

ATTACHMENT A

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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 UNITED STATES OF AMERICA,)	CR 14-00175 TEH
16 Plaintiff,)	UNITED STATES' WITNESS LIST AND PG&E'S
17 v.)	OBJECTIONS
18 PACIFIC GAS AND ELECTRIC COMPANY,)	
19 Defendant.)	
20)	

21 The United States hereby gives notice to the Court and to defendant Pacific Gas and Electric
22 Company of the witnesses it may call in its case in chief at the trial in the above-captioned case. This
23 list is intended to be inclusive and does not necessarily reflect the order in which witnesses will be
24 called. The government may not call all of the witnesses on this list. The government may seek to
25 supplement this list for good cause as trial preparations progress, and will notify the defendant of any
26 changes to its witness list.

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<u>WITNESS NAME</u>	<u>SUMMARY OF TESTIMONY</u>	<u>PG&E'S OBJECTIONS</u>
David Aguiar	ECDA and all preassessment work, assessments of manufacturing threats, pipeline survey sheets, integrity management, and GIS	PG&E objects to this testimony to the extent it relates to alleged failure to gather and integrate data on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7.
William Arndt	PG&E's 2008 and 2009 budget reduction and expense walk through	PG&E objects to this testimony in full because it relates to general financial evidence and is unconnected to any charged conduct, as explained in its motion <i>in limine</i> no. 4.
Todd Arnett	Record keeping integration, GIS, assessment decisions, planned pressure increases, process involved in making integrity management decisions and what decisions were based on, and all communications, decisions, practice and policy regarding maintaining maximum operating pressure on pipelines	PG&E objects to this testimony to the extent it relates to alleged failure to gather and integrate data and planned pressure increases on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7.
Les Buchner	Role at PG&E, including promotion to Senior Manager for Gas Program and Performance Management; budgetary matters (process, requests, reductions, deferred work and IM spending) and performance metrics	PG&E objects to this testimony about Mr. Buchner's promotion and role as irrelevant to any charge. PG&E also objects to this testimony to the extent it relates to general financial evidence and is unconnected to any charged conduct, as explained in its motion <i>in limine</i> no. 4.
Geoffrey Caldwell	Work as a San Bruno police officer responding following the San Bruno pipeline explosion in 2010; his role, experience, and observations as a party representative during the NTSB investigation into the cause of the explosion	PG&E objects to this testimony in full as irrelevant to any charge. PG&E objects to this testimony because it relates to the response to the San Bruno pipeline accident in 2010, as explained in its motion <i>in limine</i> no. 1. PG&E also objects to this testimony to the extent it relates to his observations as a party representative to the NTSB investigation because the government has no foundation to connect Mr. Caldwell to any charged conduct.
Brian Cherry	Discussions and representations made by PG&E to the CPUC and the NTSB post the San Bruno explosion, including about PG&E's findings and definitions concerning lines that had been	PG&E objects to this testimony in full as irrelevant to any charge. PG&E objects to any testimony about representations made after the San Bruno accident because the government has no foundation that

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	overpressurized, planned and unplanned pressure increases, state of records, not considering a line overpressurized unless the pressure exceeded the MOP/MAOP + 10%, MAOP validation, and the NTSB's Investigation	Mr. Cherry has personal knowledge of relevant circumstances during the relevant time period, or that any employee at PG&E was aware of any such post-accident circumstances during the relevant time period. PG&E also objects to this testimony to the extent it relates to alleged failure to gather and integrate data and planned or unplanned pressure increases on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7. PG&E also objects to this testimony to the extent it relates to MAOP validation, which is a post-accident improvement, as explained in its motion <i>in limine</i> no. 5.
Ravindra Chhatre	NTSB's investigation of PG&E following the San Bruno explosion as the "investigator in charge"; the launch of investigation into the explosion (team and purpose), the on-site investigation of the explosion, the party member system and obligations of a party member, the issues investigated, the focus areas of the investigation, witness interviews, data requests and responses, urgent recommendations issued, removal of PGE's party representative, the NTSB hearings, factual reports, receipt of the April 6 th , 2011 letter and actions taken, late disclosures made concerning the 1988 leak on line 132, and timeline of the investigation	PG&E objects to this testimony to the extent that it involves legal conclusions and/or lay opinion about the obligations of any party member. PG&E also objects to this testimony to the extent that it discusses any of the NTSB's recommendations because such testimony is prohibited by the NTSB regulations, as described in PG&E's motion <i>in limine</i> no. 2. <i>See also</i> 49 C.F.R. § 835.3(c). PG&E also objects to this testimony to the extent it includes any opinions or conclusions of the Board, or statements beyond Mr. Chhatre's firsthand information obtained during an investigation that is not reasonably available elsewhere, as described in PG&E's motion <i>in limine</i> no. 2. <i>See also</i> 49 C.F.R. §§ 835.3(c), 835.10. PG&E also objects to this testimony to the extent it involves witness interviews, data request and responses, and any alleged failure to cooperate with the NTSB investigation unconnected to the April 6, 2011 letter, including relating to the alleged removal of PG&E's party representative and alleged late disclosures made concerning the 1988 leak on Line 132, as explained in PG&E's motion <i>in limine</i> no. 9.
Paul Clanon	Executive Director of CPUC 2007-2014; CPUC relationship with PG&E; CPUC investigations and audit of PG&E following San Bruno explosion, including data requests, data responses.	PG&E objects to this testimony to the extent it concerns PG&E's relationship with the CPUC, which is irrelevant to any charge. PG&E also objects to this testimony to the extent it concerns any

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	directives, penalties, and other communications; PG&E's focus on reducing costs rather than prioritizing safety; PG&E's planned pressure increases, pressure exceedances, MAOP and MOP validations, threat assessments, record keeping, and Line 147 errata	CPUC directives or penalties following the San Bruno accident, as explained in PG&E's motion <i>in limine</i> no. 3. PG&E also objects to this testimony to the extent it relates to general financial evidence and is unconnected to any charged conduct, as explained in its motion <i>in limine</i> no. 4. PG&E also objects to this testimony to the extent it relates to alleged failure to gather and integrate data and planned pressure increases on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7. PG&E also objects to this testimony to the extent it relates to MAOP and MOP validation, which is a post-accident improvement, as explained in its motion <i>in limine</i> no. 5. PG&E also objects to this testimony to the extent it relates to the Line 147 errata, as explained in its motion <i>in limine</i> no. 3 and its opposition to the government's motion <i>in limine</i> no. 5.
Daniel Curtis	Role in the Integrity Management group at PG&E; choosing assessment methods of pipelines, ranking risk of pipelines, assessing threats on pipelines, and record keeping	PG&E objects to this testimony to the extent it relates to alleged failure to gather and integrate data on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7. PG&E also objects to this testimony to the extent it relates to general financial evidence and is unconnected to any charged conduct, as explained in its motion <i>in limine</i> no. 4.
Peter Darbee	PG&E's representations to shareholders, investors, employees, regulators, and the public concerning the objectives, focus, goals, and/or policies of the company, both before and after the San Bruno explosion	PG&E objects to this testimony in full as irrelevant to any charge. Mr. Darbee is PG&E's former Chief Executive Officer. PG&E objects to this testimony because the government has no foundation to connect Mr. Darbee's representations to shareholders, investors, employees, regulators, and the public to any charge. PG&E also objects to this testimony to the extent it relates to general financial evidence and is unconnected to any charged conduct, as explained in its motion <i>in limine</i> no. 4. PG&E also objects to this testimony to the extent it involves statements of remorse or recognition, as explained in its motion <i>in limine</i> no. 5

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Brian Daubin	Participation in NTSB investigation; all communications and discussions concerning RMI-06, its revision, and its production	PG&E objects to this testimony in full as irrelevant to any charge. PG&E objects to this testimony to the extent it involves alleged failure to cooperate with the NTSB investigation unconnected to the April 6, 2011 letter, as explained in PG&E's motion <i>in limine</i> no. 9. PG&E also objects to this testimony because the government has no foundation to connect Mr. Daubin to any communications or discussions concerning RMI-06.
Frank Dauby	Knowledge of and role in inline inspections and ECDA, the Pipeline Safety Act, his role in the Baseline Assessment Plan, budget, hydrotesting, RMP-06, GIS, the pipeline features list, the planned pressure increase program, and Subpart O T	PG&E objects to this testimony to the extent it relates to general financial evidence and is unconnected to any charged conduct, as explained in its motion <i>in limine</i> no. 4. PG&E also objects to this testimony to the extent it relates to alleged failure to gather and integrate data and planned pressure increases on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7.
Alan Eastman	Role as the manager of Risk Management at PG&E; the GPRP and switch to RMP, creating the Baseline Assessment Plans for lines, record integration, considerations in determining the proper assessment method, consideration of various threats on a line, the development of EDCA, and PG&E's incorporation of Subpart O into their IM program	PG&E objects to this testimony to the extent it relates to GPRP and the transition to RMP, as explained in its opposition to the government's motion <i>in limine</i> no. 7. PG&E also objects to this testimony to the extent it relates to alleged failure to gather and integrate data and planned pressure increases on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7. PG&E also objects to this testimony to the extent it relates to the development of ECDA as a political activity, as explained in its motion <i>in limine</i> no. 8.
Robert Fassett	PG&E's integrity management program, GIS, ECDA, budget, PG&E planned pressure increase program, and questions related to Line 132 Segment 180	PG&E objects to this testimony to the extent it relates to general financial evidence and is unconnected to any charged conduct, as explained in its motion <i>in limine</i> no. 4. PG&E also objects to this testimony to the extent it relates to alleged planned pressure increases on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7.

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Margaret Felts	Summarize evidence concerning her knowledge of PG&E's records and recordkeeping policies and practices	PG&E objects to this testimony in full as irrelevant to any charge. PG&E objects to this testimony because there is no foundation for Ms. Felt's personal knowledge of PG&E's records and recordkeeping policies and practices during the relevant timeframe. It appears that Ms. Felts will offer opinion testimony, even though the government has withdrawn her as an expert witness. PG&E further objects to this testimony to the extent it describes post-accident safety improvements, such the records review at the Cow Palace/MAOP and MOP validation efforts, as explained in its motion <i>in limine</i> no. 5. PG&E also objects to this testimony to the extent Ms. Felts intends to rely on summary evidence that has not yet been approved by the Court or the defense. <i>See United States v. Olano</i> , 62 F.3d 1180, 1204 (9th Cir. 1995).
Sandra Flores	Subpoenas to PG&E and PG&E responses; summary witness regarding strength test pressure records	PG&E objects to this testimony in full as irrelevant to any charge. PG&E objects that its responses to subpoenas are not relevant to any charge. PG&E also objects to this testimony because there is no foundation for Ms. Flores's personal knowledge of PG&E's records during the relevant timeframe. PG&E also objects to this testimony to the extent Ms. Flores intends to rely on summary evidence that has not yet been approved by the Court or the defense. <i>See United States v. Olano</i> , 62 F.3d 1180, 1204 (9th Cir. 1995).
Jeffrey Gilliam	PHMSA inspector; participating in an audit of PG&E's gas integrity management, his role with regard to the San Bruno explosion investigation, instruction and training that he provided regarding PHMSA integrity management regulations and what the regulations required operators to do, how operators can seek clarification of the regulations, how he advised utilities regarding over pressurizations and activation of threats, and what FAQs are and their purpose	PG&E objects to this testimony to the extent it relates to the San Bruno pipeline accident in 2010, as explained in its motion <i>in limine</i> no. 1. PG&E objects to this testimony to the extent that it involves legal conclusions and/or lay opinion about what the integrity management regulations required operators to do and how he advised utilities regarding their meaning.

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1 2 3 David 4 Harrison	5 6 Discovery of a leak on L147 and 7 discoveries made when the pipe 8 segment was unearthed, GIS and record 9 integration, the 1956 relocation of 10 segment 180	11 12 PG&E objects to this testimony in full as 13 irrelevant to any charge. PG&E objects to 14 this testimony to the extent it relates to the 15 discovery of a leak on Line 147 and 16 discoveries made when the pipe segment 17 was unearthed, as explained in its motion 18 <i>in limine</i> no. 3 and its opposition to the 19 government's motion <i>in limine</i> no. 5. 20 PG&E also objects to this testimony to the 21 extent it relates to GIS and record 22 integration because the government has no 23 foundation that Mr. Harrison has personal 24 knowledge of relevant circumstances 25 during the relevant time period, or that any 26 employee at PG&E was aware of any such 27 circumstances during the relevant time 28 period. PG&E also objects to this testimony to the extent it relates to the 1956 relocation of segment 180 because Mr. Harrison lacks any personal knowledge, and because they are irrelevant to any charge.
14 15 William Hayes	16 17 PG&E party member to the NTSB 18 investigation; his qualifications and 19 how he became PGE's NTSB party 20 member, and the April 6, 2011 letter, 21 signed by him, at the heart of the obstruction count and events/conversations/emails surrounding the letter's transmittal and content	22 23 PG&E objects to this testimony to the 24 extent it involves alleged failure to 25 cooperate with the NTSB investigation 26 unconnected to the April 6, 2011 letter, 27 including relating to how he became 28 PG&E's NTSB PG&E's party member, as explained in PG&E's motion <i>in limine</i> no. 9. PG&E also objects to this testimony to the extent it relates to the content of the April 6, 2011 letter because the government has no foundation that Mr. Hayes has personal knowledge of the content.
22 23 Todd 24 Hogenson	25 26 Responsibilities as Director of Pipeline 27 Safety Enhancement Plan, GIS, the 28 planned pressure increase program, resources dedicated to his group, integrity management, inline inspections, hydrotesting, HCA pipelines, and enterprise risk management	29 30 PG&E objects to this testimony to the 31 extent it relates to Mr. Hogenson's 32 responsibilities as Director of the Pipeline 33 Safety Enhancement Plan ("PSEP"), which 34 is a post-accident improvement, as 35 explained in its motion <i>in limine</i> no. 5. 36 PG&E also objects to this testimony 37 concerning PSEP to the extent it is only 38 relevant to the government's sentencing theory under the Alternative Fines Act, which this Court has bifurcated. <i>See</i> Dkt. 275. PG&E also objects to this testimony to the extent it relates to alleged

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		failure to gather and integrate data and planned pressure increases on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7. PG&E also objects to this testimony to the extent it relates to general financial evidence and is unconnected to any charged conduct, as explained in its motion <i>in limine</i> no. 4. PG&E also objects to this testimony to the extent it relates to HCAs, which is not relevant to any charge.
Manly Kirk Johnson	PG&E Vice President and spokesperson; participation in NTSB investigation; PG&E record-keeping, MAOP and MOP verification, Baseline Assessment Plans, and assessment methods; role at incident command center for San Bruno explosion	PG&E objects to this testimony to the extent it relates to the NTSB investigation because the government has no foundation that Mr. Johnson has personal knowledge of any facts relating to the obstruction charge. PG&E also objects to this testimony to the extent it relates to alleged failure to gather and integrate data and planned pressure increases on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7. PG&E also objects to this testimony to the extent it relates to MAOP and MOP verification, which is a post-accident improvement, as explained in its motion <i>in limine</i> no. 5. PG&E also objects to this testimony about Mr. Johnson's role at the incident command center for the San Bruno accident, as explained in its motion <i>in limine</i> no. 1.
Peter Katchmar	PHMSA investigator and as the PHMSA party member to the NTSB investigation; learning of PG&E's policy documented in RMI-06 (the version that was submitted to the NTSB as a data response and used in the NTSB hearings) regarding PG&E's planned pressure increases and when PG&E considered threats on a line activated (the so called "plus 10% policy"), and what he did as a result of learning of RMI-06	PG&E objects to this testimony to the extent it relates to the San Bruno pipeline accident in 2010, as explained in its motion <i>in limine</i> no. 1. PG&E further objects to this testimony to the extent that it involves legal conclusions and/or lay opinion about the obligations of any party member. PG&E further objects to this testimony to the extent that it involves legal conclusions and/or lay opinion about what the integrity management regulations required operators to do and how he advised utilities regarding their meaning. PG&E may call this witness in its defense case to elicit party admissions concerning the regulations at issue, and his activities concerning this matter, among other things.

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Andrew Kelly	Background regarding transmission, distribution, and distribution feeder mains; PGE's planned pressure increases, clearance process, and pressure exceedances, including for Line 132; MAOP, MOP, and validation; GIS and other record keeping systems, including deficiencies; leaks, leak repairs, and records; threat assessments, methods, and challenges; LTIMPs	PG&E objects to this testimony to the extent it involves distribution lines, which have different conditions and are subject to different regulations, and thus are not relevant to any charge. PG&E also objects to this testimony to the extent it relates to alleged failure to gather and integrate data and planned pressure increases on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7. PG&E also objects to this testimony to the extent it relates to MAOP and MOP validation, which is a post-accident improvement, as explained in its motion <i>in limine</i> no. 5.
Stephen Klejst	Director at NTSB during investigation of the San Bruno explosion; purpose and focus of the investigation, why he chose to launch the investigation, his role in the investigation, his role in the termination of the PG&E party member representative to the investigation, and the NTSB generally, its mandate, when it launches an investigation, and how it conducts investigations	PG&E objects to this testimony to the extent it relates to why he chose to launch the investigation, and the NTSB generally, which is not relevant to any charge. PG&E further objects to this testimony to the extent that it involves legal conclusions and/or lay opinion about the obligations of any party member. PG&E also objects to this testimony to the extent it involves alleged failure to cooperate with the NTSB investigation unconnected to the April 6, 2011 letter, including relating to his role in the alleged termination of the PG&E party member representative, as explained in PG&E's motion <i>in limine</i> no. 9. PG&E also objects to this testimony to the extent it involves legal conclusions and/or lay opinion about the NTSB's mandate. PG&E further objects to this testimony to the extent that it discusses any of the NTSB's recommendations because such testimony is prohibited by the NTSB regulations, as described in PG&E's motion <i>in limine</i> no. 2. <i>See also</i> 49 C.F.R. § 835.3(c).
Chih Hung Lee	PG&E's threat assessment methods and challenges (DA, ILI, Hydrotest); RMP-06 and RMI-06; LTIMP; reliance on GIS; record keeping deficiencies; accuracy and accessibility of A-Forms; pressure test records; and MOP and MAOP determinations	PG&E objects to this testimony to the extent it relates to alleged failure to gather and integrate data and planned pressure increases on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7. PG&E also objects to this testimony to the extent it relates to determinations of MOP/MAOP, which is

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		not relevant to any charge.
Howard Lubow	Expert witness in the field of gas utility companies; PG&E's focus on financial results at the expense of safety – PG&E's financial motive in limiting safety expenditures, deferring projects and choosing assessment methods; PG&E's corporate structure and organization, the utility ratemaking process (i.e., how the CPUC sets rates to charge customers, what PG&E asked for and how they spent the money, the allowable rate-of-return that PG&E was permitted and what they received) and obligations accompanying being a regulated utility operator, including the impact on an operator's profit incentives; PG&E's change in structure and spending following the San Bruno explosion and PG&E's admissions about lack of focus on safety; PG&E's budget decisions leading up to the San Bruno explosion as focused on maximizing profits at the expense of safety	PG&E objects to this testimony in full as irrelevant to any charge in this case. As PG&E explained in its Brief Regarding Additional Motions <i>in Limine</i> (Dkt. 240), PG&E requests the opportunity to file a <i>Daubert</i> motion regarding Mr. Lubow's testimony, which, among other things, (i) purports to summarize evidence with a prosecution-friendly veneer; (ii) includes opinions that are based on novel, unscientific, and unreliable methods; (iii) focuses on compliance with standards of care other than the charged regulations; (iv) involves financial results and executive compensation that are irrelevant to any charge (<i>see also</i> PG&E's motion <i>in limine</i> no. 4); and (v) purports to offer opinions about the supposed intent behind PG&E's actions. PG&E further objects to this testimony to the extent it relates to PG&E's changes in structure and spending related to post-accident safety improvements, as explained in its motion <i>in limine</i> no. 5. PG&E also objects to statements about a supposed "lack of focus on safety," which are statements of remorse or descriptions of needed improvements that should be excluded.
Calvin Lui	PG&E's tracking of pipeline operating pressures, seam types, and pressure exceedances; SCADA reports; planned pressure increases and 10% pressure exceedances; RMI-06; application of Pipeline Safety regulations (Subpart O) and FAQs; PG&E's Baseline Assessment Plans; pipeline threat assessment methods; HCA analysis; incomplete and inaccurate data in GIS; CPUC 2010 audit; threat and risk assessments and MAOP validation efforts after San Bruno explosion	PG&E objects to this testimony to the extent it relates to alleged failure to gather and integrate data and planned or unplanned pressure increases on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7. PG&E also objects to this testimony to the extent it relates to HCA analysis, which is not relevant to any charge. PG&E also objects to this testimony to the extent it relates to MAOP validation efforts after the San Bruno accident, which is a post-accident improvement, as explained in its motion <i>in limine</i> no. 5.
William Manegold	PG&E's Baseline Assessment Plans; threat identification, assessments, and assessment methods; HCAs; application of Pipeline Safety	PG&E objects to this testimony to the extent it relates to alleged failure to gather and integrate data and planned or unplanned pressure increases on uncharged

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	regulations (Subpart O) and FAQs; CPUC investigation and audits; NTSB investigation; incomplete and inaccurate data in GIS and other record keeping; RMP-06 and RMI-06; PG&E's planned pressure increases and pressure exceedances; leak repairs	lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7.
Frank Maxwell	Operating expenditures and limitations in gas transmission and distribution in 2007 through the San Bruno explosion and beyond; discussions regarding assessment methods and budgetary concerns during integrity management team meetings.	PG&E objects to this testimony to the extent it relates to general financial evidence and is unconnected to any charged conduct, as explained in its motion <i>in limine</i> no. 4. PG&E objects to this testimony to the extent it involves distribution lines, which have different conditions and are subject to different regulations, and thus are not relevant to any charge in this case.
Leslie McNiece	Role at PG&E, her efforts to draft the Records & Information Management Standard and Policy, her knowledge of the state of PG&E's records, including at Dado Street and the Corporate Records Center, resistance she faced, the "Post-It note" story, the "records in the dumpster" story, information from her journal and why she kept one, and audit committee and Board presentations she made	PG&E objects to this testimony in full as irrelevant to any charge and untimely noticed, as explained in its motion <i>in limine</i> no. 10 and its opposition to the government's motion <i>in limine</i> no. 6. PG&E further objects to this testimony to the extent it describes post-accident safety improvements, such the records review at the Cow Palace/MAOP and MOP validation efforts, as explained in its motion <i>in limine</i> no. 5.
Lawrence Medina	Responsibilities at PG&E, transmission pipeline records, physical moves of the records, memoranda he drafted while at PG&E, and his contact with PG&E post-San Bruno	PG&E objects to this testimony in full as irrelevant to any charge. Mr. Medina left PG&E in 1993, and the government has no foundation to connect him to any charged conduct, or to establish that any employee at PG&E was aware of his memoranda from 1992 and 1993 during the relevant time period.
William Morrow	Company-wide messages that he sent out and his participation in, and presentations given at, a 2008 Utilities Officer's offsite	PG&E objects to this testimony in full as irrelevant to any charge. Mr. Morrow is PG&E's former Chief Executive Officer and President. PG&E objects to this testimony because the government has no foundation to connect Mr. Morrow's company-wide messages or officer offsite presentations to any charge.

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Eugene Muse	Role at PG&E as part of the Integrity Management team; record gathering and integration, GIS, assessment methods, planned pressure increases, not considering a pressure exceedance over MOP/MAOP as activating a threat unless the exceedance was MOP plus 10%, tracking the MOPs of pipelines, drafting a policy to address the planned pressure increases and maintaining MOP which included the +10%, and instructing engineers about the planned pressure increases	PG&E objects to this testimony to the extent it relates to alleged failure to gather and integrate data and planned or unplanned pressure increases on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7.
Steven Nanney	Expert testimony explaining purpose, meaning, and requirements of Pipeline Safety Act regulations 49 CFR §§ 192.517, 192.709, 192.917, and 192.919; development of the regulations; Frequently Asked Questions (FAQs)	PG&E objects to this testimony in full. As PG&E explained in its Brief Regarding Additional Motions <i>in Limine</i> (Dkt. 240), PG&E requests the opportunity to file a <i>Daubert</i> motion regarding the government's PHMSA expert (Alan Beshore at that time). PG&E also objects to this testimony to the extent that it involves legal conclusions about the purpose, meaning, and requirements of Pipeline Safety Act regulations. PG&E also objects to this testimony to the extent the government does not have foundation to establish his personal knowledge of the development of the regulations. PG&E also objects to Mr. Nanney's testimony because the government has not yet disclosed any opinions, bases, or reasons for him, as required under Rule 16.
Matthew Nicholson	NTSB's investigation of PG&E following the San Bruno explosion; NTSB's on site investigation of the explosion, PG&E as a party member, issues investigated related to integrity management such as record keeping, record integration, threat assessment, planned pressure increases, determination of MOP/MAOP, witness interviews, data requests and responses, and late disclosures made concerning the 1988 leak on line 132	PG&E objects to this testimony to the extent that it involves legal conclusions and/or lay opinion about the obligations of any party member. PG&E also objects to this testimony to the extent that it discusses any of the NTSB's recommendations because such testimony is prohibited by the NTSB regulations, as described in PG&E's motion <i>in limine</i> no. 2. <i>See also</i> 49 C.F.R. § 835.3(c). PG&E also objects to this testimony to the extent it includes any opinions or conclusions of the Board, or statements beyond Mr. Nicholson's firsthand information obtained during an investigation that is not reasonably available elsewhere, as described in

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		PG&E's motion <i>in limine</i> no. 2. <i>See also</i> 49 C.F.R. §§ 835.3(c), 835.10. PG&E also objects to this testimony to the extent it involves witness interviews, data request and responses, and any alleged failure to cooperate with the NTSB investigation unconnected to the April 6, 2011 letter, including relating to the alleged removal of PG&E's party representative and alleged late disclosures made concerning the 1988 leak on Line 132, as explained in PG&E's motion <i>in limine</i> no. 9.
Paul Penny	CPUC's 2011 audit of PG&E, including PG&E's over-pressurizations; PG&E's risk management program and RMI-06 policy	PG&E objects to this testimony to the extent that it involves legal conclusions and/or lay opinion about the application of the Pipeline Safety regulations or Subpart O.
Sara Peralta	Role as supervisor and manager in PG&E's integrity management group; PG&E's planned pressure increases and pressure exceedances; RMP-06 and RMI-06; application of Pipeline Safety regulations (Subpart O) and FAQs; PG&E's Baseline Assessment Plans; pipeline threat identification, assessments, and assessment methods; incomplete and inaccurate data in GIS and other record keeping; CPUC investigations and audits; NTSB investigation; threat assessments after San Bruno explosion; MAOP and MOP validation; A-form processing; leak repairs; HCAs	PG&E objects to this testimony to the extent it relates to alleged failure to gather and integrate data and planned or unplanned pressure increases on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7. PG&E also objects to this testimony to the extent it relates to general financial evidence and is unconnected to any charged conduct, as explained in its motion <i>in limine</i> no. 4. PG&E also objects to this testimony to the extent it relates to MAOP and MOP validation, which is a post-accident improvement, as explained in its motion <i>in limine</i> no. 5. PG&E also objects to this testimony to the extent it relates to HCAs, which is not relevant to any charge.
Charles Tateosian	Head of Gas System Design; findings about, discussions concerning, and recommendations made regarding pipeline integrity, welding methods, pipe failures, records and strength tests	PG&E objects to this testimony in full as irrelevant to any charge in this case. Mr. Tateosian left PG&E in 1987, and the government has no foundation to connect him to any charged conduct, or to establish that any employee at PG&E was aware of Mr. Tateosian's findings and discussions during the relevant time period. PG&E also objects to this testimony to the extent it relates to the GPRP, as explained in its opposition to the government's motion <i>in limine</i> no. 7.

<u>WITNESS NAME</u>	<u>SUMMARY OF TESTIMONY</u>	<u>PG&E'S OBJECTIONS</u>
Philip Villanueva	U.S. Attorney's Office financial analyst; summary witness regarding PG&E's assessments and replacements in its Baseline Assessment Plans and PG&E's gross gains based on his review of PG&E records	PG&E objects to this testimony in full as irrelevant to any charge. PG&E objects to this testimony to the extent it relates to general financial evidence and is unconnected to any charged conduct, as explained in its motion <i>in limine</i> no. 4. PG&E also objects to this testimony to the extent Mr. Villanueva intends to rely on summary evidence that has not yet been approved by the Court or the defense. <i>See United States v. Olano</i> , 62 F.3d 1180, 1204 (9th Cir. 1995). PG&E also objects to this testimony because it is only relevant to the government's sentencing theory under the Alternative Fines Act, which this Court has bifurcated. <i>See</i> Dkt. 275.
Scott Waldvogel	San Bruno firefighter, his work on the day of the pipeline explosion in San Bruno in 2010, including driving the engine that was first to arrive on scene following the pipeline, and some of the challenges he and other firefighters faced following the explosion, including a lack of water due to the explosion	PG&E objects to this testimony in full as irrelevant to any charge. PG&E objects to this testimony because it relates solely to the response to and effects of the San Bruno pipeline accident in 2010, as explained in its motion <i>in limine</i> no. 1.
Chris Warner	Role as a manager of Integrity Management and Compliance at PG&E; the risk management program, IM budget and compensation, record keeping systems, decisions regarding assessment methods, planned pressure increase program; treatment of activated threats on pipelines; and later role as a consultant to PG&E while working at the Mears Group, including work that he performed for PG&E regarding EDCA, in anticipation of a May 2010 CPUC audit, and post San Bruno	PG&E objects to this testimony to the extent it relates to general financial evidence and is unconnected to any charged conduct, as explained in its motion <i>in limine</i> no. 4. PG&E also objects to this testimony to the extent it relates to alleged failure to gather and integrate data and planned or unplanned pressure increases on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7. To the extent that this involved work related to PSEP or other records improvement projects, this testimony should be excluded as related to post-accident safety improvements, as explained in PG&E's motion <i>in limine</i> no. 5.
Michael West	Line 132 survey sheets from 11/2003 and 12/2003; process by which data was integrated into GIS; document retention policy after the San Bruno	PG&E objects to this testimony to the extent it relates to alleged failure to gather and integrate data on uncharged lines, as explained in its opposition to the government's motion <i>in limine</i> no. 7.

<u>WITNESS NAME</u>	<u>SUMMARY OF TESTIMONY</u>	<u>PG&E'S OBJECTIONS</u>
	explosion	PG&E also objects to this testimony to the extent it relates to document retention policies after the San Bruno accident, which are not relevant to any charge and may be post-accident improvements, as explained in its motion <i>in limine</i> no. 5.
PG&E Records Custodian	What records were produced, and not produced, by the company in response to subpoenas, lay the foundation for the records to be admitted as business records should the records not be admitted as party-opponent admissions	PG&E objects to this testimony to the extent it relates to the production of records in response to subpoenas, which is not relevant to any charge in this case. PG&E also objects to this testimony to the extent that the witness that created, sent, or received a document will often be necessary to lay the foundation for admissibility.
CPUC Records Custodian	Lay the foundation for CPUC records to be authenticated as official government records	

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Dated: February 22, 2016

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