

From: Shori, Sunil
Sent: 11/8/2011 12:53:46 AM
To: Ramaiya, Shilpa R (/o=PG&E/ou=Corporate/cn=Recipients/cn=SRRd)
Cc: Horner, Trina (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=TNHC);
Cooke, Michelle (michelle.cooke@cpuc.ca.gov); Halligan, Julie
(julie.halligan@cpuc.ca.gov)
Bcc:
Subject: RE: Line 131

Shilpa,

The default pressure reduction related to an indication, allowed for by code, are independent of the line's MAOP/MOP and are, instead, dependent on the operating pressure of the line at the time of discovery. The fact that a line is operating below 80% of its MAOP at the time of discovery does not automatically negate the potential need for additional pressure reductions. We need the values requested in my e-mail to confirm the adequacy of actions taken by PG&E.

Since work is already underway on Line 131 and no specific details related to the scope of the emergency repairs have been provided to CPSD/USRB, we request that PG&E preserve all portions of pipe removed from Line 131 until they can be inspected by the USRB. Please let us know where the removed sections will be stored.

Thanks, Shilpa.

Sunil

From: Ramaiya, Shilpa R [mailto:SRRd@pge.com]
Sent: Mon 11/7/2011 7:46 AM
To: Shori, Sunil
Cc: Cooke, Michelle; Halligan, Julie; Horner, Trina
Subject: RE: Line 131

Sunil,

Here's information I've collected from the team:

49 CFR 192.933(a)(1) does not apply because the operating pressure (324 psig) of this line was already low enough that it did not require a reduction in pressure in response to the anomalies. This pressure is less than 80% of MAOP of 461 psig. Further, the pipeline pressure is already below the requested MOP of 368 psig (80% level). Because the pressure is already below 368 psig, there was no reduction in pipeline pressure.

Since the reduce pressure provided safety given the increased time needed to repair ("if it cannot meet the schedule for evaluation and remediation required under paragraph (c) of this section and cannot provide safety through the temporary reduction in operating pressure or other action."), notification was not required to PHMSA prior to work starting.

That said, I'll be working with the team to get answers to your questions below as soon as possible.

Thanks.
Shilpa
415-973-3186

From: Ramaiya, Shilpa R
Sent: Sunday, November 06, 2011 7:01 PM
To: 'sunil.shori@cpuc.ca.gov'
Cc: 'michelle.cooke@cpuc.ca.gov'; 'julie.halligan@cpuc.ca.gov'; Horner, Trina
Subject: Line 131

Thanks for the information, Sunil. Will get back to you soon.

Shilpa
415-509-7599 (cell)

From: Shori, Sunil [mailto:sunil.shori@cpuc.ca.gov]
Sent: Sunday, November 06, 2011 06:56 PM
To: Ramaiya, Shilpa R
Cc: Cooke, Michelle <michelle.cooke@cpuc.ca.gov>; Halligan, Julie <julie.halligan@cpuc.ca.gov>
Subject:

Shilpa,

PG&E recently updated Paul Clanon with general information related to emergency pipeline repair work on Re Re that will begin Monday Nov 7 in the area Redacted. This is work to repair identified weaknesses, noted through in-line testing of Redact south of the Redacted, that resulted in a pressure reduction on the line. In turn, the reduced pressure and capacity has created a concern about the loss of service to 3000 customers. The fact that a pressure reduction has been applied on Line 131, and emergency repairs are necessary, warrants that PG&E file an official notification per 49 CFR, Part 192, Section 192.933(a)(1) with PHMSA and CPSD/USRB. At a minimum, we believe the notice from PG&E needs to detail:

1) The date when the potential anomaly, prompting the reduction in pressure, was discovered; 2) how, and which, ILI indications were used by PG&E to determine the reduced, safe, operating pressure; 3) when was the pressure reduction actually initiated? 4) specifications for the pipe and/or facilities on which the indications were noted; 5) a description of the potential anomaly and its location on the pipeline, 6) intended repairs and when they are to be performed; and 7) a copy of the map for the location where the indications are located and where repairs are to be performed.

Since PG&E has indicated that it will begin emergency repairs tomorrow, it is urgent that PG&E provide CPSD/USRB with information responsive to above items 4,5, and 7. The rest of the information must be provided by November 8, 2011.

Thanks, Shilpa.

Sunil Shori