

From: Campbell, Ben (NRD)  
Sent: 11/10/2011 12:15:04 PM  
To: 'Shori, Sunil' (sunil.shori@cpuc.ca.gov)  
Cc: Doll, Laura (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=LRDD);  
Horner, Trina (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=TNHC);  
Ramaiya, Shilpa R (/o=PG&E/ou=Corporate/cn=Recipients/cn=SRRd); Halligan,  
Julie (julie.halligan@cpuc.ca.gov)  
Bcc:  
Subject: RE: Second Notification for Hydrostatic Testing without Spike Tests

Sunil:

For Test 121 in Livermore on Line 303, PG&E would have had to break this test into three hydrotests of 750 feet, 3000 feet and 1250 feet in order to achieve a 5% spike test. To do the spike test in these three sections would require PG&E to cut the pipe at two additional locations than those planned. Both locations create significant difficulties. One is on a side hill where it is difficult and unsafe to stage equipment, and the other is in the middle of a grape orchard where a significant amount of grape vines would have to be removed to access the dig location and to dig a large bell hole. The land owner, Wente Vinyards, would not have agreed to allow PG&E to dig at this location. The small test sections also create difficulties because water has to be stored and trucked from each location, and breaking a test into three sections adds to the time it takes to complete the tests. Test 121 needs to be completed before the cold weather begins.

In addition, PG&E believes that more than 5% is needed to conduct a spike test. PG&E is calling for a 10% spike test with a 5% reduction once the spike test is completed. The other 5% is needed to provide a manageable test range for the test operator. The pressures fall or rise during the test because of temperature changes from sun on the exposed piping, cloud cover, or nightfall. The operator needs at least 30 psi and usually more to allow adequate room for the movement of pressure during the test. Even though the spike test is not being conducted, the majority of the pipe on Test 121 (over 4000 feet) will see pressures between 92-94% of SMYS during the 8 hour test. These percentages are already exceeding the mill test pressure percent of SMYS and should be adequate to prove the safety of the pipeline without a spike test.

For Test 118 in Bear Valley Springs on Line 300A, PG&E would have had to break this test into at least four hydrotests of 750 feet, 10000 feet, 7000 feet, and 400 feet. PG&E has already broken this test into two sections. To do the spike test in these four sections would require PG&E to cut the pipe at two additional locations and move one of the planned cuts to a location with much steeper terrain. Because of the steep elevation and resulting static head, to get a spike test would require PG&E to cut the pipe at two locations which are half way up very steep hills with as much as a 40% grade. It is very difficult and unsafe to work on such a steep slope. Also, these slopes are very sensitive environmental habitat that PG&E attempts to avoid. The third additional cut would be in an environmentally sensitive drainage basin area which would require long lead times to acquire the permits from State and Federal agencies. PG&E's hydrotest program has attempted to avoid these types of areas by digging at road sites and farm fields that don't impact the environment. Even though the spike test is not being conducted, the majority of the pipe on Test 118 (72%) will see pressures between 90-94% of SMYS and all the pipe will see greater than 87% of SMYS during the 8 hour test. These percentages are already exceeding the mill test pressure percent of SMYS and should be adequate to prove the safety of the pipeline without a spike test.

Attached are drawings of these two tests and where the additional cuts would be required.

Ben

**From:** Shori, Sunil [mailto:sunil.shori@cpuc.ca.gov]  
**Sent:** Friday, November 04, 2011 2:37 PM  
**To:** Campbell, Ben (NRD)  
**Cc:** Horner, Trina; Doll, Laura; Ramaiya, Shilpa R; Halligan, Julie  
**Subject:** RE: Second Notification for Hydrostatic Testing without Spike Tests

**Ben:**

**For each of the pressure tests where PG&E has indicated it was, or will be, unable to perform spike tests due to elevation and static pressure head conditions, what factors did PG&E consider, and/or which prevented PG&E, from segmenting the tests such that conditions conducive to a minimum 5% spike test could be achieved? For each of the listed pressure tests, what is the minimum number of individual test sections that would be needed in order to facilitate a 5% spike test?**

**Thanks, Ben.**

**Sunil Shori**

**From:** Ramaiya, Shilpa R [mailto:SRRd@pge.com]  
**Sent:** Wednesday, November 02, 2011 12:31 PM  
**To:** Cooke, Michelle  
**Cc:** Halligan, Julie; Shori, Sunil; Campbell, Ben (NRD); Horner, Trina; Doll, Laura  
**Subject:** Second Notification for Hydrostatic Testing without Spike Tests

Michelle,

Attached is a letter (and associated spreadsheet) from Ben Campbell of PG&E providing notice for hydrostatic testing where spike testing is inadvisable. There are two new tests to the list, and two that were removed given the scheduled insertion of new pipe.

Thanks.

Shilpa Ramaiya

415-973-3186

