

**PACIFIC GAS AND ELECTRIC COMPANY
San Bruno GT Line Rupture Investigation
Data Response**

PG&E Data Request No.:	CPUC_100-02		
PG&E File Name:	SanBrunoGT-LineRuptureInvestigation_DR_CPUC_100-Q02		
Request Date:	March 21, 2011	Requester DR No.:	
Date Sent:	April 1, 2011	Requesting Party:	CPUC (ED)
		Requester:	Eugene Cadenasso

QUESTION 2

Does the GPRP just involve pipeline replacements or other work as well (e.g., pipeline inspections, maintenance, etc.)? Specify what pipeline related work would not be included in the GPRP?

ANSWER 2

The GPRP in its current form covers expenditures relating to (1) the replacement of gas distribution main meeting the criteria for inclusion in the GPRP (and the cost of replacing any adjacent pipeline that, as a practical matter, must be replaced at the same time); (2) the related service replacement and meter relocation; and (3) the replacement of copper services. As explained in Data Response CPUC_088-01, the criteria for including distribution pipeline in the GPRP have evolved since the program's inception in 1985.

In addition to the GPRP, PG&E conducts a wide range of gas pipeline safety, maintenance, and reliability work relating to its gas distribution system. PG&E's spending on gas distribution pipeline safety and maintenance work is tracked in a variety of major work categories. As reflected in the most recent GRC, these currently include:

- Gas Pipeline Replacement Program—Capital (MWC 14) covers capital expenditures for the GPRP (including the Copper Services Replacement Program).
- Gas Reliability—Capital (MWC 50) covers capital expenditures for gas distribution safety and maintenance work (including, e.g., main replacement, service replacement, regulator station replacement, and cathodic protection).
- Gas Emergency Response—Capital (MWC 52) covers capital expenditures to replace damaged or failed facilities (e.g., replacement of gas mains due to dig-ins, landslides or earthquakes).
- Leak Survey—Expense (MWC DE) covers routine and special leak surveys

(including integrating the leak survey information into the GPRP risk prioritization model).

- Mark and Locate—Expense (MWC DF) covers gas and electric distribution damage prevention work.
- Cathodic Protection—Expense (MWC DG) covers, among other activities, the monitoring of the cathodic protection of PG&E’s distribution system and troubleshooting of cathodic protection areas found to be below appropriate cathodic protection levels.
- Operate Gas System—Expense (MWC FG) covers a broad range of operational work such as monitoring system pressures and flows, checking odorant intensity levels, operating valves and regulator stations, and other miscellaneous maintenance.
- Preventive Maintenance—Expense (MWC FH) includes miscellaneous main, services, and distribution valve maintenance, atmospheric corrosion inspections and remediation, and a variety of preventive maintenance costs relating to PG&E’s Gas Distribution Integrity Management Program (DIMP).
- Corrective Maintenance—Expense (MWC FI) covers a variety of corrective maintenance activities including leak repair, cathodic protection restoration, regulator station repair, distribution valve repair, and DIMP-related corrective maintenance.

These work categories are described in detail in PG&E’s 2011 GRC submission at PG&E-3, Chapters 17-19. This list does not include pipeline work to increase capacity to meet load growth or pipeline work requested by customers or others.

Transmission pipeline was removed from the GPRP in 2000. The programs and work categories involving transmission pipeline repair, replacement, and maintenance are described in the response to Question 3.