PACIFIC GAS AND ELECTRIC COMPANY
Gas Transmission System Class Location OII
Data Response

PG&E Data Request No.:	CPSD_015-001		
PG&E File Name:	GTSClassLocationOII_DR_CPSD_015-001		
Request Date:	April 17, 2012	Requester DR No.:	
Date Sent:	May 17, 2012	Requesting Party:	CPUC (CPSD/Legal)
		Requester:	[redacted]

QUESTION 1

How does PG&E define "class study" pursuant to 49 C.F.R. Pt. 192.609?

a. What duties are performed by PG&E employees in a class study?

b. What are the titles of those PG&E employees who are engaged in class studies?

c. What are the names of those PG&E employees who were engaged in class studies from September 1, 2009 to August 31, 2010?

ANSWER 1

49 C.F.R. Pr. 192.609 defines the study an operator shall perform when an increase in population density indicates a change in class location for a segment of an existing steel pipeline operating at hoop stress that is more than 40 percent of SMYS.

PG&E implements Section 609 through Utility Procedure TD-4127S (previously provided to the Commission as *GasTransmissionSystemRecordsOII_DR_CPUC_045-Q04Atch01*) and associated Utility Procedure TD-4127P-01 (previously provided to the Commission as *GasTransmissionSystemRecordsOII_DR_CPUC_045-Q04Atch02*).

As described in TD-4127P-01, a class study includes:

1) A review of:
    a. The current (and originally installed) class location for the segment of pipeline involved
    b. The design, construction, valve spacing and testing procedures followed in the original pipeline construction. Compare these with the current requirements for the new class location
    c. The physical condition of the affected segment of the pipeline to the extent it can be ascertained from available record
    d. The operating and maintenance history of the pipeline segment, including the physical condition, based on available records

e. The maximum actual operating pressure and the corresponding operating hoop stress, taking pressure gradient changes into account, for the segment of pipeline involved
f. The characteristics of the actual area affected by the population density increase, including physical barriers or other factors which may limit further expansion of the more densely populated area.

2) The evaluation of the study data to determine if the pipeline is in satisfactory physical condition for present class location

3) Documentation of the study elements and results on Form TD-4127P-01-F02 (also previously provided to the Commission as part of GasTransmissionSystemRecordsOII_DR_CPUC_045-Q04Atch02).

Although a number of personnel provide information used during Section 609 class studies, as described in Utility Procedure TD-4127P-01, the pipeline engineering department is responsible for completing these studies. PG&E has not found any record of a Section 609 class study completed between September 1, 2009 and August 31, 2010. Although not documented as a formal 609 study, PG&E pipeline engineers analyzed sections of pipeline that changed in class and created projects that resulted in pipe being replaced or hydro-tested due to class location changes between September 1, 2009 and August 31, 2010.