opinion as a safety professional
22 for corrective actions to address the issues
23 that you have identified for us.

24 So speaking -- taking you back to
25 the time when you were a superintendant in
26 the Locate and Mark Department. As a safety
27 professional and a subject matter expert on
28 Locate and Mark, were any of the Locate and

1 Mark activities that you discussed unsafe?

2 A Yes.

3 Q Which ones?

4 A You're asking about in general?
5 Just which ones were unsafe?

6 Q It's a broad --

7 A Yeah, it's broad. Not locating the
8 tickets within the 48 hours. I mean, that's
9 the big one. You know, not having proper
10 staff both QEW and gas employees, you know,
11 to perform the work. You know, asking for
12 setting expectations without a way to meet
13 them. That's a huge one. If you're just
14 told to go do something, but you're not given
15 the means to do it.

16 Q And you're specifically talking
17 there about the objective of zero late
18 tickets without the staff to achieve that
19 goal?

20 A Right. Right. And that cascades
21 into other areas. Dig-ins and, you know,
22 employee behavior and morale and people
23 staying, you know. People are not going to
24 stay under that kind of stress. I think
25 those are some of the big ones.

26 And then the stress is another
27 thing because it creates errors. People make
28 errors when they're under stress. It just

1 creates a lot of other issues I think.

2 Q Okay.

3 A So and then people were forced to
4 work overtime because they didn't have enough
5 staff to get the work done. They felt
6 obligated, you know, and they didn't want to
7 work.

8 Q And in your professional opinion,
9 the stress and the not wanting to work, did
10 that impact the performance of locators?

11 A I think it absolutely did, and I
12 think it impacted their families. I would
13 get calls from, you know, employees saying,
14 you know, "My wife's going to divorce me if I
15 don't start, you know, staying home. I can't
16 do it." They were literally nearly in tears.
17 I'm like, "I get it. Stay home, you know."

18 So, yeah. And stress causes
19 errors. We can see that, you know, somebody
20 would fail a QC report or something and
21 working too many hours or not focusing where
22 they should be focusing or not having QEWs to
23 perform the locate, you know.

24 Q Okay. Anything else that you want
25 to add to that?

26 A No.

27 Q I just want to be sure we have a
28 complete answer.

1 A Yeah.

2 Q Okay. As a safety professional and
3 subject matter expert on locate and marks
4 given your background as superintendant in
5 the Locate and Mark Division, to your
6 knowledge were any of the Locate and Mark
7 activities illegal?

8 A Well, not locating tickets within
9 48 hours is illegal. Performing functions as
10 a QEW is illegal because you're, you know,
11 it's against the law to perform those
12 functions without being, you know, qualified
13 to do that.

14 I'm not sure the difference between
15 what is -- if it's, you know, a NERC standard
16 or a, you know, state, you know, OSHA
17 standard. But definitely some of those
18 things fall under OSHA laws. So that would
19 be, I'm assuming, illegal. I don't know the
20 difference what is illegal if you're going
21 against OSHA or NERC.

22 MR. PENDLETON: That's a question I had
23 for the transcript. Just because -- illegal
24 just to make sure your question is clear to
25 me. Are you asking Katherine about potential
26 criminal conduct? Or not in compliance with
27 regulations with government code? "Illegal,"
28 just I'm not sure how you mean the term

1 illegal.

2 BY MR. GRUEN:

3 Q Well, the two that I heard I think
4 were not complying with the 48-hour
5 requirement, which is Government Code Section
6 4216, I believe; is that right?

7 A Yes. It also falls under OSHA.

8 Q It falls under -- there's an OSHA
9 requirement?

10 A Yes.

11 Q I wasn't aware of that.

12 A Yeah. There's some OSHA
13 requirements about locating.

14 Q Okay.

15 A And there's OSHA requirements
16 around the QEW piece.

17 Q I see. I may be -- your point's
18 well taken, both of you. Maybe I can be
19 specific about which law we're talking about.

20 So in this case what I think I'm
21 hearing is that there's a statute, Government
22 Code Section 4216, that has the 48-hour
23 requirement that you discussed. Am I getting
24 that right?

25 A Mh-hm.

26 Q Okay. And you're familiar with
27 this, it's my understanding, because of your
28 role and your knowledge in the PG&E's Locate

1 and Mark Department; is that accurate?

2 A Yes.

3 Q Okay. And then the OSHA
4 requirements would be specific regulations
5 for operational safety and health
6 administration; is that right?

7 A Yes.

8 Q Okay.

9 A I know there's some stuff that
10 falls under -- and I remember printing it
11 out. I want to say Section 8, but don't hold
12 me to that. I don't remember.

13 Q Of the OSHA regs?

14 A Yeah. I'm not positive about that.
15 But I know that some Locate and Mark stuff
16 and some of the transmission stuff falls
17 under that. And I know the QEW does. But I
18 don't remember what numbers.

19 Q Okay.

20 A For some reason Section 8 sticks in
21 my head about the locating map.

22 Q Okay. Thank you. I appreciate
23 you're doing your best to inform the record.
24 We can research it.

25 A Yeah.

26 Q And then if I heard right, the
27 other thing was the -- maybe "the need," is a
28 better term than "requirement." I think you

1 used it earlier to have a qualified
2 electrical worker to do work on certain
3 locates. Did I did get that right?

4 A I am sorry. I'm not sure if that
5 was a full question or what. I'm not sure
6 what you're asking me.

7 Q I'll restate. I think it wasn't
8 phrased very well. Pardon me.

9 I'm trying to stick with other
10 illegal activities or maybe violations is a
11 better word.

12 But in your view, was there a
13 violation or illegal activity when PG&E did
14 not send a qualified electrical worker out
15 when there was a need to have a qualified
16 electrical worker but there wasn't one to be
17 had? Was that illegal?

18 A Okay. So you said illegal or --
19 what was the other one that you used?

20 Q Violation.

21 A Violation. So, I mean, I think the
22 result of that was a violation. So I think
23 it resulted in violations. Because we
24 couldn't locate the ticket within 48 hours,
25 which was a violation.

26 The locator performing the locate
27 themselves if they did it with a hot stick
28 or, you know, just put marks on the ground is

1 a violation.

2 Q Okay.

3 A But I think, I mean, I don't know.
4 When you use the term "illegal," I go back to
5 that question. I'm not sure.

6 Q I don't want you to guess. Let me
7 state it this way: When a qualified
8 electrical worker was needed to locate but
9 one could not be had, was PG&E following its
10 own procedures?

11 A No.

12 Q Okay. Again, knowing that you're
13 not in the Locate and Mark Department
14 anymore, but what are the Locate and Mark
15 safety problems today to your knowledge?

16 A Again, I think you'd have to ask
17 somebody that's in the Locate and Mark world
18 now.

19 Q Understood. What corrective
20 actions with regards to Locate and Mark, if
21 any, would you recommend?

22 A I think they have to do one of the
23 two things. Either qualify and train, you
24 know, gas guys to perform that electric
25 locate, or give the electric locates over to
26 the Electric Department and let them locate
27 them. I mean, I think one of the two of
28 those things has to happen. Or hire QEWS.

1 Something has to happen to provide that.

2 The other thing is, you know,
3 giving enough manpower to get the work done.
4 No matter what that number is. They have to
5 have enough people to get the work done. And
6 then let supervisors manage the people
7 whether they're working to their capacity or
8 not. But they should have enough people to
9 get the work done.

10 Q Understood.

11 A I think those are the two big
12 things. And then really changing that
13 mindset about, you know, safety first. Not
14 just a message, you know. Having that open
15 dialogue. You know, I think those are things
16 that just have to happen. It takes time to
17 change culture, you know.

18 But I think the huge thing is the
19 manpower both on the electric side and the
20 gas side however that's managed. They have
21 to have people to get the work done.

22 Q Understood. Okay. Thank you very
23 much. One or two other things that just
24 occurred to me. I think if we can go back to
25 just -- I think earlier this morning you had
26 talked about certain areas where -- that had
27 far more underground electric facilities
28 Oakland, San Jose, San Francisco, and so and

1 -- versus say a Fresno that have far less
2 underground facility. Just in comparison. I
3 know we're not talking about concrete numbers
4 here.

5 But am I inferring correctly that
6 there would have been a greater workload on
7 qualified electrical workers in the
8 San Franciscos and Oaklands and San Joses
9 than in the Fresnos?

10 A Yes.

11 Q And would there have been more need
12 on gas tickets to have a qualified electrical
13 worker to help in the San Franciscos and
14 Oaklands and San Joses than there would in
15 the Fresnos?

16 A I am sorry. Could you say that
17 again?

18 Q Sure. The areas like -- let's just
19 take an example. Let's say Oakland that
20 you've -- I think you've described has a
21 greater amount of underground electric
22 facilities than say Fresno. So just
23 comparing those two for illustrative
24 purposes.

25 Do tickets -- in your experience,
26 tickets in Oakland do they require help from
27 -- more often from qualified electrical
28 workers than tickets in Fresno?

1 A Yes.

2 Q And if the problem you talked about
3 earlier of getting, having qualified
4 electrical workers help when there's a need
5 but not getting them, I'm wondering if
6 there's a greater problem with inappropriate
7 documentation in areas like Oakland that have
8 a higher -- a greater density of underground
9 electric facilities than say in Fresno?

10 A Well, there's more opportunity for
11 it because you don't have electric folks that
12 you need so you know.

13 Q On the staffing side, was a
14 qualified -- I'm just wondering if you're
15 able to tell if given -- I don't know how to
16 quantify this. But given the amount of
17 underground electric infrastructure, you
18 know, were there a proportionate number of
19 qualified electrical workers who handled
20 Oakland compared to those who handled Fresno?
21 Do you know?

22 A Okay. So proportionate you're
23 asking if there was that number?

24 Q Correct. Let's -- let me give you
25 just an idea. Let's say the number of
26 qualified electrical workers per linear mile.

27 A Yeah. I would not know that at
28 all.

1 Q Okay. But just that's more
2 illustrative to give an idea of a higher
3 level. Just using that as a concept, were
4 there more qualified electrical workers in --
5 proportionately in the higher density areas
6 like Oakland compared to Fresno or do you
7 know?

8 A I don't know.

9 Q Okay. All right. All right. One
10 other thing to clarify just I think -- let's
11 go off the record for a second if we can.

12 (Off the record.)]

13 MR. GRUEN: While we were off the
14 record, we had some discussion around the
15 nature of a data request, and we'll use the
16 record to capture it. So the nature of the
17 data request was is in light of the testimony
18 today that Ms. Mack has given, is there any
19 supplemental context that PG&E wishes to
20 provide with regards to electric locate and
21 mark practices?

22 And by "supplement," I really mean
23 supplementing the words that PG&E used in the
24 law and motion on March 5th, and I'll leave
25 it that broadly. I'll leave it worded that
26 broadly on purpose.

27 And then I think, Mr. Chan, I think
28 there was a question off the record that you

1 had contributed that talked about whether the
2 locate and mark procedures and those that
3 applied to Qualified Electric Workers are the
4 same in different parts, across different
5 parts of PG&E service territory.

6 Did I understand that correctly?

7 Is there anything you wanted to add
8 or correct on that?

9 MR. CHAN: We are specifying also the
10 area that -- where only electric facility,
11 distribution facility, but without gas
12 facility, which we understand that were --
13 the locate and mark work were performed by
14 gas -- no, PG&E electric personnel, where
15 they're using the same procedure as gas
16 distribution personnel were using.

17 Mr. Gruen: Okay. Thank you.

18 All right. Just to see if I've
19 captured everything, is there anything else,
20 Mr. Chan or Mr. Mee? Are there any other
21 questions that either of you wish to ask me?

22 MR. MEE: No, I don't have.

23 MR. CHAN: No.

24 MR. GRUEN: Well, with that, we'll go
25 off the record.

26 MR. PENDLETON: I ordered the
27 transcript.

28 MR. GRUEN: Let's go off the record.

1 (Off the record.)

2 MR. GRUEN: Back on the record.

3 Ms. Mack, that concludes our
4 deposition for today. Pursuant to the
5 subpoena that we issued on Mr. Pendleton, you
6 were required to be here and answer our
7 questions, but, nonetheless, I want to thank
8 you very much for your help and insight
9 today. We very much appreciate you sharing
10 the knowledge and insight that you have based
11 on your experience as a PG&E employee, and we
12 very much appreciate that. On behalf of SED,
13 I want to thank you.

14 Off the record.

15 (Whereupon, at the hour of 3:00
16 p.m., at San Francisco, California, the
deposition then adjourned.)

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, JASON STACEY, Certified Shorthand Reporter
No. 14092, in and for the State of California do
hereby certify that the pages of this transcript
prepared by me comprise a full, true, and correct
transcript of the testimony and proceedings held in
this matter on March 6, 2019.

I further certify that I have no interest in the
events of the matter or the outcome of the proceeding.

EXECUTED this 12th day of March, 2019.

A handwritten signature in black ink, appearing to read 'J. Stacey', written over a horizontal line.

Jason A. Stacey
CSR No. 14092

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, Rebekah L. De Rosa, Certified Shorthand Reporter No. 8708, in and for the State of California, do hereby certify that the pages of this transcript prepared by me comprise a full, true, and correct transcript of the testimony and proceedings held in this matter on March 6, 2019.

I further certify that I have no interest in the events of the matter or the outcome of the proceeding.

EXECUTED this 12th day of March, 2019.

A handwritten signature in cursive script that reads "Rebekah L. De Rosa". The signature is written in dark ink and is positioned above a horizontal line.

Rebekah L. De Rosa
CSR No. 8708

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, Shannon Ross, Certified Shorthand Reporter
No. 8916, in and for the State of California, do
hereby certify that the pages of this transcript
prepared by me comprise a full, true, and correct
transcript of the testimony and proceedings held in
this matter on March 6, 2019.

I further certify that I have no interest in the
events of the matter or the outcome of the proceeding.

EXECUTED this 12th day of March, 2019.

A handwritten signature in blue ink, appearing to read 'Sh-Ross', is written over a horizontal line.

SHANNON ROSS
CSR No. 8916