

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



**FILED**  
10-23-15  
04:59 PM

Application of Pacific Gas and Electric  
Company for Authority, Among Other Things,  
to Increase Rates and Charges for Electric and  
Gas Service Effective on January 1, 2017.

A.15-09-001  
(Filed September 1, 2015)

U 39 M

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 M)  
PREHEARING CONFERENCE STATEMENT**

MICHELLE L. WILSON  
STEVEN W. FRANK  
PETER VAN MIEGHEM

Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94105  
Telephone: (415) 973-2902  
Facsimile: (415) 973-0516  
E-Mail: PPV1@pge.com

Dated: October 23, 2015

Attorneys for  
PACIFIC GAS AND ELECTRIC COMPANY

## TABLE OF CONTENTS

	Page
I. INTRODUCTION .....	1
II. BACKGROUND .....	1
III. DISCUSSION .....	2
A. Procedural Schedule.....	2
B. Scope of Issues to Be Included in (or Excluded from) the Proceeding .....	2
C. Need for Evidentiary Hearings .....	3
D. Appropriate Category for this Proceeding .....	3
E. Discovery Issues .....	3
1. Status.....	3
2. 10 Business Day Target .....	3
3. Web-Based Discovery .....	4
F. Other Matters .....	5
1. Document Website.....	5
2. PG&E’s Current List and Labeling of Exhibits.....	5
3. Common Briefing Outline .....	6
4. Hearing Ground Rules .....	6
a. Cross-Examination Exhibits .....	6
b. Cross-Examination Time .....	7
c. Case Management Statement and Schedule of Witnesses.....	7
d. Hearings Should Be Used for Evidentiary Purposes and Motions Should Typically Be in Writing.....	7
5. PG&E Contact List .....	8
6. Public Participation Hearings .....	8
7. Organizational Information for PG&E Witnesses .....	8
IV. CONCLUSION.....	9

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

Application of Pacific Gas and Electric  
Company for Authority, Among Other Things,  
to Increase Rates and Charges for Electric and  
Gas Service Effective on January 1, 2017.

U 39 M

A.15-09-001  
(Filed September 1, 2015)

**PACIFIC GAS AND ELECTRIC COMPANY'S  
PREHEARING CONFERENCE STATEMENT**

**I. INTRODUCTION**

Pursuant to the “Administrative Law Judge’s Ruling Setting Prehearing Conference” (Ruling), dated October 13, 2015, and Rule 7.2 of the California Public Utilities Commission (CPUC or Commission) Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) submits this Prehearing Conference (PHC) Statement. The Ruling asks that PHC Statements address the following:

- Procedural schedule;
- Scope of issues to be included in (or excluded from) the proceeding;
- Need for evidentiary hearings;
- Appropriate category for this proceeding;
- Discovery issues; and
- List and description of other matters the parties wish to address at the PHC.

After a brief procedural background in Section II, Section III of this statement addresses the above-mentioned issues. Section IV of this statement concludes with a summary of PG&E’s specific recommendations.

**II. BACKGROUND**

On September 1, 2015, PG&E filed its 2017 General Rate Case (GRC) Phase I Application (Application) and served supporting testimony seeking to increase gas and electric

distribution and generation base revenue requirements by a total of \$457 million, effective January 1, 2017, as compared to the adopted revenue requirements as of December 31, 2016.

The Application appeared on the Commission's Daily Calendar on September 3, 2015.

On October 5, 2015, seven protests or responses were filed by:

- the Commission's Office of Ratepayer Advocates (ORA),
- The Utility Reform Network (TURN),
- Marin Clean Energy,
- the Merced and Modesto Irrigation Districts (the Irrigation Districts),
- the National Diversity Coalition,
- Southern California Edison Company (SCE), and
- Sonoma Clean Power.

PG&E filed its reply to these protests and responses on October 15, 2015.

### **III. DISCUSSION**

#### **A. Procedural Schedule**

PG&E proposed a procedural schedule for this proceeding in its Application. ORA proposed a competing schedule in its protest. ORA and PG&E have begun discussions to see if the parties could narrow their differences. PG&E expects to continue discussions with ORA and other parties about the schedule prior to the PHC.

As part of these discussions, PG&E will seek parties' input regarding a possible motion to make the revenue requirement effective January 1, 2017, regardless of the date of a final Commission decision. PG&E may wish to discuss this matter further at the PHC.

#### **B. Scope of Issues to Be Included in (or Excluded from) the Proceeding**

PG&E identified a number of issues in its Application, which, for the convenience of the parties, are listed in Attachment A to this PHC Statement. PG&E believes that the issues raised by the parties in their protests and responses are adequately captured by this list. Accordingly, PG&E asks that the Administrative Law Judge (ALJ) and Assigned Commissioner adopt this list as the list of issues to be considered in this proceeding.

### **C. Need for Evidentiary Hearings**

In light of PG&E's Application, as well as the parties' protests and responses, PG&E expects that the Commission will conduct evidentiary hearings in this GRC.<sup>1/</sup>

### **D. Appropriate Category for this Proceeding**

In its Application, PG&E proposed that this case should be categorized as a rate-setting proceeding, which other parties support.<sup>2/</sup>

### **E. Discovery Issues**

#### **1. Status**

Significant discovery has already occurred in this case. To date, parties have propounded over 1,100 individual requests. (This figure includes all subparts of questions and requests.) PG&E appreciates the efforts of parties to engage in early discovery.

#### **2. 10 Business Day Target**

As a matter of practice, PG&E attempts to respond to data requests within 10 business days of receipt, although PG&E cannot meet this target in every instance, in light of the number of requests and the extensive amount of information sought by parties. The 10 business day target can be particularly difficult to meet when parties propound requests on a single day that have a multitude of questions targeted at a limited number of witnesses.

Consistent with PG&E's current practice and the Commission's rule in PG&E's recent GRCs, PG&E requests that the Commission adopt a 10 business day target for responding to discovery, subject to reasonable extensions.<sup>3/</sup> Also consistent with PG&E's prior GRCs, if a party's sole response to discovery is an objection, PG&E requests that the Commission adopt a

---

1/ See PG&E's Application, p. 18; ORA Protest, p. 4; TURN Protest, p. 19; Marin Clean Energy Response, p. 8; the Irrigation Districts Protest, p. 10; National Diversity Coalition Protest, p. 7; SCE Response, p. 3; and Sonoma Clean Power Response, p. 2.

2/ See PG&E's Application, p. 18; ORA Protest, p. 4, TURN Protest, p. 19; Marin Clean Energy Response, p. 8; National Diversity Coalition Protest, pp. 6-7; SCE Response, p. 3; and Sonoma Clean Power Response, p. 2.

3/ See Assigned Commissioner's Ruling and Scoping Memo, issued January 22, 2013, in A.12-11-009, p. 9.

rule that such objection should be made within five business days.<sup>4/</sup> Similarly, PG&E is amenable to a five business day target for discovery made after rebuttal testimony based on the content of the rebuttal testimony.<sup>5/</sup>

### **3. Web-Based Discovery**

In PG&E's recent GRCs, the Commission has adopted PG&E's proposals to use a web-based discovery tool.<sup>6/</sup> PG&E requests that parties be directed to use this tool again in the 2017 GRC.

Specifically, PG&E maintains the following website:

**(<https://pgera.azurewebsites.net/account/login>)**

where PG&E makes available data request responses, including most documents listed as attachments to the responses. This site is also linked to PG&E's main Internet site (<http://www.pge.com>), via the "Regulation" sub-area. As in prior GRCs, the site does not give access to responses and documents that are voluminous or confidential (e.g., submitted to ORA subject to Public Utilities Code Section 583 or provided to a party subject to a Non-Disclosure Agreement (NDA))<sup>7/</sup> or that are unavailable electronically.

This website is helpful to parties because it allows access 24 hours a day and seven days a week to nearly all data request responses, thereby giving parties ready access to data request responses PG&E has provided to other parties. This site is updated frequently and greatly increases the speed with which PG&E can distribute responses to data requests. In addition, the website provides access to other electronic case documents that PG&E has received from parties.

---

4/ *Id.*

5/ *Id.*

6/ *Id.*

7/ PG&E has drafted a standard NDA that comports with agreements used in previous cases. This NDA is included as Attachment B. TURN and several of its representatives have already signed the NDA and received access to confidential information. If a party requests market sensitive procurement information protected by Public Utilities Code Section 454.5(g), that party will also need to sign the form NDA approved by the Commission in Resolution E-4448 that applies specifically to market sensitive procurement information.

PG&E can benefit from the website as well because it saves PG&E the substantial time and expense involved in photocopying and mailing discovery responses for thousands of discovery responses. This is especially true when a party asks for copies of all data requests PG&E has received from all parties as well as PG&E's answers to those requests.

Therefore, PG&E requests that the Commission adopt the web-based discovery protocols set forth in Attachment C.

## **F. Other Matters**

### **1. Document Website**

As in PG&E's prior GRCs, PG&E proposes to maintain a document website, where public pleadings, testimony, and Commission rulings will be maintained for access to the public, regardless of party status in the case.<sup>8/</sup> PG&E suggests that the same procedures apply in the 2017 GRC. Those procedures, along with the website address, are attached as Attachment D to this PHC Statement.

### **2. PG&E's Current List and Labeling of Exhibits**

PG&E's current list of exhibits, including workpapers, is attached as Attachment E to this PHC Statement. The list indicates the witness, attorney, and other information.

As shown in Attachment E, PG&E has labeled its testimony using a numbering convention following a "PG&E" prefix. For example, PG&E's first exhibit has been labeled "Exhibit (PG&E-1)" and PG&E recommends that it be labeled, upon admission, as "PG&E-1." PG&E proposes a similar convention for its workpapers. That is, the workpapers for PG&E's first exhibit would be labeled "PG&E-1WP." PG&E requests the ALJ and Assigned Commissioner's concurrence with this labeling convention. Regardless of what labeling conventions are adopted for this proceeding, PG&E would be pleased to keep a running list of exhibits throughout the proceeding and to provide such a list to the ALJ and interested parties at the start of each day of evidentiary hearings. PG&E expects that the running exhibit list would

---

8/ Assigned Commissioner's Ruling and Scoping Memo, issued January 22, 2013, in A.12-11-009, page 11.

be similar in form to that included as Attachment E.

Also, as explained in the Application, PG&E intends to move its workpapers into evidence as part of the record.<sup>9/</sup> To date, three sections of workpapers have been marked as Confidential. These workpapers have been provided to ORA and other parties pursuant to the terms of the NDA or the protections of Public Utilities Code Section 583. To the extent that it becomes necessary to move the Confidential versions of these materials into the public record (instead of the public versions), at such time, PG&E will make a motion to file such workpapers under seal.

### **3. Common Briefing Outline**

As in prior GRCs, PG&E would be pleased to work with the parties to prepare a common briefing outline, which will assist the parties to organize – and the Commission to follow – the post-hearing briefs in a consistent and logical format. The specifics of the outline will be developed towards the end of the evidentiary hearings and provided to the ALJ and Assigned Commissioner at the end of the evidentiary hearings.

### **4. Hearing Ground Rules**

PG&E anticipates that the Scoping Memo will include a set of ground rules for hearings.<sup>10/</sup> PG&E requests that the ALJ and Assigned Commissioner adopt ground rules in the following areas in order to promote efficient use of hearing room time.

#### **a. Cross-Examination Exhibits**

The testimony and workpapers in this proceeding are extensive. PG&E asks that the ALJ and Assigned Commissioner adopt a rule requiring any party who intends to introduce an exhibit during cross-examination to provide a copy to the witness and the witness' counsel prior to 8 pm the day before the witness takes the stand. This approach is consistent with that agreed-to by

---

9/ Application, p. 17.

10/ Assigned Commissioner's Ruling and Scoping Memo, issued January 22, 2013, in A.12-11-009, Appendix D.



parties and adopted in PG&E's 2014 GRC.<sup>11/</sup>

**b. Cross-Examination Time**

As in prior cases, before the commencement of evidentiary hearings, PG&E is willing to collect and consolidate estimates of cross-examination times from the various parties. In order to facilitate such an effort, PG&E recommends that each party send its cross-examination estimates, as well as a list of any days that its witnesses may be unavailable, to PG&E seven days prior to evidentiary hearings. To the extent such estimates exceed the available hearing time, PG&E asks that the ALJ and Assigned Commissioner put parties "on notice that it may be necessary to limit and allocate time for cross-examination as well as time for redirect and recross-examination."<sup>12/</sup>

**c. Case Management Statement and Schedule of Witnesses.**

Consistent with prior cases, PG&E is willing to produce a case management statement providing a consolidated list and schedule of witnesses, the exhibits sponsored by such witnesses and expected cross-examination times for each.<sup>13/</sup> PG&E proposes to circulate this statement five days prior to the commencement of evidentiary hearings.

PG&E will update the schedule on a daily basis and distribute it each morning at the evidentiary hearings. Similarly, during evidentiary hearings, PG&E will email the service list each evening with an expected schedule of witnesses for the coming two business days.

**d. Hearings Should Be Used for Evidentiary Purposes and Motions Should Typically Be in Writing**

In order to make the most effective use of evidentiary hearings, PG&E asks that the parties avoid bringing oral motions during evidentiary hearings that could have been made in writing. In PG&E's experience, parties have taken hearing time with oral motions to strike written testimony, as well as discovery disputes that should have been raised outside of hearings.

---

11/ Assigned Commissioner's Ruling and Scoping Memo, issued January 22, 2013, in A.12-11-009, Appendix D, p. 3.

12/ *Id.*

13/ Assigned Commissioner's Ruling and Scoping Memo, issued January 22, 2013, in A.12-11-009, pp. 6-7.

Therefore, consistent with PG&E's last GRC, PG&E urges that the ALJ and Assigned Commissioner direct motions to be made in writing unless (i) the motion is in direct response to oral testimony or (ii) an oral motion is likely to be unopposed and can be done expediently.<sup>14/</sup> PG&E also urges the Commission to direct parties to follow the procedures set forth in Resolution ALJ-164 regarding discovery disputes.<sup>15/</sup>

## **5. PG&E Contact List**

To assist parties seeking help or information from PG&E concerning this case, PG&E has compiled a list of PG&E personnel whom parties may call or e-mail regarding specific aspects of the case. The list is attached as Attachment F to this PHC Statement.

## **6. Public Participation Hearings**

PG&E anticipates that a separate ruling will be issued setting forth the schedule for Public Participation Hearings (PPHs). PG&E takes no position on the number, or location, of PPHs. However, as PG&E has done in prior GRCs, to the extent that the ALJ, Assigned Commissioner or Public Advisor deem it useful, PG&E would be pleased to host a conference call or meeting in order to help consolidate parties' input into the number and location of the PPHs.

PG&E will participate in such PPHs in whatever manner that the Commission desires.

## **7. Organizational Information for PG&E Witnesses**

In response to a prior request from ALJ Roscow, PG&E has included additional information concerning PG&E's witnesses as Attachment G. This information includes, as applicable, the witnesses' departments, the Vice President to whom the witness reports and simplified organizational charts showing the placement of PG&E's line of business witnesses.

---

14/ Assigned Commissioner's Ruling and Scoping Memo, issued January 22, 2013, in A.12-11-009, Appendix D, p. 2.

15/ Assigned Commissioner's Ruling and Scoping Memo, issued January 22, 2013, in A.12-11-009, pp. 9-10.

#### **IV. CONCLUSION**

For the reasons discussed above, PG&E respectfully requests that ALJ Roscow and Assigned Commissioner Picker issue a scoping memorandum:

1. Adopting the schedule set forth in PG&E's Application.
2. Adopting the list of issues provided in Attachment A as the list of issues to be considered in this proceeding.
3. Determining that evidentiary hearings are necessary.
4. Categorizing the case as a rate-setting proceeding.
5. Urging the parties to engage in discovery as early as possible.
6. Setting a 10 business day target for responding to discovery, subject to reasonable extensions, and a target of five business days for responding to discovery solely with an objection.
7. Adopting PG&E's proposal to use a web-based discovery tool.
8. Adopting the web-based discovery protocols set forth in Attachment C.
9. Requiring PG&E to maintain a document website in accordance with the procedures set forth in Attachment D.
10. Adopting a labeling convention for exhibits and workpapers that commences with the party's name or abbreviation, followed by a numeric reference (e.g., PG&E-1; ORA-1; TURN-1).
11. Requiring PG&E to keep a running list of exhibits throughout the proceeding and to provide such a list to the ALJ and interested parties at the start of each day of evidentiary hearings.
12. Requiring PG&E to work with the parties and prepare a common briefing outline to be provided to the ALJ and Assigned Commissioner at the end of the evidentiary hearings.
13. Requiring any party who intends to introduce an exhibit during cross-examination to provide a copy to the witness' counsel prior to 8 pm the day before the witness takes the stand.
14. Requiring each party to send its cross-examination estimates, as well as a list of any

days that its witnesses may be unavailable, to PG&E seven days prior to hearings, and directing parties to be on notice that it may be necessary to limit and allocate time for cross-examination as well as time for redirect and recross-examination.

15. Requiring PG&E to produce and circulate a case management statement five days prior to the commencement of evidentiary hearings that provides a consolidated list and schedule of witnesses, the exhibits sponsored by such witnesses and expected cross-examination times for each.

16. Requiring PG&E to update the witness schedule on a daily basis and distribute it each morning at evidentiary hearings and to email the service list each evening with an expected schedule of witnesses for the coming two business days.

17. Directing that motions, as a general rule, should be made in writing unless (i) the motion is in direct response to oral testimony or (ii) an oral motion is likely to be unopposed and can be done expediently.

18. Directing parties to follow the procedures set forth in Resolution ALJ-164 regarding discovery disputes.

Respectfully Submitted,

MICHELLE L. WILSON  
STEVEN W. FRANK  
PETER VAN MIEGHEM

By: /s/ Peter Van Mieghem  
PETER VAN MIEGHEM

Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94105  
Telephone: (415) 973-2902  
Facsimile: (415) 973-0516  
E-Mail: PPV1@pge.com

Dated: October 23, 2013

Attorneys for  
PACIFIC GAS AND ELECTRIC COMPANY

# Attachment A

## List of Issues

## **List of Issues**

The principal issues are whether:

1. The proposed revenue requirement for the electric distribution function in 2017 is just and reasonable and the Commission should authorize PG&E to reflect the adopted electric distribution revenue requirement in rates.
2. The proposed revenue requirement for the gas distribution function in 2017 is just and reasonable and the Commission should authorize PG&E to reflect the adopted gas distribution revenue requirement in rates.
3. The proposed revenue requirement for the electric generation function in 2017 is just and reasonable and the Commission should authorize PG&E to reflect the adopted revenue requirement in rates.
4. The Budget Compliance Reports required by PG&E's 2011 and 2014 GRCs should be continued through the 2017 GRC period as described in Exhibit (PG&E-2), Chapter 1.
5. With respect to the Gas Distribution organization described in Exhibit (PG&E-3):
  - a. The proposed revision to PG&E's policies in order to remove idle stubs should be approved, as described in Chapter 4.
  - b. The two-way balancing account for leak survey and repair should be closed, as described in Chapter 6C.
6. With respect to the Electric Distribution organization described in Exhibit (PG&E-4):
  - a. The two-way balancing account for major emergency costs should be continued, as described in Chapter 4.
  - b. The facilities charge associated with the light-emitting diode (LED) Streetlight Conversion program should be continued, as described in Chapter 6.
  - c. The one-way balancing account and tracking account for Vegetation Management should be continued, as described in Chapter 7.
  - d. The ongoing revenue requirements associated with the costs of Smart Grid pilot deployment projects should be approved and included in the 2017 GRC, as described in Chapter 15.
  - e. The annual PG&E Electric Tariff Rule 20A work credit allocation amount of \$41.3 million should be extended through 2019, as described in Chapter 18.
7. With respect to the Energy Supply function described in Exhibit

(PG&E-5):

- a. The two-way balancing account for implementation of rulemaking requirements associated with nuclear safety and security should be continued, as described in Chapter 3.
  - b. The two-way balancing account associated with FERC hydroelectric relicensing and new/amended license conditions should be continued, as described in Chapter 4.
  - c. The proposal to return the underspending in the two aforementioned balancing accounts should be approved, as described in Chapter 8.
  - d. The credit of the Department of Energy refunds to the generation revenue requirement should be continued, as described in Chapter 8.
  - e. The Diablo Canyon Seismic Studies Balancing Account should be closed and the costs associated with the Diablo Canyon Power Plant Long Term Seismic Program should be included in the generation revenue requirement, as described in Chapter 8.
  - f. The costs of the second refueling outage at Diablo Canyon and of the costs associated with the Colusa and Gateway Generating Station major outages associated with their Long-Term Service Agreements should be levelized over the 2017 GRC period, as described in Chapter 8.
  - g. The ongoing revenue requirement associated with PG&E's Photovoltaic Program assets should be included in the generation revenue requirement going forward, and the capital cost savings related to the PV Program should continue to be credited to the Utility Generation Balancing Account, as described in Chapter 8.
  - h. The ongoing revenue requirements associated with the costs of Smart Grid pilot deployment projects should be approved and included in the 2017 GRC, as described in Chapter 8.
8. With respect to the Customer Care organization described in Exhibit

(PG&E-6):

- a. The Memorandum of Understanding between the Small Business Utility Advocates and PG&E should be adopted, as described in Chapter 2.
- b. The Energy Data Center Memorandum Accounts should be closed, as described in Chapter 2.
- c. The Dynamic Pricing Memorandum Account should be closed, as described in Chapter 3.

d. The alternative proposal to revise telephone service levels should be adopted, as described in Chapter 4.

e. The Memorandum of Understanding between the Center for Accessible Technology and PG&E should be adopted, as described in Chapter 5.

f. The alternative proposal to close 26 customer service offices should be adopted, as described in Chapter 5.

g. The SmartMeter™ Opt-Out Memorandum Accounts should be closed, as described in Chapter 7.

h. The requirement to perform accuracy testing of certain gas meters that have been removed from service should be eliminated, as described in Chapter 7.

i. The proposed reductions to customer fees (i.e., the reconnection fees and non-sufficient funds fees) should be adopted, as described in Chapter 8.

j. The proposed clarification to the calculation of PG&E's uncollectibles factor should be adopted, as described in Chapter 8.

9. With respect to PG&E's Results of Operations material set forth in Exhibit (PG&E-10):

a. The proposed allocation of common costs (A&G expenses and common plant) should be approved for use in other, non-GRC Commission ratemaking mechanisms, as described in Chapter 7.

b. The forecast of payroll and other taxes should be approved, as described in Chapter 8.

c. The forecast of rate base should be approved, as described in Chapters 9 and 14.

d. The forecast of depreciation reserve and expense and accompanying depreciation parameters, including the proposed adjustment relating to the Kern Power Plant Order Instituting Rulemaking (I.14-08-022), should be approved, as described in Chapter 10.

e. The forecast of income and property taxes should be approved, as described in Chapter 12.

f. The computations for working cash should be approved, as described in Chapter 13.

g. The forecast of other operating revenue should be approved, as described in Chapter 17.



10. With respect to the Post Test-Year Ratemaking proposal set forth in Exhibit (PG&E-11):

a. The proposed attrition adjustments for 2018 and 2019 for the electric and gas distribution and electric generation functions should be approved, as described in Chapter 1.

b. The proposal to implement the annual adjustments through the Annual Electric True-Up and Annual Gas True-Up filings should be approved, as described in Chapter 1.

11. With respect to PG&E's General Report material set forth in Exhibit (PG&E-12):

a. The proposed modifications to reporting requirements should be approved, as described in Chapter 8.

b. The revisions to existing balancing and memorandum accounts should be approved, as described in Chapter 9.

c. The proposed simplification to the accounting procedures for affiliate transfer fees should be approved, as described in Chapter 9.

Attachment B

Non-Disclosure Agreement

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

Application of Pacific Gas and Electric Company for  
Authority, Among Other Things, to Increase Rates and  
Charges for Electric and Gas Service Effective on  
January 1, 2017

(U 39 M)

Application No. 15-09-001  
(Filed September 1, 2015)

**NONDISCLOSURE AGREEMENT**

This Nondisclosure Agreement ("Agreement") is effective this \_\_\_\_\_ day of \_\_\_\_\_, 2015, by and between Pacific Gas and Electric Company, ("PG&E"), and \_\_\_\_\_ on behalf of \_\_\_\_\_ ("Receiving Party").

**RECITALS**

**A.** Certain of the information requested to be produced or disclosed by PG&E in the above-captioned proceeding ("Proceeding") constitutes trade secret, market sensitive, proprietary, and/or confidential information ("Confidential Material").

**B.** PG&E and the Receiving Party believe that this Agreement will facilitate discovery in the Proceeding and avoid unnecessary law and motion practice.

**C.** PG&E and the Receiving Party believe that this Agreement will protect legitimate confidentiality concerns, and preserve their rights.

**AGREEMENT**

In consideration of the recitals set forth above, PG&E and the Receiving Party agree that the following terms and conditions shall govern the disclosure and use of Confidential Material in the context of the Proceeding:

**1.** For purposes of this Agreement:

**a.** The term "Confidential Material" includes: (1) information (including information in electronic form) or documents provided and designated by PG&E as confidential, including material PG&E has designated as confidential under the provisions of Public Utilities Code section 583; (2) copies of Confidential Material; (3) Notes of Confidential Material; and (4) information or documents in PG&E's possession that PG&E received from persons who consider the information or documents to be confidential or proprietary.

**b.** The term "Notes of Confidential Material" means memoranda, handwritten notes, spreadsheets, PowerPoint presentations, or any other form of information (including information produced or maintained in electronic form) which copies or discloses all or portions of Confidential Material.

**c.** The term "Reviewing Representative" is a person described in paragraph 8 of this Agreement.

d. The term “Commission” means the California Public Utilities Commission.

2. This Agreement shall govern Confidential Material provided and designated as such by PG&E in this Proceeding, and, notwithstanding any order terminating the Proceeding, shall remain in effect for a period of sixty (60) days after an order concluding or otherwise terminating the Proceeding is no longer subject to judicial review; however, the non-disclosure and confidentiality obligations of Reviewing Representatives, as specified in Appendix A to this Agreement, shall remain in full force and effect for two (2) years after an order concluding or otherwise terminating this Proceeding is no longer subject to judicial review.

3. PG&E may designate as Confidential Material any information or documents that PG&E customarily treats as confidential or proprietary, which are not available to the public, and which, if disclosed freely, would, in PG&E’s judgment, adversely affect either its employees, ratepayers or PG&E.

4. Confidential Material shall be made available under the terms of this Agreement only to Reviewing Representatives as provided in paragraphs 7 and 8, and, where appropriate, paragraph 9 of this Agreement.

5. Confidential Material shall remain available to the Receiving Party until the date that an order concluding or otherwise terminating the Proceeding is no longer subject to judicial review. Upon written request by PG&E after such date, all Reviewing Representatives shall return to PG&E within thirty (30) days all Confidential Material, including all copies of Confidential Material (except Notes of Confidential Material). Within the time period for return of Confidential Material, the Receiving Party shall destroy all Notes of Confidential Material, and the Receiving Party shall submit to PG&E an affidavit stating that all Confidential Material, copies thereof, and Notes of Confidential Material are being returned to PG&E or have been destroyed in accordance with this Paragraph.

6. Confidential Material shall be physically and/or electronically marked “Confidential Material” or “Confidential Pursuant to Section 583 of the Public Utilities Code,” or marked with words of similar purport. The Receiving Party may make only one (1) copy of Confidential Material without the prior approval of PG&E, which approval shall not be unreasonably withheld. The Receiving Party shall maintain a log of such copies for review by PG&E. All Confidential Material shall be maintained by the Receiving Party in a secure manner. Access to Confidential Material shall be limited to those Reviewing Representatives specifically authorized pursuant to paragraph 8, and, where appropriate, paragraph 9 of this Agreement.

7. Confidential Material shall be treated as confidential by the Receiving Party and by the Reviewing Representatives, in accordance with the Nondisclosure Certificate executed pursuant to paragraph 10 of this Agreement. The Receiving Party and Reviewing Representatives shall adopt suitable measures to maintain the confidentiality of Confidential Material, and shall employ the higher of the standard of care that the Receiving Party and Reviewing Representatives employ to preserve their own confidential information or a reasonable standard of care to prevent unauthorized use or disclosure of Confidential Material. Confidential Material shall not be used except as necessary for the conduct of the Proceeding and, subject to the limitations specified in paragraph 8, and, where appropriate, paragraph 9, Confidential Material shall not be disclosed in any manner to any person other than a Reviewing Representative who is engaged in the conduct of the Proceeding and who needs to know the information to carry out that person’s responsibilities in the Proceeding. The Reviewing Representatives may make Notes of Confidential Material, which notes must be maintained in a

secure manner pursuant to paragraph 6 of this Agreement.

**8.** A Reviewing Representative may include: (a) an employee of the Receiving Party who is engaged in the conduct of the Proceeding and who needs to know the information to carry out that person's responsibilities in the Proceeding; (b) an attorney representing the Receiving Party in the Proceeding, including his or her associated attorneys, paralegals, or other employees ("Attorneys"); and (c) an expert or an employee of an expert retained by the Receiving Party for the purpose of advising, preparing for, or testifying in the Proceeding, so long as that expert or employee has not been and is not employed by or otherwise affiliated with the Receiving Party ("Experts"). In the event that the Receiving Party wishes to nominate as a Reviewing Representative a person not described in this Paragraph, the Receiving Party shall obtain the prior written agreement of PG&E.

**9.** PG&E may identify certain Confidential Material as "Highly Confidential Material" by marking it "Highly Confidential Material." Unless otherwise agreed in writing by PG&E, employees of the Receiving Party shall not be entitled to access to Highly Confidential Material. Access to Highly Confidential Material shall be limited to Attorneys and Experts, and only to the extent they must have access to this material as part of their participation in this Proceeding. PG&E will limit its designation of Highly Confidential Material to information and documents that are especially commercially sensitive. Except for the limited access to Highly Confidential Material specified in this Paragraph, Highly Confidential Material shall otherwise be treated as Confidential Materials subject to provisions and protections of this Agreement.

**10.** A Reviewing Representative shall not be permitted to inspect, participate in discussions regarding, or otherwise access Confidential Material pursuant to this Agreement unless and until each and every such Reviewing Representative has first executed and delivered to PG&E a Nondisclosure Certificate in the form set forth in Appendix A to this Agreement ("Nondisclosure Certificate"). Attorneys qualified as Reviewing Representatives are responsible for ensuring that all persons under their employment, instruction, supervision or control who require access to Confidential Material comply with this Agreement and execute and deliver to PG&E a Nondisclosure Certificate.

**11.** A Reviewing Representative may disclose Confidential Material to any other Reviewing Representative, as long as both Reviewing Representatives have executed and delivered a Nondisclosure Certificate to PG&E. In the event that any Reviewing Representative to whom Confidential Material is disclosed ceases to be engaged in the Proceeding or is employed or retained for a position whereby that person is no longer qualified to be a Reviewing Representative under paragraphs 7 and 8, and, where appropriate, paragraph 9, of this Agreement, such person shall no longer be permitted access to Confidential Material and must comply with the return and destruction requirements of paragraph 5 of this Agreement. Every person who has signed and delivered a Nondisclosure Certificate shall continue to be bound by the provisions of this Agreement and the Nondisclosure Certificate, even if such person is no longer engaged in the Proceeding.

**12.** If the Receiving Party intends to submit or use in the Proceeding any Confidential Material such that the submission or use would result in a public disclosure of such Confidential Material, including, without limitation, the presentation of prepared testimony, cross-examination, briefs, comments, protests, or other presentations before the Commission, counsel for the Receiving Party shall communicate with counsel for PG&E as soon as possible and, where practicable, not later than five (5) business days prior to such use, and both counsel shall constructively explore means of identifying the Confidential Material so that the confidentiality thereof may be reasonably protected (including, but not limited to, submission of testimony and briefs under seal, and clearing the hearing room during examination, discussion, or argument concerning Confidential Material), while at the same time enabling an effective

presentation. If PG&E and the Receiving Party are unable to agree upon a procedure to protect the confidentiality of the Confidential Material, the Receiving Party shall request an order from the principal hearing officer in the Proceeding, and PG&E reserves the right to oppose the Receiving Party's request. Except as expressly provided for herein, no use may be made of Confidential Material that would fail to protect its confidentiality without such an order from the principal hearing officer.

**13.** The principal hearing officer retains the discretion to review and evaluate the facts and circumstances involved in any proposed use of Confidential Material in Commission hearings, and the flexibility to respond in whatever manner is most appropriate under the circumstances, including the holding of in camera hearings.

**14.** Notwithstanding this Agreement, Confidential Material may be disclosed to a governmental, judicial, or regulatory authority requiring such Confidential Material pursuant to any applicable law, regulation, ruling, or order, provided that: (a) such Confidential Material is submitted under any applicable provision, if any, for confidential treatment by such governmental, judicial or regulatory authority; and (b) prior to such disclosure, PG&E is given prompt notice of the disclosure requirement so that it may take whatever action it deems appropriate, including intervention in any proceeding and the seeking of any injunction to prohibit such disclosure. If a request for Confidential Material is made of the Receiving Party under any public records laws, including without any limitation the California Public Records Act, and the Receiving Party believes that it is obligated to disclose Confidential Material in response to such request, the Receiving Party shall provide PG&E with prompt notice of such request so that PG&E may seek a protective order or other appropriate remedy and/or waive compliance with the terms of this Agreement.

**15.** The Receiving Party agrees that any release, attempted release, or use of Confidential Material other than as contemplated by this Agreement is strictly prohibited and may cause PG&E irreparable injury which cannot adequately be compensated through pecuniary damages. PG&E shall be given prompt notice of the attempted release or use of Confidential Material so that it may take whatever action it deems appropriate, including intervention in any proceeding and the seeking of any injunction to prohibit such disclosure.

**16.** Nothing in this Agreement shall be construed as limiting the right of PG&E to object to the use or disclosure of Confidential Material, to require the use of additional protocols for the protection of Confidential Material, or to object to the use at hearings or in any other manner Confidential Material on any legal grounds, including relevance and any applicable privilege.

**17.** To the extent that Confidential Material is discussed, analyzed or otherwise the subject of consideration during any conference or other session held in connection with the Proceeding, only Reviewing Representatives may be present for such sessions.

**18.** Failure to designate information or documents as Confidential Material prior to disclosure shall not be deemed a waiver in whole or in part of PG&E's claim of confidentiality, and PG&E shall have the right to designate or re-designate such information and documents at any time. Upon receipt of notice from PG&E of any new designation or re-designation, the Receiving Party thereafter shall treat said information or documents according to the new designation or re-designation, and/or will endeavor to return all copies of any newly designated or re-designated documents to PG&E in exchange for copies of the documents with the new designation.

**19.** The inadvertent disclosure of any information or documents which are subject to a claim of work product, the attorney-client privilege or other legal protection shall not waive the

protection for such information or documents as long as PG&E requests their return and takes reasonable precautions to avoid such inadvertent disclosure. Upon written request, the Receiving Party shall return to PG&E any such protected information or documents inadvertently disclosed, together with all copies and any notes pertaining thereto.

**20.** This Agreement shall be governed and construed according to the laws of the State of California.

**21.** The provisions of this Agreement shall be severable, and in case any provision of this Agreement shall be invalid, illegal or unenforceable, the validity, legality and enforceability of the remaining provisions of the Agreement shall not in any way be affected or impaired thereby.

**22.** This Agreement sets forth the complete understanding of the parties hereto with respect to the subject matter hereof as of the date set forth above. This Agreement supersedes any prior understandings, discussions, or course of conduct (oral and written). Any modification or waiver of the provisions of this Agreement must be written, must be executed by both PG&E and the Receiving Party, and shall not be implied by any usage of trade or course of conduct.

**23.** This Agreement may be executed in separate counterparts by PG&E and the Receiving Party, each of which shall be fully effective as to the party executing it.

**24.** The principal hearing officer in the Proceeding shall resolve any disputes arising from this Agreement. Prior to presenting any dispute arising from this Agreement to the principal hearing officer, PG&E and the Receiving Party shall use their best efforts to resolve the dispute.

//

//

IN WITNESS WHEREOF, the undersigned have executed this Agreement as of the date entered below on behalf of PG&E and the Receiving Party.

PACIFIC GAS AND ELECTRIC COMPANY

RECEIVING PARTY

Dated: \_\_\_\_\_

Dated: \_\_\_\_\_

By: \_\_\_\_\_

Signature: \_\_\_\_\_

Steven W. Frank  
Law Department  
Pacific Gas and Electric Company  
Post Office Box 7442  
San Francisco, CA 94120  
Telephone: (415) 973-6976  
Fax: (415) 973-5520  
Email: SWF5@pge.com

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Attorney for  
PACIFIC GAS AND ELECTRIC COMPANY

Company/Firm: \_\_\_\_\_

Representing (name of party): \_\_\_\_\_

\_\_\_\_\_



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

Application of Pacific Gas and Electric Company for  
Authority, Among Other Things, to Increase Rates and  
Charges for Electric and Gas Service Effective on  
January 1, 2017

(U 39 M)

Application No. 15-09-001  
(Filed September 1, 2015)

**NONDISCLOSURE CERTIFICATE**

I certify my understanding that access to Confidential Material is provided to me pursuant to the terms and restrictions of the Nondisclosure Agreement (“Agreement”) for use in the above-captioned proceeding. I have been given a copy of and have read the Agreement and agree to be bound by it. I understand that the contents of Confidential Material and Highly Confidential Material (if I may have access to such material as provided in paragraph 9 of the Agreement), including any notes or memorandum or other form of information (including information received or maintained in electronic form) which copy or disclose such material, shall not be disclosed to anyone other than in accordance with the Agreement and shall be used only for the purpose of the above-captioned proceeding. I agree to honor the confidentiality of Confidential Material and Highly Confidential Material for two (2) years following the conclusion or termination of this proceeding as specified in the Agreement.

Dated: \_\_\_\_\_

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Company/Firm: \_\_\_\_\_

Representing (name of party): \_\_\_\_\_

Business Address: \_\_\_\_\_

Business Phone: \_\_\_\_\_

Business Fax: \_\_\_\_\_

Email: \_\_\_\_\_

## Attachment C

# Web-Based Discovery Protocols

## **Web-based Discovery Protocols**

PG&E requests that the Scoping Memo adopt the protocols set forth below:

1. Parties should transmit their data requests to PG&E electronically by email, preferably with the content document (discovery request) attached to the email. The email should be sent to GRC2017@PGE.COM. This will greatly facilitate the processes of routing the questions to the appropriate witness and the posting of the data request on the website.

2. Service of the response should be deemed effected once PG&E posts its response on its website, and PG&E sends an email to the requestor indicating that the response has been posted for Internet access and, subject to size limitations, providing the requestor an electronic copy of PG&E's response. Please note that, in the case of confidential material or material that cannot be made available electronically, the same protocol will apply, but the confidential or non-electronic material will be sent in hard copy via first-class mail.

3. PG&E should not be required to provide paper copies of discovery responses to any party that has access to PG&E's Regulation Internet website, except for those portions of a response that are not available electronically, or which include confidential material. PG&E will establish discovery website access for those individuals related to an active participating party in the PG&E General Rate Case 2017 who signs PG&E's "Internet Discovery Access Agreement" a copy of which is included as Attachment H to this PHC Statement. A party seeking access should locate the area of the website labeled "Discovery Log-In," click on "Register" to register for an individual user name and password, and to complete the enrollment process for GRC 2017. The last step of that process asks the party to download a Word file containing the agreement, and then execute and return to PG&E a paper copy of the agreement. Once PG&E receives that agreement, PG&E will notify the party by email that the party has been given requisite case access. Several parties have already successfully followed this practice to obtain access to discovery over the internet for this GRC.

PG&E should be required to accept data requests by mail and provide paper copy

responses only for those parties who do not have internet access. This is consistent with the protocol in PG&E's 2014 and 2011 GRCs as well as the Commission's own filing rules, which require major utilities such as PG&E to file their pleadings electronically rather than in hard copy (Rule 1.13).

## Attachment D

### Document Website Posting Procedures

## **Document Website Posting Procedures**

Pacific Gas and Electric Company (PG&E) has established a dedicated e-mail address to facilitate development of the “Document Website” for the Test Year 2017 General Rate Case. Parties and the public can access documents posted at the following link:

<https://pgera.azurewebsites.net/Regulation/search?CaseID=1387>

Click on the Search button to access a list of posted documents. Each party shall send all public version documents that are required to be either filed or served to GRC2017@PGE.COM as an attachment.

In the case of documents containing confidential material subject to Pub. Util. Code § 583 or a non-disclosure agreement, a redacted copy shall be sent to the above email address. For documents PG&E receives during normal business hours (M-F, 8:30 a.m. to 5:00 p.m.), PG&E shall post the document within three hours after receipt; for documents PG&E receives outside normal business hours, PG&E shall post the document by 11:30 a.m., the next business day. In the event that a document is not timely posted, PG&E shall promptly post the document after discovery of the error.

To eliminate differences in pagination upon printing, parties should save their documents in Adobe Portable Document Format (.pdf). Files converted by Adobe Acrobat from other document formats are preferred to files that contain scanned images due to file size and searchability features. Parties to the case who do not have access to the web shall be served with paper copies, as is normally the case.

## Attachment E

### Current List of Exhibits Including Workpapers

PACIFIC GAS AND ELECTRIC COMPANY  
2017 General Rate Case  
Current Exhibit List

Hearing Room Exhibit Number	Document	Party	Chapter	Title/Description	Doc Type	Witness	Attorney	Date Identified	Date Admitted
	PG&E-1	PG&E		Summary of PG&E's 2017 General Rate Case					
	PG&E-1	PG&E	Ch. 1	Introduction and Summary of PG&E's 2017 General Rate Case	Testimony	Shelly J. Sharp	Steve Frank		
	PG&E-1 WP 1	PG&E	Ch. 1	Introduction and Summary of PG&E's 2017 General Rate Case, Workpapers Ch. 1	Workpapers	Shelly J. Sharp	Steve Frank		
	PG&E-2	PG&E		Safety, Risk and Integrated Planning					
	PG&E-2	PG&E	Ch. 1	Introduction	Testimony	Shelly J. Sharp	Steve Frank		
	PG&E-2	PG&E	Ch. 2	Safety of the Public and Employees	Testimony	Desmond A. Bell	Steve Frank		
	PG&E-2	PG&E	Ch. 3	Risk Assessment and Mitigation	Testimony	Anil K. Suri	Steve Frank		
	PG&E-2	PG&E	Ch. 4	Integrated Planning Process	Testimony	Jason P. Wells	Steve Frank		
	PG&E-2	PG&E	Ch. 5	Maturity and Integration of Risk, Asset, and Investment Management at PG&E: An Assessment Report	Testimony	Grant Davies	Mike Reidenbach		
	PG&E-2 WP 3-4	PG&E	Ch. 3-4	Safety, Risk and Integrated Planning Workpapers Ch. 3-4	Workpapers	Anil K. Suri and Jason P.	Steve Frank		
	PG&E-3	PG&E		Gas Distribution					
	PG&E-3	PG&E	Ch. 1	Gas Distribution Operations Policy and Introduction	Testimony	Nickolas Stavropoulos	Erich Lichtblau		
	PG&E-3	PG&E	Ch. 2	Forecast Summary	Testimony	William E. Mojica	Erich Lichtblau		
	PG&E-3	PG&E	Ch. 3	Gas Distribution Risk Management and Investment Planning	Testimony	Terry White; William E. Mojica	Erich Lichtblau		
	PG&E-3	PG&E	Ch. 4	Asset Family - Distribution Mains and Services	Testimony	Raymond Thierry	Erich Lichtblau		
	PG&E-3	PG&E	Ch. 5	Asset Families - Measurement and Control, and Compressed Natural Gas Stations	Testimony	Terry White	Erich Lichtblau		
	PG&E-3	PG&E	Ch. 6A	Distribution Operations and Maintenance	Testimony	Rich W. Yamaguchi	Erich Lichtblau		
	PG&E-3	PG&E	Ch. 6B	Corrosion Control	Testimony	Preston Ford	Erich Lichtblau		
	PG&E-3	PG&E	Ch. 6C	Leak Management	Testimony	John Higgins	Erich Lichtblau		
	PG&E-3	PG&E	Ch. 7	Gas System Operations	Testimony	Melvin J. Christopher	Erich Lichtblau		
	PG&E-3	PG&E	Ch. 8	New Business and Work at the Request of Others	Testimony	Nina B. Bubnova	Erich Lichtblau		
	PG&E-3	PG&E	Ch. 9	Gas Operations Technology	Testimony	Joseph Sanzo	Erich Lichtblau		
	PG&E-3	PG&E	Ch. 10	Other Distribution Support Plans	Testimony	William E. Mojica	Erich Lichtblau		
	PG&E-3 WP 2-5 and 6A	PG&E	Ch. 2-5, 6A	Gas Distribution Workpapers Supporting Chs. 2-6A	Workpapers	Multiple	Erich Lichtblau		
	PG&E-3 WP 6B	PG&E	Ch. 6B	Gas Distribution Workpapers Supporting, Ch. 6B	Workpapers	Preston Ford	Erich Lichtblau		
	PG&E-3 WP 6C and 7-9	PG&E	Ch. 6C, 7-9	Gas Distribution Workpapers Supporting Chs. 6C and 7-9	Workpapers	Multiple	Erich Lichtblau		
	PG&E-3 WP 10	PG&E	Ch. 10	Gas Distribution Workpapers Supporting Ch. 10	Workpapers	William E. Mojica	Erich Lichtblau		
	PG&E-4	PG&E		Electric Distribution					
	PG&E-4	PG&E	Ch. 1	Electric Distribution Operations Policy and Introduction	Testimony	Geisha J. Williams	Peter Van Mieghem		
	PG&E-4	PG&E	CH. 1A	Electric Distribution Operations Forecast Summary	Testimony	Matthew T. Pender	Peter Van Mieghem		
	PG&E-4	PG&E	Ch. 2	Electric Distribution Risk Management	Testimony	Eric Back	Peter Van Mieghem		
	PG&E-4	PG&E	Ch. 3	Emergency Preparedness and Response	Testimony	Barry D. Anderson	Peter Van Mieghem		
	PG&E-4	PG&E	Ch. 4	Electric Emergency Recovery	Testimony	Michael E. Swanson	Peter Van Mieghem		
	PG&E-4	PG&E	Ch. 5	Distribution System Operations	Testimony	Michael E. Swanson	Peter Van Mieghem		
	PG&E-4	PG&E	Ch. 6	Electric Distribution Maintenance	Testimony	Greg Kiraly	Peter Van Mieghem		



PACIFIC GAS AND ELECTRIC COMPANY  
2017 General Rate Case  
Current Exhibit List

Hearing Room Exhibit Number	Document	Party	Chapter	Title/Description	Doc Type	Witness	Attorney	Date Identified	Date Admitted
	PG&E-4	PG&E	Ch. 7	Vegetation Management	Testimony	Peter Dominguez	Kerry Klein		
	PG&E-4	PG&E	Ch. 8	Pole Asset Management	Testimony	Karen S. O'Connor	Kerry Klein		
	PG&E-4	PG&E	Ch. 9	Electric Distribution Reliability	Testimony	Steve E. Calvert	Kerry Klein		
	PG&E-4	PG&E	Ch. 10	Distribution Automation and System Protection	Testimony	Steve E. Calvert	Kerry Klein		
	PG&E-4	PG&E	Ch. 11	Underground Asset Management	Testimony	Steve E. Calvert	Kerry Klein		
	PG&E-4	PG&E	Ch. 12	Substation Asset Management	Testimony	Manho Yeung	Peter Van Mieghem		
	PG&E-4	PG&E	Ch. 13	Electric Distribution Capacity	Testimony	Satvir Nagra	Peter Van Mieghem		
	PG&E-4	PG&E	Ch. 14	Electric Distribution Engineering and Planning	Testimony	Satvir Nagra	Peter Van Mieghem		
	PG&E-4	PG&E	Ch. 15	Electric Distribution Technology	Testimony	Kevin J. Dasso	Kerry Klein		
	PG&E-4	PG&E	Ch. 16	Electric Distribution Mapping and Records Management	Testimony	Kevin J. Dasso	Kerry Klein		
	PG&E-4	PG&E	Ch. 17	New Business and Work at the Request of Others	Testimony	Nina B. Bubnova	Kerry Klein		
	PG&E-4	PG&E	Ch. 18	Rule 20A	Testimony	Andrea A. Samonek	Kerry Klein		
	PG&E-4	PG&E	Ch. 19	Electric Distribution Support Activities	Testimony	Matthew T. Pender	Peter Van Mieghem		
	PG&E-4 WP 1A and 2-12	PG&E	Ch. 1A, 2-12	Electric Distribution Workpapers Supporting Chs. 1A and 2-12	Workpapers	Multiple	Peter Van Mieghem		
	PG&E-4 WP 13-19	PG&E	Ch. 13-19	Electric Distribution Workpapers Supporting Chs. 13-19	Workpapers	Multiple	Peter Van Mieghem		
	PG&E-5	PG&E		Energy Supply					
	PG&E-5	PG&E	Ch. 1	Energy Supply Operations Policy	Testimony	Fong Wan	Bill Manheim		
	PG&E-5	PG&E	Ch. 2	Energy Supply Risk Management	Testimony	Eric Back; Cary D. Harbor	Bill Manheim		
	PG&E-5	PG&E	Ch. 3	Nuclear Operations Costs	Testimony	Cary D. Harbor	Bill Manheim		
	PG&E-5	PG&E	Ch. 4	Hydro Operations Costs	Testimony	Stephanie A. Maggard	Grady Mathai-Jackson		
	PG&E-5	PG&E	Ch. 5	Fossil and Other Generation Operations Costs	Testimony	Steve Royall	Bill Manheim		
	PG&E-5	PG&E	Ch. 6	Energy Procurement Administration Costs	Testimony	Janice Y. Frazier-Hampton	Grady Mathai-Jackson		
	PG&E-5	PG&E	Ch. 7	Energy Supply Technology Programs	Testimony	Dana Docherty	Grady Mathai-Jackson		
	PG&E-5	PG&E	Ch. 8	Energy Supply Ratemaking	Testimony	Stephanie A. Maggard	Bill Manheim		
	PG&E-5 WP 2-3	PG&E	Ch. 2-3	Energy Supply Workpapers Supporting Chs. 2-3	Workpapers	Eric Back; Cary D. Harbor	Bill Manheim		
	PG&E-5 WP 4-8	PG&E	Ch. 4-8	Energy Supply Workpapers Supporting Chs. 4-8	Workpapers	Multiple	Bill Manheim		
	PG&E-5 WP 5 CONFIDENTIAL	PG&E	Ch. 5 CONF.	Energy Supply Workpapers Supporting Ch. 5 CONFIDENTIAL	Workpapers	Steve Royall	Bill Manheim		
	PG&E-6	PG&E		Customer Care					
	PG&E-6	PG&E	Ch. 1	Customer Care Policy	Testimony	Laurie M. Giammona	Mike Klotz		
	PG&E-6	PG&E	Ch. 2	Customer Engagement	Testimony	Jess A. Brown	Mike Klotz		
	PG&E-6	PG&E	Ch. 3	Pricing Products	Testimony	Maril Pitcock	Mike Klotz		
	PG&E-6	PG&E	Ch. 4	Contact Centers	Testimony	Scott T. Sanford	Mike Klotz		
	PG&E-6	PG&E	Ch. 5	Customer Service Offices	Testimony	Scott T. Sanford	Mike Klotz		
	PG&E-6	PG&E	Ch. 6	Customer Retention	Testimony	Vijay Bhaskaran	Mike Klotz		
	PG&E-6	PG&E	Ch. 7	Metering	Testimony	Craig W. Kurtz	Mike Klotz		
	PG&E-6	PG&E	Ch. 8	Billing, Revenue and Credit	Testimony	Travis Browne	Mike Klotz		
	PG&E-6	PG&E	Ch. 9	Customer Operations Regulatory Strategy	Testimony	Darleen D. DeRosa	Mike Klotz		
	PG&E-6	PG&E	Ch. 10	Information Technology Programs	Testimony	Michael Glass	Mike Klotz		
	PG&E-6 WP 2-10	PG&E	Ch. 2-10	Customer Care Workpapers Supporting Chs. 2-10	Workpapers	Multiple	Mike Klotz		

PACIFIC GAS AND ELECTRIC COMPANY  
2017 General Rate Case  
Current Exhibit List

Hearing Room Exhibit Number	Document	Party	Chapter	Title/Description	Doc Type	Witness	Attorney	Date Identified	Date Admitted
	PG&E-6 WP 5 CONFIDENTIAL	PG&E	Ch. 5 CONF.	Customer Care Workpapers Supporting Ch. 5 CONFIDENTIAL	Workpapers	Scott T. Sanford	Mike Klotz		
	PG&E-7	PG&E		Shared Services and Information Technology					
	PG&E-7	PG&E	Ch. 1	Shared Services and Information Technology Policy and Introduction	Testimony	Karen A. Austin; Desmond A. Bell	Mike Reidenbach		
	PG&E-7	PG&E	Ch. 2	Safety Department	Testimony	Andrew K. Williams	Mike Reidenbach		
	PG&E-7	PG&E	Ch. 3	Transportation Services	Testimony	David M. Meisel	Mike Reidenbach		
	PG&E-7	PG&E	Ch. 4	Materials	Testimony	Lance C. Schultz	Mike Reidenbach		
	PG&E-7	PG&E	Ch. 5	Sourcing	Testimony	Benjamin S. Moglen	Mike Reidenbach		
	PG&E-7	PG&E	Ch. 6	Real Estate	Testimony	Helen Vu	Mike Reidenbach		
	PG&E-7	PG&E	Ch. 7	Environmental Program	Testimony	Andrew K. Williams	Mike Reidenbach		
	PG&E-7	PG&E	Ch. 8A	Enterprise Corrective Action Program	Testimony	Javid Khan	Mike Reidenbach		
	PG&E-7	PG&E	Ch. 8B	Enterprise Records and Information Management	Testimony	Javid Khan; Mike Swatek	Mike Reidenbach		
	PG&E-7	PG&E	Ch. 9	Information Technology	Testimony	John Nichols	Mike Reidenbach		
	PG&E-7	PG&E	Ch. 10	Information Technology Cybersecurity	Testimony	Kooros M. Mahmudi	Mike Reidenbach		
	PG&E-7 WP 2-5	PG&E	Ch. 2-5	Shared Services and Information Technology Workpapers Supporting Chs. 2-5	Workpapers	Multiple	Mike Reidenbach		
	PG&E-7 WP 6-7	PG&E	Ch. 6-7	Shared Services and Information Technology Workpapers Supporting Chs. 6-7	Workpapers	Helen Vu; Andrew K. Williams	Mike Reidenbach		
	PG&E-7 WP 8A-8B, 9, 10	PG&E	Ch. 8A, 8B, 9, 10	Shared Services and Information Technology Workpapers Supporting Chs. 8A, 8B, 9 and 10	Workpapers	Multiple	Mike Reidenbach		
	PG&E-7 WP 10 CONFIDENTIAL	PG&E	Ch. 10 CONF.	Shared Services and Information Technology Workpapers Supporting Ch. 10 CONFIDENTIAL	Workpapers	Kooros M. Mahmudi	Mike Reidenbach		
	PG&E-8	PG&E		Human Resources					
	PG&E-8	PG&E	Ch. 1	Human Resources Policy and Overview	Testimony	John R. Simon	Mike Klotz		
	PG&E-8	PG&E	Ch. 2	Talent Management and Diversity	Testimony	Bradley S. Michael	Mike Klotz		
	PG&E-8	PG&E	Ch. 2A	Report on Diversity and Inclusion	Testimony	Bradley S. Michael	Mike Klotz		
	PG&E-8	PG&E	Ch. 3	Compensation, STIP and Labor Escalation	Testimony	John Lowe	Mike Klotz		
	PG&E-8	PG&E	Ch. 4	Employee Benefits	Testimony	Dora M. Choy; Ted Huntley	Craig Buchsbaum		
	PG&E-8	PG&E	Ch. 5	Disability and Workers' Compensation	Testimony	Bryon E. Bass; Ted Huntley	Craig Buchsbaum		
	PG&E-8	PG&E	Ch. 6	Other HR Functions	Testimony	Mary King	Mike Klotz		
	PG&E-8	PG&E	Ch. 7	Total Compensation Study	Testimony	Shane Bartling, Richard Beal, Catherine Furco, Catherine Hartmann, Patrick Moloney (Consultants)	Mike Klotz		
	PG&E-8 WP 2-4	PG&E	Ch. 2-4	Human Resources Workpapers Supporting Chs. 2-4	Workpapers	Multiple	Mike Klotz		
	PG&E-8 WP 5-7	PG&E	Ch. 5-7	Human Resources Workpapers Supporting Chs. 5-7	Workpapers	Multiple	Mike Klotz		
	PG&E-9	PG&E		Administrative and General					
	PG&E-9	PG&E	Ch. 1	Introduction	Testimony	Anna Lee	Mike Klotz		

PACIFIC GAS AND ELECTRIC COMPANY  
2017 General Rate Case  
Current Exhibit List

Hearing Room Exhibit Number	Document	Party	Chapter	Title/Description	Doc Type	Witness	Attorney	Date Identified	Date Admitted
	PG&E-9	PG&E	Ch. 2	Finance Organization Costs	Testimony	Jamie L. Martin	Mike Klotz		
	PG&E-9	PG&E	Ch. 3	Risk and Audit Department Costs and Insurance Expenses	Testimony	Megan S. Janis	Mike Klotz		
	PG&E-9	PG&E	Ch. 4	Regulatory Affairs Department Costs	Testimony	Margot C. Everett	Mike Klotz		
	PG&E-9	PG&E	Ch. 5	Law Department and Related Costs	Testimony	Sanford L. Hartman	Mike Klotz		
	PG&E-9	PG&E	Ch. 6	PG&E Corporation and PG&E Executive Offices; and Corporate Secretary Department Costs	Testimony	Linda Y.H. Cheng	Mike Klotz		
	PG&E-9	PG&E	Ch. 7	Corporate Affairs Department Costs	Testimony	Susan C. Martinez	Mike Klotz		
	PG&E-9	PG&E	Ch. 8	A&G Ratemaking Adjustments	Testimony	Judith S. Gutierrez	Mike Klotz		
	PG&E-9 WP 1-3	PG&E	Ch. 1-3	Administrative and General Workpapers Supporting Chs. 1-3	Workpapers	Multiple	Mike Klotz		
	PG&E-9 WP 4-8	PG&E	Ch. 4-8	Administrative and General Workpapers Supporting Chs. 4-8	Workpapers	Multiple	Mike Klotz		
	PG&E-10	PG&E		Results of Operations					
	PG&E-10	PG&E	Ch. 1	Introduction	Testimony	Nielson D. Jones	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 2	SAP FERC Translation	Testimony	Bryan G. Wong	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 3	Electric Distribution O&M Expense	Testimony	Bryan G. Wong	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 4	Gas Distribution O&M Expense	Testimony	Bryan G. Wong	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 5	Customer Accounts Expense	Testimony	Bryan G. Wong	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 6	Generation O&M Expense	Testimony	Bryan G. Wong	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 7	Administrative and General Expenses	Testimony	Judith S. Gutierrez	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 8	Payroll and Other Taxes	Testimony	Elaine Silveria	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 9	Electric, Gas and Common Plant	Testimony	Charles M. Marre	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 10	Depreciation Reserve and Expense	Testimony	Charles M. Marre	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 11	Depreciation Study	Testimony	C. Richard Clarke	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 12	Income and Property Taxes	Testimony	Elizabeth Min	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 13	Working Cash	Testimony	Patricia Martin	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 14	Gas and Electric Distribution and Generation Rate Base	Testimony	Charles M. Marre	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 15	Electric Revenues at Present Rates	Testimony	Jamie T. Lubeck	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 16	Gas Revenues at Present Rates	Testimony	Katia Sokoloff	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 17	Other Operating Revenues	Testimony	Stephen J. Koenig	Craig Buchsbaum		
	PG&E-10	PG&E	Ch. 18	Calculation of Revenue Requirement	Testimony	Nielson D. Jones	Craig Buchsbaum		
	PG&E-10	PG&E	App. A	Detailed Results of Operations Tables	Testimony	Nielson D. Jones	Craig Buchsbaum		
	PG&E-10 WP 2-8	PG&E	Ch. 2-8	Results of Operations Workpapers Supporting Chs. 2-8	Workpapers	Multiple	Craig Buchsbaum		
	PG&E-10 WP 9	PG&E	Ch. 9	Results of Operations Workpapers Supporting Ch. 9	Workpapers	Charles M. Marre	Craig Buchsbaum		
	PG&E-10 WP 10	PG&E	Ch. 10	Results of Operations Workpapers Supporting Ch. 10	Workpapers	Charles M. Marre	Craig Buchsbaum		
	PG&E-10 WP 11 V1	PG&E	Ch. 11	Results of Operations Workpapers Supporting Ch. 11, Vol.1	Workpapers	C. Richard Clarke	Craig Buchsbaum		
	PG&E-10 WP 11 V2	PG&E	Ch. 11	Results of Operations Workpapers Supporting Ch. 11, Vol.2	Workpapers	C. Richard Clarke	Craig Buchsbaum		
	PG&E-10 WP 12 V1	PG&E	Ch. 12	Results of Operations Workpapers Supporting Ch. 12, Vol. 1	Workpapers	Elizabeth Min	Craig Buchsbaum		
	PG&E-10 WP 12 V2	PG&E	Ch. 12	Results of Operations Workpapers Supporting Ch. 12, Vol. 2	Workpapers	Elizabeth Min	Craig Buchsbaum		
	PG&E-10 WP 13-17	PG&E	Ch. 13-17	Results of Operations Workpapers Supporting Chs. 13-17	Workpapers	Multiple	Craig Buchsbaum		
	PG&E-10 WP 18 V1	PG&E	Ch. 18	Results of Operations Workpapers Supporting Ch. 18, Vol. 1	Workpapers	Nielson D. Jones	Craig Buchsbaum		
	PG&E-10 WP 18 V2	PG&E	Ch. 18	Results of Operations Workpapers Supporting Ch. 18, Vol. 2	Workpapers	Nielson D. Jones	Craig Buchsbaum		

PACIFIC GAS AND ELECTRIC COMPANY  
2017 General Rate Case  
Current Exhibit List

Hearing Room Exhibit Number	Document	Party	Chapter	Title/Description	Doc Type	Witness	Attorney	Date Identified	Date Admitted
	PG&E-11	PG&E		Post Test-Year Ratemaking					
	PG&E-11	PG&E	Ch. 1	Post Test-Year Ratemaking Proposal	Testimony	David S. Thomason	Craig Buchsbaum		
	PG&E-11	PG&E	Ch. 2	Attrition and Proposed Attrition Changes	Testimony	David S. Thomason	Craig Buchsbaum		
	PG&E-11	PG&E	Ch. 3	Rate Base Growth in Attrition Years and Related Costs	Testimony	Charles M. Marre	Craig Buchsbaum		
	PG&E-11 WP 2-3	PG&E	Ch. 2-3	Post Test-Year Ratemaking Workpapers Supporting Chs. 2-3	Workpapers	David S. Thomason and Charles M. Marre	Craig Buchsbaum		
	PG&E-12	PG&E		General Report					
	PG&E-12	PG&E	Ch. 1	Introduction	Testimony	Shelly J. Sharp	Craig Buchsbaum		
	PG&E-12	PG&E	Ch. 2	Balance Sheet and Statement of Operations	Testimony	Jennifer K. Gardyne	Craig Buchsbaum		
	PG&E-12	PG&E	Ch. 3	Escalation Rates	Testimony	David Millar	Craig Buchsbaum		
	PG&E-12	PG&E	Ch. 4	Electric Billings and Sales	Testimony	David Millar	Craig Buchsbaum		
	PG&E-12	PG&E	Ch. 5	Gas Billings and Sales	Testimony	Ipek Connolly	Craig Buchsbaum		
	PG&E-12	PG&E	Ch. 6	Illustrative Electric Rates	Testimony	Margot Everett	Craig Buchsbaum		
	PG&E-12	PG&E	Ch. 7	Illustrative Gas Rates	Testimony	Margot Everett	Craig Buchsbaum		
	PG&E-12	PG&E	Ch. 8	Compliance with Prior Commission Decisions	Testimony	Shelly J. Sharp	Steve Frank		
	PG&E-12	PG&E	Ch. 9	Balancing Accounts	Testimony	Teresa J. Hoglund	Craig Buchsbaum		
	PG&E-12	PG&E	Ch. 10	Maintaining PG&E's Financial Health	Testimony	Dick Patterson	Craig Buchsbaum		
	PG&E-12	PG&E	App. A	Glossary of Acronyms and Abbreviations	Testimony	Shelly J. Sharp	Craig Buchsbaum		
	PG&E-12	PG&E	App. B	Major Work Category Glossary	Testimony	Shelly J. Sharp	Craig Buchsbaum		
	PG&E-12 WP 3, 6, 7	PG&E	Ch. 3,6,7	General Report Workpapers Supporting Chs. 3, 6, 7	Workpapers	Multiple	Craig Buchsbaum		
	PG&E-13	PG&E		Statements of Qualifications	Testimony	All	Steve Frank		

# Attachment F

## PG&E Contact List

## Contact List

<b>Name</b>	<b>Telephone</b>	<b>E-mail Address</b>	<b>Area of Expertise</b>
Steven Frank	(415) 973-6976	SWF5@pge.com	Lead Attorney
Shelly Sharp	(415) 973-2636	SSM3@pge.com	GRC Project Manager
Minci Han	(415) 973-1140	M2H9@pge.com	Assistant Project Manager
Tessa Carlberg	(415) 973-7950	T3M3@pge.com	Discovery Manager
Scott Noyer, Kevin Oram, and Amanda Pinkston	(415) 973-3170	GRC2017@pge.com	GRC Case Coordinators
Craig Buchsbaum	(415) 973-4844	CMB3@pge.com	Attorney for Exhibits PG&E-8 (Chapters 4-5), PG&E-10, PG&E-11 and PG&E-12
Michael Klotz	(415) 973-7565	M1KE@pge.com	Attorney for Exhibits PG&E-6, PG&E-8 (Chapters 1-3, 6 and 7), and PG&E 9
Erich Lichtblau	(415) 973-1133	EFL5@pge.com	Attorney for Exhibit PG&E-3
William Manheim	(415) 973-6628	WVM3@pge.com	Attorney for Exhibit PG&E-5
Michael Reidenbach	(415) 973-2491	JMRb@pge.com	Attorney for Exhibit PG&E-7
Peter Van Mieghem	(415) 973-2902	PPV1@pge.com	Attorney for Exhibit PG&E-4

## Attachment G

### Organizational Information for PG&E Witnesses

**Exhibit 1 - Summary of PG&E's 2017 General Rate Case**

Exhibit	Chapter	Chapter Title	Witness	LOB	Witness Position Title	Dept. Name	VP Area
1	1	Introduction and Summary of PG&E's 2017 General Rate Case	Shelly J. Sharp	Regulatory Relations	Senior Director, GRC and Regulatory Operations	GRC and Regulatory Operations	CPUC Regulatory Relations

**Exhibit 2 - Safety, Risk and Integrated Planning**

Exhibit	Chapter	Chapter Title	Witness	LOB	Witness Position Title	Dept. Name	VP Area
2	1	Introduction	Shelly J. Sharp	Regulatory Relations	Senior Director, GRC and Regulatory Operations	GRC and Regulatory Operations	CPUC Regulatory Relations
2	2	Safety of the Public and Employees	Desmond A. Bell	Safety and Shared Services	Senior Vice President, Safety and Shared Services	Safety and Shared Services	Safety and Shared Services
2	3	Risk Assessment and Mitigation	Anil K. Suri	Finance	Vice President, Chief Risk and Audit Officer	Risk and Audit	Finance
2	4	Integrated Planning Process	Jason P. Wells	Finance	Vice President, Business Finance	Business Finance	Finance
2	5	Maturity and Integration of Risk, Asset, and Investment Management at PG&E: An Assessment Report	Grant Davies	N/A	External Consultant	N/A	N/A

**Exhibit 3 - Gas Distribution**

Exhibit	Chapter	Chapter Title	Witness	LOB	Witness Position Title	Dept. Name	VP Area
3	1	Gas Distribution Operations Policy and Introduction	Nickolas Stavropoulos	Gas	President, Gas Operations	Gas Operations	Gas Operations
3	2	Forecast Summary	William E. Mojica	Gas	Director, Gas Investment Planning and Resource Management	Gas Investment Planning and Resource Management	Gas Business and Performance Management
3	3	Gas Distribution Risk Management and Investment Planning	Terry White; William E. Mojica	Gas	Director, Facility Integrity Management and Technology Services/Director, Gas Investment Planning and Resource Management	Facility Integrity Management and Technology Services/Gas Investment Planning and Resource Management	Asset and Risk Management/Gas Business and Performance Management
3	4	Asset Family – Distribution Mains and Services	Raymond Thierry	Gas	Director, Distribution Integrity Management	Distribution Integrity Management	Asset and Risk Management
3	5	Asset Families – Measurement and Control, and Compressed Natural Gas Stations	Terry White	Gas	Director, Facility Integrity Management and Technology Service	Facility Integrity Management and Technology Services	Asset and Risk Management
3	6A	Distribution Operations and Maintenance	Rich W. Yamaguchi	Gas	Director, Gas Field Services North	Field Services North	Gas Transmission and Distribution Operations
3	6B	Corrosion Control	Preston Ford	Gas	Manager, Corrosion Engineering	Corrosion Engineering and Services	Asset and Risk Management
3	6C	Leak Management	John Higgins	Gas	Vice President, Gas Transmission and Distribution Operations	Gas Transmission and Distribution Operations	Gas Transmission and Distribution Operations
3	7	Gas System Operations	Melvin J. Christopher	Gas	Senior Director, Gas System Operations	Gas System Operations	Gas Operations
3	8	New Business and Work at the Request of Others	Nina B. Bubnova	Electric	Senior Manager, SPE Center of Excellence	Electric Distribution Business Operations	EDO Distribution Operations
3	9	Gas Operations Technology	Joseph Sanzo	Gas	Director, Technology Strategy and Solutions	Technology, Strategy and Solutions	Asset and Risk Management



Witness Information

3	10	Other Distribution Support Plans	William E. Mojica	Gas	Director, Gas Investment Planning and Resource Management	Gas Investment Planning and Resource Management	Gas Business and Performance Management
---	----	----------------------------------	-------------------	-----	---	---	---

## Exhibit 4 - Electric Distribution

Exhibit	Chapter	Chapter Title	Witness	LOB	Witness Position Title	Dept. Name	VP Area
4	1	Electric Distribution Operations Policy and Introduction	Geisha J. Williams	Electric	President, Electric	Electric	Electric
4	1A	Electric Distribution Operations Forecast Summary	Matthew T. Pender	Electric	Director, Performance Mgmt	ESBM Performance Management	ESBM Strategic Business Management
4	2	Electric Distribution Risk Management	Eric Back	Electric	Director, Compliance & Risk Management	EAM Compliance and Risk Management	EAM Asset Management
4	3	Emergency Preparedness and Response	Barry D. Anderson	Electric	VP, Emerg Preparedness and Operations	Emergency Preparedness and Operations	Emergency Preparedness and Operations
4	4	Electric Emergency Recovery	Michael E. Swanson	Electric	Director, Restoration Fields Ops	Restoration Field Operations	Emergency Preparedness and Operations
4	5	Distribution System Operations	Michael E. Swanson	Electric	Director, Restoration Fields Ops	Restoration Field Operations	Emergency Preparedness and Operations
4	6	Electric Distribution Maintenance	Greg Kiraly	Electric	Sr. VP, Elec Trans and Distribution	EDO Distribution Operations	EDO Distribution Operations
4	7	Vegetation Management	Peter Dominguez	Electric	Manager, Vegetation Management Planning	VM Governance & Support	EAM Asset Management
4	8	Pole Asset Management	Karen S. O'Connor	Electric	Mgr, Elec. Dist Asset Strat. & Program	EAM Dist. Asset Strategy & Development	EAM Asset Management
4	9	Electric Distribution Reliability	Steve E. Calvert	Electric	Sr. Mgr, Asset Dvlpmnt Reliab. & Strat	EAM Distribution Asset Strategy & Reliability	EAM Asset Management
4	10	Distribution Automation and System Protection	Steve E. Calvert	Electric	Sr. Mgr, Asset Dvlpmnt Reliab. & Strat	EAM Distribution Asset Strategy & Reliability	EAM Asset Management
4	11	Underground Asset Management	Steve E. Calvert	Electric	Sr. Mgr, Asset Dvlpmnt Reliab. & Strat	EAM Distribution Asset Strategy & Reliability	EAM Asset Management
4	12	Substation Asset Management	Manho Yeung	Electric	Sr Dir, Elec Sys Planning & Reliability	EAM System Planning and Reliability	EAM Asset Management
4	13	Electric Distribution Capacity	Satvir Nagra	Electric	Manager, Electric Distribution Planning	EAM Distribution Planning - South	EAM Asset Management
4	14	Electric Distribution Engineering and Planning	Satvir Nagra	Electric	Manager, Electric Distribution Planning	EAM Distribution Planning - South	EAM Asset Management
4	15	Electric Distribution Technology	Kevin J. Dasso	Electric	Sr Dir, Elec Technology & Info Strategy	EAM Techonolgy and Information Strategy	EAM Asset Management
4	16	Electric Distribution Mapping and Records Management	Kevin J. Dasso	Electric	Sr Dir, Elec Technology & Info Strategy	EAM Technology and Information Strategy	EAM Asset Management
4	17	New Business and Work at the Request of Others	Nina B. Bubnova	Electric	Sr, Mgr, SPE Center of Excellence	Service Planning and Estimating CoE	EDO Distribution Operations
4	18	Rule 20A	Andrea A. Samonek	Electric	Manager, Internal Program Management	Internal Program Management	EDO Distribution Operations
4	19	Electric Distribution Support Activities	Matthew T. Pender	Electric	Director, Performance Mgmt	ESBM Performance Management	ESBM Strategic Business Management

## Exhibit 5 - Energy Supply

Exhibit	Chapter	Chapter Title	Witness	LOB	Witness Position Title	Dept. Name	VP Area
5	1	Energy Supply Operations Policy	Fong Wan	Electric	Senior Vice President, Energy Policy and Procurement	Energy Procurement	Energy Procurement
5	2	Energy Supply Risk Management	Eric Back; Cary D. Harbor	Electric	Director, Compliance & Risk Management/Director, Compliance Alliance & Risk	EAM Compliance and Risk Management/Compliance Alliance and Risk	EAM Asset Management/Nuclear

Witness Information

5	3	Nuclear Operations Costs	Cary D. Harbor	Electric	Director, Compliance Alliance & Risk	Compliance Alliance and Risk	Nuclear
5	4	Hydro Operations Costs	Stephanie A. Maggard	Electric	Director, Planning	Power Generation - Planning	Power Generation
5	5	Fossil and Other Generation Operations Costs	Steve Royall	Electric	Director, Hydro Operations & Maintenance	Operations and Maintenance	Power Generation
5	6	Energy Procurement Administration Costs	Janice Y. Frazier-Hampton	Electric	Director, Integrated Resource Planning	Integrated Resource Planning	Energy Procurement
5	7	Energy Supply Technology Programs	Dana Docherty	Information Technology	Senior Director Energy Supply Technology	Energy Supply Technology	Business Technology
5	8	Energy Supply Ratemaking	Stephanie A. Maggard	Electric	Director, Planning	Power Generation - Planning	Power Generation

## Exhibit 6 - Customer Care

Exhibit	Chapter	Chapter Title	Witness	LOB	Witness Position Title	Dept. Name	VP Area
6	1	Customer Care Policy	Laurie M. Giammona	Customer Care	Senior Vice President & CCO	Customer Care	Customer Care
6	2	Customer Engagement	Jess A. Brown	Customer Care	Director, Bay Area Regional ES&S	Energy Solutions and Service - Bay Region / Corp	Customer Service
6	3	Pricing Products	Maril Pitcock	Customer Care	Director, Pricing Products	CES Pricing Products	Customer Energy Solutions
6	4	Contact Centers	Scott T. Sanford	Customer Care	Senior Director, Customer Service Operations and Support	Customer Service Operations and Support	Customer Service
6	5	Customer Service Offices	Scott T. Sanford	Customer Care	Senior Director, Customer Service Operations and Support	Customer Service Operations and Support	Customer Service
6	6	Customer Retention	Vijay Bhaskaran	Customer Care	Strategic Analyst, Principal	Service Analysis	Customer Energy Solutions
6	7	Metering	Craig W. Kurtz	Customer Care	Senior Manager, Field Meter Operations	Field Metering Operations	Customer Operations
6	8	Billing, Revenue and Credit	Travis Browne	Customer Care	Director, Billing Operations	Billing Operations	Customer Operations
6	9	Customer Operations Regulatory Strategy	Darleen D. DeRosa	Customer Care	Director, Customer Operations Regulatory Strategy	Records and Project Management	Customer Operations
6	10	Information Technology Programs	Michael Glass	Information Technology	Director, Business Tech. (CC-DSS)	Customer Care Technology	Business Technology

## Exhibit 7 - Shared Services and Information Technology

Exhibit	Chapter	Chapter Title	Witness	LOB	Witness Position Title	Dept. Name	VP Area
7	1	Shared Services and Information Technology Policy and Introduction	Karen A. Austin, Desmond A. Bell	Information Technology/Shared Services	Sr. VP & Chief Information Officer/SVP, Safety & Shared Svcs	Information Technology/Safety & Shared Services	Information Technology/Safety & Shared Services
7	2	Safety Department	Andrew K. Williams	Shared Services	VP, Safety, Health and Environment	Safety, Health and Environment	Safety, Health and Environment
7	3	Transportation Services	David M. Meisel	Shared Services	Senior Director, Transportation Services	Transportation Services	Safety & Shared Services
7	4	Materials	Lance C. Schultz	Shared Services	Director, Materials	Materials & Distribution Operations	Supply Chain/Materials
7	5	Sourcing	Benjamin S. Moglen	Shared Services	Director, Supply Chain Strategy & Ops	Supply Chain Strategy and Operations	Supply Chain/Materials
7	6	Real Estate	Helen Vu	Shared Services	Director, Corporate Real Estate	Corporate Real Estate Strategy & Service	Safety & Shared Services
7	7	Environmental Program	Andrew K. Williams	Shared Services	VP, Safety, Health and Environment	Safety, Health and Environment	Safety, Health and Environment
7	8A	Enterprise Corrective Action Program	Javid Khan	Gas Operations	Sr. Director, Enterprise Programs	Enterprise Programs	Enterprise Programs

Witness Information

7	8B	Enterprise Records and Information Management	Javid Khan; Mike Swatek	Gas Operations; Information Technology	Enterprise Programs, Sr. Director; Enterprise Arch, Info & Integ., Sr. Mgr.	Enterprise Programs; AIS Architecture	Enterprise Programs; Infrastructure & Operations
7	9	Information Technology	John Nichols	Information Technology	Director, Enterprise Architecture/Chief	Infrastructure & Operations	Infrastructure & Operations
7	10	Information Technology Cybersecurity	Kooros M. Mahmudi	Information Technology	Dir, Risk & Strategy	Risk Advisory Services	Information Security

## Exhibit 8 - Human Resources

Exhibit	Chapter	Chapter Title	Witness	LOB	Witness Position Title	Dept. Name	VP Area
8	1	Human Resources Policy and Overview	John R. Simon	Human Resources	EVP Corp Svcs & Human Resources	Corporate Svcs & HR	Corporate Svcs & HR
8	2	Talent Management and Diversity	Bradley S. Michael	Human Resources	Director, Talent Connect Service Center	Talent Pipeline Development & Operations	Talent Management and Inclusion
8	2A	Report on Diversity and Inclusion	Bradley S. Michael	Human Resources	Director, Talent Connect Service Center	Talent Pipeline Development & Operations	Talent Management and Inclusion
8	3	Compensation, STIP and Labor Escalation	John Lowe	Human Resources	Director, Compensation	Executive Comp	Vice President - Human Resources
8	4	Employee Benefits	Dora M. Choy, Ted Huntley	Human Resources	Principal Benefits Consultant/Director, Investments & Benefits Finance	Health & Welfare/Investments and Benefit Finance	Safety, Health and Environment/Treasury
8	5	Disability and Workers' Compensation	Bryon E. Bass, Ted Huntley	Human Resources	Integrated Disability Management/Director, Investments & Benefits Finance	Integrated Disability Management/Investments and Benefit Finance	Safety, Health and Environment/Treasury
8	6	Other HR Functions	Mary King	Human Resources	Vice President, Human Resources	Vice President - Human Resources	Vice President - Human Resources
8	7	Total Compensation Study	Shane Bartling, Richard Beal, Catherine Furco, Catherine Hartmann, Patrick Moloney (Consultants)	Human Resources	Contractors	Contractors	Contractors

## Exhibit 9 - Administrative and General

Exhibit	Chapter	Chapter Title	Witness	LOB	Witness Position Title	Dept. Name	VP Area
9	1	Introduction	Anna Lee	Regulatory Relations	Supervisor, Revenue Requirements	Revenue Requirements & Analysis	CPUC Regulatory Relations
9	2	Finance Organization Costs	Jamie L. Martin	Finance	Director, Economic & Project Analysis	Economic & Project Analysis	Finance
9	3	Risk and Audit Department Costs and Insurance Expenses	Megan S. Janis	Compliance and Ethics	Director, Compliance and Ethics	Compliance & Ethics	Chief Ethics and Compliance Office
9	4	Regulatory Affairs Department Costs	Margot C. Everett	Regulatory Relations	Senior Director, Customer Proceedings & Rates	Customer Proceedings & Rates	CPUC Regulatory Relations
9	5	Law Department and Related Costs	Sanford L. Hartman	Law	Vice President and Managing Director	Law	Senior Vice President & General Counsel
9	6	PG&E Corporation and PG&E Executive Offices; and Corporate Secretary Department Costs	Linda Y.H. Cheng	Law	Vice President	Corporate Governance & Corporate Secretary	Senior Vice President & General Counsel
9	7	Corporate Affairs Department Costs	Susan C. Martinez	Community Relations	Chief of Staff	Community Relations	External Affairs and Public Policy
9	8	A&G Ratemaking Adjustments	Judith S. Gutierrez	Regulatory Relations	Expert Revenue Requirements Analyst	Revenue Requirements & Analysis	CPUC Regulatory Relations

**Exhibit 10 - Results of Operations**

Exhibit	Chapter	Chapter Title	Witness	LOB	Witness Position Title	Dept. Name	VP Area
10	1	Introduction	Nielson D. Jones	Regulatory Relations	Manager, Regulatory Results of Operations	Revenue Requiremnets & Analysis	CPUC Regulatory Relations
10	2	SAP FERC Translation	Bryan G. Wong	Regulatory Relations	Expert Revenue Requirements Analyst	Revenue Requiremnets & Analysis	CPUC Regulatory Relations
10	3	Electric Distribution O&M Expense	Bryan G. Wong	Regulatory Relations	Expert Revenue Requirements Analyst	Revenue Requiremnets & Analysis	CPUC Regulatory Relations
10	4	Gas Distribution O&M Expense	Bryan G. Wong	Regulatory Relations	Expert Revenue Requirements Analyst	Revenue Requiremnets & Analysis	CPUC Regulatory Relations
10	5	Customer Accounts Expense	Bryan G. Wong	Regulatory Relations	Expert Revenue Requirements Analyst	Revenue Requiremnets & Analysis	CPUC Regulatory Relations
10	6	Generation O&M Expense	Bryan G. Wong	Regulatory Relations	Expert Revenue Requirements Analyst	Revenue Requiremnets & Analysis	CPUC Regulatory Relations
10	7	Administrative and General Expenses	Judith S. Gutierrez	Regulatory Relations	Expert Revenue Requirements Analyst	Revenue Requiremnets & Analysis	CPUC Regulatory Relations
10	8	Payroll and Other Taxes	Elaine Silveria	Treasury	Manager, Payroll Services	Payment Services	Treasury
10	9	Electric, Gas and Common Plant	Charles M. Marre	Finance	Senior Director, Capital Accounting	Capital Accounting	Vice President and Controller
10	10	Depreciation Reserve and Expense	Charles M. Marre	Finance	Senior Director, Capital Accounting	Capital Accounting	Vice President and Controller
10	11	Depreciation Study	C. Richard Clarke	External Consultant	N/A	N/A	N/A
10	12	Income and Property Taxes	Elizabeth Min	Tax	Director, Tax Accounting & Compliance	Tax Accounting & Compliance	Tax 01
10	13	Working Cash	Patricia Martin	Treasury	Manager, Corporate Finance	Banking & Money Management	Treasury
10	14	Gas and Electric Distribution and Generation Rate Base	Charles M. Marre	Finance	Senior Director, Capital Accounting	Capital Accounting	Vice President and Controller
10	15	Electric Revenues at Present Rates	Jamie T. Lubeck	Regulatory Relations	Expert Rate Analyst	Customer Proceedings & Rates	CPUC Regulatory Relations
10	16	Gas Revenues at Present Rates	Katia Sokoloff	Regulatory Relations	Expert Rate Analyst	Customer Proceedings & Rates	CPUC Regulatory Relations
10	17	Other Operating Revenues	Stephen J. Koenig	Regulatory Relations	Expert Revenue Requirements Analyst	Revenue Requiremnets & Analysis	CPUC Regulatory Relations
10	18	Calculation of Revenue Requirement	Nielson D. Jones	Regulatory Relations	Manager, Regulatory Results of Operations	Revenue Requiremnets & Analysis	CPUC Regulatory Relations
10	App A	Detailed Results of Operations - Tables	Nielson D. Jones	Regulatory Relations	Manager, Regulatory Results of Operations	Revenue Requiremnets & Analysis	CPUC Regulatory Relations

**Exhibit 11 - Post Test-Year Ratemaking**

Exhibit	Chapter	Chapter Title	Witness	LOB	Witness Position Title	Dept. Name	VP Area
11	1	Post Test-Year Ratemaking Proposal	David S. Thomason	Finance	Senior Director, Financial Forecasting & Analysis	Financial Forecasting & Analysis	Vice President and Controller
11	2	Attrition and Proposed Attrition Changes	David S. Thomason	Finance	Senior Director, Financial Forecasting & Analysis	Financial Forecasting & Analysis	Vice President and Controller
11	3	Rate Base Growth in Attrition Years and Related Costs	Charles M. Marre	Finance	Senior Director, Capital Accounting	Capital Accounting	Vice President and Controller

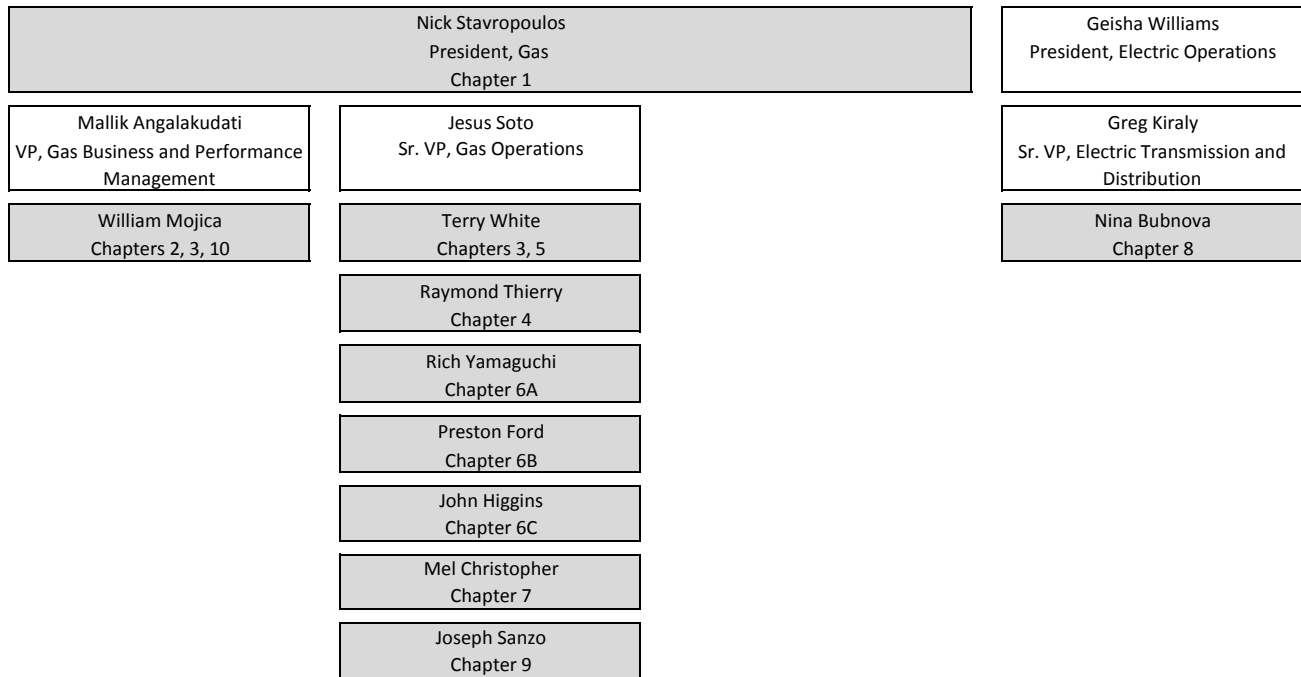
**Exhibit 12 - General Report**

Exhibit	Chapter	Chapter Title	Witness	LOB	Witness Position Title	Dept. Name	VP Area
12	1	Introduction	Shelly J. Sharp	Regulatory Relations	Senior Director, GRC and Regulatory Operations	GRC & Regulatory Operations	CPUC Regulatory Relations

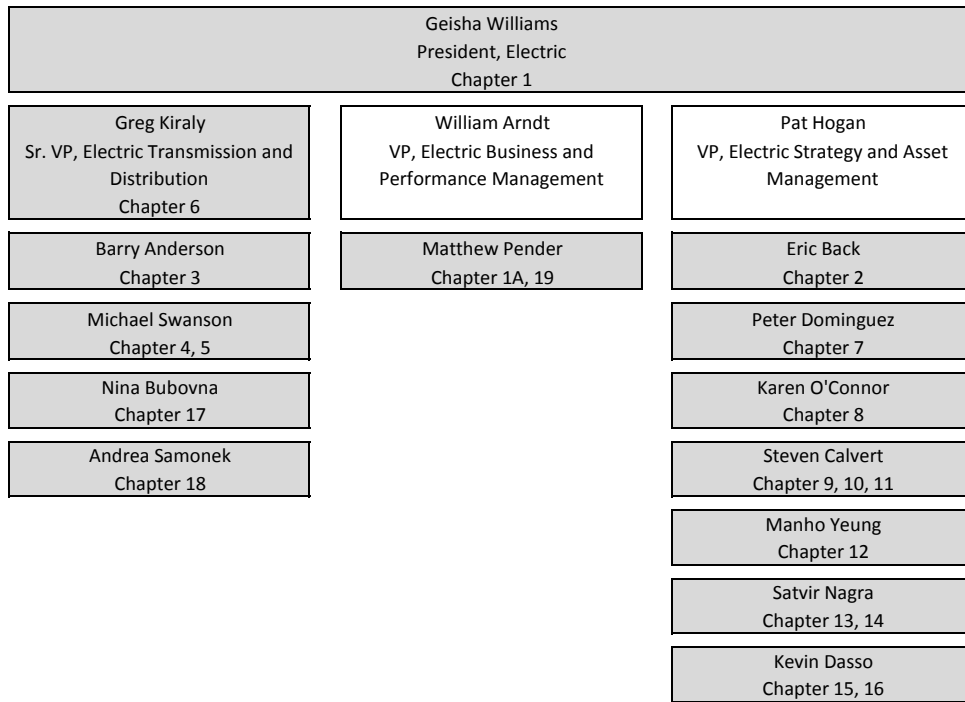
Witness Information

12	2	Balance Sheet and Statement of Operations	Jennifer J. Gardyne	Accounting	Senior Directory, Corporate Accounting	Corporate Accounting	Vice President and Controller
12	3	Escalation Rates	David Millar	Regulatory Relations	Expert Load Forecasting Analyst	Customer Proceedings & Rates	CPUC Regulatory Relations
12	4	Electric Billings and Sales	David Millar	Regulatory Relations	Expert Load Forecasting Analyst	Customer Proceedings & Rates	CPUC Regulatory Relations
12	5	Gas Billings and Sales	Ipek Connolly	Regulatory Relations	Principal Load Forecasting Analyst	Customer Proceedings & Rates	CPUC Regulatory Relations
12	6	Illustrative Electric Rates	Margot C. Everett	Regulatory Relations	Senior Director, Customer Proceedings & Rates	Customer Proceedings & Rates	CPUC Regulatory Relations
12	7	Illustrative Gas Rates	Margot C. Everett	Regulatory Relations	Senior Director, Customer Proceedings & Rates	Customer Proceedings & Rates	CPUC Regulatory Relations
12	8	Compliance with Prior Commission Decisions	Shelly J. Sharp	Regulatory Relations	Senior Director, GRC and Regulatory Operations	GRC & Regulatory Operations	CPUC Regulatory Relations
12	9	Balancing Accounts	Teresa J. Hoglund	Regulatory Relations	Director, Revenue Requirements & Analysis	Revenue Requirements & Analysis	CPUC Regulatory Relations
12	10	Maintaining PG&E's Financial Health	Dick Patterson	Finance	Senior Manager, Finance	Economic & Project Analysis	Finance
12	App A	Glossary of Acronyms and Abbreviations	Shelly J. Sharp	Regulatory Relations	Senior Director, GRC and Regulatory Operations	GRC and Regulatory Operations	CPUC Regulatory Relations
12	App B	Major Work Category Glossory	Shelly J. Sharp	Regulatory Relations	Senior Director, GRC and Regulatory Operations	GRC and Regulatory Operations	CPUC Regulatory Relations

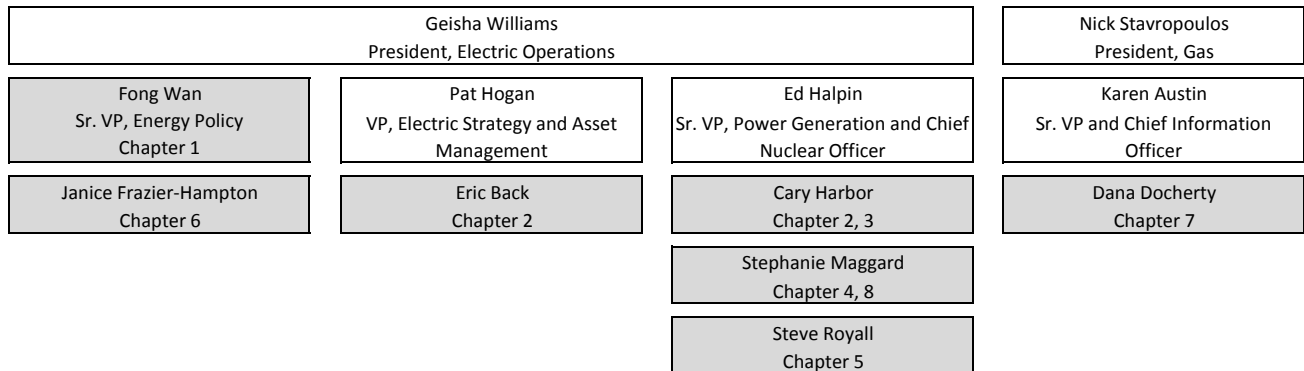
**Pacific Gas & Electric Company**  
**2017 GRC Organizational Chart**  
**Exhibit 3, Gas Distribution**  
**Case Manager: Nathalie Oram**



**Pacific Gas & Electric Company**  
**2017 GRC Organizational Chart**  
**Exhibit 4, Electric Distribution**  
**Case Manager: Kathy Wade**



**Pacific Gas & Electric Company**  
**2017 GRC Organizational Chart**  
**Exhibit 5, Energy Supply**  
**Case Manager: Stephanie Maggard**

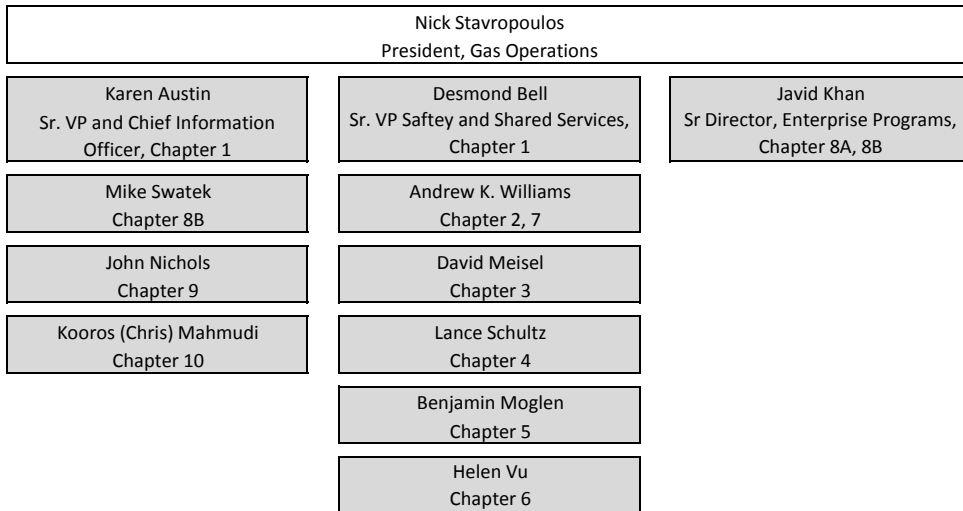




**Pacific Gas & Electric Company**  
**2017 GRC Organizational Chart**  
**Exhibit 6, Customer Care**  
**Case Manager: Elvira Howe**

Geisha Williams President, Electric Operations	Nick Stavropoulos President, Gas Operations
Laurie Giammona Sr. VP and CCO, Chapter 1	Karen Austin Sr. VP and CIO
Jess A. Brown Chapter 2	Michael Glass Chapter 10
Maril Wright Chapter 3	
Scott Sanford Chapter 4, 5	
Vijay Bhaskaran Chapter 6	
Craig W. Kurtz Chapter 7	
Travis Browne Chapter 8	
Darleen DeRosa Chapter 9	

**Pacific Gas & Electric Company**  
**2017 GRC Organizational Chart**  
**Exhibit 7, Shared Services and IT**  
**Case Manager (Shared Services): Audrey Marsalek**  
**Case Manager (IT): Geri Callejas**

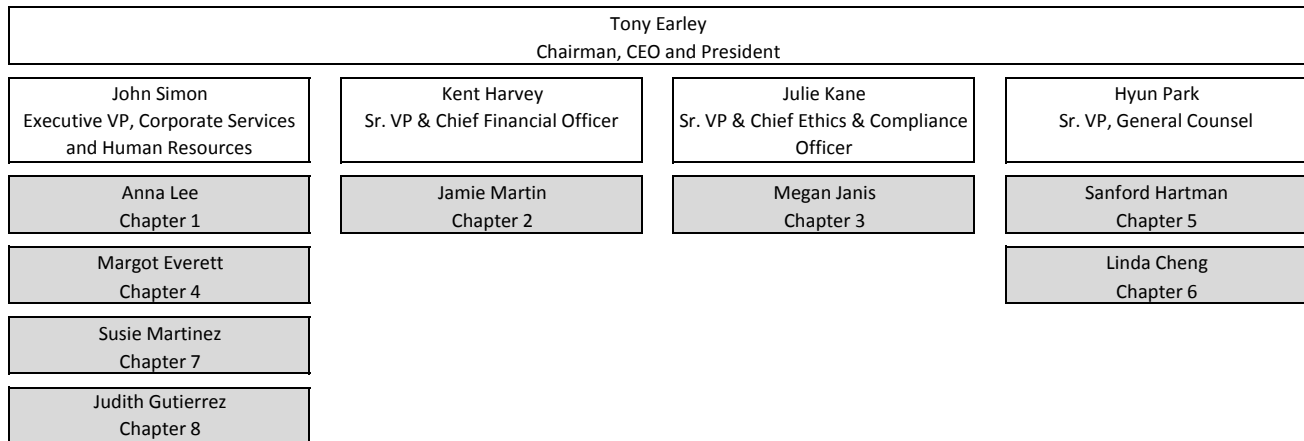


**Pacific Gas & Electric Company**  
**2017 GRC Organizational Chart**  
**Exhibit 8, Human Resources**  
**Case Manager: Janet Redmond**

John Simon Executive VP, Corporate Services & Human Resources Chapter 1		Kent Harvey Sr. VP & Chief Financial Officer	Nick Stavropoulos President, Gas
Laura Butler VP, Talent Management and Chief Diversity Officer	Mary King VP, Human Resources, Chapter 6	Nicholas Bijur VP and Treasurer	Desmond Bell Sr. VP Safety and Shared Services
Brad Michael Chapter 2, 2A	John Lowe Chapter 3	Thomas (Ted) Huntley Chapter 4, 5	Dora Choy Chapter 4
			Bryon Bass Chapter 5

\*\*Chapter 7, Total Compensation Study was completed by external consultants, Towers Watson

**Pacific Gas & Electric Company**  
**2017 GRC Organizational Chart**  
**Exhibit 9, Administrative and General**  
**Case Manager: Tom Varghese**



## Attachment H

### Internet Discovery Access Agreement

**PACIFIC GAS AND ELECTRIC COMPANY  
REGULATORY AFFAIRS  
*INTERNET DISCOVERY ACCESS AGREEMENT***

This Internet Discovery Access Agreement (“Agreement”) is made by and between Pacific Gas and Electric Company (“PG&E”) and the individual User identified below. This Agreement authorizes the User to access and retrieve in electronic form certain discovery documents in the case, under the terms and conditions in Parts I and II below.

**I. GENERAL INFORMATION**

***Purpose of This Agreement***

This Agreement provides the basis for a User to access discovery documents for a particular regulatory case contained on PG&E’s Regulatory Cases Internet site.

***PG&E Data Requests and Responses***

Data requests to PG&E from various parties and PG&E’s responses to those data requests, as well as data requests propounded by PG&E and parties’ responses to those data requests, are available unless the response or its attachments contain confidential or proprietary information provided to a regulatory agency under applicable law or regulations that limit access to such material, or the response was supplied to a party subject to a non-disclosure agreement or protective order. Documents produced in response to a request for production of documents or form of discovery other than a data request are not available on the site.

**II. TERMS AND CONDITIONS**

***User Responsibilities***

Each User of the discovery-access portion of the PG&E Regulatory Cases Internet site for a particular case is responsible for and accepts the following obligations. User shall:

1. (a) Use only the User Name and Password assigned after completion of PG&E’s site registration procedures (which allow the Users to choose their own User Name and Password), (b) not share or disclose the User Name or Password to any other person within or outside User’s organization, and (c) accept responsibility for all use of the User Name and Password whether or not expressly authorized by User.
2. Use only the site navigation and document retrieval facilities provided by PG&E’s site structure when accessing or downloading information made available under this Agreement.
3. Never modify content on the site or the manner in which content is organized or presented. Should User believe that any such modification has occurred, User shall notify PG&E of such belief.

4. Comply with all applicable regulations and orders issued by the regulatory agency with jurisdiction over this case that govern the disclosure or use of discovery responses obtained from PG&E's site.
5. Notify PG&E if the User becomes aware of any information inadvertently accessible through the site, including but not limited to information that is marked, or intended to be, confidential or protected by the attorney-client privilege or work product doctrines.

### ***Representations and Liability***

PG&E represents that to the best of its knowledge, discovery documents accessible under this Agreement are as described as posted on its site.

Apart from any obligation or liability under the laws, regulations and orders applicable to discovery in the case to which this Agreement applies, neither PG&E, nor its directors, officers, employees and agents will be liable to the User (a) for any cost, damage or loss in connection with this Agreement or its performance or non-performance, or (b) for any incidental, indirect, special or consequential cost, damage or loss.

### ***General Terms***

This Agreement will be governed by, and construed and enforced in accordance with, the laws of the State of California without regard to the principles of conflicts of laws thereunder, except to the extent that certain matters are pre-empted by federal law. This Agreement represents the Parties' complete and exclusive agreement concerning the subject matter hereof and supersedes all prior offers, communications and agreements, written and oral, as to such subject matter. No Party's failure to exercise or delay in exercising any right, remedy, power or privilege under this Agreement will operate as a waiver thereof.

### ***Term and Termination***

This Agreement will become effective when accepted by PG&E. Either User or PG&E may terminate it by written notice to the other Party, and termination will become effective upon receipt by the other Party. Whether or not PG&E terminates this Agreement, PG&E reserves the right to terminate without notice any User Name and Password that PG&E reasonably believes is being used by an unauthorized person.

### ***PG&E Contact: Obtaining Assistance***

Questions regarding the operation of the site should be directed to:

[RegRelCPUCcases@pge.com](mailto:RegRelCPUCcases@pge.com).

## **III. USER AGREEMENT FOR INTERNET DISCOVERY ACCESS**

User has read and hereby agrees to the terms and conditions, including User responsibilities, for access to and use of the discovery-access portion of the PG&E Regulatory Cases Internet site. User represents that he or she is duly authorized by the organization and, if different, the case party shown below to enter into this Agreement. The Parties agree that electronic submission by User to PG&E of this completed form (without alteration of its terms) constitutes acceptance by User and PG&E, even if not signed by the Parties.

User requests issuance of a User Name/ID and password for access to the discovery documents for the case identified below:

Case Name: \_\_\_\_\_

Docket No.: \_\_\_\_\_

User Name: \_\_\_\_\_ User Title: \_\_\_\_\_

User ID (Created During Online Enrollment): \_\_\_\_\_

User Organization: \_\_\_\_\_

User Mailing Address: \_\_\_\_\_

User Email Address: \_\_\_\_\_

User Telephone Number: (     )     -     \_\_\_\_\_

Party or Governmental Entity Represented by User: \_\_\_\_\_

Service List Status:     ☐ Party     ☐ State Service

By: \_\_\_\_\_ (User Signature)

Date: \_\_\_\_\_

**User should email agreement to [RegRelCPUCCases@pge.com](mailto:RegRelCPUCCases@pge.com).**

After PG&E's acceptance, the User's self-registration User Name and Password will be enrolled for the case discovery access requested, and the User will be notified of activation by email.

Agreement accepted:  
PACIFIC GAS AND ELECTRIC COMPANY

By: \_\_\_\_\_ (Attorney Signature)

Date: \_\_\_\_\_