From: Clanon, Paul

Sent: 12/13/2010 1:51:26 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

It's in the document you sent me. End of the paragraph:

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.

On Dec 13, 2010, at 1:44 PM, "Cherry, Brian K" <BKC7@pge.com> wrote:

> That's news to me. Of course, I'm the last one to know here at PG&E....
>
> **From:** Clanon, Paul [mailto:paul.clanon@cpuc.ca.gov]
> **Sent:** Monday, December 13, 2010 1:33 PM
> **To:** Cherry, Brian K
> **Subject:** Re: Data Requests posed from you in last 24 hours
>
> By the way, I was surprised to hear that 132 had gone up to 400 psig in December 2008. Makes it more puzzling (to me, but what do I know) that 386 would cause it to blow almost two years later. I don't know how the NTSB ever makes sense of these things.
>
> On Dec 13, 2010, at 1:23 PM, "Cherry, Brian K" <BKC7@pge.com> wrote:

I'm trying to do the same. I think the answer to your last question is that there have been over-pressurization events but none that violate the prohibition. I'm also trying to follow-up.

From: Clanon, Paul [mailto:paul.clanon@cpuc.ca.gov]
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.

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