956.1. Did PG&E keep records of gas over-pressurization incidents in its distribution and transmission system between 2002 and the fall of 2008?

**Response:**
**Yes, PG&E has records of gas over-pressurization incidents. You are apparently referring to a data response that PG&E provided in another context. PG&E was responding to a data request seeking the number of customer outages and the duration of such outages "due to under- or over-pressurization occurrences within gas distribution systems…." PG&E was explaining in that data response that it did not have a central repository where it tracked the number of customer outages, or the duration of such outages. PG&E's records can be in electronic form, or in the form of paper charts or maintenance records.**

956.2. If not, on what basis could direct assessment be performed on any transmission lines within that system, given that federal law specifies that only lines free of pressure surges over a five year period can be eligible for the direct assessment method to comply with the 2002 law?

**Response:**
**Not applicable. Federal law does not state that only lines free of pressure surges over a five year period are eligible for the direct assessment method.**

956.3. In a Nov. 30, 2009 regulatory filing, PG&E asserts that there had been four pressure spikes related to Line 132 and other lines fed from the Milpitas terminal between Sept. 2008 and November 2009. Please specify what happened in each of the four incidents. Also, since PG&E had documented pressure spikes on the line as of November 2009, on what basis did it proceed on direct assessment that month of Line 132?

**Response:**
**Despite PG&E's request, you have not provided us with a November 30, 2009 regulatory filing to this effect. The citation you provided to PG&E's rebuttal testimony dated June 4, 2010 in the 2011 General Rate Case, 3C, Chapter 29, attachment I at page 29I-1, which is PG&E's April 2, 2010 response to TURN data request no. 040-27, does not make any reference to "four pressure spikes related to Line 132 and other lines fed from the Milpitas terminal between Sept. 2008 and November 2009."**
**To the extent that you are referring to a workpaper submitted in PG&E's 2011 Gas Transmission and Storage Rate Case supporting a request for funding for the installation of filters at the Milpitas terminal, the over-pressure incidents mentioned in the work paper refer to distribution feeder mains, and did not result in any over-pressurization of Line 132.**
**PG&E has researched its records, and we did not have four, or indeed, any**

**over-pressurization events on Line 132 between September 2008 and November 2009. PG&E did have a planned increase in pressure on Line 132 on December 9, 2008, where the pressure was increased to 400.73 psig.**

956.4. The automatic relief valve on Line 132 kicked in at a pressure of 386 psig. That would suggest that MAOP at some place on the line was in fact 350 psig and that with 10 percent allowable, the maximum pressure was 385 (thus triggering relief at 386). PG&E has a history of linking networks in the distribution side with differing MAOPs, (five cases discovered in 2008/09) setting one MAOP for both. Was that the case in Line 132? In other words, was the established MAOP for the 1956 repair done on Line 132 -- based on the quality of pipe and or welds used at the time -- lower than the rest of the line, which had an MAOP of 400 and an MOP of 375?

**Response:**
**Your question has several false and erroneous premises and statements. We are not attempting to address all of the errors and mischaracterizations.**

**Your direct question is "was the established MAOP for the 1956 repair done on Line 132 -- based on the quality of pipe and or welds used at the time -- lower than the rest of the line, which had an MAOP of 400 and an MOP of 375?" The answer to that question is no. The established MAOP for the 1956 relocation (it was not a repair) was not lower than the rest of Line 132. You are erroneously assuming that PG&E had set the overprotection valve (not an automatic relief valve) for MAOP plus 10%, which was not the case. In addition, your statement about PG&E having "a history of linking networks in the distribution side with differing MAOPs, (five cases discovered in 2008/09)" is both incorrect and an exaggeration. PG&E discovered one instance in 2008 of two distribution systems with slightly different MAOPs having been linked without completing the proper documentation.**