

**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 REPLY COMMENTS ON
PROPOSED DECISION ADOPTING PROCEDURE FOR LIFTING
OPERATING PRESSURE RESTRICTIONS**

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Pacific Gas and Electric Company (PG&E) submits these reply comments in support of Administrative Law Judge (ALJ) Maribeth A. Bushey's proposed Decision Adopting Procedure for Lifting Operating Pressure Restrictions (PD).

As discussed in comments filed on August 29, 2011, PG&E supports the proposed decision with certain clarifications and modifications.^{1/} PG&E also agrees with the other parties about having an open process to share information for pressure restoration proposed by the PD.^{2/} We are committed to a transparent process, but time is of the essence -- the failure to raise pressure expeditiously for certain pipelines may compromise the safety of customers, especially during the fall and winter months when heat is needed.

In reply to the Comments filed by the other parties, PG&E generally agrees that it is appropriate to share the additional information requested by parties, subject to existing Commission rules regarding confidentiality and safety.

^{1/} Specifically, PG&E believes the PD should be modified or clarified to: (1) order that pressure test records and MAOP validation be provided for High Consequence Area (HCA) segments; (2) order that MAOP validation be provided for non-HCA segments; (3) state that pressure test requirements are consistent with those in effect at the time of the test; and (4) allow the Commission in an open process to consider alternatives to a standard process for unique pipeline characteristics.

^{2/} PG&E, p.1; City of San Bruno, p.2-3; DRA, p.1; CCSF, p.2.

Per CCSF's request^{3/}, in each instance in which pressure restoration is proposed on lines where the Commission has previously directed a reduction, PG&E will provide an overview of the operational impact of failing to restore the pipeline pressure. Per DRA's request^{4/}, PG&E will identify all the types of pressure tests performed and provide the complete results and any actions PG&E has taken. DRA's additional request that PG&E state whether it plans to operate the line at higher than its proposed maximum allowable operating pressure is moot as PG&E has no intention of doing so.

Our providing this information is subject to two limitations. First, the Commission has previously recognized the sensitive and confidential nature of the exact location of certain gas transmission and storage facilities, such as shut-off valves, which PG&E shares now with first responders but not the general public. See D.11-07-014, pp. 8-9 at n.4. Accordingly, PG&E will provide the detailed information to CPSD under Public Utilities Code section 583, and can provide redacted or higher level information to other parties.

Second, providing historical operating pressure since each line was put into service is not useful in determining whether pressure restoration should occur. These records are not typically retained for the life of the pipeline. Further, the entire point of a pressure test is to prove that a pipeline is a safe pressure vessel within the pressures validated. Once a pressure test proves the pipe is in good condition the prior operating pressure is moot.

Accordingly, PG&E supports the PD, and especially the expedited public process it has established, with certain clarifications and one modification as discussed in its comments on August 29, 2011. Further, PG&E supports additional information-sharing as requested by parties discussed herein.

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^{3/} CCSF, p. 3.

^{4/} DRA, p.3-4.

Respectfully submitted,

 /s/ [Stephen L. Garber]

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