

September 29, 2011

Paul Clanon
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Older Plastic Distribution Pipe Performance

Dear Mr. Clanon,

Recent explosions in Cupertino and Roseville have drawn interest in PG&E's natural gas distribution network and potential problems with certain older plastic piping. I write to ask for the CPUC's assessment of PG&E's plan to ensure the safety of the plastic piping that feeds natural gas into our homes and businesses.

Problems with certain types of plastic pipe are not new. In response to several accidents in the mid-1990's, NTSB released a special investigation report on brittle-like cracking in various types of polyethylene pipes manufactured from the 1960's to the early 1980's (NTSB/SIR-98/01, *Brittle-like Cracking in Plastic Pipe for Gas Service*). In response, the Research and Special Programs Administration (RSPA) of the Department of Transportation released advisory bulletins ADB-02-7 and ADB-07-1, which identified a number of pipe materials which have greater risk of failure, including the pre-1973 Dupont "Aldyl A" pipe reportedly involved in both the Cupertino and Roseville blasts.

RSPA recommended to operators that they review their records and identify locations where susceptible pipe was installed, record the print line data on any pipe involved in a failure, and establish a process for identifying brittle-like cracking failures. I am sending a letter to PG&E asking if they have acted on the recommendations, but, given the poor state of the records in their transmission system, I despair of receiving an encouraging response. **Has the CPUC compelled PG&E to follow these recommendations? If so, how?** It is incumbent on the regulator to ensure the safety of our gas distribution system.

As of August 2nd of this year, however, all natural gas distribution system operators, including PG&E, are to have rolled out a distribution integrity management plan (DIMP), pursuant to

subpart P of Code of Federal Regulations Title 49, Part 192. This places the CPUC in the role of enforcing a requirement that PG&E have a plan to identify and address the risks in its natural gas distribution system.

Has the CPUC examined PG&E's DIMP? According to §192.1007, a DIMP plan must, among other things, demonstrate knowledge of the system, identify threats to it, evaluate and rank risks, and implement measures to address those risks.

Given these high-profile gas distribution incidents, I would like answers to the following questions:

- Does the PG&E DIMP demonstrate a knowledge of the locations of these more vulnerable materials?
- Does it identify brittle-like cracking as a threat?
- Does it recognize the enhanced risk of brittle-like cracking in these older polyethylene pipes and have a plan for addressing that risk?

The San Francisco Chronicle has reported that, because of PG&E's gas system troubles, NTSB will be taking a special interest in the state's investigation of the Cupertino explosion. I hope that the Commission will be able to encourage PG&E—by all those means at its disposal—to develop an integrity management program for its distribution system that does not suffer from the deficiencies found in its transmission program and will prevent accidents such as those in Cupertino and Roseville.

Thank you for your consideration of my request.

Sincerely,

Jerry Hill
Assemblymember, 19th District

cc: Michael Peevey, President
Timothy Simon, Commissioner
Mike Florio, Commissioner
Catherine Sandoval, Commissioner
Mark Ferron, Commissioner
Edward Randolph, Director of the Office of Government Affairs
Chris Johns, President, Pacific Gas and Electric Company
Nick Stavropoulos, Executive VP of Gas Operations, Pacific Gas and Electric Company