June 17, 2011

National Transportation Safety Board (NTSB) Office of Railroad, Pipeline and Hazardous Materials Investigations 490 L'Enfant Plaza, SW Washington, D.C. 20594

Attn: Mr. Ravi Chhatre Investigator-In-Charge

Re: NTSB Accident Investigation #DCA-10-MP-008 Pacific Gas and Electric Company September 9, 2010 accident on 30" segment in San Bruno, CA

Dear Mr. Chhatre,

Please find attached the Submission of Pacific Gas and Electric Company to the National Transportation Safety Board: Pipeline Accident, San Bruno, California, September 9, 2010, Docket No. DCA-10-MP-008. The purpose of this submission is to share with the NTSB, PG&E's conclusions related to the root cause of the pipeline rupture and fire on September 9, 2010 in San Bruno, California that tragically claimed the lives of 8 people, injured 58 others and destroyed many homes. PG&E will also discuss the actions of PG&E personnel taken before and after the rupture on September 9, 2010 and our belief that they did not contribute to the rupture or impede emergency response to the accident. Finally, PG&E will highlight some of its substantial improvement initiatives completed and underway for the NTSB's consideration in connection with any recommendations the Board might make to PG&E and others to avoid another tragedy such as this.

This submission is based on the factual reports developed and reviewed at the June 1-2, 2011 Technical Review Meeting. Should additional factual information be developed and included in subsequent factual addenda and/or the final report, PG&E respectfully requests an opportunity to supplement this submission. PG&E appreciates all of the hard work of the NTSB staff in the course of this investigation. If you have additional comments or questions, please contact us at your convenience.

Respectfully submitted,

WILLIAM D. HAYES Vice President, Gas Maintenance and Construction PACIFIC GAS AND ELECTRIC COMPANY