

**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**

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September 30, 2011

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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that the Commission's operating pressure restriction on the suction side of the Topock Compressor Station can safely be rescinded.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

/s/ Joseph M. Malkin

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## 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.