

EXHIBIT 6

United States Department of Transportation - Office of Inspector General

Memorandum of Activity

Case Number: I10Z0000450900	Reporting Office: JRI-9 San Francisco	Type of Activity: Interview
Date of Activity: 07/10/2014	Date Report Drafted: 07/23/2014	Location of Activity:
Subject of Activity: HALL, ROBERT	Activity Conducted By (Name(s)): Lisa Glazzy	Signature: L G

On July 10, 2014, Special Agent Lisa Glazzy, U.S. Department of Transportation, Office of Inspector General, San Francisco, CA, interviewed Robert Hall, Pipeline Investigator, National Transportation Safety Board (NTSB), regarding the NTSB's investigation of the September 9, 2010 PG&E pipeline rupture in San Bruno, CA. Also participating in the interview were Assistant United States Attorney Kim Berger, Special Assistant United States Attorney Brett Morris and Inspector Richard Maher, San Mateo County District Attorney's Office. Present during the interview was NTSB Deputy General Counsel Ann Gawalt. Hall was interviewed at his office in Washington DC. After being advised as to the identity of the interviewers and the nature of the interview, Hall voluntarily provided the following information:

Hall began his career at the NTSB in March 2011. When he was hired, the NTSB's investigation of the San Bruno incident had been completed. The NTSB team investigating San Bruno did not have someone with significant mechanical integrity experience, so Hall filled that roll. The position required him to take a downgrade, but he was ultimately selected to a deputy director position shortly after he was hired.

For the first 3 to 4 weeks, Hall caught up with the details of the investigation by reading reports that had been submitted by PG&E. He focused on the Integrity Management program (IMP) and how it was developed. PG&E was a more difficult company to deal with. Getting information from them was like "pulling teeth."

Hall made sure that the NTSB team was being more specific with how they requested information from PG&E. They needed to use words like "any and all records." At times, PG&E would "push back" saying the NTSB's request for information was too broad. Hall felt PG&E eventually "came clean" on things, but it was like pulling teeth. If the NTSB didn't ask for something in the proper way, PG&E wouldn't provide it.

Most conversations Hall encountered with PG&E employees were with William Hayes and Bob Fassett.

Hall did not conduct any formal interviews, but recalled talking with Frank Maffei.

Hall's general impression of PG&E is that it had a sloppy IMP. He would rank PG&E in the lower third, and criticized PG&E for not following its own procedures. PG&E would not do annual reviews or updates to the IMP. Direct assessment (DA) was not supposed to be used for L132. Seam issues should have been uncovered on L132 if the right methodology had been selected. PG&E wanted DA to be its default assessment method because it was cheaper.

The NTSB team made many requests to PG&E for leak reports. Hall recalled a 1948 installation that PG&E had documented failed welds. Hall advised that PG&E fixed the failed welds but criticized them for failing to inspect anything beyond what they found.

(Agent's Note: AUSA Berger asked Hall to review a September 30, 2010 data request.)

Hall said this particular data request was made during a time when Hall was not an employee of the NTSB.

The principle issue was in the way PG&E had interpreted the regulation. PG&E interpreted it as a way to preserve its

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MAOP/MOP, but Hall felt it was an incorrect interpretation.

(Agent's Note: AUSA Berger asked Hall to review a February 2011 supplemental to the data request.)

This particular supplemental request was made during a time when Hall was not an employee of the NTSB.

During the course of the NTSB's investigation, their focus was not on whether PG&E was increasing the pressure of their lines over 10%. They focused more on the way PG&E preserved the MAOP/MOP.

Hall did not recall having discussions about RMI 06 with PG&E. Hall felt that PG&E used a "creative interpretation" of the regulation.

(Agent's Note: AUSA Berger asked Hall to review an exhibit.)

Hall had seen the April 6th letter but did not recall having any specific discussions about it. Hall did not have any specific discussions with PG&E regarding the 10% policy. Hall's interpretation of the April 6th letter certainly seemed to imply that the 10% policy was not an approved practice, but Hall had no idea of whether or not PG&E was actually using it.

Hall believes PG&E was using the wrong interpretation of the regulation. The regulation was supposed to be applied to relief valves and not transmission lines. Looking at the total picture, PG&E was very sloppy and had a number of creative interpretations. PG&E was trying to stretch the regulations. Hall commented, "Every rock you would turn over, you would find more problems."

Hall would have expected PG&E to tell him if they were using the 10% policy but the NTSB was finding so many issues that they had to leave out things just to stay "streamlined."

Hall suggested talking with PHMSA employee Mike Israni regarding the development of the IM regulations. Hall recalled a huge number of supplemental reports.

Hall described some of his frustration with PG&E in obtaining an interpretation of what "N/A" stood for. It took PG&E weeks to get him a simple response that N/A stood for "none."

(Agent's Note: AUSA Berger asked Hall about PG&E submitting a 1988 leak report late in their investigation.)

Hall advised the report was produced late in investigation, however, it may have been submitted late because of the way the NTSB requested it. The NTSB may not have been specific enough in their request.

In 1989, Hall was a consultant to PG&E in their nuclear group. Hall did not do anything dealing with their pipelines.

(Agent's Note: AUSA Berger asked Hall about Ravi Chhatre's memo to file.)

Hall did not recall it specifically, however, suspected the motivation for writing the memo was to clarify the 10% issue. Hall would have expected that if PG&E was using the 10% practice, it should have been disclosed to the NTSB.

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Hall recalled an "annoying" issue surrounding the INGAA Report. Hall felt PG&E tried to mislead the NTSB's investigation and push them into a different direction with that report. The NTSB spent a significant amount of resources to discredit the INGAA report. Hall felt it was a way for PG&E to divert attention off of them.

PG&E had to make disclosures to PHMSA regarding leaks, incidents and failures through a web-based application. PG&E certified the information to PHMSA. The NTSB never received the documentation from PG&E that supported these disclosures to PHMSA.

The NTSB prepared a factual report. All parties were invited to a technical review. The review took three days. It was a very "painful" process because PG&E argued over many of the points in the report, but the NTSB changed very little in its factual report.

Reviewed By (Initials): M M

Date: 11/06/2014

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