

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



April 8, 2011

Mr. Kirk Johnson, Vice President  
Gas Engineering and Operations  
Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA

Dear Mr. Johnson:

Pacific Gas and Electric Company (PG&E) recently informed the Commission that beginning sometime this month it intends to begin hydro-testing or replacing 152 miles of High Consequence Area pipe within its natural gas system. We request that PG&E provide us with a copy of its plan, along with a copy of the procedures to be utilized for performing the hydro-tests. At a minimum, the plan should provide an overall schedule for the planned testing or replacement. In addition, for each transmission line being tested, the plan should provide the following specific details related to each segment on that line:

- Identifier for the segment being tested along with the starting and ending mile-point data for each segment, date(s) of the test, location of the segment, test pressure and duration, and contact information for the individual(s) responsible for the testing of the segment.
- Identify how the selected segment was prioritized, what other options were considered, but not selected, for testing the segment, and why hydro-testing of the segment was determined to be the superior alternative to outright replacement of the segment?
- If any segments being tested are currently operating under a CPUC-mandated or PG&E voluntary pressure reduction of 20% of its MAOP or MOP, indicate whether and why such segment(s) were prioritized for hydro-testing ahead of other segments that have not been subject to a 20% pressure reduction.
- What additional testing (i.e., materials property, toughness, etc.) and data gathering (i.e., wall thickness, diameter, seam type, coating, etc.) does PG&E intend to perform on the segment prior to or in conjunction with the hydro-test and at what intervals on the segment and/or pipeline will any additional testing and/or data gathering will be performed?
- What protective measures is PG&E taking to reduce the potential for property damage or injuries due to the failure of the segment during the test?

Please provide the requested information by April 13, 2011. In addition, after we have had an opportunity to review PG&E's plan for hydro-testing, we would like to meet with PG&E to discuss the plan. We would like for this meeting to occur at least one-week prior to PG&E's first planned hydro-test.

If you have any questions, please contact me at 415-830-2892.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Julie Halligan', written over a faint, light-colored signature line.

Julie Halligan, Deputy Director  
Consumer Protection and Safety Division

cc:

Brian Cherry, PG&E

Bill Stock, PG&E

Richard Clark, CPSD

Michelle Cooke, CPUC

Raffy Stepanian, CPSD