

**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

R.11-02-019
(Filed February 24, 2011)

**PACIFIC GAS AND ELECTRIC COMPANY'S COMMENTS ON
PROPOSED DECISION RESCINDING OPERATING PRESSURE
LIMITATION ON SUCTION SIDE OF TOPOCK COMPRESSOR
STATION**

STEPHEN L. GARBER
CHARLES R. LEWIS, IV
Pacific Gas and Electric Company
Law Department
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-8003
Facsimile: (415) 973-0516
E-Mail: SLG0@pge.com

JOSEPH M. MALKIN
Orrick, Herrington & Sutcliffe LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105
Telephone: (415) 773-5505
Facsimile: (415) 773-5759
Email: jmalkin@orrick.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

September 30, 2011

**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

R.11-02-019
(Filed February 24, 2011)

**PACIFIC GAS AND ELECTRIC COMPANY'S COMMENTS ON
PROPOSED DECISION RESCINDING OPERATING PRESSURE
LIMITATION ON SUCTION SIDE OF TOPOCK COMPRESSOR
STATION**

Pacific Gas and Electric Company (PG&E) supports Administrative Law Judge (ALJ) Maribeth A. Bushey's proposed Decision Rescinding Operating Pressure Limitation On Suction Side Of Topock Compressor Station concluding that the Commission's operating pressure restriction on the suction side of the Topock Compressor Station can safely be rescinded. PG&E appreciates the Commission and ALJ Bushey expediting their consideration of this matter to allow the timely restoration of pressure on this critical portion of PG&E's gas transmission backbone.

To avoid a potential inconsistency with D.11-09-006, PG&E offers one clarification to Ordering Paragraph 3 in Appendix A. The clarification affirms that pressure tests presented in future requests for pressure restoration will be consistent with the requirements at the time of the test. Thus, PG&E will conduct pressure tests after September 12, 2011 consistent with the

Consumer Protection and Safety Division's memorandum of that date. Tests performed before that date will comply with the requirements at the time.

Respectfully submitted,

/s/ Stephen L. Garber

STEPHEN L. GARBER
CHARLES R. LEWIS, IV
Law Department
Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105
Telephone: (415) 973-8003
Facsimile: (415) 973-0516
E-Mail: SLG0@pge.com

/s/ Joseph M. Malkin

JOSEPH M. MALKIN
Orrick, Herrington & Sutcliffe LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105
Telephone: (415) 773-5505
Facsimile: (415) 773-5759
Email: jmalkin@orrick.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

September 30, 2011

APPENDIX A

PROPOSED REVISIONS TO PROPOSED DECISION

1. In Ordering Paragraph 3, replace:

In future requests to rescind Commission-ordered operating pressure limitation, Pacific Gas and Electric Company must remedy the pressure testing deficiencies noted in the Consumer Protection and Safety Division's September 12, 2011 memorandum.

With (addition underlined):

In future requests to rescind Commission-ordered operating pressure limitation, Pacific Gas and Electric Company must remedy pressure testing deficiencies noted in the Consumer Protection and Safety Division's September 12, 2011 memorandum for tests performed after that date.