QUESTION 5

Please provide a listing of all other pipelines, along with corresponding dates, SCADA printouts, and pressure charts, where PG&E has applied its practice of reestablishing MAOP every 5 years as PG&E has indicated it has done on Line 132. Please provide copies of all policies, standards, procedures, etc. related to PG&E's practice of reestablishing MAOP on its pipelines.

ANSWER 5

PG&E's practice of operating pipelines at the pressure needed to meet peak customer demand every five years has been limited to certain of its pipelines and has not been a system-wide practice. The pressure needed to meet peak customer demand is typically but not always equal to a pipeline's MAOP.

PG&E usually operates its pipelines at the pressure needed to serve customers, which generally is not the maximum pressure for which the lines are authorized by code. When there is particularly cold weather and demand for gas increases to peak levels, the pressure on the line can be increased to the maximum previously established pursuant to the DOT code. However, under certain circumstances where the operating pressure is raised above the maximum pressure experienced during the preceding five years, PHMSA regulations adopted in 2002 require the operator to schedule a priority assessment capable of assessing seam integrity. In these circumstances, ASME B31.8S calls for a hydrostatic pressure test, which would take a line out of service for a period of at least a week. To avoid this and any potential customer curtailments that may result, PG&E has operated, within the applicable 5-year period, some of its pipelines that would be difficult to take out of service at the maximum pressure experienced during the preceding 5-year period in order to meet peak demand and preserve the line's operational flexibility. These pressures are within generous safety margins built into a pipeline's MAOP.

Please see the table below listing the dates and lines since 2008 on which such pressure increases occurred. PG&E also has records of such pressure increases in 2003 on Lines 132 and 101, which also are included in the table.

Date of Pressure Exercise	Route
7/20/2010	50A
4/12/2010	109
1/8/2010	118A
8/13/2009	142S
6/19/2009	107
6/19/2009	114
4/13/2009	108
12/9/2008	132
11/14/2008	109
11/14/2008	0805-01
10/30/2008	138
5/23/2008	1607-01
12/11/2003	132
12/11/2003	101

We are continuing to research our records and will provide any additional information we may identify.

Attachment A provides the hourly average SCADA pressure for each pipeline listed above immediately before, during and after the pertinent pressure increases. Also attached (Attachment B) is a copy of PG&E's RMI-06, which describes PG&E's process to increase pressure in certain transmission lines every five years for these operational purposes.