

**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.

Rulemaking 11-02-019  
(Filed February 24, 2011)

**RESPONSE OF THE UTILITY REFORM NETWORK  
TO PG&E MOTION FOR DELEGATION OF AUTHORITY**



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**THE UTILITY REFORM NETWORK**

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July 20, 2011

**RESPONSE OF THE UTILITY REFORM NETWORK  
TO PG&E MOTION FOR DELEGATION OF AUTHORITY**

Pursuant to Rule 11.1 the Utility Reform Network (TURN) submits this reply to the “Pacific Gas and Electric Company’s Motion for Delegation of Authority to the Executive Director and Adoption of a Procedure to Obtain Authorization to Restore Operating Pressure,” filed on July 11, 2011.

TURN does not object to the substance of PG&E’s request – that the Commission delegate authority to the Executive Director to authorize PG&E to increase pressure on pipelines where the Commission had ordered pressure reductions. TURN does recommend two modifications that should form a part of any order approving PG&E’s proposal.

First, PG&E plans to send a letter request to increase pressure only to the Executive Director and CPSD. Given the significant public concerns regarding safety, TURN recommends that any such request from PG&E, as well as any resulting authorization from the Executive Director, should at a minimum be served on all parties to R.11-02-019.

Second, PG&E proposes that the “primary measure” for restoring normal operating pressure would be “a complete set of successful pressure test records,” presumably based either on finding old records or on conducting a new pressure test. TURN is concerned about the meaning of the word “primary.” PG&E does not appear to be unambiguously proposing to use valid pressure test results. TURN requests clarification as to whether any other means of demonstrating

pipeline integrity sufficient to warrant restoring normal operating pressure is contemplated by PG&E. Absent greater specificity and clarification, we would recommend that *only* the submission of valid pressure test records should warrant an increase in the pipeline pressure.

July 20, 2011

Respectfully submitted,

By: \_\_\_\_\_/s/\_\_\_\_\_  
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