

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



FILED

11/01/19
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, 2020. (U 39 M)

Application 18-12-009
(Filed December 13, 2018)

**MOTION OF THE UTILITY REFORM NETWORK TO
ADMIT LATE-SUBMITTED EXHIBIT INTO EVIDENCE**

Hayley Goodson, Staff Attorney

November 1, 2019

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**MOTION OF THE UTILITY REFORM NETWORK
TO ADMIT LATE-SUBMITTED EXHIBIT INTO EVIDENCE**

Pursuant to Rule 11.1 of the Commission's Rules of Practice and Procedure, The Utility Reform Network (TURN) hereby moves to admit the attached late-submitted exhibit into evidence. This exhibit contains information provided by Pacific Gas and Electric Company (PG&E) to TURN in response to a request made by TURN in the course of TURN's cross-examination of PG&E witness Mike Kerans during the evidentiary hearing held in this proceeding on October 18, 2019.¹ The exhibit pertains to cross bore inspections completed by PG&E in San Francisco in 2019.

TURN and PG&E have discussed TURN's interest in admission of this exhibit into evidence, and PG&E does not oppose this request.

Date: November 1, 2019

Respectfully submitted,

By: /s/
Hayley Goodson
Staff Attorney

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¹ 25 RT 3068: 2 - 3069: 17 (PG&E/Kerans).

ATTACHMENT

TURN LATE SUBMITTED EXHIBIT _____

A.18-12 -009

PG&E's Response to TURN Oral Data Request 005TL-1

PACIFIC GAS AND ELECTRIC COMPANY
2020 General Rate Case Phase I
Application 18-12-009
Data Response

PG&E Data Request No.:	TURN_Oral005TL-Q01Rev01		
PG&E File Name:	GRC-2020-PhI_DR_TURN_Oral005TL-Q01Rev01		
Request Date:	October 18, 2019	Requester DR No.:	Oral005TL
Date Sent:	October 24, 2019 (Original) October 31, 2019 (Revised)	Requesting Party:	The Utility Reform Network
PG&E Witness:	Mike Kerans	Requester:	Thomas Long

QUESTION 01

Please provide us the spreadsheet Mr. Kerans said he relied upon to determine the SF cross bore inspections in 2019.

ANSWER 01 REVISION 01

PG&E is revising this response to provide the number of locations that are listed in the attachment.

The attachment to the original response contains customer information and has been marked CONFIDENTIAL and was provided pursuant to the non-disclosure agreement executed between PG&E and TURN.

See attachment, GRC-2020-PhI_DR_TURN_Oral005TL-Q01Atch01CONF which provides the 8,842 locations of cross bore inspections completed in San Francisco in 2019 through October 14th.

Approximately 1,462 locations are re-inspections for previously performed inspections that through a quality review were determined to be incomplete. All but approximately 54 of these 1,462 inspections were originally performed prior to the 2017 GRC.