



Ben Campbell  
Director  
Pipeline 2020 Hydrotest  
Project

350 N. Wiget Lane  
Walnut Creek, CA 94598  
925-459-6006  
925-270-2609  
BCC3@pge.com

September 27, 2011

TRANSMITTED VIA EMAIL

Dear Ms. Cooke,

In compliance with Consumer Protection and Safety Division's September 12, 2011 letter to PG&E, PG&E is hereby providing notice for upcoming hydrotests wherein spike tests are not advisable and thus, will not be performed. For reference, CPSD's letter states "For any applicable pressure tests where a spike hydro-test will not be performed, PG&E's MAOP restoration request must provide advance notice regarding the specific pipeline facility, or component, which PG&E believes would preclude the spike hydro-test from being performed to a minimum level of 5%" (p.4). Sunil Shori of CPSD clarified that the spike test requirement does not apply to new pipe.

A list of upcoming hydrotests where a spike test is not advisable for engineering reasons is attached. This list reflects the initial review and request for additional information requested by Mr. Shori on September 22. Further, in the interest of transparency, a list of hydrotests performed without spike tests prior to the September 12, 2011 CPSD letter, is also attached. In every case, unique structural or engineering concerns precluded the use of a spike test in these limited instances.

PG&E is committed to performing spike tests wherever it is safe and reasonable to do so, and exceptions are expected to be infrequent. In the future, PG&E will provide notice for upcoming hydrotests where spike tests are not advisable via letter addressed to you with reasoning and data presented as in the attached format.

Sincerely,

  
Ben Campbell  
Director

Attachments