

**PACIFIC GAS AND ELECTRIC COMPANY  
San Bruno GT Line Rupture Investigation  
Data Response**

PG&E Data Request No.:	CPUC_243-01		
PG&E File Name:	SanBrunoGT-LineRuptureInvestigation_DR_CPUC_243-Q01		
Request Date:	November 7, 2011	Requester DR No.:	
Date Sent:		Requesting Party:	CPUC (CPSD)
		Requester:	Sunii Shori

**QUESTION 1**

PG&E recently updated Paul Clanon with general information related to emergency pipeline repair work on Line 131 that will begin Monday Nov 7 in the area south of Los Vaqueros Reservoir. This is work to repair identified weaknesses, noted through in-line testing on L-131 south of the Los Vaqueros Reservoir, 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:

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.

**ANSWER 1**

**Please note that the attachments to this response contain sensitive personal information pertaining to PG&E employees, such as employee names and identifications, and critical infrastructure information not normally provided to the general public. Federal policy by the Department of Homeland Security and by other federal, state and local agencies limits gas pipeline valve and regulator and station information from public disclosure for national security reasons pursuant to the Critical Infrastructures Information Act of 2002, 6 U.S.C. §§131-134 ("CIIA"). The CIIA defines Critical Infrastructures Information ("CII") as "information not customarily in the public domain and related to the security of critical infrastructure or protected systems. . . ." 6 U.S.C. § 133(3). Thus, for employee privacy and corporate security or CII reasons, and only these reasons, the attachments to this response are submitted under Section 583. The dissemination of employee information and corporate security information contained in the attachments to this response raises privacy concerns and**

**corporate and public safety risks. Therefore, PG&E believes that such information should remain confidential and not be subject to public disclosure.**

- 1) PG&E conducted an ILI of Line 131 from MP 24.88 to MP 50.57 on August 13, 2011. On October 13, the ILI vendor notified PG&E about the 19 dents with metal loss.
- 2) The 19 dents with metal loss are considered immediate conditions. The current pressure of this section is well below both the MAOP and the pressure during the August 13 ILI. The MAOP of this portion of Line 131 is 525 psig, and the MOP is 500 psig. The pressure during the August 13, 2011 ILI was 461 psig. The pressure on this portion of Line 131 had already been reduced to 324 psig. This pressure is between 34 and 40% of SMYS, and is approximately 70% of the operating pressure during the ILI run that discovered the anomalies.
- 3) Upon receipt of the vendor's report on October 13, the responsible gas engineer contacted Gas Control to request that pressure be reduced to not more than 368 psig. Gas Control responded that pressure was already below that level, at 324 psig, due to a temporary reduction of pressure due to a separate matter.
- 4) All 19 dents with metal loss sites are on 24" OD pipe with wall thickness of 0.281" and SMYS of either 35,000 or 40,000 as shown in RMP-11 Form F, attached as *SanBrunoGT-LineRuptureInvestigation\_DR\_CPUC\_243-Q1Atch01-CONF*.
- 5) All of the 19 immediate anomalies are dents with metal loss. Locations are as shown in RMP-11 Form F and the dig maps.
- 6) The repair disposition will depend upon the as-found dent with metal loss. Repairs for a dent with metal loss could be one of several different possibilities. All repairs would be per PG&E Standard S4134S. The direct examination and repair of these dents with metal loss will be on an expedited schedule once approval to proceed is obtained.
- 7) Maps showing the location of each dent with metal loss are attached as *SanBrunoGT-LineRuptureInvestigation\_DR\_CPUC\_243-Q1Atch02-CONF* and *SanBrunoGT-LineRuptureInvestigation\_DR\_CPUC\_243-Q1Atch03-CONF*. The repair for each dent with metal loss is expected to be limited to the dent location and could include all 19 sites.