

**PACIFIC GAS AND ELECTRIC COMPANY  
General Rate Case 2011 Phase I  
Application 09-12-020  
Data Response**

PG&E Data Request No.:	DRA_213-01		
PG&E File Name:	GRC2011-Ph-I_DR_DRA_213-Q01		
Request Date:	March 16, 2010	Requester DR No.:	DRA-213-DAO
Date Sent:	March 30, 2010	Requesting Party:	DRA
PG&E Witness:	Redacted	Requester:	Dao Phan

**EXHIBIT REFERENCE: PG&E-3, CHAPTER 18**

**SUBJECT: MWC FH, SERVICE VALVE REPLACEMENT**

**QUESTION 1**

With regard to the statement on page WP 18-26, line no. 7, "...updated work procedure that allows some service valves to be repaired/replaced later when non-hazardous..." please answer the following questions:

- a. Is the updated work procedure a result of GEEM? Please explain.
- b. What is meant by "repair/replaced later"? Please identify the time frame referenced in the statement.
- c. Please identify the specific changes within the work procedure referenced in the statement, and provide the date the work procedure was updated.
- d. Prior to the work procedure updated date, was PG&E able to repair or replace service valves at a later date when found non-hazardous? If so, please provide the number of service valves repaired or replaced "later", for each year from 2004-2008. Identify the time frame that the service valves were repaired or replaced when performed "later".

**ANSWER 1**

- a. Please refer to attachment GRC2011-Ph-I\_DR\_DRA\_213-Q01Atch01 for a copy of Gas Information Bulletin 245, revision 1 (effective 3/1/09). This document changed the Grade 1 (hazardous) gas leak grading criteria, which allowed some above ground leaks around the meterset to be considered non-hazardous at time of detection, and scheduled for repair up to 18 months later. Gas Information Bulletin 245, revision 1, was issued as an enhancement to PG&E's leak survey and leak grading process providing a more prescriptive definition for grading leaks. Since the

original version of Gas Information Bulletin 245 met the intent and was in compliance with 49 CFR 192, the revision is not the result of GEEM.

- b. A leak at the service valve or below the service valve (i.e. riser threads) can be stopped by various repair methods or by replacing the service valve. If the leak at or around the service valve is considered non-hazardous at time of detection, the leak can be scheduled for repair up to 18 months later.
- c. Gas Information Bulletin 245, revision 1 (attachment GRC2011-Ph-I\_DR\_DRA\_213-Q01A1ch01) became effective on 3/1/09. Beginning in 2008, PG&E released Gas Information Bulletin 245, which had defined any leak reading within 5 feet of the outside wall of a building to be hazardous. Consequently, small leaks at metersets that can only be detected by sensitive instruments were automatically deemed hazardous and repaired immediately. The revision on 3/1/09 changed the criteria where some above ground leaks detected within 5 feet of the outside wall of a building were no longer automatically hazardous.
- d. Please refer to response in part c for a chronology of the changes. Before Gas Information Bulletin 245 was released in 2008, some above ground leaks at service valves within 5 feet of the outside wall of a building could be graded non-hazardous and repaired or replaced later. In 2008 through 3/1/09, before releasing Gas Information Bulletin 245, revision 1, some service valve leaks beyond 5 feet of the outside wall of a building could be graded non-hazardous and repaired or replaced later.

While PG&E tracks how many service valve repairs were completed in each year from 2004-2008 (and that information is provided in WP18-16 line 36) the number repaired immediately versus those deemed non-hazardous and repaired later is not tracked and therefore is not readily available.