

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

PG&E Data Request No.:	CPUC_140-06		
PG&E File Name:	SanBrunoGT-LineRuptureInvestigation_DR_CPUC_140-Q06		
Request Date:	July 17, 2011	Requester DR No.:	
Date Sent:	August 24, 2011	Requesting Party:	CPUC
		Requester:	Michelle Cooke

QUESTION 6

How will PG&E coordinate the curtailment plan internally? At the CAISO/PG&E workshop, it seemed that perhaps the gas silo had not yet communicated with the resource procurement silo.

ANSWER 6

PG&E has taken several proactive steps to coordinate and prepare for gas curtailments that could result from demand exceeding supplies due to the current pressure limitations on the gas system. Among the many steps are:

1. PG&E recently revised its “Winter” gas curtailment process (cold weather/high demand-driven), which has historically been the conditions under which curtailment would be most likely. The Company now utilizes a “day-ahead” curtailment process flow and a “day-of” curtailment process flow that address all scenarios under which curtailment might be necessary. The process flows are weather neutral and describe the steps the Company would take under conditions where it has advance notice of the need for curtailments or where an unexpected issue arises and curtailments are necessary immediately.
2. The Company recently evaluated its emergency management organization and determined that a Gas Joint Information System team should be formed to ensure adequate notification, communication and coordination with all stakeholders. The team is now formed and roles have been established. The ISO and the CPUC have been invited to join the Company’s Joint Information System through the its Joint Information Center.
3. The Company recently conducted a tabletop exercise on August 12, 2011 to test the “day-ahead” curtailment process flow. Since a “day-of” curtailment process consists of gas control taking immediate actions to stabilize and keep safe the gas system, the “day-ahead” curtailment process gives the company a broader opportunity to explore notification, coordination and communication steps. The purpose of the exercise is to evaluate the Company’s revised process flow and identify changes needed.

4. The Company continues to perform daily coordination calls with the Cal-ISO and additionally, has added a weekly coordination call between our Gas Engineering and Operations executive and their public policy executive.

With respect to the comment about not communicating with the Resource Procurement silo, Gas Rule 26 prohibits the Gas Operations Department from sharing any non-public transportation information (load, outages, capacity availability, etc.) with any intra-company department, including the Resource Procurement group. As such, Gas Rule 26 requires Gas Operations to treat Resource Procurement as other customers of the gas transmission system.