



**Pacific Gas and
Electric Company**

Ben Campbell
Director
Pipeline 2020 Hydrotest
Project

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TRANSMITTED VIA EMAIL

Dear Ms. Cooke,

In compliance with Consumer Protection and Safety Division's September 12, 2011 letter to PG&E, PG&E is providing advanced notice for upcoming hydrotests where spike tests are not advisable because the tests pose risk to the integrity of our pipeline system and thus, will not be performed.¹ PG&E will perform these tests to the maximum allowable pressure levels. PG&E provided first such notice on September 27, 2011. PG&E uses the same format for this notification.

In addition to the hydrotests discussed in our September 27 notice, there are two upcoming hydrotests where a spike test is not advisable due to significant elevation changes that would cause the test pressure to exceed 100% of the Specified Minimum Yield Strength (SMYS) and possibly compromise the integrity of the pipeline. The first hydrostatic test is T-118 A and B on Line 300A MP 239.57 to 243.74 located in the Tehachapi mountains, with an elevation change of 269 feet for T-118A and 290 feet for T-118B. The minimum test pressure plus the static head from the elevation change will be at 97.65% of SMYS for T-118A and will be at 98.84% of SMYS for T-118B. A spike test of at least 5% will cause the pipe stress to exceed 100% of SMYS. This hydrostatic test was voluntarily added to the 2011 program to replace other tests that had to be postponed. This 34-inch diameter pipeline segment is in a Class 2 High Consequence Area (HCA) operating at 70.01% of SMYS when operating at the MAOP of 803 psig. In the interim, the line is operating at a reduced pressure, equivalent to 60% of SMYS. This is listed as Item 8 in the attached spreadsheet.

The second hydrostatic test is T-121 on Line 303 MP 26.763 to 27.704 located in Livermore, with an elevation change of 166 feet. The minimum test pressure plus the static head from the elevation change will be at 95.9% of SMYS. A spike test of at least 5% will cause the pipe stress to exceed 100% of SMYS. The 36-inch pipeline segment is currently operating at 59.97% of SMYS when operating at its MAOP of 731 psig. This test was added to the hydrotest program because of a class location change on this segment of pipeline. This is listed as Item 7 in the attached spreadsheet.

PG&E has added these two hydrotests to our post-September 12 listing of hydrostatic tests where a spike test will not be conducted, which was initially provided on September 27. PG&E has also postponed two hydrotests against a mainline valve (T-26 and T-25B) and will remove them from this list entirely on the next submission. These short sections will be replaced in 2012 with a Valve Automation Project at this location and a spike test will no longer be required. These are Items 1 and 2 in the attached spreadsheet.

¹ For reference, CPSD's letter states "For any applicable pressure tests where a spike hydro-test will not be performed, PG&E's MAOP restoration request must provide advance notice regarding the specific pipeline facility, or component, which PG&E believes would preclude the spike hydro-test from being performed to a minimum level of 5%" (p.4). CPSD has also stated that spike testing does not apply to new pipe.

As PG&E has said previously, PG&E is committed to performing spike tests wherever it is safe and reasonable to do so, and exceptions are expected to be infrequent.

Sincerely,

A handwritten signature in cursive script that reads "Ben Campbell". The signature is written in dark ink and is positioned above the printed name and title.

Ben Campbell
Director

Attachment