

From: Clanon, Paul  
Sent: 12/13/2010 12:16:33 PM  
To: Cherry, Brian K (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=BKC7)  
Cc:  
Bcc:  
Subject: RE: Data Requests posed from you in last 24 hours

PS I might be completely wrong about there even being a prohibition. Here's your guys' answer to the Chron:

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.**

And here's the reg:

Code of Federal Regulations dealing with Integrity Management - fed reg 192.917; provisions a,b,c,d,e plus 3iii. See below.

**(3) *Manufacturing and construction defects.* If an operator identifies the threat of manufacturing and construction defects**

(including seam defects) in the covered segment, an operator must analyze the covered segment to determine the risk of failure from these defects. The analysis must consider the results of prior assessments on the covered segment. An operator may consider manufacturing and construction related defects to be stable defects if the operating pressure on the covered segment has not increased over the maximum operating pressure experienced during the five years preceding identification of the high consequence area. If any of the following changes occur in the covered segment, an operator must prioritize the covered segment as a high risk segment for the baseline assessment or a subsequent reassessment.

(i) Operating pressure increases above the maximum operating pressure experienced during the preceding five years;

(ii) MAOP increases; or

(iii) The stresses leading to cyclic fatigue increase.

(4) *ERW pipe*. If a covered pipeline segment contains low frequency electric resistance welded pipe (ERW), lap welded pipe or other

pipe that satisfies the conditions specified in ASME/ANSI B31.8S, Appendices A4.3 and A4.4, and any covered or noncovered segment in the pipeline system with such pipe has experienced seam failure, or operating pressure on the covered segment has increased over the maximum operating pressure experienced during the preceding five years, an operator must select an assessment technology or technologies with a proven application capable of assessing seam integrity and seam corrosion anomalies. The operator must prioritize the covered segment as a high risk segment for the baseline assessment or a subsequent reassessment.

(5) *Corrosion.* If an operator identifies corrosion on a covered pipeline segment that could adversely affect the integrity of the line (conditions specified in §192.933), the operator must evaluate and remediate, as necessary, all pipeline segments (both covered and non-covered) with similar material coating and environmental characteristics. An operator must establish a schedule for evaluating and remediating, as necessary, the similar segments that is consistent with the operator's established operating and maintenance procedures under part 192 for testing and repair.

Now I don't see any prohibition there, except maybe for ERW pipe.

**From:** Clanon, Paul  
**Sent:** Monday,  
December 13, 2010 12:07 PM  
**To:** 'Cherry, Brian K'  
**Subject:**  
RE: Data Requests posed from you in last 24 hours

Thx. I did see this over the weekend, and I was glad to hear there weren't any overpressure events on 132. Then I wondered if there have been ANY overpressure events that would trigger an MAOP violation anywhere on your system since the baseline-assessments started being performed, and if you've done any ECDAs anywhere that violate the prohibition, with or without CPUC knowledge. That's what I'm trying to nail down now.

**From:** Cherry, Brian K [mailto:BKC7@pge.com]  
**Sent:** Monday, December 13, 2010 11:46 AM  
**To:** Clanon,  
Paul  
**Subject:** Fw: Data Requests posed from you in last 24 hours

Fyi

**From:** Garber,  
Stephen (Law)  
**Sent:** Monday, December 13, 2010 11:41 AM  
**To:**  
Stock, William; Cherry, Brian K  
**Cc:** Horner, Trina  
**Subject:**  
FW: Data Requests posed from you in last 24 hours

The email attachment below was sent by Glen to Raffy, and is the basis for what we told (or should have told) the reporter. We today are telling the reporter, in response to a follow up question, that there have not been any overpressure events on Line 132 from 2004 - 2009.

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**From:** Carter, Glen E  
**Sent:** Saturday, December 11, 2010 3:17 PM  
**To:** [Redacted] Raffy Stepanian (rst@cpuc.ca.gov)  
**Cc:** Garber, Stephen (Law); Horner, Trina  
**Subject:** Data Requests posed from you in last 24 hours

Raffy Stepanian :

Based on the instructions from your voice mail, I am sending this response to your personal e-mail due to the CPUC system currently not being active.

We have had several conversations over the last 24 hours and I wanted to ensure that I close the loop and ensure that your needs are being met.

Request #1 – Receive a copy of PG&E's response to the 12/9 media request of 4 questions posed by the SF Chronicle **(response is included below)**

<<FW: Media Inquiry: San Francisco Chronicle - Index No. 956 (updated)>>  
Request #2a – Has PG&E experienced any Overpressurization (110+% of MAOP) events within the last 5 years on Transmission Low frequency ERW or Lap welded pipe? (reference to 192.917 (4) of code) – The response for this item will obviously be coordinated with Request#3 below

Request #2b – If so, how did PG&E account for this in their selection of integrity assessment method? PG&E will not be able to provide until results of 2a are tabulated.

Request #3 – Provide a listing of all Transmission and Distribution Overpressurization (110+% of MAOP) events that have occurred within the PG&E system over the last 5 year period. – I will enter this request into the Data Request log for response with an ASAP date. To ensure a timely response, I will split this response into two segments, readily available query of Gas Event reporting tool data since inception in 2008 and a manual research of prior events recorded which will obviously take longer to provide.

Request #4 -- Has the CPUC ever stopped PG&E from performing ECDA due to an overpressurization event? As we discussed, this would seem to be better responded to from the CPUC, but PG&E will research and respond for the record.

If hope I have adequately captured our discussions and trust that if not, you will redirect my efforts ASAP.

I will proceed with entering these four questions into our database for a formal response

Thank you for continuing to keep the communication lines open and seeking clarity of the requests.

Glen