



Brian K. Cherry
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October 5, 2010

Paul Clanon, Executive Director
California Public Utilities Commission
505 Van Ness Street, 5th Floor
San Francisco, CA 94102

Re: Request for Extension to Comply with Order Number 12 of Resolution L-403;
Request for Extension of Certain Inspection Work identified in September 23, 2010
Letter from Brian Cherry to Paul Clanon

Dear Mr. Clanon:

I am writing to you to request an extension of time for Pacific Gas and Electric Company (PG&E) to comply with Order Number 12 of Resolution L-403. PG&E also requests permission to extend certain inspection work identified in my letter to you dated September 23, 2010. Specifically, PG&E requests an extension of these deliverables until October 22, 2010.

Order Number 12 directs PG&E to conduct an accelerated leak survey of all natural gas transmission pipelines, giving priority to segments in class 3 and 4 locations, by October 12, 2010, and to report the results of that survey to you by that same date. In response to your September 13, 2010, letter, PG&E committed to (1) complete an aerial leak survey of its entire gas transmission system by October 12, 2010; (2) complete leak surveys using traditional methods for all Class 3 locations, Class 4 locations, and High Consequence Areas on its transmission system; and (3) conduct instrument surveys over all gas transmission lines in San Bruno using Close Interval Survey (CIS), Direct Current Voltage Gradient (DCVG) and Pipeline Current Mapper (PCM) tools, to provide a more detailed assessment of the pipe and pipeline coating. These activities were to be completed and reported to you by October 12, 2010.

PG&E is making significant progress to complete the system-wide inspections, but requires an additional ten days to complete the aerial and ground inspections of our gas transmission lines. Both helicopter availability and weather conditions have slowed down our progress to date. In addition, fog conditions in certain locations along the coast have made aerial surveys impractical. PG&E proposes to complete ground surveys in those areas in place of aerial surveys in order to complete the leak survey work. We expect to be completed with the inspections and in a position to report the results to you by October 22, 2010. With respect to the instrument surveys on the gas transmission lines in San Bruno, we are also making progress, but request the

extension to ensure adequate time to obtain permits necessary to complete the surveys.

Under Commission Rule of Practice and Procedure 16.6, this request needs to reach you no later than three business days before October 12, 2010. Therefore, I am sending this letter to you by e-mail, as well as hand delivering the letter to you in person.

Thank you for your attention to this request for an extension.

Very truly yours,



Brian K. Cherry
Vice President – Regulatory Relations

cc: Patrick Berdge, Legal Division
Joe Como, Division of Ratepayer Advocates