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

Order Instituting Investigation on the Commission's Own Motion into the Operations and Practices of Pacific Gas and Electric Company to Determine Violations of Public Utilities Code Section 451, General Order 112, and Other Applicable Standards, Laws, Rules and Regulations in Connection with the San Bruno Explosion and Fire on September 9, 2010.

I.12-01-007
(Filed January 12, 2012)

(Not Consolidated)

Order Instituting Investigation on the Commission's Own Motion into the Operations and Practices of Pacific Gas and Electric Company with Respect to Facilities Records for its Natural Gas Transmission System Pipelines.

I.11-02-016
(Filed February 24, 2011)

(Not Consolidated)

Order Instituting Investigation on the Commission's Own Motion into the Operations and Practices of Pacific Gas and Electric Company's Natural Gas Transmission Pipeline System in Locations with Higher Population Density.

I.11-11-009
(Filed November 10, 2011)

(Not Consolidated)

**PACIFIC GAS AND ELECTRIC COMPANY'S UPDATED COMPLIANCE PLAN FOR
REMEDIES ORDERED BY D. 15-04-024**

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Dated: April 26, 2021

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I.11-11-009
(Filed November 10, 2011)

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**PACIFIC GAS AND ELECTRIC COMPANY'S UPDATED COMPLIANCE PLAN FOR
REMEDIES ORDERED BY D. 15-04-024**

Pursuant to Ordering Paragraphs 16 and 17 of the California Public Utilities Commission's Decision (D.) 15-04-024, Pacific Gas and Electric Company (PG&E) submitted its Compliance Plan for implementation of the remedies adopted by that Decision on June 8, 2015. PG&E subsequently filed updates on the completion status of the remedies on April 6, 2018, April 24, 2019, April 27, 2020, and December 17, 2020.

The update to PG&E's Compliance Plan at Attachment A provides information regarding the status of the three remedies that remain open (Updated Compliance Plan).

Pursuant to PG&E's prior commitment in the 2015 Gas Transmission and Storage proceeding (A.13-12-012/I.14-06-016), PG&E also will be serving the Updated Compliance Plan in that docket.

Respectfully Submitted,

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By: /s/ Jonathan D. Pendleton
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Dated: April 26, 2021

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT A

**PACIFIC GAS AND ELECTRIC COMPANY'S UPDATED COMPLIANCE
PLAN FOR REMEDIES ORDERED BY D.15-04-024 (April 26, 2021)**

Investigation 12-01-007
Investigation 11-02-016
Investigation 11-11-009

PACIFIC GAS AND ELECTRIC COMPANY
COMPLIANCE PLAN FOR REMEDIES
(D.15-04-024)

APRIL 26, 2021 UPDATE



**APRIL 26, 2021 UPDATE
TO PG&E'S COMPLIANCE PLAN (D.15-04-024)**

In Decision (D.) 15-04-024, the California Public Utilities Commission (CPUC or Commission) ordered Pacific Gas and Electric Company (PG&E) to implement 85 remedies adopted as part of the San Bruno investigations,¹ one of which includes a requirement to implement the 59 PricewaterhouseCoopers LLP (PwC) recommendations related to records issues.² On June 8, 2015, PG&E filed a Compliance Plan providing the implementation status for each remedy. That plan included 50 remedies as having an “open” status with an estimated date of closure. On April 6, 2018, PG&E filed an update providing that of the 50 open remedies, 31 were closed and 19 remained open. On April 24, 2019, PG&E filed an update providing that of the 19 open remedies as of April 6, 2018, 6 were closed and 13 remained open. On April 27, 2020, PG&E filed an update providing that of the 13 open remedies as of April 24, 2019, 8 were closed and 5 remained open. On December 17, 2020, PG&E filed an update providing that of the 5 open remedies as of April 27, 2020, 2 were closed and 3 remained open. As of April 26, 2021, the 3 open remedies as of December 17, 2020 remain open.

Table 1 below summarizes the status of all remedies as of April 26, 2021.

Table 1 Remedy Status as of April 26, 2021

Reference	Closed Status Through April 24, 2019	Closed Status April 27, 2020	Closed Status December 17, 2020	Closed Status April 26, 2021	Remain Open	No Action ⁽¹⁾	Total
Investigation (I.) 11-02-016 (Gas Transmission (GT) Record Keeping Order Instituting Investigation (OII)) #20 PWC	48	5	2	0	3	1	59
I.11-11-009 (Class Location OII)	13	0	0	0	0	0	13
I.12-01-007 (San Bruno OII)	44	0	0	0	0	1	45
City of San Bruno	3	0	0	0	0	0	3
I.11-02-016 (GT Record Keeping OII)	14	3	0	0	0	3	20
I.11-02-016 (GT Record Keeping OII) I.11-11-009 (Class Location OII) I.12-01-007 (San Bruno OII)	2	0	0	0	0	0	2
Cal Advocates (formerly ORA)	0	0	0	0	0	1	1
TURN	1	0	0	0	0	0	1
Total	125	8	2	0	3	6	144

(1) No Action remedies are those that introduced a group of remedies (e.g., PwC #20 introduced remedies A.1, A.2 etc.) or are the responsibility of another party (e.g., Safety and Enforcement Division).

¹ I.12-01-007 (San Bruno OII); I.11-02-016 (GT Recordkeeping OII); I.11-11-009 (Class Location OII).

² The PwC recommendations were ordered as part of Remedy #20 in the Recordkeeping OII. The PwC recommendations in the remedy templates are listed in Appendix 1 of the final PwC Gas Operations Records and Information Management Assessment, issued on March 31, 2012, which was included in TURN Exhibit 16, Appendix B in the Recordkeeping OII.

PG&E is providing the following updates to 3 compliance plans as summarized in Table 2:

- 3 Open Compliance Plans: Open as of December 17, 2020, continue to be open. Actions to implement the remedy continue to be in progress.

PG&E will continue to update the Safety and Enforcement Division (SED) on an annual basis of its progress in closing the remaining remedies.

Table 2 - April 26, 2021 Update Compliance Filing Summary

Reference	Remedy ID	Remedy Description	2021 Filing Status
1.11-02-016 (GT Record Keeping OII) #20 PWC	E.05	Standardize the use of stand-alone repositories such as SharePoint and email so they can align and potentially integrate with RIM procedures going forward.	Open
	E.07	Identify, and migrate official Records stored on network Shared Drives and local personal computer hard drives to a designated central repository (Documentum). Consider eliminating Shared Drives for some functions.	Open
	E.13	Develop and execute formal "Hold In Place" process for Documentum to facilitate preservation under Legal Holds. Ensure reporting/auditing of Holds In Place is also included.	Open

A template for each of the 3 open remedies is provided in this Compliance Plan Update. The templates include the following information:

- A. Reference: The number associated with the remedy from Appendix E of D.15-04-024.
- B. Remedy: The text of the remedy.
- C. Remedy Terms Defined: An explanation for how PG&E interpreted the words used in the remedy, if necessary.
- D. Status (Open/Closed) Date of Closure: If the remedy has not been completed, PG&E provides an estimate for when the remedy will be complete as required by Ordering Paragraph 17 of D.15-04-024.
- E. Compliance Action and Schedule: A description of the actions taken to implement the remedy, along with a schedule for remaining actions.
- F. Supporting Documentation of Compliance: A listing of the documents provided to demonstrate compliance with the remedy.
- G. Remedies That Have Been Ordered Elsewhere (Include Source and Progress to Date): This is required by Ordering Paragraph 16(a) of D.15-04-024. With respect to progress to date, that information is contained in Sections D or E.
- H. Remedies That Modify or Eliminate Remedies Ordered Elsewhere (Include Source): This is required by Ordering Paragraph 16(b) of D.15-04-024.

**I.12-01-007; I.11-02-016; I.11-11-009
COMPLIANCE PLAN (D.15-04-024)
APRIL 26, 2021**

A.	REFERENCE	PWC Recommendation E.5
B.	REMEDY	Standardize the use of stand-alone repositories such as SharePoint and email so they can align and potentially integrate with RIM procedures going forward.
C.	REMEDY TERMS DEFINED	PG&E defines stand-alone repositories as SharePoint and Outlook. Email remedy PWC E.6 was closed in 2020.
D.	STATUS (OPEN/CLOSED) DATE OF CLOSURE	Open – Estimated Closure – Q4 2021
E.	COMPLIANCE ACTION AND SCHEDULE	Since the December 2020 update, the project is currently 60 percent complete and ahead of schedule. Actions taken since last report out: • Release 1 - In Q4 2020 removed Redundant, Obsolete and Trivial (ROT) content, classified records and migrated 19 SharePoint sites in 15 departments. • Release 2 - In Q1 2021 removed ROT content, classified records and migrated 11 SharePoint sites in seven departments. • Release 3 In Q1 2021 removed ROT content, classified records and prepared for migrations with 11 sites in six departments. • Nine SharePoint sites in two departments were already in SharePoint Online and are now managed by the Records Management System Next Steps: • Continue executing on plan to complete project by end of Q4 2021 - o Migrating remainder of 39 Release 3 SharePoint sites - o Eight SharePoint sites will be decommissioned Independent of analysis, classification and migration tasks, project is dependent on a new tool (Power Automate) to manage process flows within SharePoint On-Line; tasks to implement and support this tool currently on track.
F.	SUPPORTING DOCUMENTATION OF COMPLIANCE	Compliance Plans were submitted in the December 17, 2020 Update.
G.	REMEDIES THAT HAVE BEEN ORDERED ELSEWHERE (INCLUDE SOURCE AND PROGRESS TO DATE)	Records #5 - PG&E shall develop and deploy the systems necessary to manage, maintain, access and preserve records (physical and electronic, in all formats and media types); their related data, metadata, and geographic location and geospatial content to the extent appropriate in accordance with legal and business mandated rules, utilizing technology that includes appropriate aids to help improve data and metadata quality.
H.	REMEDIES THAT MODIFY OR ELIMINATE REMEDIES ORDERED ELSEWHERE (INCLUDE SOURCE)	None

**I.12-01-007; I.11-02-016; I.11-11-009
COMPLIANCE PLAN (D.15-04-024)
APRIL 26, 2021**

A.	REFERENCE	PWC Recommendation E.7
B.	REMEDY	Identify, and migrate official Records stored on network Shared Drives and local personal computer hard drives to a designated central repository (Documentum). Consider eliminating Shared Drives for some functions.
C.	REMEDY TERMS DEFINED	None
D.	STATUS (OPEN/CLOSED) DATE OF CLOSURE	Open – Estimated Closure – Q4 2022
E.	COMPLIANCE ACTION AND SCHEDULE	Progress since December 2020 update includes: - PG&E successfully completed the first Manage-in-Place Technical Proof of Concept (POC) - Identified key learnings from the first POC, which include: - Tool set up and configuration took longer than planned - Successfully tested the update process of the File Plan in the Enterprise Records Retention Schedule - PG&E completed the revised technical assessment and evaluation - Updated project plan and strategy - Shared Drive classification and migration logistics continue to be refined to increase implementation efficiencies - Completed File Analysis and Classification Tool training - Enterprise Records Information Management (ERIM)/Gas Operations/IT held kick-off meetings with Gas Transmission Shared Drives Points of Contact - Started Shared Drive Redundant, Obsolete, and Trivial (ROT) information analysis and records identification with Points of Contact utilizing existing tools and processes Next Steps: - Complete the second Manage-in-Place Technical POC to compare cost and performance, and to validate capabilities including records management, scalability, and integration - Select tool for Manage-in-Place and conduct a Pilot
F.	SUPPORTING DOCUMENTATION OF COMPLIANCE	Compliance Plans were submitted in the December 17, 2020 Update.
G.	REMEDIES THAT HAVE BEEN ORDERED ELSEWHERE (INCLUDE SOURCE AND PROGRESS TO DATE)	Records #5 - PG&E shall develop and deploy the systems necessary to manage, maintain, access and preserve records (physical and electronic, in all formats and media types); their related data, metadata, and geographic location and geospatial content to the extent appropriate in accordance with legal and business mandated rules, utilizing technology that includes appropriate aids to help improve data and metadata quality.
H.	REMEDIES THAT MODIFY OR ELIMINATE REMEDIES ORDERED ELSEWHERE (INCLUDE SOURCE)	None

**I.12-01-007; I.11-02-016; I.11-11-009
COMPLIANCE PLAN (D.15-04-024)**

APRIL 26, 2021

A.	REFERENCE	PWC Recommendation E.13
B.	REMEDY	Develop and execute formal "Hold In Place" process for Documentum to facilitate preservation under Legal Holds. Ensure reporting/auditing of Holds In Place is also included.
C.	REMEDY TERMS DEFINED	PG&E defines a "formal hold in place process" to be the legal hold process for preservation of documents stored in Documentum.
D.	STATUS (OPEN/CLOSED) DATE OF CLOSURE	Open – Estimated Closure– Q2 2022
E.	COMPLIANCE ACTION AND SCHEDULE	In Q1 of 2021, the project accomplished the following (the overall project is approximately 20% complete): • IT Platform: - o Completed Documentum Platform Upgrade Strategy - o Completed Test Strategy - o Completed the designs for Amazon Web Services (AWS) Platform Storage & Database Components, AWS Platform Security & Network, Elastic Kubernetes Service (EKS) Cluster and Worker node Components, and Consolidated Records Management Integration Services (CRMIS) Application Configured Microservice • Application Data Preparation & Migration: - o Completed Disposition Requirements Documentation - o Completed the metadata consolidation between applications, Business Process Design (BPD), metadata analysis, My Electronic Access (MEA) documentation, and Detailed Functional Requirements (DFR) for three major gas applications, representing nearly 50% of all gas-related files, as a pre-requisite for migration to the cloud platform. - o Completed the DFR for the first minor gas application which will be used for the test migration - o Two additional Gas application analyses started on time in Q1 - o Completed the first Line of Business (LoB) metadata cleanup to identify and sort drawings, in the Engineering Library, that belong to multiple LoBs into the sole ownership of a single LoB For the remainder of 2021, the plan is to complete the following: • IT Platform: - o Complete AWS Cloud Platform Setup - o Complete CRMIS Setup - o Complete Documentum Retention Policy Services (RPS) Configuration - o Implement the latest ERRS • Application Data Preparation & Migration: - o Identify application vendors and execute at least one contract - o Complete the test migration of the GOQ application - o Complete migration of the top three major gas applications with a slated go-live by the end of 2021 - o Verification of applications against the newest certified records inventory

**I.12-01-007; I.11-02-016; I.11-11-009
COMPLIANCE PLAN (D.15-04-024)**

APRIL 26, 2021

		- o Second data cleanup (out of 3) for the ELS Gas Application - o Start analyses required for the remainder of gas-related applications - o Complete integrations with other systems such as SAP, External Mobile Offline solution (CORE), Gas Distribution Geographic Information System (GDGIS), Maps+, & Intelligent Capture (formerly Captiva) Due to the complexity and amount of data cleanup associated with the ELS application, the migration was pushed out further than originally planned. However, to remedy this, additional tasks were identified and will now run in parallel to keep the project on track with the planned Q2 2022 completion. Additional applications will also run in parallel to ensure a timely completion. As part of the project, security groups will be created, and owners and approvers identified for each application. In addition, PG&E will be developing a legal hold process for the system. The new cloud CRM system will be able to exclude those files from disposition that have been flagged for legal hold. The go-live date of the CRM cloud environment is planned for Q2 2021. The 17 gas applications that contain 33 million files (50 Terabytes) of gas documentation are expected to be migrated to the new CRM cloud environment in three releases from Q2 2021 through Q2 2022. Note that these documents will contain all gas or a mix of gas and electric documents, which represent high mission/business critical processes.
F.	SUPPORTING DOCUMENTATION OF COMPLIANCE	Compliance Plans were submitted in the December 17, 2020 Update.
G.	REMEDIES THAT HAVE BEEN ORDERED ELSEWHERE (INCLUDE SOURCE AND PROGRESS TO DATE)	None
H.	REMEDIES THAT MODIFY OR ELIMINATE REMEDIES ORDERED ELSEWHERE (INCLUDE SOURCE)	None