

SoCalGas/SDG&E Pipeline Replacement and/or Pressure Test Decision-Making Process

Notes:

1. All pipeline segments must be assessed on a case-by-case basis at both the segment level, and as part of the integrated SoCalGas/SDG&E transmission pipeline system, taking into account all relevant factors. The three primary factors that are taken into consideration when choosing a course of action on a pipeline segment are: (1) Confidence the pipeline segment will withstand the pressure test at a threshold that is at least 1.575 times MAOP; (2) Customer impacts; and (3) Relative costs of prudent alternatives. In addition, other segment-specific factors (*e.g.*, environmental impacts) may be taken into account in the determination of whether to pressure test or replace a pipeline segment. Analysis of new route alternatives and pressure testing of existing pipelines will include cost factors to identify cost effective alternatives.

2. NTSB Safety Recommendation P-10-4 recommends completion of a pressure test plus a "spike." Implementation of this recommendation would require a peak pressure of 1.575 times MAOP, which is derived by the Part 192 requirement of 1.5 times MAOP plus a 5% spike ($1.5 \times 1.05 = 1.575$). For pipelines that have <u>not</u> been In-line Inspected with TFI the maximum test pressure is proposed to be equivalent to the highest operating pressure achieved in the previous 5 years. In order to meet this limitation, the new MAOP of the pipeline must be 63% or less of this pressure. The 63% is derived by calculating the inverse of 1.575 (1/1.575 = 0.63).

3. Assessment of construction and fabrication threats including certain types of girth welds and field bends can be difficult. In general, transmission pipelines installed prior to 1946 will typically not be able to have the construction/ fabrication threats assessed and would be abandoned as part of the proposed infrastructure program.