

From: Horner, Trina
Sent: 10/29/2011 7:59:56 AM
To: 'tdp@cpuc.ca.gov' (tdp@cpuc.ca.gov); Michelle Cooke (mlc@cpuc.ca.gov) (mlc@cpuc.ca.gov)
Cc: Doll, Laura (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=LRDD); Ramaiya, Shilpa R (/o=PG&E/ou=Corporate/cn=Recipients/cn=SRRd)
Bcc:
Subject: Chronicle story for Sunday (likely)

Michelle, Terrie,

The San Francisco Chronicle is writing a story, scheduled for as early as Sunday, about seam issues that PG&E has had on lines 300 A and 300 B. The story will also include information about the types of baseline assessments PG&E chose to perform on those lines since 2002, and will likely (again) state that PG&E over-relied on visual inspections, and should have been doing more hydrotests and ILI. That isn't new news. We've responded to his questions as best we could given very short turnaround time to do so, and focused on our forward-looking safety and testing activities in compliance with CPUC actions. I've copied in his questions and our answers, below, so you have a sense of where the article will go.

Trina

Q. 2302.01 Reporter says there were seam weld failures on Line 300 (A or B - not sure) in 2002 and 2009 - is that true?

A. 2302.01: PG&E had a seam weld repair for a Grade 2 leak on Line 300A in 2002 and a seam weld repair for a Grade 3 leak on Line 300A in 2009.

Q. 2302.02: He has also heard that a contractor found a "small colony" of stress corrosion cracking on 300A in 1996 or 1997 near Hollister - is that accurate?

A. 2302.02: No. It is not accurate. PG&E has inspected for stress corrosion cracking through a series of excavations in the Hollister area, but has not found any SCC.

Q. 2302.03: How many leaks have been reported on both 300A and 300B during their lifetime? (if this is difficult to find or will take more time, please prioritize this one last)

A. 2302.03: Because of the amount of time it would take to properly investigate all of our records to respond to this, PG&E respectfully declines to respond to this question.

Q. 2302.04 What is everything we have done as far as integrity management on those pipelines?

A. 2302.04: PG&E has a program to manage the integrity of its transmission pipelines and has an on-going program to monitor its pipelines through aerial, foot patrols, leak surveys, valve and station inspections. In addition, it has applied corrosion control

systems to its pipelines and monitors its system to assure that they are working sufficiently.

In addition to these activities, PG&E has also initiated its Transmission Integrity Management Program (TIMP), as prescribed by Federal Regulation (49CFR192, Subpart O). As part of this program, PG&E conducts an initial or "baseline" assessment of high consequence areas (HCAs) and then must conduct subsequent assessments periodically at intervals not to exceed seven years. This is in addition to meeting additional maintenance requirements on both HCA and Non-HCA segments on its transmission system.

Lines 300A and 300B are each over 500 miles in length and have been scheduled for assessment in sections. For Line 300A, PG&E completed an In-Line Inspection (ILI) in 2002, External Corrosion Direct Assessments (ECDA) in 2007 and 2009, and pressure tests in 2007 and 2009. For Line 300B, PG&E completed ILIs in 2005 and 2006 and an ECDA in 2007. ILIs are planned for both Lines 300A and 300B in 2012. -