

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Own Motion to Adopt New
Safety and Reliability Regulations for
Natural Gas Transmission and Distribution
Pipelines and Related Ratemaking
Mechanisms

R.11-02-019
(Filed February 24, 2011)

DISABILITY RIGHTS ADVOCATES' RESPONSE TO PACIFIC GAS AND
ELECTRIC COMPANY'S MOTION FOR ADOPTION OF A MAXIMUM
ALLOWABLE OPERATING PRESSURE VALIDATION METHODOLOGY AND
REQUEST FOR ORDER SHORTENING TIME TO RESPOND

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I. INTRODUCTION

In accordance with Rule 11.1 (e) of the Commission’s Rules of Practice and Procedure and the Ruling issued by ALJ Bushey on April 25, 2011, Disability Rights Advocates (“DisabRA”) hereby responds to Pacific Gas and Electric Company’s Motion for Adoption of a Maximum Allowable Operating Pressure Validation Methodology and Request for Order Shortening Time to Respond (“Motion”), seeking an order adopting a methodology by which PG&E can validate MAOP for various natural gas pipelines. In this motion, PG&E seeks approval for a validation process that would permit it to make various assumptions regarding pipeline components for which no direct documentation can be located. To the extent that Commission intends to consider any validation process where direct documentation is unavailable, DisabRA recommends that it engage in an independent review to develop such a validation process to avoid the appearance of acting with too much deference to PG&E, and to avoid the appearance that it is relying on PG&E to self-regulate.

II. TO DATE, IT APPEARS THAT THE COMMISSION IS PREPARED TO ACCEPT SOME LEVEL OF MAOP VALIDATION BASED ON DOCUMENTATION, WHICH WILL LIKELY INVOLVE SOME RELIANCE ON ASSUMPTIONS

DisabRA takes no position at this time as to whether any level of analysis that relies purely on documentation can effectively validate MAOP, given the fact that the existing documentation for the pipeline that exploded in San Bruno was demonstrably inaccurate. However, the fact that the Commission has directed PG&E to engage in this validation process indicates that it is considering the option of approving some form of purely documentary review; PG&E is now indicating that any such documentary review is almost certain to be incomplete, and it requests permission to rely on various assumptions about pipeline components for which no direct documentation is available.¹

¹ Since the Motion was filed, CPSD has issued a letter indicating its growing discomfort with the use of any assumptions for pipeline validation, and recommending direct testing whenever complete documentation is not available. See CPSD letter to Kirk Johnson, April 26, 2011. Again, DisabRA takes no position on the

To the extent that the Commission agrees that any process relying on documentation may be sufficient to demonstrate MAOP, DisabRA recognizes the truth of PG&E’s statement that it is unlikely that documentation will be located for every pipeline component, down to fittings and valves.² Thus, if any analysis based on documentation is to be accepted, there will likely be some degree of reliance on assumptions. The questions then become: (1) who will develop the set of assumptions, and (2) what assumptions are appropriate.

III. THE PUBLIC DOES NOT TRUST PG&E TO DEVELOP ITS OWN SET OF ASSUMPTIONS

While some level of reliance on assumptions may be needed for any documentary review that might be authorized for validating MAOP, if such a process is to be viewed as meaningful by the public, the Commission must take action that will be seen as reliable and based on technical expertise, with no hint of self-interest. Because of the level of public concern about pipeline safety in the wake of the San Bruno explosion, and because the public is likely to perceive any set of assumptions developed by PG&E as self-serving, DisabRA believes that the public will not accept any set of assumptions developed by PG&E itself.³ Thus, as set forth in greater detail below, DisabRA proposes that, to the extent that any set of assumptions will be permitted as part of a validation process that relies on existing documentation, the Commission should convene a panel of

underlying issue and proposes its alternative process to be considered only if the Commission determines to move forward with documentary validation.

² PG&E Motion at p. 4

³ As is well documented in the media coverage of the aftermath of the San Bruno explosion, the public has a substantial level of distrust in PG&E as well as skepticism of this Commission. *See, e.g.* “San Bruno Neighborhood to Rebuild,” *San Francisco Chronicle*, April 28, 2011, at <http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2011/04/27/MN2U1J9219.DTL> (describing San Bruno residents at a public meeting asking “how can the company and the oversight agency be trusted to make sure that a similar tragedy will not occur again”).

outside experts to develop an appropriate set of assumptions that could then be used by PG&E.⁴

IV. A PANEL OF EXPERTS IS AN APPROPRIATE MECHANISM FOR DEVELOPING REASONABLE ASSUMPTIONS THAT ARE NOT AT RISK OF BEING PERCEIVED AS SELF-INTERESTED

If the Commission is to increase public trust in both the regulated utilities and its own role as an effective regulator, it must make clear that PG&E cannot dictate the terms of its own pipeline safety review. If it were to accept PG&E's set of assumptions without further analysis or input, it would risk the perception that PG&E is issuing direction to the Commission rather than the other way around.⁵ Similarly, it is clear that there is substantial public skepticism about any set of assumptions advanced by PG&E itself.

Instead of adopting PG&E's proposal, the Commission should engage a panel of outside experts, to be selected by the Assigned Commissioner or some other appropriate decision-maker at the Commission, and to be compensated by PG&E, to review an appropriate sample of existing documentation, identify areas where verifiable documents for pipeline components are likely to be lacking, and then develop an appropriate set of assumptions that can be used for components lacking documentation. Of course, the expert panel should also be free to conclude after appropriate review that no reasonable assumptions exist that could substitute for direct documentation.

Such a process would be consistent with the Commission's appointment of an independent review panel to study the cause of the San Bruno explosion and make

⁴ PG&E indicates in its Motion that its proposals were developed in conjunction with three outside engineering firms, and none of them was able to suggest any better way of doing a records-based MAOP validation. *See* Motion at p. 5. Be that as it may, the public needs a more transparent process for delivering assumptions, outside of PG&E's direct control, if it is to have confidence in an eventual document review process.

⁵ This perception issue is already a concern that has been articulated in multiple forums, including among the Commissioners themselves. At the oral argument on the Order to Show Cause and the subsequent proposed stipulation, Commissioner Simon stated: "Separately, it seems more reasonable to me that any plan approved by the Commission should be clear, and the Commission, not PG&E, I repeat, the Commission, not PG&E, will decide when assumptions rather than documents can serve as an appropriate basis for establishing maximum pressure, and the Commission will have a final say on whether the assumptions are valid." Transcript of Oral Argument, Vol. 3, p. 358:12-21 (Com. Simon).

CERTIFICATE OF SERVICE

I certify that I have, by electronic mail to the parties to which an electronic mail address has been provided, served a true copy of “Disability Rights Advocates’ Response to Pacific Gas and Electric Company’s Motion for Adoption of a Maximum Allowable Operating Pressure Validation Methodology and Request for Order Shortening Time to Respond ,” on all known parties to R.11-02-019.

Dated April 29, 2011, at Berkeley, California.

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