

In The Matter Of:
NTSB Public Hearing Re:
PG&E Gas Transmission Pipeline - DAY 2

March 2, 2011



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NATIONAL TRANSPORTATION SAFETY BOARD
OFFICE OF ADMINISTRATIVE LAW JUDGES

Public Hearing in the matter of:

Pacific Gas and Electric DAY 2 OF 3
Natural Gas Transmission
Pipeline

NTSB Board Room and Conference Center
490 L'Enfant Plaza
Washington, D.C. 20024

Wednesday, March 2, 2011

9:02 A.M. TO 4:17 P.M.

BEFORE THE NTSB PANEL:

Deborah A. Hersman, Chairman, Board of Inquiry
Mark R. Rosekind, Member
Christopher A. Hart, Vice Chairman
Robert Sumwalt, Member
Earl F. Weener, Ph.D., Member

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TECHNICAL PANEL FOR AFTERNOON SESSION
Ravi Chhatre, Karl Gunther, Matt Nicholson

WITNESSES FOR AFTERNOON SESSION

Dennis Lee, CPUC, Sr. Utilities Engineer,
Supervisor

Richard Clark, CPUC, Director, Consumer Protection
and Safety Division

Julie Halligan, CPUC, Deputy Director, Consumer
Protection and Safety Division

Linda Daugherty, PHMSA, Deputy Associate
Administrator for Policy and Program

Zach Barrett, PHMSA, Director, State Programs

Paul Metro, NAPSRS, Vice-Chair

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TECHNICAL BOARD FOR MORNING SESSION:
Dana Sanzo, Bob Trainor

WITNESSES FOR MORNING SESSION:

Dennis Haag, City of San Bruno, Fire Chief
James (Jim) Narva, NASFM, Executive Director
Peter Lidiak, API, Pipeline Director
Terry Boss, INGAA, Sr. VP Environment Safety and
Operations
Carl Weimer, Pipeline Safety Trust, Executive
Director
Aaron Rezendez, PG&E, Sr. Program Manager, Safety
Health and Claims
Annmarie Robertson, PHMSA, Program Manager

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1

2 * * * P R O C E E D I N G S * * *

3 9:02 A.M.

4 MARCH 2, 2011 - DAY 2

5 CHAIRMAN HERSMAN: Good morning, and

6 welcome back to Day 2 of our public hearing of San

7 Bruno. We'll begin with our third panel on public

8 awareness.

9 Ms. Ward, will you please swear in the

10 witnesses.

11 HEARING OFFICER WARD: Thank you, Madam

12 Chairman. For the record, we have Chief Haag,

13 Mr. Jim Narva, Mr. Peter Lidiak, Mr. Terry Boss,

14 Mr. Carl Weimer, Mr. Aaron Rezendez, and

15 Ms. Annmarie Robertson already seated.

16 If I could have the witnesses please

17 rise to be sworn in.

18 DENNIS HAAG,

19 JAMES NARVA,

20 PETER LIDIAK,

21 TERRY BOSS,

22 CARL WEIMER,

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1 AARON REZENDEZ,
2 and ANNMARIE ROBERTSON,
3 called as a witness in this case,
4 having been first duly sworn
5 upon their oath, testified as follows:
6 HEARING OFFICER WARD: And starting with
7 Chief Haag, if you could please state your full
8 name, title and a brief description of your duties
9 and responsibilities.
10 DENNIS HAAG: Good morning. My name is
11 Dennis Haag, Fire Chief of the City of San Bruno.
12 I have over 30 years experience in Fire Service,
13 became fire chief in the City of Millbrae, a city
14 just south of San Bruno, in 2000. And was --
15 services [inaudible] and became chief of San Bruno
16 in 2008.
17 I have a Fire Chief certification in the
18 State of California and a Bachelor's degree in
19 economics from San Francisco State. Thank you.
20 HEARING OFFICER WARD: Mr. Narva.
21 JAMES NARVA: Good morning. I'm Jim
22 Narva. I'm the executive director for the

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1 National Association of State Fire Marshals.
2 Previous to that I was Wyoming State Fire Marshal,
3 and I've been with the Fire Service for about 25
4 years.
5 HEARING OFFICER WARD: Thank you.
6 Mr. Lidiak.
7 PETER LIDIAC: Hi. I'm Peter Lidiak.
8 I'm Fire Director for the American Petroleum
9 Institute, API, a little over ten years, working
10 in refining, fuels, and pipeline-related issues,
11 and represent our member companies on pipeline
12 safety operations and environmental issues.
13 HEARING OFFICER WARD: Mr. Boss?
14 TERRY BOSS: Yes. I'm Terry Boss,
15 Senior Vice President of Environment, Safety and
16 Operations at the Interstate Natural Gas
17 Association of America which represents the
18 Interstate Natural Gas Transmission Pipelines in
19 the Northern 48 here.
20 And I've been with INGAA for around 18
21 years working in various areas. Before that I had
22 19 years with a pipeline company, then one year

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1 with a research group.
2 HEARING OFFICER WARD: And, Mr. Weimer?
3 CARL WEIMER: Yes, I'm Carl Weimer. I'm
4 the executive director of the Pipeline Safety
5 Trust. The Trust is the only national non-public
6 interest group that focuses on pipeline safety.
7 I'm also an elected member of the
8 Whatcom County Council, so I'm the an elected
9 public official for the public awareness efforts.
10 HEARING OFFICER WARD: Mr. Rezendez.
11 AARON REZENDEZ: Hello. I'm Aaron
12 Rezendez. I'm the senior program manager for
13 Public Safety at Pacific Gas & Electric Company.
14 I've been in this position for five years. I've
15 worked in a variety of capacities within
16 communications here at PG&E for the past nine
17 years. I have a Bachelor of Science in geology
18 from the University of Missouri, and I have a
19 master's in civil environmental engineering from
20 Stanford University.
21 HEARING OFFICER WARD: And,
22 Ms. Robertson.

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1 ANNMARIE ROBERTSON: I'm Annmarie
2 Robertson. I am a program manager for the
3 Business Office of Program Development. Prior to
4 coming to PHMSA, I worked with the State of
5 Indiana where I managed the Gas Pipeline Safety
6 Program for several years.
7 I also served as Chair of the National
8 Association of Pipeline Safety Representatives
9 until I transitioned over to PHMSA. My work at
10 PHMSA, I focus on damage prevention, public
11 awareness, and working with various stakeholders
12 throughout the country to advance those
13 initiatives.
14 HEARING OFFICER WARD: Thank you.
15 Madam Chairman, the witnesses have been
16 sworn in and qualified, and they're ready to be
17 questioned by Ms. Sanzo.
18 CHAIRMAN HERSMAN: Thank you, Ms. Ward.
19 Ms. Sanzo, please begin questioning from
20 the Technical Panel.
21 MS. SANZO: Chief Haag, prior to
22 September 9th, what natural gas pipelines were you

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1 aware of within San Bruno?
2 CHIEF HAAG: The fire department was
3 only aware -- we thought that the gas that was
4 moving through the system serviced the City of San
5 Bruno. We did not know that there was a
6 transmission line through the city until after the
7 incident.
8 MS. SANZO: Were you aware of the two
9 other transmission pipelines that run parallel to
10 line 132?
11 DENNIS HAAG: During orientation PG&E
12 had run through a regular orientation, it was
13 mentioned that there are two pipelines that run
14 the Peninsula, pipelines that go essentially
15 through the freeway corridors of 101 and 280.
16 MS. SANZO: What information do you
17 believe is critical for firefighters for
18 responding safely to natural gas incidents?
19 DENNIS HAAG: Well, on a routine basis
20 we work with PG&E on typical gas leak halls,
21 electrical lines down, old fires, transformed
22 fires, and so forth and so on. So, that, we're

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1 very familiar with.
2 In the event of a pipeline, we really
3 don't have any direct training on pipeline
4 training, so ...
5 MS. SANZO: What other sources of
6 training would -- excuse me.
7 What other sources of training are there
8 available to the fire department that include
9 natural gas safety?
10 DENNIS HAAG: As part of our rookie
11 academy training curricula, we do have electric
12 and gas safety presentations, for a long time PG&E
13 presented those classes to us, and so that's the
14 basis for our training.
15 We still do scenario-based, pre-planned
16 type activities to address any kind of incident
17 that we may face from pipeline -- to prepare for
18 transmission position.
19 MS. SANZO: You had described that PG&E
20 had provided training. Could you please describe
21 the training.
22 DENNIS HAAG: The initial training, the

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1 orientation training, is really meant to just give
2 you an idea of the electrical side and the gas
3 side, you know, kind of their -- they go through
4 transmission lines, the go through the
5 distribution system is, what to do with meters, so
6 forth and so on. So it's really a -- a basic
7 course of -- [inaudible]. In the case of a gas
8 leak they'll deny entry, cordon off the area, look
9 for any potential emission sources and so forth,
10 and obviously contact PG&E.
11 MS. SANZO: What methods do
12 organizations use to actively provide outreach to
13 the Fire Service?
14 DENNIS HAAG: I'm sorry? I missed that
15 first part.
16 MS. SANZO: What methods do you think
17 would be effective to provide information to the
18 Fire Service?
19 DENNIS HAAG: Well, there's obviously
20 some sources, and some are here at the desk with
21 me, we do use a Public Pipeline Awareness video
22 DVD that we provide. We have sent two of our

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1 training officers to the [inaudible] -- which
2 we've provided to all our line personnel in our
3 training division.
4 So I mean, those are the type things we
5 look for. As a matter of fact, [inaudible] I did
6 pick up the National Association Fire Marshal's
7 video and incorporated that in our training
8 curriculum.
9 MS. SANZO: And is this prior to
10 September 9th, or post?
11 DENNIS HAAG: That was
12 post-September 9th.
13 MS. SANZO: And could you provide an
14 overview of the San Bruno Fire Department?
15 DENNIS HAAG: The San Bruno Fire
16 Department has 29 line personnel. We run 2 line
17 engines with aerials and we cover 6.1 miles.
18 MS. SANZO: What knowledge should
19 firefighters have about the location of natural
20 gas lines?
21 DENNIS HAAG: Well, obviously I think
22 the benefit of having a knowledge of location of

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1 the pipelines is it gives the Fire Service the
2 ability to preplan, to do scenario-based training.
3 Obviously, you know, the situation on
4 September 9th wasn't something that we could ever
5 imagine. But it -- it does give us some
6 opportunity to go out to the scenarios, look at
7 evacuations and so forth and so on.
8 MS. SANZO: Thank you.
9 Prior to September 9th how did the fire
10 department communicate or coordinate with PG&E;
11 for example, perhaps, drills?
12 DENNIS HAAG: I have no training
13 documentation of drills directed with PG&E. As I
14 mentioned earlier, it is -- you know, our line
15 personnel routinely work with PG&E line personnel,
16 you know, on these type of calls, and I'm sure
17 there's an exchange of information at this point.
18 MS. SANZO: Thank you, Chief Haag.
19 MR. TRAINOR: Good morning, Chief. How
20 are you.
21 DENNIS HAAG: How are you?
22 MR. TRAINOR: With respect to your

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1 jurisdiction, how many people in the San Bruno
2 community do you serve?
3 DENNIS HAAG: About 41,000.
4 MR. TRAINOR: And what's the approximate
5 square area?
6 DENNIS HAAG: I said that earlier, 6.1
7 square miles.
8 MR. TRAINOR: I didn't quite hear that.
9 Thank you.
10 Is the San Bruno area a residential
11 area?
12 DENNIS HAAG: Yes, it is. Yeah, there
13 is, obviously, some commercial and light industry.
14 MR. TRAINOR: You mentioned that you
15 were not aware of line 132, the transmission line,
16 running through San Bruno, but you had been told
17 by PG&E of two pipelines through the freeway
18 corridor up the Peninsula.
19 How are those pipelines -- what
20 information, specific information, about those
21 pipelines were you provided?
22 DENNIS HAAG: That was pretty much the

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1 early introduction of -- kind of the orientation
2 training, information that we had that they ran up
3 the corridors all the way up the corridor, and
4 there's 101 close to Millbrae, the 101/Millbrae
5 Avenue juncture that I think in the 1980s we had
6 an incident where PG&E was servicing a line, and
7 we -- we went down as a fire unit, and there
8 was -- they were doing some maintenance work and
9 he just happened to mention that [inaudible] 101.
10 MR. TRAINOR: If I understand you
11 correctly, the comment was made in the context of
12 responding to an incident, as opposed to a
13 specific focused effort to exchange information?
14 DENNIS HAAG: You are correct, yes.
15 MR. TRAINOR: Were these two pipelines
16 described as transmission lines, or otherwise
17 identified?
18 DENNIS HAAG: Just as transmission
19 lines.
20 MR. TRAINOR: Okay. And did you know
21 what a transmission line was at the time?
22 DENNIS HAAG: At the time I was a

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1 firefighter, so I went back and looked it up and
2 found out.
3 MR. TRAINOR: We were talking about
4 sources of information. Has your department ever
5 consulted with the National Pipeline Mapping
6 System?
7 DENNIS HAAG: As a matter of fact, no,
8 we have not.
9 MR. TRAINOR: Would you care to expound
10 on that, please, as to why you didn't? Or why
11 you -- why it hasn't been done?
12 DENNIS HAAG: Well, I'll -- we don't
13 have maps of the pipeline system, you know, at any
14 agency on the Peninsula. And so what we have
15 tried to do is -- is -- it was kind of a --
16 whether it was a transmission line or not, was
17 there a need to know?
18 And until we kind of determined that
19 there was the need to know, we didn't do that.
20 MR. TRAINOR: I'm not quite sure I
21 understand that last response.
22 The need to know, is this something that

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1 you determined is important since the accident?
2 Or was there --
3 DENNIS HAAG: Well, there's no question,
4 yes.
5 MR. TRAINOR: What about before the
6 accident?
7 DENNIS HAAG: Well, we assumed that this
8 transmission line was a line providing -- we
9 didn't recognize the pressure, besides what we
10 read, that it was 60-pound psi or greater.
11 MR. TRAINOR: But did you recognize or
12 consider there was a need to consult the National
13 Pipeline Mapping System prior to the accident?
14 DENNIS HAAG: Well, we definitely could
15 have done that, but we did not.
16 MR. TRAINOR: Okay. I'd like to ask you
17 if you could describe in a little bit more detail
18 the -- the training materials that you have
19 received from PG&E.
20 Would you provide a brief summary of
21 those?
22 DENNIS HAAG: In 2007, again, we had our

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1 training -- response to -- responding to utility
2 emergencies that was presented by PG&E personnel
3 in 2007. We rolled that out to our line staff
4 right after that -- that -- having been approved
5 for the class.
6 And later in 2007 we actually went to
7 the San Mateo Substation for electrical
8 orientation on substation emergencies.
9 And those are the two documented
10 trainings I have received.
11 MR. TRAINOR: You mentioned that the --
12 about the electrical side of the house, the
13 materials you got with regards to the electrical
14 utilities.
15 Can you describe the pipeline training
16 materials in a little bit more detail?
17 Were -- and what I'm specifically
18 interested in is -- is how specifically these
19 training materials are to the PG&E system, as
20 opposed to more generic materials.
21 DENNIS HAAG: It is generic material.
22 It was not specific to PG&E's system, per se. It

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1 dealt with, you know, the procedures in the
2 event -- in typically, distribution-type
3 emergencies. There was no direct pipeline
4 training.
5 MR. TRAINOR: Prior to the accident,
6 what type of communications or coordination had
7 your department had with PG&E with respect to
8 emergency response coordination and communication?
9 DENNIS HAAG: Primarily the
10 communication was with line personnel. It was no
11 direct training with any of our command staff,
12 officers and so forth and so on.
13 MR. TRAINOR: Did you or any of your
14 senior officers have any communication with your
15 counterparts at PG&E?
16 DENNIS HAAG: No.
17 MR. TRAINOR: Since the accident, have
18 you had any communications with PG&E?
19 DENNIS HAAG: Yes, we have. After the
20 accident, PG&E contacted us and provided us with
21 updated maps. We had discussions about enhancing
22 the training curriculum between the Fire Service

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1 and PG&E.
2 Soon after that, I was contacted by
3 another PG&E representative regarding a GIS
4 program that would be compatible with the Fire
5 Service CAD dispatch center, and possibility of
6 rolling out of some enhanced training
7 communication with PG&E.
8 MR. TRAINOR: And what progress has been
9 made on those initiatives?
10 DENNIS HAAG: Right now, the last e-mail
11 I received was a desire to meet with myself and
12 several other interested agencies.
13 MR. TRAINOR: One last question. Were
14 there any markings on the street? I guess it
15 would be Glendale Drive?
16 DENNIS HAAG: Glenview.
17 MR. TRAINOR: Glenview Drive from line
18 132?
19 DENNIS HAAG: The market we found on
20 Glenview were small sticker-type plastic stickers
21 on the sidewalks. Some were there, some were
22 missing, and some were hard to identify.

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1 MR. TRAINOR: Had you ever seen these
2 types of markings before?
3 DENNIS HAAG: No, I hadn't.
4 MR. TRAINOR: That's all I have.
5 I guess we'll proceed with Mr. Narva?
6 MS. SANZO: Mr. Narva, could you please
7 describe your organization's involvement with
8 pipeline safety.
9 JAMES NARVA: We've been involved with
10 pipeline safety for about seven years, going on
11 eight. We have a program that's entitled
12 "Pipeline Emergencies" and it's a joint project
13 between the United States Department of
14 Transportation and the National Association of
15 State Fire Marshals.
16 It is a curriculum that is specific to
17 transmission pipelines, for the most part, both
18 gas and liquid. And the curriculum involves a --
19 or includes a textbook, training scenarios, a DVD,
20 and instructor's guide. And so, a complete
21 package for emergency responders.
22 Over the years we've conducted training

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1 sessions where we'll go out to each state. And
2 we've gone to each of the 50 states and trained a
3 number of Fire Service trainers with the
4 expectation, then, that they go back to their
5 department, and train their members. So that's
6 been the approach that we've taken in the past.
7 We are now in the process of making all
8 of that electronic so that it can be delivered
9 over the web, and we can really measure that
10 training.
11 We've been very involved with having the
12 program there for first responders.
13 MS. SANZO: About how many sets of
14 materials have you distributed?
15 JAMES NARVA: We've distributed
16 approximately 45,000 copies of the curriculum.
17 MS. SANZO: And about how many sets of
18 materials have been training materials?
19 JAMES NARVA: Well, it's the same
20 material.
21 MS. SANZO: Okay.
22 JAMES NARVA: It goes out to fire

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1 departments.
2 So if a fire department requests it, we
3 will send them a package. If the industry
4 requests it, we can send a package.
5 When we go out and do the training,
6 trainer sessions, we give them all a package. So
7 it's the same material.
8 MS. SANZO: What specific information
9 and training do emergency responders need to
10 typically respond to pipeline incidents?
11 JAMES NARVA: In a general sense, they
12 need to be aware, first of all, that a pipeline is
13 underground. That's something that we all take
14 for granted but it's an awareness, a recognition
15 of that.
16 You need to understand how a pipeline
17 operates; understand the different characteristics
18 between gas and a liquid pipeline, as an example;
19 understand and literally go through some scenarios
20 that take them through different experiences that
21 might occur. So those are the key components.
22 And then another part, while it's not

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1 necessarily training, is the contact with the
2 operators to know who to contact, have those
3 relationships in place before an incident happens.
4 MS. SANZO: Do you believe that the
5 information and training, as of today, are meeting
6 the needs of the Fire Service?
7 JAMES NARVA: Yes, I would say that the
8 information that's available would meet the needs
9 of the Fire Service. That's not saying that
10 they're always getting into the hands of Fire
11 Service.
12 MS. SANZO: And what degree of
13 communication and coordination exists between
14 pipeline operators and the emergency response
15 community?
16 Do you --
17 JAMES NARVA: Go ahead. I'm not sure I
18 got the first part of the question.
19 MS. SANZO: Do you believe there -- what
20 do you think the communication level is between
21 pipeline operators and Fire Service in general?
22 Do you think it's at an acceptable level today?

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1 Or would you like to see it increased?
2 JAMES NARVA: Certainly I would like to
3 see an increased level. I don't think you can
4 have too much communication between those two
5 parties.
6 As I said, it ought to occur before an
7 incident, but that face-to-face dialogue and
8 information awareness is vital ahead of time, so
9 it ought to be increased.
10 MS. SANZO: And what methods do you
11 think would be effective to deliver this
12 information to the Fire Service?
13 JAMES NARVA: Oh, there isn't one -- one
14 particular method that works. It's -- it's
15 multiple sources and mediums, I think.
16 Face-to-face is always good. But that's
17 not always possible. We need to be cognizant of
18 that.
19 I think electronic format certainly
20 helps where the technology, where the time or
21 technology allows that. Where there can be
22 communications, you can find out. The e-mail is

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1 opened, what part did they read? They may be able
2 to find two messages to approach that, so we need
3 to move beyond just mailing things out.
4 And I think probably the biggest thing
5 from a response perspective is that we need to
6 know that there's more than just checking a box
7 off, that there was an effort to communicate, that
8 there truly is communication. And that's a
9 two-way street.
10 There's also a responsibility with the
11 Fire Service for responders to seek out that
12 information and to be aware, so ... it's
13 important.
14 MS. SANZO: Thank you.
15 MR. TRAINOR: Mr. Narva, just a couple
16 of clarifications.
17 Your organization, could you describe
18 the membership, what interests or organizations
19 they represent.
20 JAMES NARVA: The National Association
21 of State Fire Marshals is primarily an
22 organization that consists of the 50 state fire

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1 marshals.
2 MR. TRAINOR: Do you have any pipeline
3 operators that participate as ad hoc members or
4 observers to -- to your organization?
5 JAMES NARVA: I -- we have over the
6 past. I couldn't tell you right now whether there
7 is or is not one. They participate in our annual
8 conference. Something that we try and do each
9 year is have a session that deals with pipelines,
10 pipeline emergencies. So there is some
11 communication there, and participation.
12 MR. TRAINOR: You mentioned the need for
13 better face-to-face communication between the two
14 groups.
15 What is your organization doing to
16 facilitate that?
17 JAMES NARVA: Currently we aren't doing
18 anything between our organization and individual
19 fire departments or the Fire Service in general.
20 It goes to our members.
21 MR. TRAINOR: Okay. And just to tie
22 this up, do you see any measures that you could

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1 take at this point?
2 JAMES NARVA: Certainly could. And we
3 are developing this electronic portal that I
4 talked about. I think the face-to-face is
5 something that needs to come, not necessarily
6 always from an operator's perspective, but there
7 needs to be -- have a neutral, credible source
8 that goes with it and can partner with those
9 organizations.
10 Within the Fire Service, probably law
11 enforcement, other emergency responders, there's
12 a -- there's a natural trust for organizations
13 that they understand and know. And that's not to
14 say a distrust for those that they don't. It's
15 just a hesitancy, maybe. So we need to facilitate
16 that.
17 MR. TRAINOR: Okay. Is there any active
18 program encouraging the fire departments
19 throughout the country to reach out to pipeline
20 operators?
21 JAMES NARVA: Not that I'm aware of,
22 through our association.

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1 MR. TRAINOR: Thank you.
2 I'd like to go to Mr. Rezendez from
3 PG&E, please.
4 Good morning.
5 AARON REZENDEZ: Good morning.
6 MR. TRAINOR: Mr. Rezendez, we've heard
7 the perspective of the firefighters as far as
8 public awareness about pipeline systems.
9 Now we'd like to get your perspective on
10 this.
11 Would you summarize the outreach efforts
12 that PG&E made to the City of San Bruno prior to
13 the September 9th accident.
14 AARON REZENDEZ: Surely. We do a couple
15 of things, and a few of those were mentioned here.
16 One of the -- one of the baseline
17 programs that we participate in is through the
18 Pipeline Association for Public Awareness. And
19 that is a materials-based program which provides
20 emergency response professionals, whether they be
21 fire or police.
22 And it provides them information. As

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1 was discussed, it contains various baseline
2 emergency response information; it also contains a
3 DVD that has various scenario-based exercises that
4 individuals can go through at a laptop.
5 We also conduct various liaison
6 meetings, and those would be referred to as well.
7 These are annual meetings. The local maintenance
8 and construction superintendent, along with our
9 governmental relations organization put together
10 a -- a discussion, if you may, as he described,
11 which provides both gas and electric-related
12 safety. It gives them an overview of our
13 emergency plan, tours of the facilities, the kinds
14 of systems and software, for example, that we use
15 to manage emergencies.
16 MR. TRAINOR: Okay. That's a good
17 summary. Thank you.
18 With respect to the materials you give
19 out, does it include any specific information to
20 PG&E pipeline systems? And if so, what
21 information is included?
22 AARON REZENDEZ: We do not mail, like,

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1 maps or other types of information relevant to our
2 pipeline.
3 What we do do is provide information
4 around the national pipeline system, or mapping
5 system, which allows them to have access to that
6 kind of information, as well as a contact
7 directory.
8 MR. TRAINOR: And the national mapping
9 system would do what for the firefighter?
10 AARON REZENDEZ: Well, it would allow
11 them, there's a secure portion of that website
12 that allows them to access GIS-based datasets that
13 can be, either used online, or downloaded to their
14 own systems.
15 MR. TRAINOR: And, if one did that, we
16 they get maps showing the location of line 132 and
17 your other transmission pipelines?
18 AARON REZENDEZ: All the systems and
19 operators that navigate at that system, that's my
20 understanding.
21 MR. TRAINOR: Does PG&E have data in the
22 national mapping system?

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1 AARON REZENDEZ: Yes, we do.
2 MR. TRAINOR: So, again, if one accessed
3 that mapping system and queried for the San Bruno
4 area, would they come up with a map showing the
5 location of line 132?
6 AARON REZENDEZ: Yes.
7 MR. TRAINOR: With respect to liaison
8 meetings, about how often are these held?
9 AARON REZENDEZ: These are annual events
10 usually held in the spring.
11 MR. TRAINOR: And what is the degree of
12 participation of emergency response agencies
13 within an operating area?
14 AARON REZENDEZ: This is focused on the
15 Peninsula, that is to say, the general area around
16 San Bruno, and they'll have anywhere from, you
17 know, 13, 14 attendees up to 20.
18 MR. TRAINOR: And that represents 13 or
19 14 people from how many separate jurisdictions?
20 AARON REZENDEZ: I don't know the exact
21 breakdown, but it does include multiple
22 jurisdictions.

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1 MR. TRAINOR: I want to discuss a little
2 bit about the public awareness program, the
3 program to educate the public about the pipeline
4 facilities that may be running through their
5 community.
6 We understand that you do have a mailing
7 program. And, again, the frequency of the mailing
8 program depends upon the particular location of
9 residence and businesses.
10 And I know that there are mailings made
11 to municipal officials, including the fire
12 department. Each of these have different
13 frequencies and so forth.
14 The information -- informing the
15 citizens of a public community, such as those
16 affected by the September 9th accident, what
17 specific actions do you take to inform these
18 people of the hazards or risks from pipelines?
19 AARON REZENDEZ: Yes, sir. You
20 mentioned the communication pieces that we sent
21 out as a part of our bill to the community. And
22 that contains information, safety-related

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1 information, not only hazard recognition, but
2 response. And we also provide contacts around
3 pipeline markers, and where they can find
4 additional information, including contacting the
5 utility directly.
6 We also participate in various
7 community-based events for which we provide safety
8 information as well.
9 MR. TRAINOR: All right. Let's talk
10 about the mailing program for a minute. You
11 mentioned the materials that comes with the bills.
12 I think those are commonly referred to as "bill
13 stuffers."
14 AARON REZENDEZ: That is correct.
15 MR. TRAINOR: What has PG&E done to
16 assess the effectiveness of these bill stuffers?
17 AARON REZENDEZ: We participate in the
18 PAPA survey. It's API and INGAA-sponsored survey,
19 and that's the survey that we use for assessing
20 the effectiveness of our programs as it relates to
21 the public.
22 MR. TRAINOR: Does this survey involve

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1 going around knocking on doors and asking people
2 if they know there's a pipeline close to their
3 community?
4 AARON REZENDEZ: No.
5 MR. TRAINOR: Well, who do you survey?
6 AARON REZENDEZ: It's a process by which
7 the survey company employs its -- I believe it's a
8 mailer-based survey and response that is used for
9 that particular survey.
10 MR. TRAINOR: And what's the response
11 level to these mail surveys?
12 AARON REZENDEZ: I'm sorry?
13 MR. TRAINOR: What's the response rate
14 to the mail surveys?
15 AARON REZENDEZ: I think the response
16 rate, it's kind of mathematical, it kind of gets
17 into the statistics of it all, but I believe the
18 response rate is somewhere in the ballpark of 150
19 as a sample representing a scalable reference to
20 the entire pipeline --
21 MR. TRAINOR: No, no. If you send out a
22 hundred surveys, what do you typically get back in

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1 the way of responses? How many people respond?
2 AARON REZENDEZ: I -- based on the way
3 the survey is designed -- I apologize, I'm not a
4 survey expert -- but the way the survey itself is
5 designed is such that it would receive 150 or so
6 responses, which would give you a 95 percent
7 confidence.
8 MR. TRAINOR: All right. Now, I
9 understand, too, that with respect to the public
10 awareness program, you employ a couple of
11 contractors to conduct these mailings and surveys
12 for you; is that correct?
13 AARON REZENDEZ: That's correct.
14 MR. TRAINOR: What procedures or
15 policies do you have within PG&E to make sure that
16 these contractors are, in fact, doing what they
17 should be doing? And -- all right. If you'd
18 answer that question first, and then I have a
19 second part to it.
20 AARON REZENDEZ: There's no specific
21 policy or procedure on how we manage those
22 relationships. But I -- I would like to add that

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1 we are fully engaged in those processes from
2 cradle to grave.
3 MR. TRAINOR: Well, that's where I'm
4 going with this. How do you know that what
5 they're doing, one, is being conducted?
6 And, secondly, how do you know that what
7 they are doing is having the desired effect?
8 AARON REZENDEZ: Sure. We're involved
9 in every level of the development of the content,
10 the language to be used.
11 If it be, for example, with emergency
12 responders, we use various surveys that give us
13 feedback. For example, maybe they want more
14 information about pipelines in the general area,
15 where they would go to get that information, and
16 how to reach the utility.
17 We would enhance those programs based on
18 the cycles in which we mail them out, in this case
19 it would be annually, to provide kind of that
20 continuous improvement along the program.
21 We do use, obviously, vendors with
22 specialized expertise in these areas of producing

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1 these mailers and distributing them, but we are
2 certainly involved in the content of all of them.
3 MR. TRAINOR: Can you give me an example
4 of where this process has led to a change, or a
5 revision to the public awareness efforts?
6 AARON REZENDEZ: Yes. Some of the
7 feedback that was received by POPA, for example,
8 as well as industry input, we ultimately changed
9 the emergency responder program to enhance it by
10 adding information around what 911 dispatchers
11 need to know and we actually developed a module
12 which is now included within that disk and
13 available online, exclusively for that particular
14 population.
15 MR. TRAINOR: What lessons have you
16 learned since September 9th?
17 AARON REZENDEZ: Do you have a specific?
18 MR. TRAINOR: With respect to your
19 public awareness program.
20 AARON REZENDEZ: I think what we
21 learned, first and foremost, is that within the
22 emergency response community, there clearly needs

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1 to be a greater level of engagement between the
2 preparedness and the prevention aspects within the
3 company; that is to say, you have a prevention
4 program that is sending material; you have a
5 preparedness program that actually sits down,
6 meets with, and provides -- kind of exercises what
7 we described a little bit earlier.
8 And we're actively working on that right
9 now.
10 MR. TRAINOR: We're very interested in
11 your continued efforts on that front.
12 And the reason our concern is high on
13 this, is there have been a number of comments made
14 to us since the investigation started that the
15 community -- and we heard from Chief Haag --
16 largely is unaware of the presence of line 132.
17 How -- going back to the Emergency
18 Responder Program, again, how do you assess the
19 effectiveness of that program?
20 AARON REZENDEZ: We participate -- the
21 PAPA survey that's sponsored by API surveys all
22 four of the major stakeholder audiences. We did

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1 it based on a survey in 2007, and we will be
2 participating in that survey once again. It's
3 slated to be executed this spring.
4 But we also, if I may add, as part of
5 our responding to the utility emergencies classes
6 we actively solicit feedback during the course of
7 the class, and we've had 700 attendees to those 22
8 classes. They provided us really solid feedback,
9 one that the class is meeting the need, but, too,
10 I think that there is greater emphasis and a need
11 to deliver through various medium information
12 specific to pipelines.
13 MR. TRAINOR: What specific outreach
14 have you made to the City of San Bruno with
15 respect to communicating with their Merck
16 management officials about the pipeline facilities
17 within their community?
18 AARON REZENDEZ: Well, I know that each
19 and every contact, as the Chief had talked about,
20 some of the liaison meetings, in areas, an
21 overview given of the actual transmission system
22 whereby additional information could be provided,

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1 and, as he discussed as well, there have been
2 efforts post San Bruno to further engage that
3 community.
4 MR. TRAINOR: But the Chief just said a
5 few moments ago that prior to September 9th he
6 really wasn't aware of line 132.
7 So how do you explain that?
8 AARON REZENDEZ: I can't.
9 MR. TRAINOR: Okay. Has there been any
10 consideration within PG&E on the need to provide
11 specific information to emergency responders about
12 the location of the transmission pipelines?
13 AARON REZENDEZ: Yes. And we've
14 provided emergency response personnel across our
15 service territory with maps of the local areas to
16 give them that information.
17 MR. TRAINOR: Okay. And that -- has
18 that been since the accident? Or was that prior?
19 AARON REZENDEZ: It has.
20 MR. TRAINOR: Okay. Thank you.
21 Dana, I'll let you take over.
22 MS. SANZO: Mr. Lidiak, can you provide

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1 an overview of the mission and membership of API,
2 please.
3 PETER LIDIAC: Yes. API is a national
4 trade association with approximately 450 corporate
5 members, representing all aspects of the oil and
6 gas industry.
7 MS. SANZO: And could you please provide
8 an overview of the pipeline public awareness
9 requirements that are specified in API
10 departmental practice 1162?
11 PETER LIDIAC: Yeah. The requirements
12 are, you know, relatively new. I'll point out
13 they were put into place in 2005 under PHMSA
14 regulation.
15 The actual RP was released in 2003, and
16 it has been industry practice since then.
17 It gives operators a framework for
18 developing, implementing, and evaluating their
19 public awareness programs.
20 MS. SANZO: And who are the stakeholders
21 involved in the development and implementation of
22 RP1162?

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1 PETER LIDIAC: The work group that
2 developed the initial document was primarily made
3 of industry personnel, state regulators, and the
4 Office of Pipeline Safety. The state -- the state
5 and federal participants were observers in the
6 process.
7 The federal and state agencies often
8 will take that role rather than being direct
9 members of the work group. We also engaged in a
10 number of workshops, comment periods, et cetera,
11 to gather input during the development of the
12 document.
13 MS. SANZO: Were there any other service
14 organizations involved in the development of
15 RP1162?
16 PETER LIDIAC: I don't know the answer
17 to that.
18 MS. SANZO: What guidance does the
19 standard provide for operators for assessing their
20 awareness programs?
21 PETER LIDIAC: Well, in general it does
22 require an assessment element. And it is -- it is

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1 not a very specific and, shall we say, you know,
2 standards-driven process.
3 It requires that they evaluate their
4 effectiveness on, you know, a statistical basis,
5 and demonstrate the effectiveness.
6 MS. SANZO: Mr. Boss, could you provide
7 an overview of the membership and mission of
8 INGAA, please.
9 TERRY BOSS: Yes. INGAA is an
10 association of interstate natural gas transmission
11 companies, approximately 28 members, that reflect
12 around 186,000 miles of natural gas transmission
13 pipelines.
14 MS. SANZO: Are the public and emergency
15 responders aware of the methods used by PG&E
16 common to other guest pipeline operators?
17 TERRY BOSS: There is a commonality
18 because of the pipeline safety regulations. PG&E
19 has participated in the past in the implementation
20 of those practices, specifically on API 1162.
21 And ever since that has been adopted
22 through PHMSA, we've previously had an education

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1 program rather than an awareness program, so the
2 change has been trying to measure the awareness
3 rather than the amount of education out there.
4 And it is a continuing program that's -- as Peter
5 mentioned, I think the new API 1162 was just
6 published in December of this year.
7 MS. SANZO: What challenges do gas
8 pipeline operators encounter with the recommended
9 practice and regulations for public awareness?
10 TERRY BOSS: I think one of their big
11 challenges is that it is a two-way street, and
12 there can be a lot of education that's put out
13 there. But being sure that you're educating the
14 correct people and the messages that you're giving
15 to those groups do fit into their communication
16 patterns, the jargon that those particular groups
17 work with.
18 For example, there's different messages
19 that you may give to a public official versus an
20 emergency official, versus a homeowner. And
21 crafting those messages, and being able to catch
22 their attention so that they do pay attention to

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1 this information and understand.
2 Unfortunately, pipelines are buried
3 underground and a lot of folks don't have a visual
4 indication of what's there, so it's hard to gauge
5 their attention on those things.
6 MS. SANZO: Mr. Lidiak, I would also
7 like to ask you the same question. What
8 challenges is your membership encountering with
9 the recommended practice for public awareness?
10 PETER LIDIAK: Much the same answer that
11 Mr. Boss just gave, and that is that, you know,
12 you would have messages that are going out to
13 literally hundreds of thousands of people. And
14 getting their attention, getting them to listen to
15 that, and ensuring that they're getting the
16 message is the challenge here.
17 MS. SANZO: Thank you.
18 Mr. Weimer.
19 MR. TRAINOR: She thought she was going
20 to get away without letting me throw a few
21 questions your way.
22 Mr. Lidiak, you mentioned that the

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1 self-assessment efforts at this point are
2 statistically driven as opposed to -- well,
3 statistically driven, I guess, versus standards or
4 prescribed techniques.
5 Looking at PG&E's integrity management
6 program, which does address public awareness
7 issues, their measurement seems to be on the
8 number of mailings made, the number of contacts
9 made.
10 What are the pipeline operators doing
11 beyond measuring those types of parameters as
12 opposed to looking at parameters that give you
13 a -- let's say, a more complete sense of
14 effectiveness?
15 CHAIRMAN HERSMAN: Mr. Trainor, if you
16 wouldn't mind holding on a minute. That's
17 actually a door. Sometimes, that's opened and
18 it's a security alarm. So ... it's not an
19 emergency, but it will take a few minutes -- a few
20 seconds or a minute to shut it down.
21 If we do have a fire alarm, I will let
22 you know, there are three exhibits, one behind

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1 you, where you came in and two on the sides, so if
2 everyone will just hold tight, and we'll shut it
3 down. Thank you.
4 (FIRE ALARM SOUNDS)
5 CHAIRMAN HERSMAN: Sorry about the
6 interruption. And, Mr. Trainor, please continue
7 on with your questioning.
8 MR. TRAINOR: Yes, we were with
9 Mr. Lidiak, and I had asked you -- this was in
10 response to your comment about the self-assessment
11 efforts being statistically driven.
12 And my question was, what statistics are
13 being sought to ensure that the effectiveness of
14 the self-assessment programs are, in fact,
15 effective?
16 And, for example, I cited as an example
17 that PG&E includes the number of bill stillers
18 that they mail out, and the frequency and that
19 type of thing.
20 And what I'm concerned about are the --
21 whether the statistics being tracked are, in fact,
22 going to provide a true measure of effectiveness.

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1 And that's what I'd like to ask you
2 respond to.
3 PETER LIDIAC: And I think it's good to
4 make the distinction by what's required by the
5 program.
6 The programs do require that they mail
7 out a certain number of pieces of information, or
8 provide that information in other means, through
9 meetings.
10 The effectiveness requirements require
11 that they evaluate the effectiveness of those
12 materials. I'll give you an example of what our
13 industry program -- and there are many other
14 programs that are meant to offer to operators, but
15 I can tell you what ours looks at.
16 The kinds of questions that we're
17 looking at is pipeline awareness in the community,
18 the level of being informed about pipelines in the
19 community, recall receipt of the information about
20 pipelines, questions about whether the -- what are
21 the most effective methods for the recipients.
22 And so those types of questions are

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1 being polled. And the process, as was alluded to
2 before, is, we set a confidence limit for what
3 we'd like to see for responses that will give us
4 surety about the answers. And we simply continue
5 to poll until we reach the right sampling limit to
6 get that level of confidence.
7 MR. TRAINOR: Okay. Thank you. I would
8 address this question to both Mr. Boss and
9 Mr. Lidiak -- or to Mr. Boss.
10 In representing an association of gas
11 transmission operators and gas pipeline operators,
12 one thing I've noticed from the PG&E public
13 awareness program is that there doesn't seem to be
14 a distinction between the hazards and risks of a
15 distribution system versus the hazards and risks
16 from a transmission pipeline.
17 Do you think that that distinction needs
18 to be made? And how would you go about doing
19 that?
20 TERRY BOSS: I think that's a very
21 important point, Bob. The companies that are
22 members are usually integrated companies that just

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1 operate natural gas transmission pipelines.
2 When you're in a situation and you have
3 a corporate environment where you're providing
4 natural gas transmission, distribution and
5 possibly electrical service, there may be some
6 paradigms in thoughts of what they think a
7 pipeline is.
8 And even though you may consider that
9 there may be more problems in the distribution
10 systems so the messages need to get out on a
11 distribution system, there's still a message on
12 the transmission system. And you may have some
13 folks arbitrarily thinking that you're talking
14 about a distribution like going to a house, and
15 they get a different paradigm in their mind.
16 So it's how do you distinguish that sort
17 of thing? I think how we're trying to accomplish
18 that is some of the material to distinguish that.
19 But, honestly, distribution and
20 transmission is a jargon term that we use within
21 the industry, and it is not well-known outside of
22 this industry. So it's removing those jargon

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1 terms and trying to communicate that there is
2 something different between the lines.
3 MR. TRAINOR: Okay. I'd like also to
4 direct this question to Mr. Boss. And we
5 mentioned challenges facing the pipeline operators
6 in this -- with respect to public education or
7 public awareness programs. You mentioned it's a
8 two-way street, we need to educate the correct
9 people and in a manner that fits their particular
10 communication pattern.
11 What's being done through your
12 organization and other industry organizations to
13 address that need, that challenge?
14 TERRY BOSS: I think what we're trying
15 to do is have a cooperative environment. We have
16 progressed from, say, the late '90s, where we
17 worked together with PHMSA on the National
18 Pipeline Mapping System, making that available.
19 We went to the Common Ground Alliance
20 because the key group to talk to is the excavators
21 out there, a realization that public officials
22 besides the emergency officials, maybe were not

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1 getting the information. API 1162 addressed some
2 of those kinds of techniques.
3 And then a realization that, let's get
4 some of the jargon, or how are we describing it,
5 or how we talk to people in this busy environment,
6 where people tend not to, maybe, read mail, and
7 understanding, you know, are we really getting the
8 message?
9 So PIPA was the latest effort that we
10 were involved with Pipeline and Informed Planning
11 Alliance, that was just published in December, to
12 talk to other people in the stakeholder game. So
13 it's a constant improvement. And as Peter
14 mentioned, we do have the new API 1162, so as we
15 find things we're constantly trying to improve
16 that in terms of adjusting the regulations moving
17 forward.
18 MR. TRAINOR: Thank you. I'll give it
19 back to Ms. Sanzo.
20 MS. SANZO: Mr. Weimer, could you please
21 describe the organization and the mission of
22 Pipeline Safety Trust?

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1 CARL WEIMER: Yes. The Pipeline Safety
2 Trust is the only national, non-profit public
3 interest group that really focuses on pipeline
4 safety. It came about after the 1990 Bellingham
5 pipeline tragedy where a quarter of a million
6 gallons of gasoline was dumped into a creek
7 through the middle of Bellingham, Washington where
8 it ignited two miles downstream and killed three
9 kids playing in a park.
10 After that event, through the U.S.
11 Justice Department's investigation of that, they
12 were kind of so aghast with the way the company
13 that maintained their pipeline and the way federal
14 regulators had regulated it, that they went to bat
15 for the parents who lost those children to set
16 aside \$4 million of the criminals' settlement to
17 set up the Pipeline Safety Trust to be a watchdog
18 for both the industry and the regulators.
19 MS. SANZO: What are the important
20 messages that the general public should know about
21 natural gas and safety?
22 CARL WEIMER: Well, I think the word

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1 messages that they have to know that there is a
2 pipeline in their neighborhood for them to have
3 any real concern about that. And that seems to be
4 a message that often is missing, in these mass
5 communication efforts.
6 We kind of beat around the bush about
7 that and don't come out and tell people that there
8 is a pipeline in their neighborhood and what the
9 potential impacts of that pipeline would be in the
10 small chance that it failed.
11 MS. SANZO: What do you think are
12 effective methods at reaching out to the general
13 public to provide this information?
14 CARL WEIMER: Well, certainly the more
15 specific targeted personalized the messages, the
16 more likely that people are to listen to it.
17 And you also have to have something that
18 catches their attention. I think sometimes these
19 mass efforts that the industry has tried to put
20 forward, and certainly this has been a huge effort
21 on industry's part to get this message out in the
22 last few years, but a lot of it has been kind of

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1 mass mailings. And there's, to some degree, a
2 conflict of interest in the message coming from
3 the industry because the industry very much wants
4 to portray themselves as having safe pipelines.
5 And certainly that's true, but if the
6 message on all of your mailers is that everything
7 is safe and reliable and you have to wade through
8 that for a couple of pages before you get to the
9 safety messages, it's hard for people to get to
10 the safety messages and read those. And that's
11 what we see in a lot of these kind of generic
12 efforts across the country.
13 MS. SANZO: What should be the goals of
14 public awareness programs and outreach to the
15 general public?
16 CARL WEIMER: Well, I think there's
17 multiple goals and API 1162 has most of those
18 messages identified pretty well. People need to
19 know where pipelines are, people need to locate
20 them, and know what to do if something goes wrong
21 with the pipeline, who to contact. They certainly
22 need to know about damage prevention because

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1 that's one of the major causes of these problems,
2 and if you're communicating with the public,
3 that's something they need to know about.
4 But you really need to provide those
5 messages in a way that we don't hear after every
6 one of these tragedies, that the communities had
7 no idea there were pipelines running through their
8 neighborhoods.
9 MS. SANZO: What can be done to increase
10 public awareness about pipelines?
11 CARL WEIMER: Well, I think there's a
12 number of things. One is I think we just need to
13 really target the message better. I talked a
14 little bit about the conflicting messages. I even
15 was looking at PG&E's mailer that went out, and
16 while you want people to get to the public safety
17 messages of damage prevention and what to do, and
18 what -- if you smell gas, what to do, you have to
19 wade through a couple of pages. And when I was in
20 school in education, there was always a rule, it
21 was the 7-word rule. Most people only read the
22 first seven words of something. That's why

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1 newspapers hire headline writers.
2 Well, if you look through the PG&E
3 brochure, the first thing you run into is safe,
4 efficient, reliable, the popular choice, the
5 safest choice, and safety commitment. So you go
6 through all kinds of things telling them
7 everything is good, before you ever get to the
8 safety messages.
9 We need to really try to come up with a
10 different lead-in so people will pay attention to
11 what is inside of those brochures. We need to get
12 the messages out more often, everybody realizing
13 that there are different text communications and
14 media multiple communications. And people that
15 are only getting a mailer once every two years,
16 the chance of them picking up and taking those
17 messages to heart is much sooner than if they were
18 hearing messages from different sources and
19 different directions. And I think the lead-in
20 message has to be something that will get people's
21 attention.
22 We have testified in Congress a couple

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1 of times, and most of these messages -- one of the
2 generic messages we see around the country is a
3 quote from the NTSB stating that pipelines are the
4 safest way to transport fuel. That's totally
5 true. We don't disagree with that at all.
6 But if that's your lead-in message on
7 the public awareness piece to try to get safety
8 messages out to people, why would anybody read the
9 rest of the brochure? You just told them
10 everything is safe. If the message on the cover
11 was more to the tune of, there's a significant
12 incident in the country every other day and half
13 where someone ends up dead or seriously injured
14 every four or five days from a pipeline incident,
15 maybe they'd open up the brochure up and take
16 those safety messages to heart.
17 MS. SANZO: Thank you, Mr. Weimer.
18 MR. TRAINOR: Mr. Weimer, just a couple
19 of questions.
20 Your message about better targeting of
21 the message to the citizens, could you describe,
22 perhaps, the research and information that you

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1 collected, your agency has collected, to support
2 that particular idea?
3 CARL WEIMER: Well, we haven't done a
4 lot of research. We did this through a project
5 this past year as part of the Pipeline and
6 Informed Planning Alliance, where we're trying to
7 look at ways to get local public officials to
8 adopt, use their permitting and zoning regulations
9 to protect people that are, you know, newly
10 develop near pipelines. So we did a project,
11 trying to figure out how do you get a local,
12 elected official or mayor or city council or
13 planning officials to start looking at those types
14 of messages?
15 And what we found out is you really need
16 to drill down and look at the message and find out
17 what the incentives are for them to pay attention,
18 what the barriers are for them to pay attention.
19 And as we did that we learned that, who
20 the messenger is, is very important. That's one
21 of the things we don't see in these mass marketing
22 efforts by the industry, really drilling in to

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1 find out who the messenger ought to be, what the
2 message ought to be, what the barriers and
3 incentives are for people to pay attention.
4 MR. TRAINOR: Thank you. Is there a
5 written report that your agency has produced
6 summarizing this information?
7 CARL WEIMER: Yes, there is. We have it
8 on our website. I can't remember the address but
9 I'd be glad to give that --
10 MR. TRAINOR: We would like to obtain a
11 copy of that, if you could, please.
12 CARL WEIMER: Glad to do that.
13 MR. TRAINOR: I think now we're ready to
14 move to Ms. Robertson from PHMSA.
15 Good morning.
16 ANNMARIE ROBERTSON: Good morning.
17 MR. TRAINOR: You've heard the testimony
18 from your fellow panelists, and we wanted to
19 address PHMSA last, because your agency is
20 involved in all of these matters, and -- I am
21 trying to find my place here, bear with me.
22 ANNMARIE ROBERTSON: Okay.

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1 MR. TRAINOR: We know that PHMSA was
2 deeply involved in the development of 1162, and
3 worked with the participants of that effort to
4 develop the recommended standard that's now in
5 place.
6 One of the problems that keeps -- that
7 seems to be arising in different pipeline
8 accidents we've seen recently is, people didn't
9 know they had a pipeline within their community.
10 And there's been some discussion of the
11 National Pipeline Mapping System.
12 How do you ensure that people are aware
13 of this resource in are using -- how -- has PHMSA
14 made any effort to determine whether these public
15 awareness programs, people in these communities,
16 generally know it's there?
17 ANNMARIE ROBERTSON: Well, our
18 inspection program includes a review, not only of
19 the written program, the program requirements, the
20 implementation of the program, but also a review
21 of the operator's evaluation of effectiveness of
22 that. That is on a four-year cycle which means we

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1 are just at the beginning of -- beginning stages
2 of our review of the operator's effectiveness
3 evaluations.
4 We expect to learn a lot as we go
5 through the inspection process to determine what's
6 working and what's not working --
7 MR. TRAINOR: Have you developed a list
8 of criteria that you would use when you go in and
9 look at an operator's program?
10 ANNMARIE ROBERTSON: Yes. We -- state
11 and federal ad hoc team have been working on this
12 issue for several months.
13 MR. TRAINOR: And --
14 ANNMARIE ROBERTSON: We have -- go
15 ahead.
16 MR. TRAINOR: I was just going to say,
17 are these criteria in a written format
18 with written --
19 ANNMARIE ROBERTSON: Yes. We have a
20 discussion form, inspection guidance. We are
21 developing frequently asked questions and we're
22 developing inspector training.

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1 All of that is underway right now. The
2 ad hoc team is meeting this week to go over
3 lessons learned.
4 MR. TRAINOR: We would be interested in
5 receiving that guidance and those check-off lists,
6 please.
7 ANNMARIE ROBERTSON: Certainly.
8 MR. TRAINOR: One of the things that,
9 again, we've been focusing on in this hearing is
10 operator self-assessment, but we're also
11 interested in regulator self-assessment. I think
12 our concern is you have, PHMSA as a regulator,
13 federal regulator, has two responsibilities. And
14 the first one is, how you assess the effectiveness
15 of the operators' local public awareness program.
16 Can you elaborate on that, please.
17 ANNMARIE ROBERTSON: Well, what we do is
18 when we do our inspections we go out and look at
19 their records, look at the results of the surveys
20 that they've done, both to implement the program
21 in accordance with what the written program says,
22 do their records indicate that they have sent the

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1 mailings, how do they develop the mailing list,
2 what were their data sources.
3 And then as we go through the
4 evaluations of the effectiveness, we will also
5 look at those bill surveys, and how they -- the
6 methodology they used for each stakeholder group,
7 and each measurement. Are there measurement
8 requirements for if the audience actually received
9 the message, did they understand the message, have
10 they -- have they taken any action, is there any
11 change of behavior based on that, and bottom line
12 results.
13 So operators are required to review all
14 of those, and we review their measurements.
15 MR. TRAINOR: Well, how would your
16 auditors, for example -- if they looked at
17 these -- the customer survey results, what would
18 they look for in that, in those results, to assure
19 them that the program has been effective?
20 ANNMARIE ROBERTSON: Well, we'll be
21 looking for response rates, we'll be looking for
22 feedback from the various stakeholder groups. And

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1 we're in a learning process ourselves as to what's
2 working and what's not working, what kind of
3 thresholds can we expect to see as far as response
4 rates.
5 And once we have conducted more
6 inspections we'll have a better understanding of
7 what we can expect to see and whether our
8 regulations are working and need to be revised.
9 MR. TRAINOR: Has PHMSA established
10 threshold rates for, say, for example, responses
11 to surveys? Have you got any criteria of that
12 nature?
13 ANNMARIE ROBERTSON: No, we haven't. We
14 have -- the operators are required to use
15 statistically valid sampling, but as far as
16 response rates, we have not yet determined what
17 should be expected.
18 MR. TRAINOR: Would you describe the
19 Community Assistance and Technical Services
20 Program?
21 ANNMARIE ROBERTSON: Certainly. The
22 Community Assistance and Technical Support

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1 program, as we've been calling it, the CATS
2 program, is a program that involves inspectors,
3 PHMSA inspectors in each region.
4 And their role is not only to -- they're
5 qualified to do inspections, and certainly are
6 capable of that, but they also reach out to the
7 communities. They assist in permitting for
8 repairs, if operators need repairs. They assist
9 in working with communities. They answer
10 questions from individuals. They represent PHMSA
11 at various meetings, giving presentations.
12 So they do a lot of outreach, in
13 addition to being fully trained as inspectors and
14 understanding the regulations.
15 MR. TRAINOR: I'm not quite clear. So,
16 is the CATS program a training program for your
17 inspectors, or is it an outreach activity directed
18 to operators in communities?
19 ANNMARIE ROBERTSON: More the latter.
20 More the latter.
21 MR. TRAINOR: With respect to that
22 outreach activity, about what percentage of the

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1 time is devoted to the operators versus the
2 community?
3 ANNMARIE ROBERTSON: Within the CATS
4 program?
5 MR. TRAINOR: Yes.
6 ANNMARIE ROBERTSON: I don't believe I
7 can answer that. It varies from region to region,
8 depending on the issues in that region and the
9 activities that are going on as far as
10 construction work, other efforts, that they may
11 need to devote their attention to.
12 MR. TRAINOR: Has there been any
13 outreach activity through the CATS program to the
14 City of San Bruno or the Bay area as a whole?
15 ANNMARIE ROBERTSON: I am unaware of
16 any. But I can find out ...
17 MR. TRAINOR: You just don't know or ...
18 ANNMARIE ROBERTSON: I don't know.
19 MR. TRAINOR: Okay. We would appreciate
20 getting information about the CATS program
21 activity that's been done nationwide, and would
22 ask if you can provide that to us.

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1 ANNMARIE ROBERTSON: Certainly.
2 MR. TRAINOR: I don't have any more
3 specific questions, but I would like to very
4 quickly ask each panel member to take a moment
5 and, based on the discussion we've had this
6 morning, offer their comments as far as what they
7 think can be done to elevate the level of public
8 awareness of pipeline systems.
9 And we'll start with Chief Haag.
10 DENNIS HAAG: Well, I agree. I think
11 it's imperative that the awareness elements, even
12 in the Fire Services, are certainly heightened by
13 the events of September 9, but I also think, you
14 know, my experience on the reentry program in San
15 Bruno, when the city elected to move our
16 residents -- to move their losses and their
17 damaged homes and, you know, my conversations with
18 the residents, around the pipeline, and there's
19 something that has to be done to make that right.
20 So I agree with all the panel members
21 that the outreach has to continue and become
22 enhanced and make those contacts real.

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1 MR. TRAINOR: Thank you. Mr. Narva?
2 JAMES NARVA: It's my feel that, from an
3 emergency responder perspective, not the public in
4 general, but I think you have to have a credible
5 message, multiple means of delivering that
6 message, and value for the time that you're going
7 to do. There's something that has to catch that,
8 an incentive, so to speak.
9 Again, multiple methods. And then to
10 look at new technologies, looking at new ways to
11 communicate and then have real evaluation.
12 MR. TRAINOR: Thank you.
13 Mr. Lidiak.
14 PETER LIDIAC: I think that public
15 awareness programs is going to be a matter of
16 continual improvement.
17 As I mentioned earlier, it's a
18 relatively new program. 1162 has been updated
19 recently to reflect the learnings that we've had
20 in the first few years of operation.
21 And I just want to mention in passing,
22 of course, that in that revision we also addressed

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1 a recommendation from the Board to recognize
2 emergency response call centers as part of the --
3 part of the target audience for the public
4 awareness programs. And so that, that directly
5 addresses that recommendation.
6 I think the other side of this, too,
7 though, is, as far as the awareness goes, the PIPA
8 document was mentioned, and this process of
9 population growth and encroachment on pipeline
10 rights-of-way is a pretty big issue. And I
11 believe that this San Bruno incident is somewhat
12 impacted by the fact we have an existing pipeline
13 that had a great deal of development occur around
14 it. And so it was pre-existing.
15 The PIPA document hopefully will help
16 communities to avoid that sort of situation,
17 because it informs the planning -- the planning
18 officials in communities.
19 MR. TRAINOR: Thank you. Mr. Boss?
20 TERRY BOSS: I pretty much echo Peter's
21 response on that. It's a process of continuous
22 improvement, both from the pipeline operators and

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1 regulators, and also the community on those
2 things.
3 And, unfortunately, we do learn things
4 as these events happen. We don't want these
5 events to happen, but we've got to continuously
6 improve on these sort of things.
7 MR. TRAINOR: Mr. Weimer?
8 CARL WEIMER: Yes. I think that one of
9 the keys is to make this information more
10 specific, targeted and personalized to people so
11 they'll pay attention to it when they receive it.
12 I also think that we need to really
13 focus on the evaluation, improvement of the
14 programs over time. And, at least in our minds,
15 that evaluation should be a key towards whether
16 we're really changing behaviors, just not counting
17 how many brochures are getting mailed out, but
18 there are measurable behaviors here that we could
19 key on, a number of calls going into the one call
20 centers going up after these mass mailings.
21 After we're talking to public officials,
22 are they adopting ordinances about pipelines

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1 near -- planning near pipelines, those types of
2 things should be measured, and that should be what
3 the evaluations are based on to some degree.
4 MR. TRAINOR: Thank you. Mr. Rezendez.
5 AARON REZENDEZ: I too could kind of
6 chime in on a lot of things that have already been
7 mentioned. I think the use of new technologies --
8 hello? -- recognizing, for example, that a
9 volunteer firefighter located in a remote area
10 might not be able to make it to a training center,
11 being able to provide them online content could be
12 a solution. E-mails, things like Twitter and Face
13 Book, as we compete against all of the other
14 messaging, for example, in our society.
15 Tone, as it's been clearly stated, is
16 huge. I think that in a post San Bruno reality we
17 have to kind of peel back on our prior thoughts
18 and methodologies and ask ourselves, are we
19 speaking to this audience in a way that they would
20 expect us to speak?
21 MR. TRAINOR: Thank you. Ms. Robertson.
22 ANNMARIE ROBERTSON: I would say, in

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1 addition to analyzing our regulatory program and
2 especially enforcements program, we recognize that
3 there are roles for everyone as far as public
4 awareness.
5 We have a number of outreach efforts
6 that we've been doing at PHMSA. Our stakeholder
7 communications website contains a lot of
8 information about damage prevention, about the
9 CATS program, about public awareness. We are
10 trying to, not only get a better understanding of
11 what works or what doesn't work, but also
12 facilitate sharing that information.
13 We take the NTSB recommendations very
14 seriously. We've responded to the Lively
15 incident, the Carmichael incident, and we are
16 continuing to work to address the recommendations
17 in the Carmichael incident.
18 MR. TRAINOR: Thank you.
19 MR. CHHATRE: Madam Chairman, the
20 Technical Panel has concluded its questions.
21 CHAIRMAN HERSMAN: Thank you very much,
22 Technical Panel, and also to the witnesses. We're

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1 going to take a short break, and then we'll come
2 back and the parties and the Board of Inquiry will
3 ask questions.
4 We will adjourn and resume at 10:40.
5 (RECESS TAKEN FROM 10:24 TO 10:44 A.M.)
6 CHAIRMAN HERSMAN: Go ahead and take
7 your seats. We're about to resume.
8 And we'll begin with the parties asking
9 questions of the witnesses. IBEW.
10 MS. MAZZANTI: Thank you, Madam
11 Chairman. I actually do have questions today. My
12 question is for Chief Haag.
13 The first question is, there's a water
14 line and a sewer line that run parallel to line
15 132. And there was work done to a sewer line
16 which also included a pipe bursting in '08. So
17 was this -- the city not aware that that gas line
18 ran there when they would do that pipe bursting in
19 the sewer enlarging?
20 DENNIS HAAG: The excavation -- from
21 what my understanding was, and I probably should
22 defer that question, I don't have any knowledge,

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1 but that -- those -- that excavation didn't impact
2 anything as far as I know.
3 MS. MAZZANTI: But it did include work
4 done around that transmission line --
5 DENNIS HAAG: I can't answer that. As
6 far as my knowledge, as far as if they saw the
7 pipe or not saw the pipe.
8 MS. MAZZANTI: So then my next question
9 would be, what's the relationship in regard to
10 communications between the public works department
11 and the fire department?
12 DENNIS HAAG: Well, the two departments
13 have great communication. I just don't have -- if
14 there wasn't a reason for -- to contact the fire
15 department, is my assumption.
16 MS. MAZZANTI: And my next question is,
17 was the fire department invited to the trainings
18 that were held in '09 and 2010?
19 DENNIS HAAG: Which trainings are you
20 referring to?
21 MS. MAZZANTI: In Exhibit 40, there's an
22 invitation list.

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1 DENNIS HAAG: The liaison meetings?
2 MS. MAZZANTI: Correct.
3 DENNIS HAAG: Yes, we did receive an
4 invitation.
5 MS. MAZZANTI: And did you attend at
6 that time?
7 DENNIS HAAG: I believe my fire marshal
8 attended the 2010 session.
9 MS. MAZZANTI: And my last question is,
10 the hydrants were dry at the time because there
11 was no water supply after the explosion; correct?
12 DENNIS HAAG: Correct.
13 MS. MAZZANTI: How long was it before
14 you were able to get water to the scene?
15 DENNIS HAAG: Without giving you an
16 exact time, it probably took us 30 to 40 minutes
17 to get out some water, and in the meantime we
18 brought up water tenders to provide assistance for
19 that.
20 MS. MAZZANTI: Thank you. No further
21 questions.
22 CHAIRMAN HERSMAN: CPUC.

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1 MR. CLANON: Thank you. I'm Paul
2 Clanon. I'll be representing the Public Utilities
3 Commission. A couple of questions for Chief Haag.
4 Chief, you were there the night of the
5 incident, you were out at the scene after the
6 explosion, and took command of the incident;
7 correct?
8 DENNIS HAAG: Correct.
9 MR. CLANON: And you were there during
10 the course of the evening and you saw and, in
11 fact, you ordered -- [inaudible].
12 DENNIS HAAG: Correct.
13 MR. CLANON: What was it like?
14 DENNIS HAAG: Well, in my 30 years I've
15 never seen anything like that. Obviously, you
16 know, San Mateo County has -- the State of
17 California uses their [inaudible] system probably
18 as frequent as anyone but in our county, we have
19 drawn boundaries in our response, we have a
20 central dispatch for fire, so ordering up
21 resources I think we had over 68 firefighters on
22 the scene within 22 minutes.

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1 So the response from both law, fire,
2 public services, was probably the most amazing
3 thing I've seen.
4 MR. CLANON: And I want to get to the
5 discussion we had this morning about what you knew
6 about the pipeline in advance. And, in general,
7 you didn't know much about the pipeline in the
8 fire department.
9 Does that also mean you didn't know
10 where the valves were?
11 DENNIS HAAG: No, we did know.
12 MR. CLANON: Had you known that there
13 was a gas pipeline there, or had your dispatchers
14 known and your immediate responders, what would
15 have been different? The way I understand this,
16 some of the earlier reports were -- people
17 believed that there had been a plane crash, for
18 example, had you known or had any of the
19 dispatchers known in advance that there was a gas
20 transmission line through there, what might have
21 gone down differently?
22 DENNIS HAAG: The initial reports on the

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1 incident was a plane down. And that -- those
2 reports continued for the first 45 minutes. You
3 know, with the airport being as close as it is to
4 this site, you know, initial -- we thought that
5 that was a possibility, obviously.
6 Our response to the incident would not
7 have changed, whether it was an airliner down or
8 the explosion itself, you know, or a tactical
9 dispatch, our strategy would be the same, fighting
10 what we saw, and then we're trying to adapt and
11 control. That's the same issue occurring.
12 MR. CLANON: I've asked for an exhibit
13 to come up, it's Exhibit 2BC, this is just a map
14 of the subdivision that shows the fire damage.
15 And I want to talk about what might have
16 gone down differently had the gas been able to be
17 shut off earlier.
18 So we heard yesterday that there was --
19 that there was a period of about an hour or so, it
20 took about an hour or so longer to cut off the gas
21 that was coming in to, both directions, to the
22 ruptured pipe in San Bruno on September 9th, than

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1 it might have had there been remote control
2 valves, for example. So roughly for an hour or
3 so. I'm not going to hold you to that number.
4 What I'm curious to know is what the
5 impact of that hour was.
6 You were nearby -- I'm not sure where
7 your command center was. I think it was just off
8 this map; is that right?
9 DENNIS HAAG: Actually it was just off
10 the San Bruno Avenue and Glenview, which --
11 MR. CLANON: Just below this map?
12 DENNIS HAAG: It's going to be at the
13 lower end of the interstate --
14 MR. CLANON: And just to situate the
15 folks here, so the purple shows fire destroyed
16 properties, the yellow shows damage, and then the
17 green undamaged, I think.
18 Do you happen to know what those black
19 bars mean? I don't know.
20 DENNIS HAAG: On this map, I believe
21 they're security gates.
22 MR. CLANON: Security gates. Okay. And

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1 the valves, they're --
2 MR. JOHNSON: Ms. Chairman, this is a
3 little off topic, and we're talking about a lot of
4 speculation.
5 MR. CLANON: Let me ask the Ms.
6 Chairman, and please tell me if it's off the
7 topic.
8 My basic question is, in terms of public
9 awareness since the fire department didn't know
10 about the valves and didn't know how to navigate
11 closing the valves, what impact that had and
12 whether advanced knowledge might have changed the
13 situation on the ground that night.
14 And I'm perfectly happy to take that off
15 the table if that's --
16 CHAIRMAN HERSMAN: Mr. Clanon, it's
17 fine. We're on topic.
18 If you could just speak up a little bit,
19 and ask a specific question to the Chief.
20 MR. CLANON: If the gas had been turned
21 off a little earlier what, in fact, would have
22 happened that night?

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1 DENNIS HAAG: Again, we've been
2 instructed by Madam Chair not to speculate. And,
3 my honest opinion, I would be speculating.
4 Obviously, we had the initial explosion
5 without the fuel supply. There's a possibility we
6 could have been, instead of in a defensive mode,
7 in an offensive mode. But I couldn't tell you
8 what impact that would have -- would have had --
9 MR. CLANON: So it could have been
10 beneficial but I certainly don't want you to
11 speculate. Thank you. And my time is up. Thank
12 you.
13 CHAIRMAN HERSMAN: Okay. Just so the
14 parties and the witnesses are clear, it's -- it's
15 perfectly fine to ask questions that are factual
16 in nature. The witnesses are experts in their
17 certain areas, and that's where they're here, and
18 so we do want to ask questions where your
19 qualifications can actually shed light on them.
20 We just want to keep the questions in a
21 factual nature, and so if you were asked, what
22 damage might have been done in the 30 seconds or

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1 the first 15 minutes after the response, given
2 your experience as a fire official, that might be
3 something that's in your purview rather than
4 speculation.
5 So, just if we can help the parties, if
6 you have any questions, we can get through that
7 again.
8 I note PHMSA, PG&E and San Bruno all
9 have witnesses on this panel, so we'll go to PHMSA
10 first.
11 MR. WIESE: Great. Thank you very much.
12 I would just like to solicit your ideas on how can
13 we collectively, whether it be emergent -- the
14 emergency response community represented by
15 Mr. Narva and others, or whether it's the industry
16 or the regulators, get the attention of local
17 officials, including first responders, prior to a
18 failure.
19 We will see a lot of efforts that will
20 be going out. But as a couple of people have
21 said, the communication has to go two ways. It's
22 not meant by any means as a criticism. I know you

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1 have your hands full on a daily basis and if you
2 don't have a history of failures, how do we get
3 your attention prior to a failure?
4 I welcome any ideas.
5 DENNIS HAAG: Well, if the awareness
6 isn't any higher right now, I'd be very
7 disappointed, on the fire side.
8 So I think the opportunity to jump on
9 that awareness opportunity -- I'm sure the Fire
10 Service would collaborate, hopefully, you know, in
11 a much greater effort than they have been, but I'm
12 in, put it that way.
13 MR. WIESE: My next question, and,
14 hopefully, leading off to that, would be to
15 Mr. Narva.
16 Have you gotten much feedback or
17 recognition for the Pipeline Emergencies Program
18 and, again, maybe just to connect to the Chief's
19 thoughts, your ideas on how we can get the
20 information that's already been developed more
21 rapidly into the hands of emergency responders.
22 JAMES NARVA: Sure. The Pipeline

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1 Emergencies, I mentioned in the earlier session,
2 is a program that's been around for about seven
3 years. It's continually evolving. We are now
4 just finishing up a second edition, and part of
5 that second edition is to make it electronic. I
6 alluded to that briefly.
7 It will be deployed in an electronic
8 portal so it is available to any emergency
9 responder at their convenience, their time, and
10 also do it in a way that's -- that's measurable
11 and trackable, so that we know how far they've
12 gone in the curriculum. We can measure learning.
13 We can measure the communication and the
14 awareness. And then to couple that with a
15 communication piece, so that -- whether it's the
16 National Association of State Fire Marshals or a
17 pipeline operator, has the ability to
18 electronically communicate with emergency
19 responders, and also to track that. So,
20 technology will get us a long way, I think.
21 MR. WIESE: Thank you very much. I
22 guess I still have a couple of minutes.

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1 I'll open it up to anyone's comments on
2 this one, but it's, having myself been involved in
3 public awareness for a number of years, one of the
4 things we're constantly struggling with is the
5 difference between the awareness and behavioral
6 change.
7 You know, awareness is the first step,
8 you know, and I just welcome any thoughts -- and,
9 Carl, we've had this conversation ourselves about,
10 how do you -- once you gain awareness, how do you
11 get people to change behavior? 811 is a perfect
12 example. People know you need to call before you
13 dig. They will be aware of it and still not do
14 it. So, just anyone that wants a swing at that
15 one.
16 You know, not having the opportunity to
17 sit across from Carl that often, maybe we can
18 point to Carl to answer this.
19 CARL WEIMER: Well, I think the key to
20 building upon awareness to actually get to the
21 behavior change really results from really
22 drilling down and looking at the incentives and

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1 barriers for people that make those types of
2 behavior changes and addressing those. And that's
3 something that I think we all need to work on
4 harder.
5 Some of it even goes to the previous
6 question about who's just doing the communication.
7 You know, we have Chief Haag now, who could be a
8 great communicator with other people in the fire
9 industry, more so than receiving that
10 communication from PG&E, he might -- they might be
11 more receptive to hearing from him.
12 The mayor from San Bruno could
13 communicate with other local public officials, and
14 I think that would be one way to help open the
15 door up to move things toward behavior change.
16 TERRY BOSS: I might want to add, Jeff,
17 that Carl had a good description on how to
18 emotionally communicate to people and if they're
19 receiving messages or not, and, basically, what
20 kind of mood they're in. First, when they see it,
21 they tend to have a different mood. And all of a
22 sudden you get into that section where they're

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1 actually hearing the message, and trying to
2 identify how we can get to that, where they're
3 actually hearing it, rather than having read, or
4 ignoring the messages, is really key.
5 CHAIRMAN HERSMAN: Thank you. PG&E.
6 MR. JOHNSON: Yes, thank you. My
7 question is directed to Mr. Rezendez.
8 Earlier this morning during the
9 Technical Panel discussion you had started to
10 discuss what is covered at the public liaison
11 meeting, and the responding to gas and electric
12 emergency seminars that PG&E puts on.
13 Would you care to share your thoughts?
14 AARON REZENDEZ: Yeah. The public
15 liaison meeting is intended to increase
16 partnership and coordination among the local group
17 and the local emergency response community,
18 whether that be the fire and police chiefs or the
19 office of emergency services located in that local
20 area.
21 The kinds of things that they cover
22 are -- reviewing and looking upon those various

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1 incidents, which have occurred, to understand what
2 might have been learned, as well as go over
3 various aspects of gas and electric
4 infrastructure, as it is high-tech, if you may,
5 and at its basis, is very complicated. And there
6 is certainly a level of understanding that we
7 would want to convey around that infrastructure.
8 But I think most importantly is the
9 communication that you meet a person, a
10 communication, that occurs, as well as providing
11 them contact information, for example, our
12 designated 911 number for the emergency response
13 community exclusively and allowing them, and
14 letting them understand how that looks and feels
15 when they make that phone call into our dispatch.
16 MR. JOHNSON: Do you care to cover
17 what's your handle on your gas and electric
18 emergency seminar information?
19 AARON REZENDEZ: In general, we've had
20 22 classes so far across our service territory.
21 We've had in excess of 700 attendees: police,
22 fire, 911 dispatchers, Homeland Security, safety

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1 professionals. We've had other operators come to
2 these, as well as public works departments.
3 Feedback has been extremely positive.
4 What we cover are, you know, the
5 foundational issues, what does the infrastructure
6 look, like both gas and electric, what kind of
7 hazards might be encountered, staff and touch
8 potential, why pinching off the line or stopping
9 the flow of gas could be a potential issue.
10 We talk about transmission level issues.
11 We actually hand a handout out, that includes the
12 evacuation instances for various pipe sizes and
13 pressures.
14 And then in follow-up we even provide
15 them all of the resources that were used, build a
16 class. Most of these are free and available for
17 them to go and access online, or actually order
18 the books and materials that are being provided.
19 MR. JOHNSON: Thank you. One further
20 question. Earlier today we talked about new
21 technologies and new opportunities to educate the
22 public on the location of gas transmission

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1 pipelines.
2 Can you talk a little bit about what
3 PG&E's done in that regard.
4 AARON REZENDEZ: Sure. I also mentioned
5 that we had a lot of meetings with public
6 officials. I'd like to call up a slide,
7 Exhibit 4Y, and while that's coming up, just a
8 couple of comments.
9 It was mentioned a little bit earlier
10 that the National Pipeline Mapping System has been
11 usually the go-to point in a variety of
12 communications, whether it be the affected public,
13 public officials, or emergency responders.
14 What we did was actually incorporated a
15 map within our website that allows the user to
16 type in any address, whether it be their home,
17 their business, or a family member. What you're
18 seeing right now is actually a localized map
19 that's available through their "My Account"
20 feature, that being the feature that you go in, to
21 log into to pay your bill, manage your energy.
22 But it also includes a map site. This one gives

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1 about a two-mile radius around the home, so it
2 actually gets down to the street level so the
3 individual in that -- in that spot, if you may,
4 would be able to know specifically where these
5 pipelines are located.
6 Beyond that, we've also designated an
7 888 number, if people are wanting additional
8 information, for which they can get that
9 information as well.
10 MR. JOHNSON: Thank you. I have no
11 further questions.
12 CHAIRMAN HERSMAN: We'll finish with the
13 City of San Bruno.
14 CONNIE JACKS: Thank you. With that
15 exhibit still up, I have a quick follow-up
16 question. Is that the scale -- Mr. Mendez ...
17 AARON REZENDEZ: Rezendez.
18 CONNIE JACKS: Is that the scale that
19 that map is currently available to members of the
20 public?
21 AARON REZENDEZ: Yes, it is, that, if
22 you were the one to log in today to "My Account"

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1 you would see that map --
2 CONNIE JACKS: At the scale that it
3 shows.
4 AARON REZENDEZ: That's correct.
5 CONNIE JACKS: Ms. Robertson, in your
6 opinion, is the Federal Map System, the online
7 tool that's available both to the public as well
8 as to emergency responders, in your opinion does
9 that provide an adequate level of information for
10 preparedness to first responders?
11 ANNMARIE ROBERTSON: I believe the
12 information that is there is adequate, especially
13 when it's coupled with the other information that
14 is available by going directly with the pipeline
15 operators. We're continually working on our NPMS
16 and advising and issuing upgrades to us. So yes,
17 I believe it is adequate especially coupled with
18 the other outreach efforts.
19 CONNIE JACKS: A question for
20 Mr. Lidiak, Mr. Boss, Mr. Weimer, and
21 Ms. Robertson.
22 Have any of you specifically evaluated

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1 the effectiveness of PG&E's public awareness
2 program relative to Regulation API 1162?
3 ANNMARIE ROBERTSON: I can talk to that.
4 The Inspection Enforcement Authority for PG&E is
5 the California Public Utilities Commission. So
6 the inspection will be done by that agency.
7 Originally, when the pipeline operators
8 first completed their public awareness written
9 programs, there was a clearinghouse, and the
10 clearinghouse reviewed all of the requirements
11 that are in 1162, on the programs.
12 The feedback from that clearinghouse
13 review was sent to the California Public Utilities
14 Commission, and the additional activity that
15 occurred between that time and now would have been
16 done by the California Public Utilities
17 Commission.
18 PETER LIDIAK: I'll just mention because
19 PG&E does participate in our papers program, they
20 were part of the surveys done for that region, and
21 that data would be available to the company --
22 CHAIRMAN HERSMAN: I'm sorry. I don't

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1 think that you mike is on.
2 PETER LIDIAK: Because PG&E does
3 participate in papers program, they were part of
4 the surveys done in that region, and that
5 information would have been presented back to them
6 as part of their -- part of their records for
7 their [inaudible].
8 We would not -- we would not have looked
9 at the individual data. We would look at
10 aggregate data for the industry.
11 TERRY BOSS: I would add that one of the
12 purposes of the trade association is to share
13 information among their members --
14 CHAIRMAN HERSMAN: Please put the
15 microphone just a little closer.
16 TERRY BOSS: One of the functions of the
17 trade association is to share information among
18 the members, be they regulatory efforts or
19 workshops, so there would be an informal feedback
20 connected as less concerns on individual companies
21 [inaudible] belonged to, and in some cases will
22 invite outside parties to those sessions.

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1 CARL WEIMER: Just quickly, we haven't
2 done any specific evaluation of those public
3 awareness. The programs are not available to
4 groups like ourselves or the public, so it would
5 be hard to evaluate them; although, the ultimate
6 evaluation is what we heard after the San Bruno
7 tragedy, that the people had no idea.
8 CONNIE JACKS: Thank you.
9 Mr. Narva, you mentioned earlier that
10 your pre-event communication is desirable. If you
11 could expound a little bit about how you believe
12 pipeline operators can improve their public
13 awareness programs, particularly as it relates to
14 information available to local emergency
15 responders about the location, operating
16 characteristics and hazards posed by pipelines in
17 their communities.
18 JAMES NARVA: The importance of having
19 communication before the incident can't be
20 understated. We in past years have focused on
21 state-by-state approach of bringing together the
22 emergency responders, pipeline operators, state

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1 and federal regulators, all of the stakeholders,
2 so to speak, in trying to facilitate those
3 communications and understanding what -- what one
4 another does, what their role is, and what
5 resources that they have. That's something that
6 we need to replicate far more frequently and on a
7 state-by-state approach, as well as at the local
8 level.
9 You just can't replace that face-to-face
10 communication in understanding what the other
11 party has to offer.
12 CONNIE JACKS: If I might just take
13 another couple of seconds for a question to
14 Chief Haag, a two-part question.
15 First if you could clarify the situation
16 that was raised earlier regarding the "dry
17 hydrants," I believe was the word.
18 And then, secondly, I am sure that, even
19 in your 30-year career with the Fire Service, that
20 you might not have imagined being before the NTSB
21 in a proceeding such as we are here today.
22 What are you looking for as far as a

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1 result?
2 DENNIS HAAG: I'm sorry, was there a
3 question regarding the hydrants?
4 CONNIE JACKS: If you could clarify a
5 statement that was made earlier about the dry
6 hydrants.
7 DENNIS HAAG: About the water main being
8 blown out in the explosion?
9 CONNIE JACKS: Correct.
10 DENNIS HAAG: And that was the reason
11 for ... correct.
12 Responding to your second question, I do
13 want to thank the NTSB and the Technical Staff for
14 giving us the opportunity to be here and
15 participate. My belief is there's players in this
16 room that can -- has the ability to see that
17 something like this doesn't occur again.
18 Whether it's through legislation,
19 regulatory training, safety measures, technology,
20 so that this doesn't -- no other community has to
21 suffer the consequences that we did in San Bruno.
22 Thank you.

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1 CONNIE JACKS: Thank you.
2 CHAIRMAN HERSMAN: Member Sumwalt.
3 MEMBER SUMWALT: Thank you. I think
4 this has been a very informative panel, and I want
5 to thank all of the panel witnesses for being
6 here. The only pipeline accident that I've been
7 involved with before, in Carmichael, Mississippi
8 about two and a half -- actually about three and a
9 half years ago -- and I was on the scene there.
10 And, of course, it came to the Board about a year
11 later.
12 I noticed there, and I just went through
13 the report this morning, that, in that particular
14 case, in Carmichael, Mississippi, which is really
15 an extremely rural community, we had difficulty
16 even finding the place -- the -- one of the
17 callers to 911 immediately knew that it was a gas
18 explosion. So here's a very rural community where
19 the residents knew that it was a pipeline
20 explosion, they knew there was a pipeline going
21 through the community. The sheriff immediately
22 knew that there was a pipeline. He even knew that

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1 it was a liquid propane pipeline going through the
2 area. As did the assistant chief of the county
3 volunteer fire department.
4 So, Chief, this question will be
5 directed to you. I notice that Mr. Narva said
6 that pipeline information was available to meet
7 the needs of fire departments on the pipeline
8 disasters which, of course, he represents the
9 National Association of State Fire Marshals.
10 I suspect that you -- do you interact
11 with that organization? Or do you more interact
12 with the National Association of Fire Chiefs? Or
13 both?
14 DENNIS HAAG: Our immediate business is
15 the California State Fire Marshal's office.
16 In California the CPUC has regulatory
17 gas line transmission. Our -- State Farm office
18 typically deals with liquid transmission lines.
19 But I think, as you indicated, I -- as I
20 said earlier, I have been on the National
21 Association State Fire Marshal's website, and
22 actually have downloaded some of the scenarios and

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1 programs from them.
2 MEMBER SUMWALT: I want you speaking
3 up. We're having people coughing, and people
4 taking pictures, and I'm an old jet pilot and I
5 can't hear, so grab that mike and speak louder for
6 me.
7 DENNIS HAAG: Gotcha. I had mentioned
8 earlier that I had been on the website with the
9 National Association of State Fire Marshals and
10 actually have downloaded material from that
11 program, and actually put it on our training
12 curriculum.
13 MEMBER SUMWALT: Thank you. Mr. Narva
14 said that it's the responsibility of the fire
15 departments to seek out information about
16 pipelines in their areas.
17 And do you agree with that statement?
18 DENNIS HAAG: Yes, I do.
19 MEMBER SUMWALT: I'm curious, then,
20 what is the particular reason why the San Bruno
21 Fire Department was not aware that there was a
22 transmission pipeline going through the middle of

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1 San Bruno?
2 DENNIS HAAG: We didn't have the
3 information; we didn't have maps of a pipeline
4 going through. Obviously, you know, we've heard
5 today that there is a system that we can access
6 and we -- I just didn't know about it, to be
7 honest with you.
8 MEMBER SUMWALT: And I appreciate your
9 candor, but the statement that you agreed with was
10 one that said that the fire department should seek
11 out that information. And so I just wanted to
12 understand better why that information wasn't
13 sought.
14 Are you personally a PG&E customer?
15 DENNIS HAAG: Yes, I am.
16 MEMBER SUMWALT: So what I'm
17 understanding is that they do mail out public
18 information material in their monthly bills?
19 DENNIS HAAG: I've seen it in the bills.
20 MEMBER SUMWALT: What exactly does that
21 material say if they're mailing it to you, and you
22 don't -- and you don't -- and you're not aware of

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1 it. What is it they're sending out? Are they
2 saying there's a pipeline going through your area?
3 Or what exactly is it saying?
4 DENNIS HAAG: I don't live in San Bruno.
5 I live in another community.
6 MEMBER SUMWALT: Okay. Thanks.
7 Mr. Weimer? Whose responsibility is it
8 to find out if a pipeline is in your community?
9 If you're a citizen, should you be aware? If
10 you're a first responder, should you be aware? If
11 you're the gas provider, should you make people
12 aware? All the above? What's the answer to that?
13 CARL WEIMER: Well, I think it's a
14 shared responsibility. And you can't really
15 expect people to go out and looking for something
16 if they don't know it's there, so I think the
17 industry has a real responsibility to try to get
18 that information into people's hands. But it's
19 certainly a shared responsibility on everybody's
20 part.
21 I think as locations become known and
22 the emergency response plans are shared with fire

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1 departments and local emergency planning
2 committees, that type of information will flow out
3 from both ways.
4 MEMBER SUMWALT: Thank you. It's a
5 shared responsibility.
6 When I was on the airport commission
7 years ago we talked about people that would
8 complain about airport noise and we said, well,
9 they should be aware what they're getting when
10 they buy the property. I don't think that ever
11 went anywhere with the real -- with the state
12 legislature.
13 But I'm wondering, has there ever been
14 any thought to disclosure on a -- on a real estate
15 contract or something to make people -- make
16 people aware? I don't know -- I do not know if
17 there's a pipeline going through my neighborhood.
18 I don't know that. That's my own lack of
19 information there.
20 I do know there's a railroad track going
21 there because I can see it.
22 (LAUGHTER)

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1 MEMBER SUMWALT: But has there ever
2 been any thought to disclosing information on this
3 on a real estate contract?
4 CARL WEIMER: There certainly has been
5 thought to that, and the Pipelines Planning
6 Alliance Report that came out a little over a
7 month ago has a recommendation to move forward
8 from state to state -- I think it has to be a
9 state-by-state thing, to put that in a disclosure,
10 so people have an awareness when they purchase new
11 homes.
12 MEMBER SUMWALT: Thank you very much.
13 And as you said before, awareness is the key to
14 this.
15 Chairman Hersman, thank you.
16 CHAIRMAN HERSMAN: Member Weener.
17 MEMBER WEENER: I have a question for
18 Mr. Rezendez.
19 Is PG&E an interstate or intrastate
20 carrier?
21 AARON REZENDEZ: It's an intrastate.
22 MEMBER WEENER: Where do the

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1 requirements for public awareness come from for
2 intrastate carriers?
3 AARON REZENDEZ: They're also inside the
4 1162 document [inaudible]
5 AARON REZENDEZ: 1162.
6 MEMBER WEENER: 1162 based on federal
7 standards?
8 AARON REZENDEZ: It was the -- yes, it
9 references back to -- 616 [inaudible].
10 MEMBER WEENER: So is the onus entirely
11 on the carrier for public awareness, or are there
12 other stakeholders?
13 AARON REZENDEZ: It actually allows for,
14 and we do look for, opportunities to partner with
15 other operators who may have mutual interest in
16 reaching out to communities.
17 MEMBER WEENER: To follow up from
18 Mr. Sumwalt's question, in a sense is -- are the
19 emergency responders also responsible for public
20 awareness in a -- in a sense? For their own
21 public awareness?
22 AARON REZENDEZ: I think so. We've had

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1 firefighters in my class with their children. So
2 I know to some extent they're reaching out to the
3 local community. Does that answer your question?
4 MEMBER WEENER: Yes. Thank you.
5 CHAIRMAN HERSMAN: Member Rosekind.
6 MEMBER ROSEKIND: I just want to say to
7 the Chief Haag, I know you're familiar with the
8 hearing that someone called off for the San Bruno
9 Police Department. And the two of you are
10 representing all the first responders, and I want
11 to make sure we have a chance to acknowledge and
12 thank you for your response on September 9th,
13 because after these tragedies we are always
14 reminded that there are people who run toward them
15 on our behalf so we thank you for that.
16 This is a test for the whole panel. I
17 think there's been conceptual discussion about
18 public and first-responder awareness and I want to
19 make this very concrete.
20 So this is a test. No grade, but it's a
21 test. All of you.
22 Point to the fire exits, please.

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1 (Indicating)
2 MEMBER ROSEKIND: That's good.
3 Mr. Weimer, if the fire alarm actually goes off,
4 what would you do?
5 CARL WEIMER: Head towards the closest
6 exits over there.
7 MEMBER ROSEKIND: Walk or run?
8 CARL WEIMER: I'd probably walk because
9 I don't want to trip over the four people in front
10 of me.
11 MEMBER ROSEKIND: Thank you. The focus
12 really of this whole discussion about awareness
13 really is out, and I think the Technical Panel and
14 the questions try to go to this. Really the
15 objective is knowledge, action. All the surveys,
16 response rates, et cetera, don't get at any of
17 that.
18 So I'm sure all of you are familiar that
19 before the meeting started, those exits were on
20 the screens up here, and then the Chairman gave
21 you specific directions so you could point to
22 multiple ones.

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1 The challenge is, you have the
2 knowledge, you all seem to pass that.
3 The next is do you know the action, walk
4 don't run.
5 The third part, of course, is what
6 happens when the alarm actually goes off. And
7 that we can only test through a scenario,
8 practice, or during actual disaster.
9 I bring this up because my question
10 really is, on the public side, as well as first
11 responder, is there any program or activity that
12 has been demonstrated to actually address
13 knowledge and appropriate action?
14 And you get extra credit if anyone has
15 actually shown that that translates into people
16 knowing what they're doing.
17 On the public side that means I smell
18 gas, do I know where to call? I'm excavating, do
19 I know what to do about that.
20 First responders, where is that
21 information coming from, what do I do?
22 It's knowledge and it's appropriate

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1 action. Do we have any information, any data,
2 anything, that shows there's something effective
3 going on now in the public or the first-responder
4 side that we're dealing with this effectively?
5 TERRY BOSS: I think on various parts of
6 the program, there are measurements out there.
7 The Common Ground Alliance has a reporting system
8 called DIRT. And it tries to look at the
9 accidents, analyze the accidents, and ask those
10 kinds of questions: If the people knew what was
11 going on.
12 There's an attempt on this program for
13 public awareness, first to understand if there's
14 awareness, but during accident investigations,
15 that is some information that's gathered on how
16 effective it is, and ...
17 MEMBER ROSEKIND: More? We've still got
18 a couple minutes here. More?
19 CARL WEIMER: Yes. In Washington State
20 because of the Pipeline and Informed Planning
21 Alliance document that's recently come out, we've
22 had an effort for the past year in Washington

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1 State to try to engage local public officials
2 about planning new pipelines. And through some of
3 those very targeted efforts we've got, I think,
4 four jurisdictions now that have passed ordinances
5 that use their zoning and permitting processes to
6 help people stay safer near pipelines. And a
7 couple other jurisdictions that are moving in that
8 direction.
9 ANNMARIE ROBERTSON: I think with
10 respect to damage prevention it's a little bit
11 easier to measure, because we can measure calls to
12 811 after a campaign, and in many cases we can
13 measure damages for thousands and locate tickets.
14 It's more difficult to measure the behavior, what
15 do you do after you smell gas? But I do know
16 campaigns where they measure understanding and
17 intended behavior if -- if a customer would smell
18 gas, and they run the campaign and take the same
19 measurements.
20 There is some effort going on out there.
21 MEMBER ROSEKIND: My emphasis is trying
22 to focus on that objective, because while you're

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1 measuring survey rates and the people got
2 mailings, and you can count on the fact that after
3 this hearing I'm going to pull all my colleague
4 board members to find out what they've got in the
5 mail and if they read them or not, right?
6 (LAUGHTER)
7 MEMBER ROSEKIND: So just because we
8 don't know something's there, after tragedy it's
9 easy for all of us to say, we really should have
10 paid attention.
11 We need to focus on the knowledge, and
12 do they have the action.
13 I think there's a lot of examples with
14 responses -- San Francisco Airport, they do this
15 all the time, people really do walk or run. We
16 can measure that kind of stuff, but that has to be
17 where the focus is. And I want to raise the
18 concern that we're just focusing on the mailing,
19 did they get it or not, did they read it, et
20 cetera.
21 What we really want to know, do they
22 have the right knowledge, do they have the

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1 knowledge to take the right action? Whether they
2 do it or not is another thing, but we've got to
3 get that part -- I think there's a misnomer about
4 awareness because we all know it's not good.
5 And the final comment I would make is,
6 this is hard to do with models. I work in
7 transportation safety. Fasten seat belt, do not
8 drink and drive. And prevention is even harder.
9 There are models, though, that people
10 can take from other places to make sure that
11 you're using the most effective mechanisms
12 possible to get the best outcomes that you want.
13 Because we don't want these tragedies, and just
14 wondering if the people got the mailing or not.
15 We want to know that the first
16 responders had the right information to take the
17 right action. Thank you.
18 CHAIRMAN HERSMAN: Vice Chairman.
19 VICE CHAIRMAN HART: Thank you. I would
20 like to second Mr. Rosekind, and certainly what
21 the Chairman has already said about the amazing
22 response of the first responders. I was there on

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1 the scene so I witnessed it and I heard the story
2 of the truck turning the corner and the heat
3 cracked the windshield. That tells what the
4 people were subjected to and they did an amazing
5 job. So I'd like to second that, what
6 Mr. Rosekind and the Chairman have said.
7 My question is to is 1162. And it's not
8 clear to me, maybe it should be addressed to
9 Mr. Lidiak from API and Ms. Robertson from PHMSA.
10 But it's not clear to me whether this is
11 a recommended practice from API or whether or not
12 it's a requirement that was made a requirement by
13 PHMSA.
14 So what is the -- what is the status of
15 1162 in the industry?
16 ANNMARIE ROBERTSON: In 2005, PHMSA
17 incorporated by reference the API 1162 recommended
18 practice, and operators are directed to develop
19 and implement programs that align with the
20 baseline and supplemental requirements of their
21 recommendations of 1162.
22 VICE CHAIRMAN HART: So the regulation

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1 elevated it from a regulated practice to a
2 requirement, I take it.
3 ANNMARIE ROBERTSON: Yes -- yes --
4 VICE CHAIRMAN HART: Are there metrics
5 to determine whether this requirement is being met
6 and what kind of follow-up has been --
7 ANNMARIE ROBERTSON: We have a special
8 program underway.
9 VICE CHAIRMAN HART: Okay. Thank you
10 very much.
11 CHAIRMAN HERSMAN: Thank you.
12 Chief, I'm going to start with you. Did
13 you have any delay in accessing any of the victims
14 or the survivors, or protecting public or private
15 property?
16 DENNIS HAAG: Madam Chair, did you say
17 "delay"?
18 CHAIRMAN HERSMAN: Yes.
19 DENNIS HAAG: No, there was no delay on
20 the part of emergency medical response, or --
21 conservation.
22 CHAIRMAN HERSMAN: How long did it take

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1 you to get to the victims or survivors?
2 DENNIS HAAG: I'm trying to count ... I
3 believe five of the victims were deceased, and we
4 had one self-transport, two self-transport.
5 But there was no delay in getting to
6 them.
7 So as far as they were out of the
8 residences, so we had access to those transports.
9 CHAIRMAN HERSMAN: Okay. So the fire
10 didn't prevent you from getting to anyone?
11 DENNIS HAAG: No.
12 CHAIRMAN HERSMAN: Okay. How about
13 public or private property?
14 DENNIS HAAG: Well, obviously, the fire
15 prevented us from getting to some of the
16 properties. You mean undamaged properties?
17 CHAIRMAN HERSMAN: (Nodding head)
18 DENNIS HAAG: And this -- in this
19 scenario, which I guess I'm having a little hard
20 time understanding, is, the size of the explosion
21 and the ensuing ball of fuel pretty much
22 established its own perimeter.

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1 And from the heat, we could access only
2 so close to any point in that perimeter. So that
3 was essentially our limitations of gaining access
4 there.
5 CHAIRMAN HERSMAN: And once the gas blow
6 was stopped were you able to access inside that
7 perimeter?
8 DENNIS HAAG: Once the flow was stopped,
9 yes, we were able to get in there; we were still
10 fighting structure fires and, obviously, we were
11 still waiting for the residual pressure to be shut
12 down also.
13 CHAIRMAN HERSMAN: And how long did that
14 take, once your folks arrived on the scene?
15 DENNIS HAAG: I believe it was another
16 20 minutes, I think, for the residual to be shut
17 down.
18 Now, some of those areas had to be done
19 manually, so it -- there was probably certain
20 areas that could have accessed it a little easier
21 if that wasn't impacting the operation.
22 CHAIRMAN HERSMAN: When you say 20

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1 minutes, you're saying 20 minutes from the first
2 911 call or --
3 DENNIS HAAG: No, I'm sorry. I thought
4 you were referring to the residual.
5 CHAIRMAN HERSMAN: No, I'm talking about
6 the initial fire, and your arrival on the scene.
7 How long did it take you to access inside the
8 perimeter? Were your teams watching for an hour?
9 Or what was going on?
10 DENNIS HAAG: The valves were shut off
11 about an hour and 20 minutes after.
12 CHAIRMAN HERSMAN: So your teams arrived
13 on-site.
14 DENNIS HAAG: Yes --
15 CHAIRMAN HERSMAN: How long after --
16 DENNIS HAAG: Set up our perimeter, did
17 what we could with what we had, essentially,
18 contained that perimeter.
19 We did have firefighting activity being
20 done on structures who copped to exposures and
21 radiant heat.
22 And then it was probably an hour and 20

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1 minutes before the main valves were shut down and
2 the main fuel source went down, we were able to
3 advance on the perimeter.
4 CHAIRMAN HERSMAN: Okay.
5 Mr. Jones, can you please pull up
6 Exhibit 4A.
7 I want to follow up on Mr. Trainor's
8 question to Mr. Rezendez having to do with public
9 awareness. And RP1162 establishes guidance for
10 operators to develop, manage, and evaluate public
11 awareness programs.
12 And Mr. Trainer asked you a question
13 about evaluating the effectiveness of your public
14 awareness programs. And I understand that you
15 contract out the evaluation portion of that? And
16 there was a little bit of a discussion about the
17 response rate and that they had mathematical
18 models.
19 Do you remember that?
20 AARON REZENDEZ: I do.
21 CHAIRMAN HERSMAN: Did you feel like you
22 got a good response rate on your evaluation?

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1 AARON REZENDEZ: I do. You know, again,
2 we're participating in the API-sponsored PAPA
3 survey which is the public awareness program,
4 effectiveness research survey, we participated in
5 in 2007.
6 Now, again, I'm not a statistician, but
7 it's my understanding that that particular survey
8 as executed was designed to get a representative
9 sample such that you'd be able to scale that to
10 that population.
11 CHAIRMAN HERSMAN: Okay. Mr. Jones, if
12 you could pull the exhibit up. And this is the
13 exhibit for the group responsible for this. The
14 survival factors for [inaudible] --
15 Would you go to page 18, please.
16 And right here at the bottom it talks
17 about your effectiveness review, Paradigm Alliance
18 conducted a program effectiveness review in
19 June 2010.
20 They mailed public awareness brochures
21 with business reply and survey postcards to over
22 15,000 addresses. Eight weeks later, 20 survey

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1 postcards were returned.
2 So if you could go to the next page,
3 please, Mr. Jones.
4 And here's a summary of some of the
5 responses that they received on your behalf. And
6 these were all mailed to people who actually are
7 located near a pipeline.
8 And so, do you or someone you know work
9 or live near a pipeline? More people said no than
10 said yes.
11 Have you seen information about pipeline
12 safety within the last two years.
13 And earlier in the document we talked
14 about all the mailings that are done twice a year,
15 through the bills and things like that.
16 Fourteen of them said no, that they had
17 not seen information, and only three had.
18 The great news is everyone would call
19 911. And, unfortunately, I think this kind of
20 shows what we have problems with excavation, have
21 you or anyone you know ever discovered a buried
22 pipeline while digging, and 17 people said yes.

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1 So maybe these people who were
2 responding to this postcard self-selected because
3 they may have actually had a problem.
4 And have you ever heard of the one-call
5 system before reading this brochure? And only two
6 people said yes and 14 said no.
7 So I think I -- I think 20 responses out
8 of over 15,000, to me does not say that you had a
9 good hit on your evaluation program.
10 I'm not sure if Mr. Weimer or
11 Ms. Robertson want to comment with respect to what
12 the expectation is for evaluation and
13 effectiveness. But I think even the 20 people who
14 did respond demonstrate you've got serious
15 problems with people being aware of what's going
16 on around them.
17 AARON REZENDEZ: And you're right, Madam
18 Chairman. I will not disagree that there was a
19 real learning opportunity in the responses that we
20 received.
21 I think what's important here is what
22 was mentioned a little bit earlier, that one of

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1 the things that utilities are encouraged to do is
2 actually develop materials that are compelling,
3 and informative, and that have a tone and a
4 language for which the audience speaks, as opposed
5 to utilities speak.
6 And in those responses, and just so
7 we're clear as to what we did, the business reply
8 card that was used there was to test the actual
9 content, not affecting the survey such as the PAPA
10 survey, but it affected the survey, if you may, I
11 mean actual effectiveness of just that individual
12 piece.
13 In getting 20 responses, we have 15,000
14 recipients, was unacceptable to us, and it caused
15 us to step back and to really ask the question,
16 you know, what are we doing wrong with respect to
17 notifying and informing and raising awareness?
18 Clearly the language needs to change.
19 And so we will be engaging our corporate
20 communications group, who has particular expertise
21 in these kinds of areas, to completely
22 reformulate, if you may, the information.

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1 And I think, too, when you look at the
2 business reply card, and this is kind of an
3 industry technique is, what are you really
4 offering in return?
5 One of the things I think we really
6 missed in that particular piece was, we didn't
7 give the customer some benefit of letting us know
8 that information. We said their opinion was
9 important, but maybe they had additional
10 questions, maybe they wanted to get additional
11 information.
12 So we're looking at opportunities to
13 improve, if you may, the techniques that we use to
14 be able to kind of entice, and I was mentioning a
15 little bit earlier, or prompt that kind of
16 response.
17 CHAIRMAN HERSMAN: Thank you. We'll
18 turn back to the panel. If you have some
19 additional questions.
20 MR. TRAINOR: I have one question for
21 Mr. Rezendez.
22 During the session where the parties

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1 were posing questions to the panel, you brought up
2 Exhibit 4Y which was a Google map showing the
3 location of pipelines in the San Bruno area.
4 When was that diagram, or map, placed on
5 your website or on the Internet?
6 AARON REZENDEZ: Shortly after the San
7 Bruno incident.
8 MR. TRAINOR: What type of comparable
9 information was available through the Internet or
10 other public sources prior to the accident?
11 AARON REZENDEZ: The National Pipeline
12 Mapping System.
13 MR. TRAINOR: Thank you.
14 MR. CHHATRE: Madam Chairman, the
15 Technical Panel have no more questions.
16 CHAIRMAN HERSMAN: Thank you,
17 Mr. Chhatre.
18 How about the parties? Are there other
19 parties who have additional questions? Okay.
20 Let's do CPUC first.
21 MR. CLANON: Is there information about
22 the pipelines through the area that PG&E would

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1 choose not to give to first responders? Either in
2 your own book or in [inaudible]?
3 AARON REZENDEZ: I'm sorry, could you
4 repeat the question.
5 MR. CLANON: Yes. Is there information
6 about a transmission line, for example, through a
7 neighborhood that PG&E was not to give to first
8 responders for any reason?
9 AARON REZENDEZ: Not that I'm aware of.
10
11 MR. CLANON: And, similarly, for the
12 general public, is there information about
13 pipelines through my neighborhood that PG&E has,
14 that PG&E would not feel comfortable giving me?
15 AARON REZENDEZ: Not that I'm aware of.
16 MR. CLANON: The reason I ask that, if
17 you want to stand on that answer is, that,
18 particularly since the San Bruno accident, people
19 in Northern California are concerned not
20 [inaudible] through their neighborhood by whether
21 it might be an old one or whether it is similar to
22 the one that ruptured.

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1 So, PG&E would feel comfortable
2 providing local people with specific information
3 about the pipelines?
4 AARON REZENDEZ: Yeah. In fact, we have
5 an 888 number that was set up, because we were
6 receiving a lot of inquiries. Customers wanted to
7 know, and we wanted to provide information.
8 And so, we set up an 888 number,
9 received thousands of calls on that individual
10 line. And for those more complicated questions,
11 maybe kind of the ones that you're inferring,
12 those actually go through a process whereby
13 experts, if you may, with that particular
14 specialty and the ability of being able to get
15 those answers, will send in writing to those
16 customers, those various responses.
17 MR. CLANON: Thank you. That's all I
18 had.
19 CHAIRMAN HERSMAN: Mr. Wiese.
20 MR. WIESE: Thank you very much.
21 Ms. Robertson, I wonder if you could
22 talk to us a little bit about what the federal

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1 regulations require in regard to liaison,
2 emergency responders, emergency response plans,
3 and maybe a recent advisory on that subject.
4 ANNMARIE ROBERTSON: Yeah, our
5 regulations have long required pipeline operators
6 to liaison with emergency responders, not only in
7 our public awareness requirements but in 192 at
8 615 has to do with the emergency response plans.
9 They have responsibility to reach out to the first
10 responders, to explain to them the pipeline is in
11 the area, that the characteristics of release, how
12 to respond, how to get more information, contact
13 information.
14 Recently, I believe it was in November
15 of 2010, we issued an advisory bulletin reminding
16 operators of the responsibility, of the liaison
17 responsibilities for emergency responders.
18 MR. WIESE: Thank you very much.
19 Chief, I just want to make a -- forgive
20 me, minor rhetorical comment. It was in part, we
21 all look to learn from tragedies like San Bruno.
22 Our administrator following that

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1 directed us to reinforce the message with the
2 industry that they have a positive requirement to
3 maintain liaison with emergency responders. I
4 think we all believe that's crucial.
5 Just a real quick question, because I
6 think it needs to be in the dialogue as we talk
7 about maps. I don't know if there's anyone who
8 wants to comment about the National Pipeline
9 Mapping System.
10 There was a compromise reached after a
11 number of years of talking about what level of
12 accuracy, who can access what, I don't know -- I
13 mean, Carl, you were as involved in that as
14 anyone. Would you care to address that?
15 CARL WEIMER: Certainly. The
16 availability of NPMS system is one of the few ways
17 that people can really find whether there is a
18 pipeline in their neighborhood or not. We just
19 need to get the word out more that that is
20 available. There may be some user-friendly issues
21 with that, still, because I -- I get calls all the
22 time from people that have tried to access that

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1 and can't quite figure out how to get in there, or
2 they get to the first page where you have to have
3 a password, and they can't figure out how to get
4 past that.
5 But it's a wonderful system once you
6 figure it out. And after the San Bruno tragedy,
7 the NPMS got so many hits that it was overwhelmed.
8 Our website went down, too, because there were so
9 many people looking for that information.
10 MR. WIESE: Well, thank you. We think
11 it's a crucial tool, too. What I was trying to
12 get to is there are security considerations so the
13 compromise that was reached after three years of
14 negotiation with Homeland Security and everyone
15 was to get it at a county level and lower, and not
16 to allow people to zoom in and out, that it could
17 be used for other purposes. I know there are a
18 million opinions on that. I just wanted to get it
19 on the record.
20 And, lastly, for Ms. Robertson, during
21 your inspection of public awareness, obviously
22 effectiveness is what everyone was after. It was

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1 an original recommendation from the NTSB, as you
2 noted, from Lively and, I think, also an accident
3 in -- well, in Carmichael, but in Kansas as well.
4 And they asked us, and we built that
5 into that standard which is now appropriated.
6 But how do we look to see if a company
7 is actually learning?
8 ANNMARIE ROBERTSON: That's what the
9 inspection process is all about. What we want to
10 find out when we go out to the -- and meet with
11 these operators and conduct our inspections is,
12 number one, what does their program say? Is it in
13 line with the 1162? Number 2, did they implement
14 it in accordance with what they've written, what
15 they've said they're going to do? Have they taken
16 the measurements that are required? How do they
17 go about each of the different audiences and each
18 of the different messages? How did they measure,
19 what was their methodology, and what did they
20 learn from it? You know, you can have the
21 measurements but you need to evaluate it, what do
22 you learn from it, and what have you done, what

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1 are you planning to do to make changes to your
2 program?
3 Public awareness is a continual
4 improvement-type regulation. There's a 12-step
5 process within the regulation that outlines out to
6 operators what they should do to improve their
7 programs.
8 And as we continue to do these
9 inspections, we'll learn what's working and what's
10 not working with respect to the regulation, and
11 the standard, and we can make changes accordingly.
12 MR. WIESE: Thank you. Just
13 rhetorically exiting, I'll say if I had a response
14 rate, as you did, and PG&E and Mr. Rezendez, I'd
15 be thinking about whether that tool was effective,
16 you know, or maybe there's another way of
17 implementing that tool to see whether that's
18 effective.
19 But clearly that sort of response rate
20 is not helping.
21 So thank you.
22 CHAIRMAN HERSMAN: Do we have other

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1 questions from PG&E?
2 MR. JOHNSON: Yes.
3 Mr. Rezendez, could you please clarify
4 what the 2007 PAPA survey was.
5 AARON REZENDEZ: The 2007 PAPA Survey
6 was an opportunity for us to gain a baseline
7 understanding and awareness level for the various
8 populations, be it the effected public,
9 excavators, as well as emergency response
10 professionals, and public officials.
11 MR. JOHNSON: Could you clarify what the
12 2010 tear-off mailing was all about?
13 AARON REZENDEZ: It was to assess the
14 effectiveness of that individual piece. Was the
15 language, the tone, the messaging, being
16 understood by the individuals who physically were
17 receiving that material?
18 MR. JOHNSON: And that is the survey,
19 the 2010 tear-off response was what you were
20 responding to in terms of the number of responses
21 we received?
22 AARON REZENDEZ: That's correct. That's

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1 the 20 responses we got as a part of that business
2 response card.
3 MR. JOHNSON: Thank you.
4 CHAIRMAN HERSMAN: Ms. [inaudible].
5 CONNIE JACKS: Yes, I just have a
6 follow-up question regarding the questions a
7 moment ago from PHMSA, having to do with the
8 National Pipeline Mapping System, and I'll ask
9 this -- this question to Mr. Rezendez and
10 Ms. Robertson.
11 Given that the scale of that map is --
12 and the security considerations in a previous
13 discussion that was referenced earlier suggested
14 that the -- and they scaled that down and thought
15 it should be a fairly high level, I'm told that it
16 is a 1 to 24,000, what tools are available to a
17 member of the public who might wish to drill down,
18 if you will, a little bit further, somebody who's
19 actually very anxious to get more information?
20 Where would they go? Either within PG&E
21 or through Ms. Robertson, where might they go, in
22 general?

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1 ANNMARIE ROBERTSON: With respect to
2 specific location information about pipelines, the
3 NPMS is the source guide, is the source. We have
4 on our Safe [inaudible] Communications website,
5 there's a lot of communication about the pipeline
6 safety program, about the regulations, about
7 specific operator pages, what the mileage to
8 enforcement actions.
9 We have a wealth of information about
10 damage prevention, public awareness of the type of
11 program that just came out.
12 So, although there may not be more
13 definitive information about the location of the
14 pipelines, there is a lot of information about the
15 Pipeline Safety Program available on our website.
16 We also do a lot of outreach. Our CATS
17 program, certainly, is key to getting out to the
18 public, and another of the -- another
19 opportunities -- any other opportunities that we
20 have to reach out to the public we try to take
21 advantage of that.
22 AARON REZENDEZ: The map that's located

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1 within My Account function, I believe, is a much
2 closer view, and gives some two-mile radius.
3 Also PG&E is participating in a new
4 program that was developed by the Pipeline
5 Association for Public Awareness. It's an online
6 module that allows people to identify pipes near
7 them.
8 I think what's really -- we're trying to
9 take advantage of technology, so it will also have
10 kind of an iPhone or a Google-based phone
11 application that will allow you to access that
12 through your browser and be able to find major
13 pipelines that are located in the area, it will
14 tell you the direction, the distance, it will tell
15 you what product is inside, the various hazards
16 associated with that, response needs, if there's a
17 leak, and contact information for the operator.
18 So we are looking at additional opportunities to
19 be able to meet that need.
20 CONNIE JACKS: Thank you.
21 CHAIRMAN HERSMAN: Member Weener.
22 MEMBER WEENER: Just a comment. I just

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1 pulled up the National Pipeline Mapping System,
2 and the Public Map Viewer doesn't work.
3 CHAIRMAN HERSMAN: Actually, I just
4 pulled it up a few minutes ago and it did work,
5 so -- don't have a heart attack. I actually was
6 able to use it.
7 I know that there is some confusion --
8 some places that look confusing, almost like you
9 need a password for it. There's a public way to
10 get in. So I'll show you how to find the pipeline
11 in your neighborhood.
12 (LAUGHTER)
13 MR. WIESE: We'd like to commit to fix
14 that page.
15 CHAIRMAN HERSMAN: Member Rosekind.
16 MEMBER ROSEKIND: Operator error,
17 obviously.
18 (LAUGHTER)
19 MEMBER ROSEKIND: Just a quick question.
20 I'm curious. In terms of responder knowledge,
21 prior to September 9th, what type of information
22 was available between PG&E and San Bruno, both

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1 Police and Fire, regarding any information that
2 would help facilitate coordination of a response?
3 DENNIS HAAG: Well, my understanding ...
4 am I on -- thank you. No?
5 CHAIRMAN HERSMAN: Sometimes you have to
6 get pretty close to the mike.
7 DENNIS HAAG: Am I on?
8 (LAUGHTER)
9 DENNIS HAAG: Yeah, my understanding is,
10 we know that PG&E uses units in the command system
11 and the Fire Service has used the command system
12 for a long time.
13 And my hope is we would go into the next
14 phase, and our program is to look at those
15 response plans and merge our plans between the two
16 agencies.
17 So there's a point of contact that, you
18 know, in an event like this we can make a one-step
19 call, make that contact, and have somebody who can
20 make decisions quickly, and speed up the entire
21 process of the emergency response.
22 MEMBER ROSEKIND: So just to be clear,

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1 was that point of -- before September 9th was that
2 point of contact clear, and had those lines of
3 communication for coordinated response been worked
4 out?
5 DENNIS HAAG: No, at the time. But I do
6 want to say that on September 9th, the PG&E
7 response was great. We had -- we had liaisons
8 established and it worked out. I think there was
9 an opportunity to enhance that, and that's my
10 goal.
11 MEMBER ROSEKIND: Thank you.
12 CHAIRMAN HERSMAN: Vice Chairman.
13 VICE CHAIRMAN HART: Thank you. I
14 already spoke to the amazing job that the first
15 responders did as first responders, but I would
16 also like to take this opportunity to thank the
17 City of San Bruno and all the agencies, San Bruno
18 Fire and Police and the others for facilitating
19 the investigation as well as they did, for
20 preserving the site, for accompanying us wherever
21 we had to go to do what we needed to do as
22 investigators, for feeding us, and providing a

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1 place to meet, and all of the things that you did
2 to help this investigation go as well as it did.
3 I want to congratulate you for a job well done.
4 CHAIRMAN HERSMAN: You know, yesterday
5 we had an opportunity to discuss some of the SCADA
6 activities and the 911 calls and stuff like that.
7 I just wanted to ask Mr. Rezendez if
8 there's any post-September 9th collaboration
9 between you, and kind of what goes on in the SCADA
10 center.
11 If they're relying on someone from PG&E
12 go on, and kind of give them feedback on what
13 happens, and yesterday they were told they don't
14 call 911 if they see something, an anomaly at the
15 SCADA center.
16 Has there been any changes to that post
17 accident?
18 AARON REZENDEZ: That is actually an
19 active conversation, a very timely question,
20 indeed. Thank you.
21 Yeah, we're actually -- yeah, one of the
22 things that I think kind of typifies an incident

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1 that occurs, whether it be on the distribution
2 side or a much larger scale like what happened in
3 San Bruno, is that oftentimes because of awareness
4 among the public, that when something occurs,
5 their first call is usually 911.
6 So it's -- it's typically the situation
7 where, they're the first responder of all the
8 first responders.
9 Going forward, yes, they are actually --
10 they're looking at our policies and our procedures
11 at exactly that very issue to, you know, assess
12 when is the appropriate time to make that phone
13 call, who should be making that phone call.
14 Because, obviously, we have first responders out
15 there who go and make an initial assessment,
16 whereby the need of having the fire or the police
17 department present there in order to secure the
18 area is essential.
19 So we are absolutely looking at that.
20 CHAIRMAN HERSMAN: Okay. Thank you.
21 And, Ms. Robertson, can you please talk
22 about some of the improvements that we saw before,

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1 and then after 3-digit dialing was instituted as
2 far as public awareness for one-call?
3 ANNMARIE ROBERTSON: 911. Yes. The
4 Common Ground Alliance does a survey, I believe
5 it's every two years, to get an understanding of
6 the awareness level for 811. And although it's
7 not like where we would like it to be, we are
8 seeing constant improvement in, you know, the
9 awareness and responsibility of calling 811, and
10 the availability of the number.
11 CHAIRMAN HERSMAN: So what we know,
12 though, is before we had 3-digit dialing we had
13 more excavation events than we did after we did
14 3-digit dialing, 811 and community awareness
15 campaigns.
16 So what I'm trying to understand is, we
17 had a success in that area, where we were actually
18 able to change behavior and get information out,
19 and people actually acted on it. And so those
20 excavation damages accidents are going down.
21 What created the catalyst for the
22 success in seeing that be effective, and that

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1 communication be effective? And could we
2 translate any of those lessons learned to the
3 public -- general public awareness side?
4 ANNMARIE ROBERTSON: The 811 campaign is
5 largely a grassroots campaign. It's done through
6 the -- the materials of it are available through
7 the Common Ground Alliance but they're distributed
8 to grassroots level through various organizations.
9 So it's about getting the right message
10 to the right people from the right source. I
11 think Carl talked a little bit about that.
12 As far as overall awareness, there are
13 many other messages besides damage prevention and
14 calling 811 that we need to convey, and that can
15 be a bit of a challenge when you're trying to
16 convey so many different messages to get to the
17 stakeholder audience.
18 CHAIRMAN HERSMAN: Okay. Great.
19 Mr. Rezendez, I want to ask you, if after the
20 accident -- and I don't know how much, you know,
21 what the cover and the reach is for PG&E -- is it
22 reasonable to expect a PG&E employee to make

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1 personal contact with each and every fire chief in
2 your service area?
3 AARON REZENDEZ: I think --
4 CHAIRMAN HERSMAN: Is that realistic?
5 AARON REZENDEZ: Well, I think at a
6 local level where, say our maintenance and
7 construction operation, it would be the other
8 first responder on scene, that those are two-way
9 communication channels that should be maintained
10 and encouraged at the local level. Absolutely.
11 CHAIRMAN HERSMAN: Okay. And I did want
12 to follow up. Just -- I did use the mapping tool.
13 It's on PHMSA's website. And I think this is one
14 of the challenges because I think for people, if
15 they don't know that they need to look for
16 something, or that they should look for something,
17 or how to look for something, that they're not
18 going to look for it.
19 And so these are -- these pipelines are
20 buried, and I think I'm a little bit unique and
21 I'm probably hypersensitive to these issues, more
22 than your average consumer. But there is a

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1 transmission pipeline that runs through my
2 neighborhood at the top of our street in our
3 community.
4 And, really, the primary reason why I
5 knew that is because I saw the yellow poles
6 sticking out of the ground with disks on them.
7 And I know what those are because I've worked in
8 the transportation field for many years and I've
9 worked on pipeline issues in particular.
10 But most people don't know what those
11 are, most people don't know what they're looking
12 at. So I know along those right-of-way there are
13 those markers, but I have to tell you, there's
14 been a lot of acquisitions and mergers over the
15 years, so when I went to PHMSA's website just now,
16 I didn't even know the name of who that
17 transmission line operator is, because it's not
18 the distribution line that provides the gas to my
19 home.
20 Washington Gas provides gas to my home.
21 But the transmission that runs through our
22 neighborhood, the transmission line is actually

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1 Dominion. And I didn't know if it was Dominion or
2 another name when I went to look.
3 And so I did have an opportunity to go
4 look at the map and take a look at it, but I have
5 to tell you, your average consumer isn't going to
6 go do that. They are not going to know in
7 particular that it runs through.
8 But, Member Sumwalt, I do think that if
9 you have a right-of-way running through your
10 property, you are going to have that disclosure
11 when you go to settle, when you are purchasing
12 property. But that doesn't mean that I will. I
13 live in that neighborhood, and I don't have,
14 necessarily, the pipeline located on my
15 right-of-way, but it's near me. And I wouldn't
16 necessarily know that, and so, I think it's a real
17 challenge.
18 If I got a mailing from a company called
19 Dominion, and I didn't know what the pipelines
20 were, I would probably throw it in the trash
21 before I even opened it because I would think it
22 was junk mail.

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1 I do open my gas bill because I know
2 they should be mailing something to me, but I know
3 it's a difficulty. This is what Mr. Rosekind was
4 saying, there's information that's presented, but
5 do people get it? Is it coming in? Are they
6 internalizing it? Do they understand?
7 So I know our team is very interested in
8 this issue. We've had great response from our
9 panelists and we thank you very much for your
10 participation. And we look forward to continuing
11 to work with you as this investigation proceeds,
12 to draw on your expertise.
13 I think we will have some specific
14 comments on -- or questions for the record, and
15 particularly for Mr. Rezendez, but given that our
16 time is short we want to keep on schedule, we'll
17 potentially file those in paper for you.
18 Thank you very much. The second panel
19 is excused. Thank you for your service, and we'll
20 take a break for lunch and we'll come back at 1:00
21 o'clock.
22 (LUNCH RECESS TAKEN AT 11:58 P.M.)

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1 AFTERNOON SESSION
2 1:02 P.M.
3 CHAIRMAN HERSMAN: Welcome back, and we
4 will begin with our fourth panel on federal and
5 state oversight.
6 Ms. Ward, if you could please swear in
7 the witnesses.
8 HEARING OFFICER WARD: Thank you, Madam
9 Chairman.
10 For the record, the witnesses are seated
11 right now -- and they're standing up on their own.
12 Okay.
13 (LAUGHTER)
14 HEARING OFFICER WARD: Please raise your
15 right hand.
16 DENNIS LEE,
17 RICHARD CLARK,
18 JULIE HALLIGAN,
19 LINDA DAUGHERTY,
20 ZACH BARRETT, and
21 PAUL METRO
22 called as witnesses in this case,

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1 having been first duly sworn
2 upon their oath,
3 testified as follows:
4 EXAMINATION
5 HEARING OFFICER WARD: Thank you.
6 Please be seated.
7 For the record, I will state the name of
8 the witnesses at the table.
9 We have Mr. Dennis Lee, Mr. Richard
10 Clark, Ms. Julie Halligan, Ms. Linda Daugherty,
11 Mr. Zach Barrett, and Paul Metro.
12 We'll start with you, Mr. Lee.
13 DENNIS LEE: Good afternoon. My name is
14 Dennis Lee. I'm a senior utilities engineer with
15 the CPUC. I've been with the CPUC since December
16 of 1999 and my duties and responsibilities at the
17 CPUC is to supervise the gas engineers in the gas
18 safety section at the CPUC.
19 HEARING OFFICER WARD: And Mr. Clark.
20 RICHARD CLARK: Good afternoon. My name
21 is Richard Clark. I'm the director of Consumer
22 Protection and Safety Division at the California

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1 Public Utilities Commission.
2 My job is to influence and implement
3 policy within the commission with respect to
4 natural gas, electricity, communications, freight
5 railroads, passenger railroads, rail transit and
6 rail crossings. I have a Bachelor's degree from
7 San Diego State University in history, political
8 science and sociology. I've been with the
9 commission since the energy crisis in 2000.
10 HEARING OFFICER WARD: Ms. Halligan.
11 JULIE HALLIGAN: My name is Julie
12 Halligan and I'm...
13 Can you hear me now? Okay.
14 My name is Julie Halligan. I'm the
15 deputy director for the Consumer Protection and
16 Safety Division at the California Public Utilities
17 Commission. I have all the non-rail programs in
18 CPSD. That includes utilities, safety, gas and
19 electric, as well as electric generation
20 performance, transportation enforcement and
21 consumer fraud.
22 I've been at the commission for about 19

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1 years. I've been in this position for four years.
2 I have a Bachelor of Science degree in finance.
3 HEARING OFFICER WARD: Thank you.
4 Ms. Daugherty.
5 LINDA DAUGHERTY: Good afternoon. My
6 name is Linda Daugherty. I'm the deputy associate
7 administrator for the Pipeline and Hazardous
8 Materials Safety Administration's Office of
9 Pipeline Safety.
10 My group includes the program
11 development, engineering, regulatory development,
12 enforcement, state programs, and training and
13 qualification.
14 I started in the regulatory business
15 about 20 years ago. I'm a chemical engineer, and
16 I started as an inspector and accident
17 investigator for our central region. So I've been
18 in a while.
19 HEARING OFFICER WARD: And Mr. Barrett.
20 ZACH BARRETT: Good afternoon. My name
21 is Zach Barrett. I'm the director of state
22 programs. I have the responsibility of the

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1 performance evaluations of state programs and
2 distributing the associated grant funding with
3 that. I've been with the organization for 23
4 years, working on 24 years. I've been an
5 inspector, then a senior project engineer, leading
6 our gas integrity management regulation
7 development.
8 I have been an enforcement officer, and
9 I appreciate the opportunity to participate in the
10 hearings today that you guys are giving us.
11 HEARING OFFICER WARD: And Mr. Metro.
12 PAUL METRO: Good afternoon. My name is
13 Paul Metro. I'm chief engineer of the
14 Pennsylvania Public Utility Commission Safety
15 Office. I've been with the Pennsylvania Public
16 Utility Commission for about 26 years. Today I'm
17 representing the National Association of Pipeline
18 Safety Representatives as the Vice Chairman.
19 HEARING OFFICER WARD: Thank you.
20 And Madam Chairman, the witnesses have
21 been sworn in and qualified, and they're ready for
22 Mr. Nicholson to question them.

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1 CHAIRMAN HERSMAN: Thank you very much,
2 Ms. Ward. And welcome back to Mr. Clark.
3 We had a hearing on the Metrolink
4 accident in Southern California a few years ago,
5 and I understand how -- how the breadth of your
6 responsibilities goes across many activities and
7 areas, and thank you for coming back after having
8 participated in a hearing in the past -- WMATA.
9 RICHARD CLARK: That's correct.
10 CHAIRMAN HERSMAN: Okay. So,
11 Mr. Nicholson, please proceed.
12 MR. NICHOLSON: Thank you, Madam
13 Chairman.
14 Mr. Lee, I'd like to start with you and
15 discuss state and federal management audits that
16 were performed on PG&E. If you would, could you
17 tell us just overall how an integrity management
18 audit is performed for a natural gas operator?
19 DENNIS LEE: Basically, we would use
20 PHMSA's gas protocol forms. They're on a protocol
21 checklist. Basically, it's about 168 pages long
22 and it covers about 14 areas, which basically

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1 covers the entire IM program.
2 And we would conduct these audits using
3 that protocol, going through the checklists, and
4 reviewing related procedures, records, project
5 files, pertaining to their program.
6 And throughout -- usually, it's about a
7 two-week audit with about four engineers. And
8 once we complete the audit, a report goes out, as
9 in two of those exhibits, and we -- before we have
10 a response from the company, and we review their
11 response, and we close out the file if we agree
12 with their response.
13 MR. NICHOLSON: What are the 14 areas
14 that you discussed?
15 DENNIS LEE: Pardon me, why don't I
16 just -- this is -- the 14 areas are: Identifying
17 high consequence areas.
18 Baseline assessment plan.
19 Identify threats.
20 Data integration and risk assessment.
21 Direct assessment plan.
22 Remediation.

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1 Continual evaluation and assessment.
2 Conformatory direct assessment.
3 Preventative and mitigative measures.
4 Performance measures.
5 Record-keeping.
6 Management of change.
7 Quality assurance.
8 Communication plan.
9 And submittal of program documents.
10 And those are the 14 areas.
11 MR. NICHOLSON: Okay. And during those
12 interviews, or those audits, are you actually
13 interviewing persons?
14 DENNIS LEE: Yes. Yes, we are. We
15 interview individuals or groups.
16 MR. NICHOLSON: And what sort of things
17 do you go over with those individuals?
18 DENNIS LEE: Basically, we go through
19 the checklist that covers these different areas.
20 MR. NICHOLSON: So while you're filling
21 out the checklist, you're actually entering the
22 person --

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1 DENNIS LEE: Exactly --
2 MR. NICHOLSON: -- that's responsible
3 for that?
4 DENNIS LEE: Exactly, yes. And if I may
5 add, we also interview the individuals or groups
6 and we review their programs and procedures
7 pertaining to the areas.
8 MR. NICHOLSON: Okay. You say four
9 groups?
10 DENNIS LEE: Or groups.
11 MR. NICHOLSON: Or groups. Gotcha.
12 DENNIS LEE: Sorry about that.
13 MR. NICHOLSON: How exactly does the
14 CPUC evaluate the operators' self-assessment of
15 their integrity management plan?
16 Is that a checklist process? Can you
17 elaborate a little bit on how you look at the
18 operator's ability to assess their integrity
19 management program for effectiveness? What do you
20 look at in that area?
21 DENNIS LEE: One of the -- a requirement
22 is they have -- they go through a continual

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1 evaluation of their program, and they have their
2 own -- there's certain rules requiring their --
3 them to have effectiveness, either digs or other
4 things.
5 And we review that and make sure they
6 are doing what are required to do.
7 MR. NICHOLSON: Were there any findings
8 related to the self-assessment of the integrity
9 management program for PG&E in 2010?
10 DENNIS LEE: Well, we had an area of
11 concern where a contractor -- they hired a third
12 party contractor to review their risk management
13 plan, to review their ILI process and their ECA
14 process, and the consultant found some areas of
15 concern.
16 So they -- PG&E went ahead and
17 remediated those issues, and -- and we let them
18 in.
19 MR. NICHOLSON: Okay. So their
20 self-assessment was hiring a third party
21 consultant?
22 DENNIS LEE: One of many ways for them

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1 to do that.
2 MR. NICHOLSON: And in what years were
3 those?
4 DENNIS LEE: The self-assessment --
5 the -- it was 2007 for one of them. And then 2009
6 was another one.
7 MR. NICHOLSON: And the finding was then
8 that PG&E was not responsive to those?
9 DENNIS LEE: Yes -- yes. They weren't
10 as responsive. However, they did send a response,
11 and we're still currently reviewing their response
12 to -- their response to the third party findings.
13 MR. NICHOLSON: And how long do they
14 have to respond to a finding from a third party
15 consultant?
16 DENNIS LEE: There's no written rule.
17 It's just a timely -- doing it in a timely
18 fashion, basically.
19 MR. NICHOLSON: Also in this audit, you
20 looked at risk management. I believe that was one
21 of the 14 areas.
22 DENNIS LEE: Yes, it was.

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1 MR. NICHOLSON: Can you discuss findings
2 from 2010 in the area of risk management?
3 DENNIS LEE: In that --
4 MR. NICHOLSON: For PG&E.
5 DENNIS LEE: It was just maybe minor
6 procedural issues, where they had to maybe
7 incorporate more into the procedures,
8 strengthening certain parts of their procedures.
9 I don't have the exact details.
10 MR. NICHOLSON: I understand.
11 Were annual reviews looked at of their
12 program?
13 DENNIS LEE: By PG&E? Or --
14 MR. NICHOLSON: Yes. Is that something
15 you'd audit?
16 DENNIS LEE: Yes, we would look at that.
17 MR. NICHOLSON: And was there any
18 finding in the area of whether they were reviewing
19 their plans on an annual basis?
20 DENNIS LEE: No, there wasn't, I don't
21 believe.
22 MR. NICHOLSON: I want to go back a

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1 little bit now to the 2005 audit.
2 If you could tell me, on the 2005 audit,
3 were there any issues found on PG&E on their
4 integrity management?
5 DENNIS LEE: Yes, there were some issues
6 found.
7 MR. NICHOLSON: Was that a joint audit
8 with yourself?
9 DENNIS LEE: Yes. It was four
10 individuals from the CPUC and one individual from
11 PHMSA.
12 MR. NICHOLSON: And what were the
13 findings?
14 DENNIS LEE: Again, same thing:
15 Procedural issues. There was one issue where 80
16 percent wall loss, they had classified it -- they
17 didn't classify that as immediate; however, by the
18 end of the audit, they actually revised their
19 plans and procedures, that they would state
20 that -- that if it was an 80 percent wall loss,
21 they will consider that as an immediate finding.
22 MR. NICHOLSON: Okay. And so they

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1 corrected that when you were onsite?
2 DENNIS LEE: Yes.
3 MR. NICHOLSON: Do you know where the
4 wall loss was on the findings in 2005? What
5 areas? What segments?
6 DENNIS LEE: I don't know.
7 MR. NICHOLSON: Was this line 132?
8 DENNIS LEE: It wasn't.
9 MR. NICHOLSON: So when going through
10 the threat assessment of the risk management plan,
11 RMP1, did CPUC have any views with regards to
12 their selecting the top ten threats?
13 DENNIS LEE: No, we didn't have any
14 comment.
15 MR. NICHOLSON: Is that typical? Have
16 you seen that with other operators, that the risks
17 are categorized, or sequentially listed, and then
18 just taken as the top ten for action? Or is that
19 something where there's a fixed threshold for
20 risk?
21 DENNIS LEE: Sorry, I'm not really
22 familiar with that part.

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1 MR. NICHOLSON: There's no notations, no
2 findings, as far as how they're ranking their
3 riskiest pipe segments in their system.
4 DENNIS LEE: No, there was no issue with
5 that.
6 MR. NICHOLSON: So you talked about the
7 checksheet. Is there anything else that the CPUC
8 does in evaluating the adequacy of the threat
9 assessments identified in the risk management
10 plan?
11 DENNIS LEE: No. We basically rely on
12 the PHMSA check-off list, and there's also
13 guidance material that's part of that, too.
14 MR. NICHOLSON: Now, you get into the
15 plan itself, right? I mean, you're looking at the
16 actual weightings and categories?
17 DENNIS LEE: Yes.
18 MR. NICHOLSON: Okay. And there was no
19 findings, no concerns, in 2005 or 2010 on the
20 weightings used?
21 DENNIS LEE: I don't believe so.
22 MR. NICHOLSON: Okay. Okay.

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1 Can you talk a little bit about
2 exception reports and how those are used on PG&E?
3 DENNIS LEE: Yes. In the 2010 audit, we
4 found issues where PG&E had used exception reports
5 more frequently than needed. The exception
6 reports should basically be used when they can't
7 meet a certain timeframe, or there's certain
8 things that it can't do.
9 However, they were actually using some
10 of these exception reports to basically -- keeping
11 them from doing certain procedural things that
12 they were required to do.
13 MR. NICHOLSON: What sort of procedural
14 things?
15 DENNIS LEE: Things like -- let me just
16 look at my notes briefly. (Perusing document)
17 Things like looking -- accepting a
18 report to -- for basis of not excavating or
19 examining certain indications found, which are
20 required to do.
21 MR. NICHOLSON: Okay. So if they found
22 an indication that it should have been a dig, they

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1 would take exception to that?
2 DENNIS LEE: Yeah. Because of certain
3 reasons, they couldn't get to it.
4 MR. NICHOLSON: They could not get to
5 it? So that was a reason to take exception to
6 actually digging --
7 DENNIS LEE: Well, actually, they
8 delayed the response. They delayed examining the
9 dig for beyond the 90 days.
10 MR. NICHOLSON: Okay.
11 DENNIS LEE: So -- but they did --
12 MR. NICHOLSON: So the exception report
13 was for a delay?
14 DENNIS LEE: For a delay, yes. It was
15 for a delay.
16 MR. NICHOLSON: It was not an
17 immediate --
18 DENNIS LEE: No, it was not an
19 immediate, no.
20 MR. NICHOLSON: Now, you said they were
21 also using exception reports for some other
22 procedural matters? Can you elaborate, or is that

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1 the extent?
2 DENNIS LEE: That was pretty much --
3 pretty much it. A lot of delays and things like
4 excavating all the schedule anomalies within
5 367 -- 365 days. Instead, they took 27 months.
6 MR. NICHOLSON: Okay. Almost -- over
7 two years.
8 Can you speak up a little bit, too?
9 DENNIS LEE: Oh, sure.
10 MR. NICHOLSON: Thank you.
11 So as part of the audit in 2010, the
12 PG&E integrity management plan review included a
13 review and documentation of their pre-1970 pipe
14 and how it was established within a maximum
15 allowable operating pressure?
16 DENNIS LEE: They may have. I'm not
17 sure.
18 MR. NICHOLSON: You did not specifically
19 review sections of the pipeline that was pre-1970?
20 DENNIS LEE: No, we didn't.
21 MR. NICHOLSON: Okay. And that's not
22 typical of an audit, that you go in and actually

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1 look for pipe that may have been grandfathered?
2 DENNIS LEE: Not for this audit in
3 particular, because the -- basically, the data
4 that's in the -- PG&E's GIS is populated through
5 their pipeline survey sheets. And we didn't get
6 into -- in-depth as looking into their purchase
7 orders or their vouchers for the different
8 pipeline information to verify that the
9 information in their pipeline survey sheets were
10 accurate.
11 MR. NICHOLSON: All right. Now, I'm
12 speaking more -- not so much about their survey
13 sheets or their GIS, necessarily, moreso pipe that
14 would not have been hydro tested. You don't go
15 back -- pipe that falls into 192.619.A3, you don't
16 look for verification or documentation as to how
17 that pipe was categorized?
18 DENNIS LEE: Not for this audit, no.
19 MR. NICHOLSON: And you were just
20 talking about the GIS database. Would it be
21 typical for your audit to go in and look at where
22 they had assumed values?

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1 DENNIS LEE: Yes, we do.
2 MR. NICHOLSON: You do. And was there
3 any finding in either 2005 or '10?
4 DENNIS LEE: No, there wasn't, because
5 if they didn't have the data, they would use
6 conservative values for the data.
7 MR. NICHOLSON: And they were using the
8 correct conservative values?
9 DENNIS LEE: Yes.
10 MR. NICHOLSON: Is that a spot check,
11 or --
12 DENNIS LEE: Basically, these audits --
13 all these audits are randomly sampling of records.
14 We just don't have the resources and the time to
15 look over every single record.
16 MR. NICHOLSON: And you say there were
17 four of you on that audit, right?
18 DENNIS LEE: Yes, there was.
19 MR. NICHOLSON: Was it four of you
20 reviewing that same documentation or did you split
21 it?
22 DENNIS LEE: Different -- we split. We

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1 looked at different projects, different lines.
2 MR. NICHOLSON: So you did look at the
3 GIS data, at least on the survey sheets?
4 DENNIS LEE: Some of it, yes.
5 MR. NICHOLSON: Did you audit their
6 process or procedure for populating the GIS
7 system?
8 DENNIS LEE: We may have. I... I'm not
9 sure.
10 MR. NICHOLSON: Can you speak a little
11 bit about how much training a CPUC auditor might
12 receive?
13 DENNIS LEE: Usually, for us to be
14 qualified as quality management inspectors, we go
15 through two courses that are offered by PHMSA.
16 And they are gas integrity management protocol
17 course, and also the other course is called safety
18 valuation of inline inspection, which is ILI, or
19 taking program courses. So that's two courses
20 that we take.
21 And also, we take -- there's seven
22 web-based training that we do for the IM course.

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1 That's also offered by PHMSA.
2 MR. NICHOLSON: Okay. And the gas
3 integrity management program training, what does
4 that cover?
5 DENNIS LEE: That's what -- that's
6 exactly what it was for. The previous one that I
7 mentioned, those are for the IM training.
8 MR. NICHOLSON: For auditing?
9 DENNIS LEE: IM -- auditing of IM
10 programs?
11 MR. NICHOLSON: Yes.
12 DENNIS LEE: Yes, those are the four
13 things.
14 MR. NICHOLSON: It's not how it's
15 executed.
16 Can you tell me what kind of formal
17 training? Is there a degree requirement for
18 auditors?
19 DENNIS LEE: Yes, an engineering degree.
20 MR. NICHOLSON: Okay. That's all I have
21 at this time. I'll pass this on to Mr. Chhatre.
22 Thank you.

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1 RAVI CHHATRE: I have a couple of
2 questions for Mr. Clark.
3 And what I'd like to do is, maybe if you
4 can tell me what factors you have considered in
5 determining the audit frequency for operators, not
6 just PG&E, but California utility that you are a
7 director of.
8 RICHARD CLARK: At my level, I'm not
9 really involved in the planning of the auditing.
10 However, what I do know about it -- the two folks
11 on both sides of me probably know more about that
12 than I do.
13 But I do know that we do -- we do more
14 than just integrity management audits. We do
15 GEO112E audits. That's the general order that the
16 State of California instituted back in 1960 with
17 regard to gas safety.
18 We audit mobile home parks. We audit
19 propane facilities. We audit the distribution
20 facilities. We audit the transmission facilities
21 via the integrity management audits.
22 And we -- basically, our approach in the

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1 past has been to be able to touch every aspect of
2 the utilities operations as frequently as we can,
3 and in as much depth as we can.
4 We have a statutory requirement on the
5 mobile home parks that we inspect all 2800 of them
6 at least once every five years.
7 The rest, there are no statutory
8 requirements for the inspections of the other
9 facilities. We do that at -- as our resources
10 allow.
11 RAVI CHHATRE: And Mr. Lee, or maybe
12 Ms. Halligan, can answer that.
13 JULIE HALLIGAN: In terms of the audit
14 frequency -- can you hear me?
15 RAVI CHHATRE: Yes.
16 JULIE HALLIGAN: Basically, we decide
17 how frequently to audit.
18 CHAIRMAN HERSMAN: Actually, I don't
19 think everyone can hear you too well. If there
20 are any other mics that are live over there, just
21 make sure they are turned off. I heard a little
22 bit of feedback.

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1 But maybe we can get your mic turned up
2 a little bit. Try again.
3 JULIE HALLIGAN: Okay. Better?
4 We have -- for the PG&E system, they
5 have about 17 distribution -- I forget if it's
6 district or division, and about 11 of the
7 transmission units, and we audit each of them
8 depending on whether it's distribution or
9 transmission. We'll audit distribution every two
10 or three years. Transmission, we'll try to do it,
11 again, every two or three years.
12 We'll audit a unit more frequently if
13 we're finding -- if we're having significant
14 findings or a higher number of findings in
15 previous audits.
16 So we'll be looking at areas of the
17 operators that might require more frequent
18 inspections for the separate utilities in the
19 south. So for gas in San Diego, they each have
20 lines, one distribution and one transmission unit,
21 and we'll audit those once every year, typically.
22 That's our goal.

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1 But again, we -- we do it as frequently
2 as we can, given our resources, and we try to
3 increase it when we see something that
4 necessitates increasing the frequency of the
5 audit.
6 RAVI CHHATRE: Thank you.
7 I will be focusing more on integrity
8 audits, not the other audits, but you answered
9 them all.
10 JULIE HALLIGAN: Oh, okay. On the
11 integrity audits we've only done -- we've done the
12 two for PG&E, and I believe the same number for
13 the Sempra company. We'd like to do them more
14 frequently, but we haven't been able to at this
15 point.
16 RAVI CHHATRE: Ms. Daugherty, can you
17 tell us, has there been inconsistencies between
18 the state audit programs and the integrity
19 management plans that are audited?
20 LINDA DAUGHERTY: Can you hear me?
21 Okay. I --
22 RAVI CHHATRE: Yes.

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1 LINDA DAUGHERTY: I understood your
2 question in asking if the federal inspections are
3 revealing different answers than the state
4 inspections.
5 RAVI CHHATRE: That's correct.
6 LINDA DAUGHERTY: I would say we are
7 finding similar issues across the country. We are
8 finding during our integrity management reviews
9 that operators, perhaps, are not doing as robust
10 an assessment -- risk assessment. We're finding
11 that there are areas that are requiring changes
12 and improvement, and that we are going to be
13 partnering later this summer for a workshop to
14 address those very issues.
15 There are changes that need to be made
16 and improvements that need to occur.
17 RAVI CHHATRE: And does it rely on
18 auditors to conduct the audits with a certain
19 minimum frequency?
20 JULIE HALLIGAN: We do not determine the
21 specific frequency. That would be based on the
22 state's allocation of resources and priorities and

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1 risks.
2 One thing that was mentioned was that
3 there are a variety of different types of
4 inspections. Integrity management is one of many.
5 So in a state where you have a lot of
6 construction, you might be doing more
7 construction. It varies.
8 RAVI CHHATRE: And again, for the
9 clarity of all the -- all the witnesses, I'm not
10 going to specify, but all my questions are
11 directed to the many directors of integrity
12 management audits.
13 So if I don't mention it, just remember,
14 it is for integrity management.
15 Now, how do you... to what extent do you
16 review the findings of the state auditors?
17 LINDA DAUGHERTY: We review them at a
18 very high level. State and federal inspection
19 results are loaded into a database, and so we look
20 at those results for allocating them into buckets
21 so we can do some trend analysis to analyze the
22 type of thing I just reported, that risk

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1 assessment is an area of more work.
2 So we do some aggregate. It's not
3 detailed review at the state level, except during
4 our annual reviews. We may go into it in more
5 depth.
6 RAVI CHHATRE: Thank you.
7 Mr. Metro, can you very briefly discuss
8 the purpose of the National Association of
9 Pipeline Safety Representatives?
10 PAUL METRO: Yes. The purpose of the
11 National Association of Pipeline Safety
12 Representatives, sometimes referred to as NAPS
13 is to have a group. We represent all the lower 48
14 states, the District of Columbia, and Puerto Rico.
15 Our purpose, our mission, is to provide
16 information on pipeline safety to represent the
17 states on pipeline safety issues with PHMSA, and
18 basically to promote pipeline safety throughout
19 the country.
20 RAVI CHHATRE: As the chairman described
21 in the opening statement, there was a rash of
22 accidents this last year, both in liquid and

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1 natural gas.
2 Does -- what are the NAPS's views in
3 terms of management regulation? Does NAPS
4 believe that this should be more prescriptive than
5 performance-based?
6 PAUL METRO: NAPS's position on whether
7 the performance-based approach is working is that
8 we need to see some studies that PHMSA needs to
9 prepare from the data that they are collecting.
10 IMP has been in the works for about nine
11 years, and we haven't seen any studies as to
12 whether performance-based measures are working or
13 if we need more prescriptive regulations, maybe in
14 some areas.
15 We need to see that study; we need to
16 start mining the data that we're gathering for
17 IMP, and take a look at that.
18 Maybe we need to make some adjustments.
19 We believe as a group, the NAPS group, that the
20 IMP document, the IMP regulations, need to be a
21 breathing, dynamic, adaptable set of regulations,
22 and we need to make some changes to make that

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1 happen.
2 RAVI CHHATRE: My time is almost up.
3 I'll ask you a last question. Does NAPS believe
4 that you have time to conduct a study?
5 PAUL METRO: Yes, I believe we have
6 time. We need to do it now, though. We need to
7 gather the data and start investigating where we
8 need to make changes. We need to make changes.
9 RAVI CHHATRE: I'll pass it on to
10 Mr. Bob Trainor.
11 MR. TRAINOR: Mr. Clark, you indicated
12 you're not specifically involved in the assessment
13 of the integrity management program.
14 Did I understand you correctly on that?
15 Is.
16 What exactly -- what functions do you
17 fulfill within CPUC? I just want to make sure
18 that the questions I ask you are appropriate.
19 RICHARD CLARK: Sure. Again, my job is
20 to influence and implement the policies of the
21 commission. So I interact with the executive
22 director, the chief counsel, the chief

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1 administrative law judge and the commissioners in
2 terms of influencing policy.
3 In terms of implementing policy, my job
4 is to -- to guide the organization in the
5 direction of the vision and the culture that we
6 have developed for the organization.
7 With respect to the integrity management
8 program itself, I rely upon my deputy director and
9 program manager to -- to take care of the details
10 of that, and to report to me any issues that they
11 have with regard to the implementation or the
12 findings that we're finding in that program.
13 MR. TRAINOR: And if your staff did come
14 to you with some kind of report of issues, what
15 would your role be then?
16 RICHARD CLARK: My role would be to go
17 to the executive director and to the commissioners
18 and to other folks, and to try to change the
19 policy, or to -- to institute either rule-making
20 or an enforcement action. I have the enforcement
21 staff within the commission, also.
22 MR. TRAINOR: Does the commission

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1 receive any federal funding?
2 RICHARD CLARK: It does, yes.
3 MR. TRAINOR: Are you involved with that
4 process?
5 RICHARD CLARK: I review the
6 documentation of the -- of the audits that are
7 done each year by PHMSA and sign off on them, and
8 kick them up to the executive director.
9 MR. TRAINOR: Are there any conditions
10 on the funding with respect to the commission's
11 performance or their own self-evaluation?
12 RICHARD CLARK: Certainly. There are
13 numerous categories of performance that PHMSA
14 looks for with us, one of which is our staffing
15 levels. The other is the number of inspections
16 that we're doing. And I'm sorry, I can't recall
17 all of them at this point.
18 MR. TRAINOR: And I assume the funding
19 is determined by how well you do? Or how much you
20 need to improve?
21 RICHARD CLARK: It's how well we do.
22 MR. TRAINOR: Okay. And how has the

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1 commission fared in recent years?
2 RICHARD CLARK: Well, for the last four
3 or five years, we have received -- 100 percent, I
4 believe, is our score.
5 MR. TRAINOR: One of the things that we
6 wanted to explore with the commission was, we know
7 that it has multiple responsibilities, one of
8 which is rate-setting for utilities within the
9 state, including natural gas operations.
10 And secondly, the pipeline safety
11 program for state operators.
12 How -- how many people are employed by
13 the commission?
14 RICHARD CLARK: The commission has about
15 a thousand employees.
16 MR. TRAINOR: And what number or
17 percentage of these employees would be dedicated
18 to the pipeline safety program?
19 RICHARD CLARK: All told, currently we
20 have 13 inspectors, two supervisors. So that's
21 15 -- probably 20 PYs directly -- PYs being
22 "personnel years" -- about 20 PYs directly

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1 involved, and then there would be involvement
2 across the commission in terms of administrative
3 law judges and attorneys for enforcement actions
4 and rule-makings and commissioners and commission
5 staff.
6 So -- I'm sorry. I'm not including the
7 folks in the Division of Ratepayer Advocates. I'm
8 also not including the folks in the energy
9 commission who work on gas.
10 So I'm going to say somewhere around 35
11 people, maybe. 30, 35 people.
12 MR. TRAINOR: The -- let's try to put a
13 box around the pipeline safety division.
14 The enforcement and oversight of
15 pipeline safety programs, would that be just the
16 13 inspectors and two supervisors?
17 RICHARD CLARK: Two supervisors, program
18 project supervisor, and a half of a program
19 manager, a third of a -- of a deputy director.
20 MR. TRAINOR: Okay. So -- are we
21 dealing with 15, 20 people?
22 RICHARD CLARK: About 20 people, I would

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1 say.
2 MR. TRAINOR: Okay. Now, what
3 percentage of the funding for the commission is
4 directed to the pipeline safety program,
5 enforcement program?
6 RICHARD CLARK: I don't -- I don't know
7 the answer to that. All of the federal funding
8 that we get is definitely dedicated to the
9 pipeline safety program.
10 MR. TRAINOR: Would you confirm that
11 number for us, please?
12 RICHARD CLARK: Certainly.
13 (Perusing laptop)
14 MR. TRAINOR: I would like to explore
15 with you for a minute how the rate-setting
16 responsibilities of the commission work with the
17 pipeline safety responsibilities of the
18 commission.
19 On the surface, there would appear to be
20 some inherent conflicts there.
21 Would you expound on that, please?
22 RICHARD CLARK: Inherent conflicts? I'm

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1 not sure what you mean.
2 MR. TRAINOR: Well, for example, would a
3 pipeline operator approach the commission for a
4 rate increase in order to fund a capital
5 improvement project?
6 RICHARD CLARK: The -- Ms. Halligan is
7 much more of an expert in this regard than I am.
8 But generally speaking, the utilities come
9 together -- come forward to the commission in a
10 gas accord case, or in a general rate case, and
11 they ask for a certain amount of money with regard
12 to their gas operations.
13 And the commission approves it or denies
14 it or modifies the request issues and decision on
15 it, and the expenditures are then not tracked.
16 MR. TRAINOR: All right. Well, maybe I
17 should redirect that question to Ms. Halligan,
18 then.
19 JULIE HALLIGAN: And what was your
20 question?
21 MR. TRAINOR: Your mic, please?
22 JULIE HALLIGAN: Your question again?

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1 RICHARD CLARK: It's on.
2 JULIE HALLIGAN: I'll try again. Can
3 you hear me now?
4 MR. TRAINOR: Yes. The question was,
5 the rate-setting responsibilities of the
6 commission, at least on the surface, seem at odds
7 with the pipeline safety responsibilities.
8 The commission, on the one hand, I
9 think, I would guess that there's pressure to keep
10 rates as low as possible because of consumer or
11 public desire for low energy.
12 And on the other hand, there's got to be
13 enough money to fund the pipeline safety program.
14 So if the commission is the sole body
15 with those responsibilities, how do you resolve
16 any conflicts between those two needs?
17 JULIE HALLIGAN: Well, when the -- when
18 the operators come in and file for their gas
19 revenue requirement and rates, there are several
20 intervenors that -- those cases are assigned to an
21 administrative law judge, and other parties can
22 intervene.

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1 One of the intervenors is the
2 commission's Division of Ratepayer Advocates, and
3 their primary responsibility is to make sure that
4 rates are just and reasonable, and to look closely
5 at the utilities application for revenues and
6 rates, to review that.
7 The Utilities Safety and Reliability
8 branch, we don't participate directly in the rate
9 cases. We'll provide advisory support to the ALJ
10 or to the energy division that's reviewing the
11 rate case.
12 We'll also provide technical support to
13 the Division of Ratepayer Advocates. If they're
14 reviewing a particular part of a utilities
15 application that has to do with maintenance,
16 operation and expenditures, or capital projects,
17 and they want to know what we think of it or
18 whether it's reasonable, staff from DRA has
19 periodically in the past come to the utilities
20 safety group to ask for an opinion on what we
21 think of particular -- particular projects.
22 But in general, there are any number of

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1 intervenors that can participate in the utilities
2 rate case.
3 CPSD isn't usually -- isn't one.
4 MR. TRAINOR: Excuse me for a moment.
5 Your acronyms, you're going to have to explain
6 them for me.
7 What's DRA?
8 JULIE HALLIGAN: DRA is the commission's
9 Division of Ratepayer Advocates.
10 MR. TRAINOR: And the second acronym --
11 JULIE HALLIGAN: Consumer Protection and
12 Safety Division. I'm sorry. I refer to them as
13 CPSD.
14 MR. TRAINOR: Okay. Have you ever had
15 an instance where an operator has come to the
16 commission for a rate increase for the sole
17 purpose of improving the integrity or the
18 condition of the system, and was denied a rate
19 increase?
20 JULIE HALLIGAN: Well, when the -- when
21 the operators come to the commission for a rate
22 increase, they're either coming on the -- for the

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1 distribution revenues, they're going into a
2 general rate case application.
3 For the transmission costs, they file
4 those currently as part of a gas transmission and
5 storage application. Those applications cover
6 backbone transmission, local transmission, storage
7 operation, and customer access charges for
8 those -- for those groups.
9 So when the utilities file rate cases --
10 or for those costs, they're covering all the costs
11 to provide those services to their customers.
12 They're forecasting the rates for all of those
13 areas, and --
14 MR. TRAINOR: Okay. Sorry. My time's
15 running out, and I have one question to ask
16 Mr. Metro.
17 It sounds like a very involved process.
18 Perhaps the commission could provide us with a
19 more detailed explanation as to how the setting of
20 rates is done in the context --
21 JULIE HALLIGAN: We'd be happy to. The
22 point I was going to make is that there are a lot

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1 of costs that are covered in that one application,
2 and safety reliability projects, those type of
3 projects, are only one part of a much broader
4 application.
5 MR. TRAINOR: I'd like to address the
6 last question to Mr. Metro.
7 Mr. Metro, do you see these types of
8 problems occurring in other state utility
9 commissions in the country?
10 PAUL METRO: Specifically what type of
11 problems are you talking --
12 MR. TRAINOR: Well, the rate-setting
13 responsibilities conflicting with pipeline safety
14 programs.
15 PAUL METRO: There has been a tremendous
16 pressure across the nation to keep rates low. And
17 I can specifically speak to Pennsylvania, that we
18 went through a restructuring process in the year
19 2000, and essentially came out of the gas
20 restructuring process with rate freezes for
21 anywhere from seven to ten years.
22 And during those rate freezes, there was

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1 a lot of pressure on the gas utilities to save
2 whatever revenues they could, and at times,
3 pipeline replacement was one of the areas in which
4 they decreased.
5 MR. TRAINOR: Okay. So there is a
6 little bit of a -- a conflict there, at least from
7 your experience?
8 PAUL METRO: Yes.
9 MR. TRAINOR: I wish we could have more
10 time to explore this further, but we do have other
11 topics we want to address.
12 So I'm going to give this back to
13 Mr. Nicholson.
14 MR. NICHOLSON: I want to talk a little
15 bit about the MAOP grandfather clause. I'll start
16 with you, Mr. Clark.
17 I'm curious: Does the CPUC trend what
18 percent of intrastate natural gas transmission
19 lanes have maximum allowable operating pressures
20 established without conducting a hydro test?
21 RICHARD CLARK: We have not in the past.
22 We certainly are now.

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1 MR. NICHOLSON: Right. So there were no
2 trends up till this point.
3 And I'll ask Mr. Metro as well if NAPS
4 has a position on non-hydro tested pre-1970
5 pipeline and what kind of risk you think those
6 might pose?
7 PAUL METRO: Yes, we do have a position
8 on that.
9 After lengthy discussion with the NAPS
10 group, part of the issue with the pre-1971 pipes,
11 especially the pipes that are non-hydro
12 test-capable, is the lack of information that we
13 have on those, lack of records, the -- and even
14 when we have records, if we can trust the findings
15 that we find with the records.
16 So we would look at it and say, this is
17 an area in which we would like PHMSA to review,
18 and take a look at reducing the MAOP for lines
19 pre-1971 that cannot be hydro tested and that the
20 records are suspect.
21 So we would look at a 20 percent
22 reduction at the MAOP level.

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1 MR. NICHOLSON: You say that's been
2 communicated to PHMSA?
3 PAUL METRO: Not yet. We're working on
4 that.
5 MR. NICHOLSON: You know where my next
6 question was going to go.
7 (LAUGHTER)
8 MR. NICHOLSON: And in fact, it is going
9 there.
10 We do have an exhibit. It's 2CT, RT,
11 and it shows that 60 percent of the nation's
12 national gas transmission lines were installed
13 prior to 1970. And I'll ask a similar question to
14 you that I asked CPUC: Does PHMSA track what
15 percent of this pre-1970 pipeline had an MAOP
16 established under 192.619.83?
17 LINDA DAUGHERTY: No, it does not.
18 That's something we may revisit.
19 MR. NICHOLSON: Mr. Metro, when do you
20 expect to get back to PHMSA with that information?
21 PAUL METRO: We'll speak to them in the
22 near future about it.

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1 JULIE HALLIGAN: Would it be possible to
2 get a copy of anything you provide to them?
3 MR. NICHOLSON: Yes. Ms. Daugherty,
4 yesterday, there was discussion from PG&E's
5 integrity management team suggesting that during
6 panel 2 that they might have a pre-1961 DSAW weld
7 problem on line 132.
8 And I just wondered, that was the first
9 time I heard of anything like that.
10 Is PHMSA ignoring this, or is this a
11 matter that PHMSA is going to take up?
12 LINDA DAUGHERTY: Definitely, any seam
13 issue is definitely of concern for us. And when
14 we find information that could tell us that
15 there's a problem out there that could be
16 systematic or widespread, we're going to research
17 it and see if -- if we have data to support it.
18 We also -- I mentioned a risk
19 management -- a risk assessment workshop. We are
20 also having a workshop on seam issues to explore
21 that very issue and find out what is out there and
22 what we need to learn more, and then we'll take

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1 some action.
2 MR. NICHOLSON: When is that workshop?
3 LINDA DAUGHERTY: Right now, I believe
4 it's targeted for July.
5 MR. NICHOLSON: Has CPUC seen any data
6 that there was a seam issue?
7 LINDA DAUGHERTY: On DSAW, I'm not aware
8 of any.
9 MR. NICHOLSON: Mr. Clark, I'll ask you
10 the same question: The DSAW issue that was
11 mentioned yesterday, is that something that CPUC
12 feels needs further research?
13 RICHARD CLARK: Yes, it is.
14 MR. NICHOLSON: And has CPUC seen any
15 evidence of that sort of problem in the past on
16 other lines?
17 RICHARD CLARK: We have not -- not that
18 I know of, that we've seen any issues with regard
19 to DSAW pipe. However, one of our first actions
20 following the incident was to have all the
21 utilities find -- locate all of the 30-inch DSAW
22 pipe that they had in their systems that had not

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1 been hydro tested, and reduce the pressure by
2 20 percent.
3 MR. NICHOLSON: Now, Mr. Lee, I'll ask
4 you also. Yesterday, there was an explanation by
5 PG&E's integrity management team regarding the
6 practice of running their MAOP -- or running up to
7 MAOP every five years. I think that was the
8 frequency.
9 Can you tell me: Was that explanation
10 accurate as to why they did that? Did you hear
11 that discussion?
12 DENNIS LEE: Yes, I did.
13 MR. NICHOLSON: Was that accurate?
14 DENNIS LEE: Yeah, that was accurate,
15 what they were saying. Yes.
16 MR. NICHOLSON: It sounded to me as if
17 by not running it -- their line up to MAOP, that
18 they would suffer a decreased operating pressure
19 every five years? Was that -- how I understood
20 that, is that correct?
21 DENNIS LEE: Yes, if it goes -- if they
22 bring the pressure up every five years to that --

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1 let's say, for example, they have a maximum
2 operating pressure of 300 and they have an MAOP on
3 that line at 375, and in the five years preceding
4 the NACA, the preceding five years, if they don't
5 get up to the 375 value, then they -- if they
6 do -- let's say in the last five years, the
7 highest pressure that they ran on that line was
8 300, and they've been operating at 250 for the
9 rest of the -- the next few years.

10 And if that pressure goes above the 300
11 pressure, then they'll have to do some sort of
12 assessment if it meets 192.917 --

13 MR. NICHOLSON: So by running up to
14 their MAOP, they're not having to do that type of
15 assessment?

16 DENNIS LEE: If they don't go above --
17 because they just reset their pressure at the
18 highest point again.

19 MR. NICHOLSON: Now, we're speaking of
20 192.917?

21 DENNIS LEE: 917, yes.

22 MR. NICHOLSON: Okay. And I think 917

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1 talks about designer manufacturing threats; is
2 that correct?

3 DENNIS LEE: Yes. And also the ERW.

4 MR. NICHOLSON: And ERW.

5 Mr. Clark, you had something to add?

6 RICHARD CLARK: Yes, Mr. Nicholson.

7 Thank you very much.

8 I want to stress that that's PG&E's
9 interpretation of that statute. They did not come
10 to us and ask us our opinion about that.

11 So we're not in accord with that
12 interpretation.

13 CHAIRMAN HERSMAN: What is your
14 interpretation?

15 MR. NICHOLSON: Can you explain the
16 differences in opinion between yourself and
17 PG&E -- oh, I'm sorry.

18 RICHARD CLARK: Well, our interpretation
19 is essentially that -- that the five-year -- that
20 the five-year period started at the time that the
21 HC -- the high consequence area was -- was
22 designated.

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1 But having said that, the --
2 artificially raising the pressure in a pipe that
3 has identified integrity seam issues seems to be a
4 wrongheaded approach to safety.

5 As to whether or not it would cause
6 stresses on the pipe that would result in a
7 fracture of the pipe, raising it incrementally
8 once every five years, it's a matter for
9 metallurgists to decide.

10 MR. NICHOLSON: I'll ask Spencer to
11 weigh in on this, too.

12 Ms. Daugherty, can you speak to that?

13 LINDA DAUGHERTY: I can respond, or
14 perhaps Zach.

15 ZACH BARRETT: 619 sets the maximum
16 level of operating pressure, and there's nothing
17 in the operations that prevents the company from
18 raising the pressure up to the maximum allowable
19 operating pressure every five years.

20 The integrity management rule under 917
21 just sets triggers for when the seams would be
22 considered unstable, and it would trigger

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1 assessment through the integrity management plan.

2 So the -- raising the pressure to the
3 five -- the five-year high MOP is about setting
4 that trigger that, if you go over that, that
5 triggers assessments for any seams on that
6 pipeline that have not been pressure-tested.

7 If there's been a pressure test on the
8 seams, be it DSAW seams or be it ERW seams, we
9 consider those stable.

10 If there's a pipe that has not had a
11 pressure test, then those seams, if you exceed the
12 high five-year prior to the identification of the
13 HCA pressure, then that makes those seams unstable
14 and you have to assess those seams, either by
15 pressure test or by inline inspection tool,
16 depending on which would be the best technology to
17 address those seams at the time.

18 MR. NICHOLSON: So again, by running up
19 to MAOP, they don't have to assess those threats?
20 If they run their line up to that highest pressure
21 every five years, they're sure they'll never
22 exceed that --

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1 ZACH BARRETT: If that was the highest
2 pressure they saw in the five years prior to the
3 identification of the HCA, that would be correct.
4 MR. NICHOLSON: Continuing with
5 yesterday's discussions, Ms. Daugherty, PG&E
6 management team mentioned some jointers that may
7 have made up the short section of pups in the 1956
8 line 132 relocation.
9 I was just wondering, does PHMSA have a
10 concern over jointers or the use of jointers?
11 LINDA DAUGHERTY: I am not aware of any
12 data that we have on jointers. I think that's an
13 area that we do need to do some further
14 exploration.
15 It has not come up before, to my
16 knowledge, so we'll need to find out if it indeed
17 is an issue and how it can be identified and
18 addressed.
19 MR. NICHOLSON: Mr. Clark, do you have
20 anything to add?
21 RICHARD CLARK: No. Thank you.
22 MR. NICHOLSON: Mr. Barrett, going back

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1 to the five-year MAOP or the five-year pressure
2 increase, can you tell me how long the pressure
3 has to be held?
4 ZACH BARRETT: The regulation doesn't
5 specify a timeframe for holding the pressure. It
6 just says the operating pressure experienced in
7 the previous five years of the identification of
8 the HCA.
9 MR. NICHOLSON: Ms. Daugherty, does
10 PHMSA track number of miles of pipeline that are
11 capable of being pigged?
12 LINDA DAUGHERTY: We have some
13 information for that. I'm trying to recall
14 whether it is submitted. I don't think we have
15 any specific data. We have more voluntary
16 submitted information, and I don't know what those
17 numbers are. I suspect that's your next question.
18 I can check and see what information we
19 have available and supply it to you later, for the
20 record.
21 MR. NICHOLSON: Is that a concern of
22 PHMSA, how many miles of pipe cannot be inspected

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1 internally?
2 LINDA DAUGHERTY: You know, I think
3 that, yes, we would like to do that. I think we
4 would like to acknowledge that there are various
5 ways that pipelines can be assessed: Hydrostatic
6 testing, internal inspection.
7 There are different risks, and different
8 tools and assessment methods may best suit the
9 type of threats and risks.
10 But definitely, we would like to see
11 more lines piggable.
12 MR. NICHOLSON: And you mentioned
13 pressure tests as one of those options.
14 Can you tell us the rationale behind the
15 PHMSA requirement for pressure and duration under
16 hydro tests versus what is called the grandfather
17 clause, which essentially requires no pressure
18 testing of the line?
19 LINDA DAUGHERTY: In general. I can
20 tell you that when the rules were promulgated back
21 in 1968 and 1970 -- well, let me back up for a
22 second.

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1 If you look at pipe miles statistics,
2 you'll note that about 50 percent or so of
3 pipelines were constructed post-war, in the 1950s
4 and 1960s.
5 So when the regulations -- the federal
6 pipeline safety regulations were developed in 1968
7 and 1970, those lines were fairly new.
8 And so when they looked at whether they
9 would require operators to have those records
10 before they can use -- you know, where they could
11 rely on those records to establish MAOP, or
12 whether they had to go out and hydrostatically
13 test, they were looking at -- most disregard newer
14 lines.
15 So I think at that time, the decision
16 was made to accept the five-year interval prior to
17 the implementation of the rule, rather than
18 requiring fairly new lines to be hydrostatically
19 tested.
20 MR. NICHOLSON: And does PHMSA have a
21 position as to whether this is a valid practice
22 that should still be allowed?

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1 LINDA DAUGHERTY: We believe it's a very
2 good question. We are now a ways down the road,
3 and we need to revisit whether the grandfather
4 clause is still appropriate, or whether additional
5 means need to be taken.
6 MR. NICHOLSON: And Mr. Clark, I'll ask
7 you: General order 112 came out in 1961. Did
8 that require a hydro test of lines?
9 RICHARD CLARK: Yes, it did.
10 MR. NICHOLSON: With that, I'll conclude
11 and pass this on to Mr. Trainor. Thank you.
12 MR. TRAINOR: Good afternoon, everyone.
13 Mr. Lee, I'd like to go back to a
14 question posed to you at the beginning of the
15 panel.
16 You were describing for Mr. Nicholson
17 how CPUC conducted its integrity management
18 audits -- pardon me -- and you mentioned the PHMSA
19 protocol, and checking -- going through
20 checklists, files and records.
21 And you also commented that you reviewed
22 program procedures. And that's what I'd like you

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1 to expound upon.
2 How do you exactly review program
3 procedures? Do you simply look at the written
4 procedure? Do you make an effort to see them in
5 action, or something else? Would you explain,
6 please?
7 DENNIS LEE: Oh, we look at --
8 basically, what's provided is a matrix that PG&E
9 would provide to us, or any utility company would
10 provide to us.
11 This matrix would include the protocol
12 in one column, and then the next column would
13 include where in the procedures that they meet
14 this protocol.
15 And so we go through their procedures to
16 make sure everything that's written in their
17 procedures are what's in the protocol.
18 And we look at the procedures, and then
19 after that, we look at project files to make sure
20 that they are following those procedures.
21 MR. TRAINOR: Okay. I guess I still am
22 concerned that reviewing records and files and

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1 protocols is -- whether that's going to give you
2 the entire picture.
3 Do you talk to employees about the
4 implementation of these protocols?
5 Do you talk to managers about their
6 review and assessment process of these protocols?
7 DENNIS LEE: Oh, yes. We interview the
8 folks that are in charge of certain parts of their
9 plans.
10 MR. TRAINOR: And are these -- the
11 requirement to do interviews and this type of
12 thing, are those specified in the PHMSA protocols
13 for conducting an audit?
14 DENNIS LEE: No, it's not in the plan,
15 but for them to tell us what's in the procedure,
16 they can clearly explain who's in charge of the
17 plan, who does the revisions, where records are
18 at.
19 MR. TRAINOR: Do you ask -- interview
20 people, question them about how they execute these
21 protocols?
22 DENNIS LEE: Oh, yes. Oh, yes.

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1 MR. TRAINOR: I've got a lot of ground
2 to cover here. I'd really like to spend more time
3 on it, but we are limited.
4 You'd also mentioned problems with the
5 2010 audit involving a third party contractor, and
6 you said there were concerns about that -- using
7 that contract.
8 Could you be more specific? What were
9 your specific concerns?
10 DENNIS LEE: Oh. Basically, PG&E hired
11 a third party contractor in 2007 to look over
12 their ILI, or inline inspection process, and the
13 program, and look at their ECDA process and
14 program.
15 And the third party consultant found
16 some deficiencies, either in their plans or the
17 way they ran their process.
18 And we didn't have a -- the CPUC, we
19 didn't have a clear picture of when they actually
20 implemented these deficiencies that were found by
21 the third party contractor.
22 MR. TRAINOR: Can you identify the

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1 specific deficiencies they noted?
2 DENNIS LEE: Basically, it's
3 strengthening their procedures, including certain
4 things that should have been in the procedures. I
5 don't recall exactly what it was.
6 MR. TRAINOR: All right. We may ask the
7 commission to send us any correspondence that
8 relates to that audit.
9 DENNIS LEE: Sure. I can send you to --
10 two internal audits that were conducted.
11 MR. TRAINOR: Ms. Halligan, you had --
12 you talked about the frequency of conducting
13 audits on transmission pipeline systems, and you
14 stated that you'd like to do them more frequently,
15 but haven't been able to.
16 Would you explain that remark, please?
17 JULIE HALLIGAN: Well, certainly since
18 the incident in San Bruno, we'd like to audit the
19 program much more frequently. Every year, if we
20 could.
21 As you know, we did an initial audit
22 along with PHMSA in 2005, and then we got back to

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1 PG&E's integrity management program in 2010.
2 Those are the only two we've done.
3 We haven't yet concluded our 2010 audit,
4 in the sense that we've given PG&E our findings,
5 but because of the intervening situation in San
6 Bruno and this investigation, we haven't yet been
7 able to dedicate staff to working with PG&E to
8 resolve those findings to our satisfaction.
9 So, while we'd like to be able to do
10 more audits, we haven't been able to.
11 MR. TRAINOR: Are there any
12 discrepancies from previous audits that are more
13 than two years old that remain outstanding?
14 JULIE HALLIGAN: Not that I'm aware of.
15 MR. TRAINOR: Are there --
16 JULIE HALLIGAN: No, we typically -- you
17 know, the staff works very hard when they do an
18 audit to -- to close out any findings, and make
19 sure that any violations, in particular, are
20 resolved before they close out that audit.
21 MR. TRAINOR: Okay.
22 Mr. Barrett, your work at PHMSA involves

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1 dealing with state programs.
2 Would you explain the process that PHMSA
3 has, whatever process you have, towards evaluating
4 the effectiveness of state programs? Would you
5 run through that process for us?
6 ZACH BARRETT: Sure. Can you hear me
7 now?
8 Yeah, thanks.
9 We have an evaluation form, evaluation
10 program that we have developed through the years
11 from working with stakeholders, such as the PHMSA,
12 through the years. There's a ground location
13 committee that helps populate the questions on
14 what a pipeline safety -- a good pipeline -- state
15 pipeline safety program, or a pipeline safety
16 program, should have.
17 We also -- they're -- on that evaluation
18 form, there's actually four recommendations from
19 NTSB dealing with cast iron and dealing with
20 emergency response.
21 So we take into consideration from all
22 of our stakeholders what -- what should be in that

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1 form.
2 Annually, my staff goes out to each
3 state and does an onsite -- an evaluation, running
4 through that form to check inspection procedures,
5 inspector training, investigation procedures,
6 damage prevention efforts.
7 Their alignment with PHMSA's inspection
8 programs and initiatives, enforcement -- call upon
9 enforcement issues and actions.
10 And also, they do an onsite field
11 investigation, where they actually go out with a
12 pipeline safety inspector and review that pipeline
13 safety inspector performing a portion of an audit
14 of a pipeline -- of the pipeline during that --
15 during their program evaluation.
16 We also review information that's
17 provided to us by states dealing with their safety
18 authority, the amount of jurisdiction they have,
19 the amount of recommended person days that they
20 are able to accomplish during inspections.
21 Their ability to adopt our pipeline
22 safety regulations, and several other factors that

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1 we -- we include in that scoring, based on that
2 score and the availability of the funding that we
3 have, we basically distribute the pipeline safety
4 grant to states, you know, based on those scores
5 and those performance evaluations of how well that
6 they're doing.
7 MR. TRAINOR: Okay. And I believe the
8 PUC responded that their -- they received scores
9 of 100 from PHMSA in past years?
10 ZACH BARRETT: I think Rich was
11 responding to the score evaluation, the score. I
12 think they were 99.5 in the last evaluation that
13 we did in '99 and the year before. In prior
14 years, they were at 100. The certification piece
15 is tied in with the score, so there's a combined
16 score.
17 They don't have full jurisdiction
18 authority over municipals, some master meters,
19 some private operators, so they lose points for
20 that.
21 Also, their inspection person years have
22 not met the minimum recommended standard for a

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1 year or so, and so they've lost points for that
2 also.
3 So I believe their combined score is
4 somewhere around 90 in that.
5 MR. TRAINOR: And how does that compare
6 to other state programs? Is it better than
7 average? Below average?
8 ZACH BARRETT: It's -- you know, I would
9 say that the California PUC has a good inspection
10 program; they have good, qualified engineers that
11 are capable of doing inspections and
12 investigations.
13 You know, with most programs -- where
14 they're taking the hits is because of the
15 jurisdictional status. They -- the legislation
16 hasn't given them authority over all pipelines
17 that are there, and for not -- also putting
18 them -- that's putting them below average in that
19 90 score -- their total aggregate score. But
20 that's reflective of not being able to get
21 legislation.
22 MR. TRAINOR: All right. What was their

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1 total aggregate score?
2 ZACH BARRETT: I believe it's 90.
3 MR. TRAINOR: And what was the maximum
4 total aggregate score?
5 ZACH BARRETT: 100.
6 MR. TRAINOR: 100.
7 Your assessment of the commission's
8 program, is that just the -- for the authority
9 delegated to them to enforce federal pipeline
10 safety standards, for distribution systems, for
11 example?
12 Does it -- does your assessment cover
13 interstate pipeline systems, their program for
14 intrastate pipeline systems?
15 ZACH BARRETT: Interstate pipeline
16 systems?
17 MR. TRAINOR: Intra.
18 ZACH BARRETT: Yes, sir, our program
19 reviews their inspection and enforcement over
20 intrastate pipelines, which are included in
21 distribution systems often.
22 MR. TRAINOR: Okay. Thank you.

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1 Going back to the scoring system again,
2 what's been the lowest score ever given to any
3 state program?
4 ZACH BARRETT: I'd have to do some
5 research for you on that and get back to that.
6 I'm not sure.
7 MR. TRAINOR: Would it be below 50, for
8 example? Or above that?
9 ZACH BARRETT: I haven't seen anything
10 below 50.
11 MR. TRAINOR: Okay.
12 ZACH BARRETT: To kind of expand on
13 that, we've been evaluating states for pipeline
14 safety since 1971, so we've been trying to --
15 obviously, you know, our goal is to get states to
16 score as high as possible, because that means that
17 they're meeting -- they're aligning their programs
18 with ours, and they're meeting the mandates that
19 are out there.
20 So most pipeline safety scores are in
21 the high 90s.
22 MR. TRAINOR: What challenges do you see

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1 as -- in your position facing the State Utilities
2 Commission in terms of their being able to develop
3 and implement effective pipeline safety programs?
4 ZACH BARRETT: I think resources are
5 always an issue, especially with the economic
6 conditions that we're dealing with right now.
7 You know, many states have had to
8 undergo furloughs, state inspectors. Some states
9 are having trouble holding onto their staff, their
10 current staff.
11 We suspended a management of effort
12 clause that allowed us to give states more
13 pipeline safety funding to help shore up states,
14 hopefully to -- that governments would recognize
15 that these are positions that we're paying for
16 through the grant, and that they would not
17 furlough those employees or keep those furlough
18 employees, you know, on the clock.
19 So I believe that's a challenge.
20 Also, in some of our states where
21 they're -- where they're producing states, where
22 the industry is doing well and where our engineers

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1 are getting up to speed, and they have, you know,
2 good backgrounds and good talents, that the
3 industry is robbing, basically -- cultivating that
4 good talent to go to work for them, because their
5 salaries are higher. So that's also a challenge,
6 I think, to hold good state pipeline safety
7 employees that are well-trained, that have
8 experience, years of experience.
9 I think those are two of the main
10 challenges that -- that we face.
11 Obviously, we're continuing to learn.
12 We're continuing to try to improve state programs.
13 Feedback from sessions like this will help us go
14 back and take things to -- to look at for an
15 evaluation form.
16 MR. TRAINOR: Mr. Metro, I would ask you
17 the same question: What are the greatest
18 challenges, in your mind, facing the state Public
19 Utility Commissions?
20 PAUL METRO: I would echo Mr. -- I would
21 echo -- (Adjusting microphone)
22 PAUL METRO: I would echo Mr. Barrett's

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1 comments about the state programs, that funding is
2 a -- is a considerable concern for the states.
3 Consistent funding over the years is a
4 problem, because each state has had economic
5 downturns. The funding levels have been -- have
6 been, over the last five years, anywhere from 40
7 percent to 64 percent. It's hard for state
8 programs to budget and go out and say, Okay, over
9 the next three years I know I'm going to get a
10 certain amount of grant from PHMSA; I'm going to
11 be able to go out and hire two or three additional
12 engineers.
13 Because the funding levels are bouncing
14 up and down, it's very difficult for the states to
15 plan how they're going to spend this money in the
16 long run.
17 So that's a -- a difficulty that the
18 states are looking at.
19 MR. TRAINOR: Mr. Clark, I would ask you
20 that same question relative to the conditions in
21 California.
22 What are your greatest challenges with

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1 respect to your pipeline state program?
2 RICHARD CLARK: Again, resources. It's
3 a resource issue in an industry that's -- whose --
4 whose history has been relatively safe. Very
5 safe, actually.
6 And to be able to convince folks that --
7 in competition for positions across state
8 government, at this point in time and in the past,
9 in terms of economic conditions, that -- that
10 folks are suffering, that it's, you know,
11 important to have inspectors be sure that the
12 utilities know what's in the ground and look very
13 deeply and broadly at what it is that they're
14 doing with their systems, when those systems are
15 first buried under the ground, so no one sees
16 them; they don't even know that they're running
17 through the neighborhoods.
18 And number two, they have a very high
19 safety record.
20 It's very difficult to convince folks
21 that we need resources sometimes.
22 MR. TRAINOR: In light of this

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1 environment -- I mean, we're -- states as well as
2 the federal government are all in a very severe
3 budget predicament, obviously.
4 I would pose the question to Mr. Metro,
5 Mr. Barrett, Ms. Daugherty and Mr. Clark again:
6 What types of things could operators and
7 regulators do to make the best of the situation?
8 And I'll give you one example.
9 Accepting the fact that increased
10 funding is probably a remote possibility, are you
11 examining more effective uses of your resources?
12 And if you are, explain how that might
13 be done.
14 Mr. Metro?
15 PAUL METRO: Yes. In Pennsylvania,
16 about five years ago we realized that we were
17 going to have funding issues and we didn't have
18 the resources that we needed to do the job the way
19 we wanted to do it. So we implemented a risk
20 assessment program.
21 But we went out and mined our data that
22 we had and said, okay, where can we put the

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1 resources that's going to give us the biggest bang
2 for the buck and reduce reportable incidents,
3 reduce non-compliance?
4 And we implemented that, and we've seen
5 some very good results of that. We've seen the
6 number of reportable incidents decrease; we've
7 seen the number of number of non-compliance issues
8 initially increase and some have decreased, and
9 that number's gone back and forth.
10 But we believe that the risk assessment
11 program for inspections is the way to go at this
12 point.
13 ZACH BARRETT: I would agree with
14 Mr. Metro. In our evaluation form, we've been
15 trying to drive states towards risk assessment of
16 their -- their operators to inspect.
17 We're also working to share data better
18 amongst ourselves in the states, and to learn more
19 from the data that we have.
20 As Paul said, we're trying to, you know,
21 run the data to try to look for trends, look for
22 information, and to be helpful to target

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1 inspection efforts.
2 LINDA DAUGHERTY: I would agree with
3 everything that's been said.
4 I would also mention -- I was surprised
5 it didn't come up when we were talking about
6 constraints and challenges. We have rolled out an
7 incredible number of new regulations over the last
8 decade. Control room management, distribution
9 integrity management. We have operator
10 qualifications.
11 States with small staffs have to absorb
12 these new regulations, so it takes an intense
13 amount of training. So it's a burden. So
14 bringing all the states up to speed is also a
15 challenge.
16 One of the ways that we are trying to
17 mitigate that is to leverage each other's
18 resources and skills.
19 You had asked, you know, ways we can
20 overcome, without more money, funding the states.
21 Without growing those programs, how can we achieve
22 good safety results?

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1 And one of the ways we can do that is
2 utilizing our data, identifying the highest risks,
3 helping each other out, identifying what we --
4 what the feds do and inspection of an operator
5 that a state may also have regulatory authority
6 over. Maybe they can use our results.
7 There are ways that we can enhance and
8 improve safety. But it is a challenge.
9 MR. TRAINOR: Has any of that work
10 commenced at this point?
11 LINDA DAUGHERTY: Yes. We recognized we
12 had these issues years ago, and we have made an
13 effort to share information, to improve our
14 information exchange, and we're not there yet. We
15 have a lot of work to do. But we are trying to
16 help each other as partners.
17 We are -- we serve the public. We work
18 together to protect the public as best as we can,
19 and by helping each other, we reach that goal.
20 MR. TRAINOR: Thank you.
21 And Mr. Clark?
22 RICHARD CLARK: We're taking a

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1 multifaceted approach.
2 First of all, we're not giving up on the
3 conversation of what the adequate resources are in
4 order to ensure a higher level of safety in the
5 gas systems. We're having robust discussions
6 across the state in that regard.
7 But we're also -- we've undertaken a
8 rule-making at the commission, where we're taking
9 a look -- essentially, at the rate-making aspects;
10 we're taking a look at the prescriptive rules; and
11 we're also taking a look at performance-based
12 rate -- a performance-based safety approach, so
13 that we can have a comprehensive system, if you
14 will, that will more adequately ensure a higher
15 level of safety amongst the gas operators in the
16 State of California.
17 Another aspect of what we're doing is
18 we've undertaken a rule-making to determine
19 whether or not the mobile home parks where we
20 spend a considerable amount of time doing
21 inspections, whether or not those master-metered
22 mobile home parks should be, in fact, absorbed by

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1 the utilities instead, so that the utilities
2 are -- are responsible for the safety of those
3 systems, rather than each owner of each particular
4 master-metered mobile home park having to have a
5 trained and qualified operator, and -- having to
6 know how the system works, and the whole nine
7 yards.
8 It is a huge challenge for us, however,
9 to implement the distribution integrity
10 management, the transmission integrity management,
11 and all that sort of thing. But we are taking a
12 comprehensive approach.
13 We're also -- in terms of sharing data,
14 we have very good information in our databases.
15 The database is built by our engineers, who also
16 do the inspective work. And we're -- we're
17 looking at ways that we can bring that data
18 together to be able to -- to trend going out,
19 looking into the future.
20 Recently we've begun trending going out
21 into the future so we can more target our
22 investigative inspective efforts.

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1 MR. TRAINOR: Thank you, Mr. Clark.
2 We have about five minutes left. I'll
3 give the balance of time back to Mr. Chhatre and
4 Mr. Nicholson.
5 RAVI CHHATRE: Thanks.
6 All questions would -- are for
7 Ms. Daugherty and Mr. Lee.
8 Yesterday PG&E told us that information
9 is not available yet, but it is known that they
10 are taking the, quote/unquote, "most conservative
11 values."
12 My question to both of you regulators
13 is: Yourself, do you know, what is the most
14 conservative value?
15 Start with you, Mr. Lee.
16 DENNIS LEE: So -- can you restate that,
17 please?
18 RAVI CHHATRE: Yesterday, during the
19 interviews, PG&E told us that on their -- on their
20 sheets, where the information is not available or
21 is unknown, that they used the, quote/unquote,
22 most conservative value.

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1 And my question is: If the operators
2 don't know what kind of pipe they have on the
3 ground, what is the most conservative value?
4 DENNIS LEE: Yeah, that -- that was
5 actually before the San Bruno event. It's
6 different now. It's different now. That would
7 change.
8 RAVI CHHATRE: I don't believe you
9 answered my question, but I'm going to ask
10 Ms. Daugherty.
11 LINDA DAUGHERTY: In a situation where a
12 pipeline operator does not know what they're
13 dealing with, the general thing that you're going
14 to be concerned with is kind of obvious. If you
15 don't know what you have, you must choose the most
16 conservative value.
17 Now, having said that, identifying what
18 that actually means would be challenging.
19 You might look at what available
20 information is out there, what it might likely
21 mean. But as mentioned yesterday, you would need
22 to add in another safety factor.

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1 There's nothing in the regulations that
2 I am aware of that would specifically state how
3 you would get to that.
4 We would expect an operator to provide a
5 technical engineering justification on how they
6 arrived at that decision.
7 So it's not a simple thing of saying,
8 well, we're just going to assume we have this
9 value.
10 No, you must provide why you arrived at
11 that value.
12 RAVI CHHATRE: I'm going to stop
13 pursuing, but I will say that I haven't gotten an
14 answer from either of you.
15 My question is: If someone does not
16 know what they have in the ground --I'll repeat my
17 question again -- what is the most conservative
18 value? And how long can they keep doing that?
19 LINDA DAUGHERTY: I'm not sure how to
20 answer that question. If someone does not know
21 what they have in the ground, then they have to
22 figure out a way of determining what they have in

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1 the ground based on good technical engineering
2 justification.
3 Maybe they dig it up and examine it;
4 maybe they have other information that would allow
5 them to apply a safety factor.
6 But if you're looking for a value, I
7 can't provide what a minimum value might be.
8 RAVI CHHATRE: And the regulation states
9 it like that?
10 LINDA DAUGHERTY: Correct.
11 RAVI CHHATRE: And how long the
12 regulation of those operators will continue to
13 exist? I mean, the way I look at PG&E line 132,
14 almost three years passed by, and you still have
15 unknown values in several areas.
16 LINDA DAUGHERTY: On the federal lines,
17 we would expect the operator to provide a
18 technical justification.
19 I can't speak to seven years or however
20 long. I would say, if there's an unknown, they
21 must be able to justify how they got to it.
22 RAVI CHHATRE: So if I have a 30-inch

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1 pipe, and I do not know I have based in them, I do
2 not know I have breaks in them, and I do not know
3 what material I have, to me, the most conservative
4 value is probably the lowest-grade steel.
5 That comes in -- with the lowest seam
6 factor, that comes in, with all the lowest values.
7 Has that been demonstrated in line 132's case?
8 DENNIS LEE: No, I don't believe so.
9 RAVI CHHATRE: That's all for me. Thank
10 you much.
11 CHAIRMAN HERSMAN: Thank you very much,
12 Mr. Chhatre. We're going to take a 15-minute
13 break and we'll come back at 2:45.
14 (RECESS TAKEN FROM 2:30 TO 2:47 P.M.)
15 CHAIRMAN HERSMAN: Please take your
16 seats and we will continue. We'll come down to
17 the fourth witness panel and the city of San
18 Bruno.
19 CONNIE JACKS: Thank you, Madam Chair.
20 This is directed to PHMSA, whoever is best to
21 answer.
22 Yesterday a member of the PG&E witness

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1 panel acknowledged that, in essence, age does
2 matter when it comes to pipelines.
3 How do you determine that the pipeline
4 operator adequately addressed in its integrity
5 management program characteristics that may be
6 associated with age of a pipeline? And obviously
7 we have a particular interest in the situation
8 that occurred in San Bruno where the age of the
9 pipeline suggested that perhaps the records were
10 not correct, and/or that the inspections programs
11 did not adequately identify the situation.
12 LINDA DAUGHERTY: You know, when an
13 operator looks at its records, it has the
14 responsibility of assuring that those records are
15 as good as they can be.
16 When it is conducting its assessment, it
17 has the responsibility of making sure it has the
18 best information possible. And when it makes a
19 decision on the issue of risks and threats, it
20 must assess the situation fully. The whole part
21 of integrity management, the whole philosophy, is
22 to identify the risks and the threats, and to

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1 assess for them.
2 And then once you know what you're
3 dealing with, you address those.
4 You must have good information, and your
5 plan must be based on the best information, the
6 best integration of data that you can get. And
7 you apply good safety factors into that.
8 When you assess your pipeline, and you
9 find issues, you must repair them. Then you must
10 apply that to the rest of your line.
11 So -- and it's about learning, taking
12 the information you learn and putting it back into
13 your plan.
14 You apply mitigative and preventive
15 measures.
16 One of the big issues we're looking at
17 now is whether operators are doing a good job on
18 this assessment, whether they understand what they
19 have. You asked specifically about age. There
20 are some things we know about age. We do know
21 that pipeline age is not necessarily the only
22 factor to look at. You may have an older pipeline

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1 that is in very good shape.
2 But, on the other hand, if there are
3 unknowns, if there is -- there's a type of pipe
4 called a pre-'70 ERW pipe. That we know can be
5 problematic. If you have that pipe, we'd expect
6 you to do some really hard thinking about how
7 you're going to assess that pipe. So you do have
8 to factor that into your integrity management.
9 CONNIE JACKS: I'm assuming by your
10 answer that PHMSA does look, then, in terms of the
11 audit or the overview -- or rather, the CPUC
12 should be looking for indication in the integrity
13 management program that those issues are
14 adequately addressed.
15 LINDA DAUGHERTY: Yes. Every operator
16 is expected to thoroughly understand their system.
17 Every pipeline system is unique.
18 One of the benefits of the integrity
19 management program is that it is not a
20 cookie-cutter regulation. It does not have a
21 one-size-fits-all answer to integrity issues. It
22 says, you must know your pipe and you must assess

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1 for the threats to that pipe, whether they be very
2 unique or not, and then you must address them.
3 CONNIE JACKS: Thank you.
4 Again for the PHMSA panel member best
5 able to answer the question: There was discussion
6 yesterday regarding control room operational
7 procedures and other factors associated with
8 controls and maintenance that may have had an
9 impact, or an effect with regard to this accident.
10 How do you determine if these -- if the
11 operator's operational procedures -- procedural
12 factors are adequately addressed within an
13 operator's integrity management program?
14 LINDA DAUGHERTY: Would you please
15 restate that? I got lost.
16 CONNIE JACKS: How do you determine if
17 operational procedures such as control room
18 operations and/or maintenance procedures are
19 adequately addressed within an operator's
20 integrity management program?
21 LINDA DAUGHERTY: Would you like to ...
22 we have a control management plan coming out that

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1 addresses equipment. The integrity management
2 program really looks towards threats to a
3 pipeline. If there was, in other words, problems
4 with the control equipment or something like that,
5 that could come under equipment threat. Under the
6 integrity management plan there was training for
7 issues for that type of thing.
8 So that's where we would look at it.
9 CONNIE JACKS: Thank you. This question
10 is for the PUC.
11 Considering the population density in
12 the area, the intensity of the fire and the length
13 of time that it took to isolate the ruptured
14 section, will the PUC be considering the
15 requirement or encouragement of automatic shutoff
16 valves, remote control valves and/or improved
17 monitoring systems in the pipeline?
18 RICHARD CLARK: The answer is yes.
19 We've already begun that and we -- the commission
20 ordered out a rule-making on February 24th.
21 It has two phases to it, a phase A and
22 phase B. And in phase A we talk about the rules

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1 for construction, especially with respect to
2 remotely controlled valves and automatic shutoff
3 valves.
4 CONNIE JACKS: Okay. Thank you.
5 RICHARD CLARK: You're welcome.
6 CHAIRMAN HERSMAN: PG&E.
7 KIRK JOHNSON: We have no questions.
8 CHAIRMAN HERSMAN: IBEW.
9 DEBBIE MAZZANTI: We have no questions.
10 CHAIRMAN HERSMAN: PHMSA?
11 JEFF WIESE: Integrity management. The
12 CPUCs know, and said it's one of many different
13 types of inspections, but I would like to ask you
14 to talk a little bit about the regulatory
15 approach, and why -- I mean, what's the value of
16 that particular approach?
17 LINDA DAUGHERTY: It is not
18 prescriptive. It is not a cookie-cutter
19 regulation. It requires an understanding of
20 pipeline facilities. It requires a comprehensive
21 assessment of the facility.
22 It also incorporates the ideas of risk

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1 management where you apply your greatest resources
2 to your greatest risks. It provides additional
3 protections where the greatest risks are to
4 people, and to the environment. As a
5 performance-based regulation, it requires us --
6 the regulations are difficult. They're not easy.
7 Sometimes the best solutions are not. It's a lot
8 of work to implement the operators and to be
9 inspected by regulators.
10 But we believe it is worth the outcome.
11 And we believe our safety trends are showing that
12 it is effective.
13 JEFF WIESE: For Mr. Barrett, I'd like
14 to ask you to talk a little bit about the
15 development of the gas integrity management
16 oversight process. Your approach, how you
17 prepared, and just describe quickly for us, if you
18 will, what a gas integrity audit might look like,
19 very quickly.
20 ZACH BARRETT: States' pipeline safety
21 program partners and we developed frequently asked
22 questions, protocols, to run through to develop

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1 out an implementation plan and program for
2 integrity management.
3 Integrity management inspections are
4 certainly, as I think our operators would share
5 with you, are not short-lived inspections; they're
6 not a checklist. Their investigative approach to
7 looking at issues and threats and assessments of
8 threats, methodologies that pipeline companies
9 employ to address those threats, there may --
10 there would be an inspection team that consists
11 maybe of four to five to eight senior inspectors
12 there that are running through a list of
13 protocols, and looking at records, and verifying
14 records, and looking at methodologies, that are
15 applied to the threats, and preventive and
16 mitigative measures and follow-ups.
17 So they're not -- they're not just a
18 quick checklist approach; they're not just looking
19 at procedures. If they're looking at procedures
20 and the implementation of those procedures, and
21 they actually check the activities in the field on
22 occasion when they have the opportunity -- when

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1 there's a dig going on or something like that that
2 we can verify what's done there.
3 So the integrity management program,
4 again, was a joint effort between PHMSA and the
5 state plan safety partners. We have workshops, we
6 include the industry and the FAQs and any of our
7 guidance material that we are pulling together
8 trying to address issues for the implementation of
9 this rule. It's a very extensive integrity rule
10 that we have.
11 I think it's probably one of the most
12 significant rule-makings that we have at PHMSA.
13 JEFF WIESE: Great. And thanks. And
14 lastly a question for Mr. Metro.
15 In terms of -- I'm anticipating, then,
16 your recommendation coming to us shortly. But I
17 would like to just ask, if you would, we've had a
18 long association between the states and PHMSA,
19 federal government. I wonder if you would talk
20 just a little bit about how that plays out during
21 the course of a year.
22 Next year you get to be the Chairman, if

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1 you're not already, and maybe you could enlighten
2 us on that.

3 PAUL METRO: First let me address your
4 first point, in that the National Association of
5 Pipeline Safety Representatives, NAPSRS in
6 proposing something to work towards a solution,
7 works through the resolution process through 48
8 states and we have -- we only meet once a year,
9 and we'll try to accelerate that process, to get
10 resolution to PHMSA addressing the MAOP for
11 grandfathered pipes.

12 On the communication portion of it, as
13 with all partnerships, there's been rocky periods
14 in which there's been strained relationships.

15 Over the last five years, the -- both
16 parties, both partners, have worked very hard to
17 develop a very good communication between each
18 other, and worked very hard to meet quite
19 frequently.

20 For example, we meet with PHMSA in all
21 the regional meetings, of which there are five.

22 We meet at the annual meeting; we have

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1 monthly calls with Jeff, with the executive board
2 at NAPSRS, and we meet in various ways with Zach
3 and Linda and three different committees that we
4 have. So I think the communication right now is
5 an all-time high and the partnership is as strong
6 as ever.

7 JEFF WIESE: Thank you. That's all I
8 have.

9 CHAIRMAN HERSMAN: CPUC.

10 PAUL CLANON: Thank you. We talked a
11 couple of times and also when -- in the last
12 change about prescriptive rules versus
13 performance-based measures and regulation.

14 Can you flesh out what those two terms
15 mean? And then I'll have a follow-up.

16 PAUL METRO: The performance-based
17 measures are measures that we look at. We study
18 and analyze how the utility performs under certain
19 thresholds. Prescriptive measures are more of a
20 checklist of, you must do this, this, this and
21 this.

22 Now, when we talk in terms of integrity

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1 management, they are performance-based. And from
2 the NAPSRS point of view, we believe that the
3 performance-based measures are working. We need
4 to study whether there's further enhancements that
5 are needed.

6 But if you look at the number of
7 anomalies that have been protected through
8 performance-based measures, if you look at the
9 number of repairs made to pipeline, there would be
10 a very strong argument that performance-based
11 measures are working.

12 However, if you look at record-keeping,
13 that might be one area in which we need to -- to
14 get away from performance-based measures and look
15 at prescriptive measures, that you must keep this,
16 this, this and this record.

17 PAUL CLANON: Thank you. And the same
18 question for Ms. Daugherty. And I wonder whether
19 you agree with that. And in particular, the
20 notion of finding the right balance between
21 prescriptive and performance-based in this area.

22 LINDA DAUGHERTY: Yes, I agree. I

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1 believe that Paul stated it very well, that there
2 is a balance.

3 And we have found that performance-based
4 regulations do have good outcomes, if they are
5 properly applied, and the oversight is strong and
6 effective. There are gaps that we are looking at.
7 There are weaknesses, and we are addressing those.
8 So yes, I thought it was very well said.

9 I do believe that the record-keeping
10 issue as identified in the advisory, yeah, that's
11 something we need to look at.

12 PAUL CLANON: Anything else other than
13 record-keeping that pops into the top of your list
14 to balance things a bit towards prescriptive?

15 LINDA DAUGHERTY: I would have to think
16 about that.

17 PAUL CLANON: Anyone else on the panel
18 want to suggest anything else?

19 JULIE HALLIGAN: (Adjusting microphone)
20 Go ahead.

21 CHAIRMAN HERSMAN: Perhaps prescriptive
22 rules for microphones rather than

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1 performance-based would be better.
2 (LAUGHTER)
3 JULIE HALLIGAN: And of course, in the
4 process I think I've forgotten what I was going to
5 add.
6 LINDA DAUGHERTY: We were talking about
7 areas where you thought prescriptive might be
8 better than performance-based.
9 One of the items -- I'll jump in while
10 she's reflecting her thoughts -- one of the items
11 that we do want to have --
12 PAUL CLANON: We can't hear you, I'm
13 sorry.
14 JULIE HALLIGAN: She did it.
15 (LAUGHTER)
16 LINDA DAUGHERTY: One of the items that
17 we that we need to have more prescriptive
18 requirements is on data reporting.
19 You know, we collect a lot of data. Are
20 we collecting the right data is the question.
21 Could we use more? We need to know more
22 about the infrastructure. I'm sure that there

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1 will be people that say we collect plenty, that we
2 collect too much, and we aren't using what we
3 have.
4 I believe that that is probably not
5 correct; that we do have data. We need to
6 collect, maybe, different data.
7 We need to have a better understanding
8 of our infrastructure. The infrastructure is
9 changing, and in order to assess the risks, we
10 need to understand it very well.
11 JULIE HALLIGAN: Thank you. The one
12 thing that I was going to add is that the rules,
13 whether it is additional prescriptive rules or
14 additional performance rules, is that, I think
15 they need to look more at making sure that there's
16 continuous improvement included within the bowl,
17 and so there's not the opportunity to sit with
18 grandfathered pipes and not make the efforts to
19 make them pick a bowl, or whether they should be
20 replaced. That element of continuous improvement
21 needs to be really strongly included in any
22 performance-based rule.

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1 And if it needs to be included by adding
2 a few other prescriptive rules, that's one way of
3 doing it, or just make sure that it's strengthened
4 in a performance-based rule.
5 PAUL CLANON: And, thank you. That's
6 all I have.
7 CHAIRMAN HERSMAN: Member Sumwalt.
8 MEMBER SUMWALT: We're talking about
9 integrity management systems in the global sense.
10 Let me focus on the San Bruno event. You
11 mentioned before the break that if someone doesn't
12 know what's in the ground, they need to find out
13 what's in the ground. And that sounds reasonable.
14 And I think one of the things you said was, dig it
15 up and look at it.
16 In the case of the San Bruno pipe, if
17 they would have dug it up and looked at it, they
18 wouldn't have seen anything abnormal.
19 Because as I understand it, it was a --
20 we're looking at an internal seam that was
21 defective.
22 And so, in this case, your integrity

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1 management program is only as good as the data in
2 which you populate it with; right?
3 LINDA DAUGHERTY: That is correct.
4 MEMBER SUMWALT: So explain to me, bring
5 it down to San Bruno, and explain how -- how -- I
6 mean, like I said, the integrity management
7 program is only as good as the information in it.
8 So how could a different integrity
9 management system have made any difference in
10 this -- in the outcome of this event?
11 LINDA DAUGHERTY: That's a good
12 question. It basically goes to what -- how do you
13 know what you don't know? I've heard that stated
14 earlier. And it's a very good question.
15 With the San Bruno situation, if they
16 had known, and they excavated, perhaps they would
17 have seen the multiple -- we called them pups, or
18 different -- they would have seen that the pipe
19 was constructed somewhat in an unusual manner, and
20 they may have done further research.
21 To get to the internal scene, it's a
22 very good question. I don't know how you'd do it,

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1 other than observing the external characteristics
2 of the pipe that might cause you to say, look,
3 this is unusual. It doesn't match what our
4 records say and we need to figure out what we've
5 got here.
6 So the question is valid.
7 MEMBER SUMWALT: And thank you. So
8 tomorrow we will be talking about industry-wide
9 technology which may have some of the answers.
10 Thank you very much for your answer.
11 CHAIRMAN HERSMAN: Member Weener.
12 MEMBER WEENER: My background, of
13 course, is not in pipelines; it's in aviation
14 engineering. So, pardon a naive question. And
15 this is probably for Ms. Daugherty:
16 There's been some references to a notion
17 of bringing the pipeline up to a certain high
18 pressure at least once every five years.
19 What's the reason for that?
20 LINDA DAUGHERTY: Under the federal
21 regulations, there is no requirement for an
22 operator to raise the pressure to MAOP to maintain

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1 that MAOP.
2 My understanding, in short, is that PG&E
3 may have raised the pressure in order to establish
4 a MOP level such that if a new HCA was identified,
5 they would not have to do a seam assessment.
6 MEMBER SUMWALT: So in a sense, this is
7 a pressure test.
8 LINDA DAUGHERTY: I would not consider
9 it a pressure test. A pressure test under the
10 federal regulations has very specific parameters.
11 It requires that you bring the pipe to a certain
12 level of stress, and a certain duration.
13 MEMBER WEENER: So if this is not a
14 pressure test, it's the aeronautical equivalent to
15 max -- never exceed speed and see if it still
16 stays together?
17 LINDA DAUGHERTY: I would hope not.
18 The -- like I said, the pipeline itself
19 is not -- or the operator is not required to
20 pressure the pipe to the MAOP to maintain the
21 MAOP.
22 For example, I'll use an analogy. If

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1 the speed limit is 65, you can drive your car at
2 55, but you may go up to 65. You cannot exceed
3 65, but you may go up to it.
4 You are not required to occasionally
5 drive your car to 65 to show that it can go 65.
6 MEMBER WEENER: Okay. Then the
7 requirement is there just to avoid having to -- to
8 do another test in case you bring -- in case you
9 have the environment around the pipeline changed
10 to a high-consequence area?
11 Is that what it -- did I understand that
12 right?
13 LINDA DAUGHERTY: My understanding is
14 that the company chose to raise the pressure to
15 establish the high MOP pressure at MAOP, so that
16 if a new HCA was identified, that it could use
17 that pressure as the MAOP without doing a seam
18 assessment.
19 The rate -- let me see if I can help.
20 The regulation says that when a new HCA
21 is identified, you must look back five years to
22 determine the highest MOP that that line segment

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1 has seen.
2 If you exceed that -- if you've exceeded
3 that, then you must do a seam assessment. The
4 trigger date is the date of when you identify an
5 HCA.
6 So, as I understand the materials
7 presented, PG&E said, we may have an HCA
8 identified next year, or two years down the road.
9 Therefore, we want to establish our MOP. We want
10 to bring it up, so that -- to the MAOP level such
11 that that is the benchmark.
12 CHAIRMAN HERSMAN: Member Rosekind.
13 MEMBER ROSEKIND: One question I have
14 from the federal perspective, as well as state.
15 One of the advantages of
16 performance-based programs, of course, is that
17 intrinsically you should be able to measure them.
18 And so Mr. Barrett started talking about 100
19 percent, and California CBC at 90 percent.
20 There a report card or other card based
21 on audits of the CPCs you -- I'm working toward
22 what I hope is sort of the state of the country's

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1 PUCs --
2 ZACH BARRETT: Sure. We do a scoring
3 document each year based on the jurisdictions, the
4 minimum training and those sort of things with the
5 training. We use the grant score to distribute
6 the funding each year. So yes, we do have scores
7 for each individual state. You'll find that those
8 scores are in the 90s to the high 90s.
9 MEMBER ROSEKIND: So give us a sense --
10 and I heard what you just said, but is there an
11 average, standard deviation? Where are these
12 state PUCs, basically, and sort of how we're doing
13 as a country.
14 ZACH BARRETT: As a country, I'd say
15 we're doing well. Your safety programs are
16 certainly meeting, you know -- the scores I think
17 are primarily from 97 to 100 unless there's some
18 problem with legislation like the PUC is
19 experiencing, where they'll have full safety
20 authority like PHMSA would have over their
21 operators. So we hit them pretty hard for that.
22 But the -- as the nation goes, our state

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1 biplane safety programs are dedicated, the folks
2 are -- they take the same training that their
3 federal inspectors take at the station at Oklahoma
4 City in TQ.
5 They work with us, you know, hand in
6 glove, you know, we try to support them, and any
7 questions or issues or investigations that they
8 have underway.
9 MEMBER ROSEKIND: So based on that, do
10 you have cutoffs for when somebody's not doing up
11 to --
12 ZACH BARRETT: The only -- the only
13 states that are not in the biplane safety program
14 are Alaska and Hawaii. Hawaii was in the biplane
15 safety program back in the late '80s and early
16 '90s, and in '95 we decertified that state because
17 of lack of allowing inspections.
18 We worked with them, and supported their
19 staff. It's a last resort with us. We'd rather
20 help the state and improve the state's program's
21 performance. But in the case where they're not
22 doing inspections and we're not seeing, you know,

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1 a safety enhancer as a result, we can't -- we have
2 to decertify.
3 There's a cutoff where you're not
4 certified anymore, so the inflation -- having
5 everybody at 97 percent is an accurate portrayal.
6 So you have cutoffs, not that you have
7 to be certified, but if there are areas that
8 people aren't performing the state PUCs that's --
9 because it's not strictly based upon the scores.
10 The scores are indicative of -- if you stop doing
11 inspections and stop doing things, you don't score
12 very well. So we do have a score cutoff.
13 But we have reports of what our total
14 programs are. And if you do not meet those, we
15 have to decertify a state.
16 We've only done it, in many, many years,
17 just once. We've been at it since 1971. NTSB
18 recognized earlier in the opening that they accept
19 their investigative reports when they're strapped
20 for -- you know, strapped for a solution to do
21 those kinds of things. So I think that speaks
22 well.

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1 MEMBER ROSEKIND: There are flags to
2 intervene when needed --
3 ZACH BARRETT: Yes.
4 MEMBER ROSEKIND: There was a lively, if
5 not articulate, discussion about prescriptive.
6 One of the challenges with prescriptive is to
7 check the list, sort of, version of rules. And
8 since I've been holding this from the last panel,
9 you know, we're hearing about public awareness and
10 their 12 items of what's effective. And we have
11 an example here of, yeah, we sent out surveys and
12 had 20 people out of 15,000 respond. That's the
13 kind of thing that comes up on a checklist as, oh,
14 we did surveys.
15 So "performance-based" means having an
16 effective evaluation of whether or not your
17 program works, right? Not just that you send
18 things out.
19 Are those, again, performance-based
20 qualified on how you evaluate these programs?
21 LINDA DAUGHERTY: Definitely. We would
22 agree with you that public awareness is

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1 performance-based regulation. You must be
2 effective. That's the simple answer.
3 There are many ways that you can be
4 effective. You just have to figure out what those
5 are for your designated audience.
6 We heard earlier from the panel that
7 they were using a survey technique that it doesn't
8 appear was effective. We would have expected them
9 to identify that as ineffective and to determine
10 what would be more effective. There are many
11 options --
12 MEMBER ROSEKIND: And since we're out of
13 time and maybe I'll stop on this here. I'll get
14 to the state part.
15 But in that realm, that's why I was
16 asking about the scorecard, you know. On one
17 hand, it's on your list demonstrating an awareness
18 program. And I think this gets to some concern
19 about the self-assessment part, which is, you
20 know, the way we heard it earlier: We were doing
21 a good job with that survey, doing a bunch of
22 things. When we look at it from another

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1 perspective, maybe it wasn't.
2 So their assessment may be different
3 than your taking a look at it and saying it
4 doesn't meet our criteria, and what effect it
5 should be.
6 LINDA DAUGHERTY: That is part of our
7 job as regulators, to look at what the company is
8 achieving and to make a judgment on whether that
9 in fact does meet the requirements of the
10 regulation, and whether it is having an impact.
11 Unfortunately, as regulators, sometimes
12 the performance measures and the metrics we use to
13 measure effectiveness are long distance. They
14 look down the road.
15 So if you were to ask us today to
16 measure the effectiveness of a rule that went into
17 effect a short time before, it would be difficult
18 to do.
19 MEMBER ROSEKIND: And that -- once
20 again, I'm sorry, but I think -- that's why I say
21 it's not so much the rule part, but
22 performance-based programs give you another avenue

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1 to quantify those and, in a more short-term basis,
2 determine if they're meeting the objectives that
3 you set.
4 LINDA DAUGHERTY: That's right.
5 MEMBER ROSEKIND: Thank you.
6 CHAIRMAN HERSMAN: Vice Chairman?
7 VICE CHAIRMAN HART: In the various
8 processes, I'd have the same question for the
9 regulators and overseers. And I would start with
10 the PUC and ask, do you exchange notes with either
11 other regulatory oversight agencies in California
12 or with other utilities commissions in other
13 states regarding what -- what are effective means
14 of oversight, what's not working well and those
15 kinds of things. Because I know in these tough
16 times you're looking at the most efficient way to
17 do it.
18 Do you exchange ideas with others in
19 order to do that?
20 RICHARD CLARK: Absolutely. We're very
21 active -- I know mine's not working (Adjusting
22 microphone)

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1 We're very active with NAPSAR, National
2 Association of Pipeline Safety Representatives.
3 We talked with the state fire marshal. We were --
4 we're very active. We talk with all the different
5 states. Our program manager Mr. Raffy Stepanian,
6 spends a lot of time talking with the other states
7 about what they're experiencing and interfacing
8 with PHMSA also.
9 VICE CHAIRMAN HART: And do you find
10 that helps you do it better?
11 RICHARD CLARK: Absolutely.
12 VICE CHAIRMAN HART: Same question, with
13 PHMSA. Because I see Jeff Wiese with the industry
14 all the time, so I know you're doing that.
15 But I would ask the same question: Do
16 you exchange notes with other federal regulators
17 and overseers regarding the most effective way,
18 and what's working and what's not working?
19 LINDA DAUGHERTY: Yes, we do. As a
20 matter of fact, we recently have met with some of
21 our other counterparts.
22 We met with FDA to look at certain

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1 portions of our regulations to see if we could
2 benefit from each other the knowledge.
3 We've looked at enforcement programs.
4 We've looked at other federal agencies
5 to determine how effective our programs are
6 compared to other agency programs.
7 We look across the Department of
8 Transportation and see what other methods have
9 used, and how we can learn from them.
10 I would also say that, in some cases
11 where we have cross-functional jurisdiction
12 alliance -- for example, FERC. FERC inspects L&G
13 facilities. We do as well. I have participated
14 on a joint inspection with FERC to learn from them
15 and to see what they brought to the table and how
16 we could benefit, and what we could share with
17 them that they would benefit by.
18 VICE CHAIRMAN HART: Are you finding
19 that exchange to be helpful?
20 LINDA DAUGHERTY: It is useful. I do
21 believe we could benefit probably from doing even
22 more.

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1 CHAIRMAN HERSMAN: Can we go back to
2 basics a little bit, and how an operator
3 establishes a MAOP and how that's approved?
4 ZACH BARRETT: Under 619, 102 -- 619 of
5 regulations -- and I try to do this from memory,
6 hopefully, there are four options under 619A that
7 you can -- that you have to have the pipe
8 materials and pipe specs; you have to have a
9 pressure test; you have to have a five-year
10 window. And the fourth option is the most
11 appropriate pressure based on the performance
12 history that you have available.
13 If you don't have all four of those
14 things, it -- basically you'd have to opt down to
15 619C, which is the grandfather clause, which is
16 the five-year window from 1965 to 1970.
17 That also invokes the class location
18 factors that you have to consider in that, so that
19 throws you back up to having to have design
20 factors, to know what your pipe is -- or to, you
21 know, to address an earlier question, you can
22 assume the most restrictive design factors on your

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1 pipes.
2 So, if you didn't know what the grade
3 was of your pipe, you could assume 24,000 for the
4 lowest grade that was available. And that's --
5 you know, the lowest of those is your maximum
6 allowable operating impression.
7 CHAIRMAN HERSMAN: So, does that
8 indicate that this line for PG&E can't have a
9 higher operating pressure than it did in the '60s?
10 It has to be that low or lower, based on the other
11 factors that are considered here?
12 ZACH BARRETT: The maximum level
13 operating pressure is locked in -- is it. That's
14 as high as you can go with that, unless you go
15 through an upgrading to increase that maximum
16 allowable operating pressure. And that usually
17 involves a pressure test.
18 CHAIRMAN HERSMAN: Okay. So their
19 operating pressure is as it has been for some
20 40-plus years, and it can go no higher unless they
21 do additional measures.
22 But it can go lower if they identify

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1 weaknesses or defects or the CPUC requires them to
2 lower it for regulatory reason.
3 ZACH BARRETT: That's correct.
4 CHAIRMAN HERSMAN: Okay. So, let's go
5 back to this issue, because you remember earlier
6 we were probing it a little bit, and I just want
7 to follow up, because I think it's important.
8 It seems to me that CPUC and PHMSA both
9 had kind of a different position than PG&E had on
10 that five-year test with the HCA identification
11 issues. And I want to understand why.
12 When they did this to establish what the
13 MAOP -- MOP could be for newly-identified HCAs,
14 and we started looking at this, is this something
15 that you had seen before in CPUC?
16 RICHARD CLARK: No, we've not seen it
17 before.
18 CHAIRMAN HERSMAN: PHMSA?
19 LINDA DAUGHERTY: No, we had not seen
20 that before. We definitely had not seen -- it was
21 the first time we heard of operators doing this.
22 CHAIRMAN HERSMAN: Okay. Mr. Metro,

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1 maybe if I can ask you, because you have some
2 more -- potentially some other operators: Is this
3 something that other pipeline operators have done
4 traditionally?
5 Is PG&E, you know, in the -- in the
6 middle of the pack? Or are they an anomaly here?
7 PAUL METRO: As far as NAPSRS is
8 concerned, it's an anomaly. We haven't seen other
9 states report anything similar to this.
10 CHAIRMAN HERSMAN: Okay.
11 And going back to hydro testing. And I
12 know I don't have a lot of time here, but I want
13 to talk about the whole issue of doing hydrostatic
14 testing from the regulator perspective.
15 This is something that obviously was a
16 requirement for new lines back in the early 1970s,
17 so it's been around for a long time. But there
18 are definitely pros and cons associated with
19 hydrostatic testing, and we understand,
20 particularly, on a distribution system like PG&E.
21 So, can you just give us from, the
22 regulator's perspective, some pros and cons? And

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1 I know we'll get a little bit more tomorrow with
2 the panel tomorrow.
3 Please. CPUC and then PHMSA.
4 RICHARD CLARK: Well, the pros, of
5 course, are that you know beyond the typical
6 operating pressure, the maximum allowable
7 operating pressure of the pipeline, that it's not
8 going to fail.
9 The downside is the possibility of --
10 and I'm not a metallurgist by any stretch of the
11 imagination -- but I have discussed it with some
12 folks who are quite expert in this regard.
13 There's a small possibility that you
14 might create an anomaly in the pipe by raising the
15 pressure as high as -- as you do and not bringing
16 it back down.
17 Of course, the other part -- the other
18 downside is that the line has to be taken out of
19 service. And that has consequences in terms of
20 being able to deliver gas to people's homes and to
21 hospitals, and that sort of thing, where -- where
22 there's the other -- the other aspect of public

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1 safety.
2 And then, the final concern is, as I
3 understand it, is trying to get the water out of
4 the pipe. There's a lot of time and effort spent
5 to keep water from getting into pipes because it
6 creates internal corrosion, and so you want to
7 make sure that you get all of that out of there.
8 Again, these -- the people who actually
9 operate these systems have much more expertise
10 than I have, but I've talked to a number of
11 people, and I think that those are the sum of the
12 issues that we face.
13 CHAIRMAN HERSMAN: And PHMSA, do you
14 have anything different to add on that?
15 LINDA DAUGHERTY: I would suggest that
16 we have found hydrostatic testing to be of great
17 value on the interstate long lines. When we have
18 found defects -- specifically seen defects, we
19 have often ordered operators to conduct
20 hydrostatic testing.
21 As Richard mentioned, there are pros and
22 cons. Depending on the type of anomaly that you

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1 have on your line, you may be able to remove
2 defects. But at the same time, if you are not
3 using a specific protocol in how you conduct the
4 testing, you may grow defects till right before
5 their failure stage such that it can create
6 issues.
7 So hydrostatic testing has definite
8 benefits. But it has definite cons, and you need
9 to consider that. You do not need to eliminate
10 one problem and create another one that you have a
11 harder time detecting.
12 CHAIRMAN HERSMAN: Okay. And from a
13 regulatory perspective, is there any other
14 alternative to hydrostatic testing to provide
15 confidence in the line?
16 LINDA DAUGHERTY: Do I go first?
17 There are various types of assessments
18 you can do, depending on the defect.
19 They are successful to different
20 degrees. You'll hear tomorrow on the panel some
21 of the challenges that we have, and I think
22 they've come out in some of the discussion.

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1 Hydrostatic testing -- pressure testing
2 is one of the old forms of destructive testing a
3 pipe. You pressure it such that, if there are any
4 anomalies, they blow out. And there's water
5 coming out, so it's relatively safe. It's
6 destructive.
7 What that does not tell you is, what is
8 left in the line. So you may have removed all of
9 the harmful anomalies or you may have grown some
10 harmful anomaly that, if you had not pressure
11 tested them, may have been stable.
12 So there's the balance.
13 You asked for alternatives. Internal
14 inspection tools. There are certain tools that
15 will detect cracks in seams, but they can only be
16 used under certain circumstances in certain lines.
17 If you have lines with varying
18 diameters, those tools may not function
19 effectively. So you have to weigh the benefits of
20 each type of assessment and figure out what your
21 overall risk is, and the overall benefit of the
22 tool.

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1 And I would not -- this may be
2 stretching a little bit, but I think people need
3 to keep in mind, in addition to requalifying pipe
4 through these types of tools, through repair or
5 rehabilitation, there's always an alternative of
6 replacement.
7 CHAIRMAN HERSMAN: And maybe, unless you
8 want to add something to that, CPUC, I think
9 Ms. Halligan, you were really focused on this
10 comment earlier. And I know your mic hasn't
11 worked for you.
12 But, have we seen proactive action on
13 any of these alternatives to hydrostatic testing
14 in California?
15 JULIE HALLIGAN: Well, I think what
16 we've found in PG&E's service territory, at least,
17 is that we haven't seen an aggressive effort to
18 make their pipes piggable, if you will, and we
19 haven't seen a -- a program to take the
20 grandfathered pipe and either make it -- either
21 hydro test it or replace it.
22 We haven't seen in the integrity

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1 management program, thus far, any aggressive
2 efforts in those areas.
3 CHAIRMAN HERSMAN: Okay. So there's
4 definitely pros and cons to all of the tools that
5 are at our disposal.
6 But do you see cons with just leaving
7 status quo and not doing any of the above?
8 JULIE HALLIGAN: Yes. Clearly, I mean,
9 the commission is at a point where PG&E needs to
10 reduce pressure on several of its lines. And
11 they're undergoing a MAOP validation effort that
12 you recommended, that we've ordered them to do.
13 And depending on what the results of
14 that are, we'll be looking at taking additional
15 actions, either requiring pressure testing or
16 requiring a replacement program, or perhaps other
17 methods, but ...
18 CHAIRMAN HERSMAN: Okay. Thank you very
19 much.
20 We actually are doing really good.
21 We're ahead of schedule. So I'll turn back to the
22 tech panel for a follow-up round of questions, and

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1 then we'll go through the parties on the Board of
2 Inquiry.
3 MR. TRAINOR: I have a question for
4 Ms. Daugherty.
5 A few minutes ago you mentioned the need
6 for prescriptive data. I think it was in response
7 to Member Rosekind's question.
8 You mentioned data recording as an
9 example of where more prescriptive methods might
10 be necessary.
11 My question to you is, you talked about
12 the need for changing our approach to data
13 collection. Are you thinking specifically of data
14 collected by the operator?
15 Or are you also addressing data
16 collected by the regulator?
17 LINDA DAUGHERTY: (Adjusting microphone)
18 I think we're good. I would say that we need to
19 look at both areas the -- we found through your
20 investigation, through our own investigation of
21 the various accidents and incidents, that perhaps
22 operators do not have access to the data that they

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1 should have. That's why we issued the advisory,
2 based on your recommendation. It is an important
3 issue.
4 If you found a risk assessment based on
5 data, then you need to have the best data
6 available.
7 Now, having said that, you can't create
8 data that you -- from the past. You can't create
9 records of something you -- that are gone.
10 Yes?
11 MR. TRAINOR: I understand. But what
12 I'm trying to get to is, you mentioned that, as a
13 regulator, you need to determine whether the
14 operators are doing a good job.
15 LINDA DAUGHERTY: Uh-huh.
16 MR. TRAINOR: And it seems to me that
17 what we've discussed has been looking at what the
18 operators are collecting. And we found through --
19 earlier today, with the mail-in and the survey,
20 for example, this does not appear to be a very
21 productive effort based on the number of responses
22 we see.

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1 It seems to me that the regulator can
2 also collect data that would indicate whether the
3 operators are doing an effective job.
4 LINDA DAUGHERTY: There are two aspects
5 that -- there is the one -- the aspect that the
6 operator collects data that we review during an
7 inspection for very specific programs, perhaps a
8 public awareness program.
9 The other aspect is PHMSA and our state
10 partners need to have data in order to accurately
11 assess the risks on the national infrastructure,
12 and look at trends.
13 MR. TRAINOR: Can you give me an example
14 of --
15 LINDA DAUGHERTY: Yes --
16 MR. TRAINOR: -- such data?
17 LINDA DAUGHERTY: Actually, there was
18 one that was brought up. I was asked if we had
19 specific data on the number of miles that had been
20 hydrostatically tested. I said I don't know. I
21 was told later that we don't have that
22 information.

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1 That might be a piece of information
2 that would be useful. It might help us better
3 assess the nation's infrastructure.
4 MR. TRAINOR: Thank you.
5 RAVI CHHATRE: I have a question both of
6 Mr. Clark and Ms. Daugherty.
7 And this leads us to Mr. Salas's
8 statement yesterday regarding RCV and ASV. And
9 one comment was regarding the technical hurdles
10 using these valves.
11 Does PG&E or PHMSA have any comments on
12 them? Have they used them successfully or
13 unsuccessfully?
14 LINDA DAUGHERTY: I would like to
15 comment on that.
16 I would mention that we have recently
17 issued an ANPRM on our liquid side, and will
18 likely be issuing an ANPRM on the gas side, that
19 asks that very question: Should ASVs or RCVs have
20 a different use? And should the government
21 require those? And should they be installed?
22 Internal management rules led the way

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1 with rule-making that said operators should
2 consider those valves in the placement of those to
3 protect ASV. Now, we're coming back to the
4 broader audience and saying, we need to revisit
5 this and determine if we need to require those in
6 a larger setting.
7 So yes, we believe those are very
8 important.
9 RICHARD CLARK: At the PG&E, this is
10 very much as I indicated in my answer to the city.
11 This is very much a high priority item for us in
12 our rule-making to consider whether or not we
13 should require the installations of automatic
14 shutoff valves or remotely controlled valves.
15 As a matter of fact, one of the first
16 issues that we addressed in this regard was to
17 order PG&E to undertake a study of where they
18 might place automatic or remotely controlled
19 valve.
20 And we did that very early on, soon
21 after the pipeline failure in San Bruno.
22 RAVI CHHATRE: I guess we are running

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1 out of time. Will it be okay? (Adjusting
2 microphone) -- CCP and technical problems with
3 these valves that makes the use questionable?
4 RICHARD CLARK: That's an unknown for us
5 at this point. That's why we're putting it
6 through a rule-making to examine it thoroughly.
7 RAVI CHHATRE: Thank you. I pass on to
8 Mr. Nicholson at this time.
9 MR. NICHOLSON: I'd like to follow up on
10 the same subject, really, and get Mr. Metro's
11 thinking on RSVs and SVUs.
12 Are other states using these valves?
13 PAUL METRO: I can't tell you off the
14 top of my head. I know -- looking at the issue
15 from the 30,000 foot level -- is that while they
16 are a very good idea and are needed, there's
17 appropriate places to install these valves, and
18 appropriate conditions.
19 And we need a feasibility study done to
20 determine those thresholds where the proper places
21 are and what the appropriate places are for these
22 valves to be installed.

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1 MR. NICHOLSON: And Ms. Daugherty, I
2 think you answered my question. The last report I
3 saw was 1999 from DOT on ASVs and RCVs.
4 Is there something more recent? Or are
5 you going straight into the rule-making?
6 LINDA DAUGHERTY: To my recollection,
7 there is not anything more recent other than
8 internal reviews and discussions, and perhaps
9 discussions with some of our stakeholders. I
10 don't think there's a formal report.
11 I would say that, when we go into the
12 ANPRM process we do trigger the full rule-making
13 process which is, as those of you that have dealt
14 with it know, it's quite a -- it's quite a system.
15 You have to go through -- you propose the idea.
16 Sometimes the best solutions do not make
17 it through simply because of the cost-benefit. We
18 can look at, ideally, it would be wonderful if we
19 could replace all older pipe and we can put valves
20 at very, very frequent intervals.
21 The fact of the matter is, there's a
22 cost to that. And whether the American economy

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1 can bear it or not, I don't know. That's an issue
2 that will be discussed.
3 When you go through the rule-making
4 process, we are required to do a cost-benefit.
5 That's part of the rule-making process. So we
6 don't know where that will end up.
7 MR. NICHOLSON: And actually, a
8 cost-benefit was done, I think, in the 1999
9 report; was that correct?
10 LINDA DAUGHERTY: I believe so. I have
11 seen estimates that replacing 50 percent of valves
12 would be very much in the millions, like 600
13 million. It would be very, very costly. So, it's
14 something that we have to consider.
15 MR. NICHOLSON: Okay.
16 To Mr. Lee, I would ask also: Was part
17 of your audit in either 2005 or 2010 a review of
18 the policy memo regarding ASVs and RCVs?
19 DENNIS LEE: Yes, I believe we looked at
20 it.
21 MR. NICHOLSON: Was there a finding?
22 DENNIS LEE: No, there wasn't.

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1 MR. NICHOLSON: That's all I have.
2 Anything else?
3 RAVI CHHATRE: Madam Chairman, the
4 technical panel has no more questions for the
5 witnesses.
6 CHAIRMAN HERSMAN: Do any of the parties
7 have questions? City of San Bruno?
8 CONNIE JACKS: Just a quick follow-up on
9 the discussion you were just having regarding
10 replacement valves. And clearly understanding and
11 recognizing the enormous potential cost, have
12 either of your agencies considered the potential
13 value of rules that might consider system
14 replacement? Pipeline replacement as part of a
15 best practice and/or regulation?
16 RICHARD CLARK: Thank you. Certainly
17 we're looking at that, absolutely. I mean, that's
18 part of bringing the rate-making into and more
19 closely aligning the rate-making with the safety
20 work that's going on and the maintenance and that
21 sort of thing, is to -- to take a look at pipeline
22 replacement in particular situations, and

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1 encourage it when we feel it is necessary.
2 LINDA DAUGHERTY: On the federal side
3 the replacement could be discussed as best
4 practices. However, I will say that we are
5 considering how some of these infrastructure
6 issues can be addressed in the long-term.
7 I would also mention that we have
8 suggested to certain pipeline operators that
9 segments of the line that have been shown to have
10 been problematic be replaced. And some of those
11 lines are being replaced.
12 So it may not always require a
13 rule-making solution to obtain good results for
14 the public.
15 CONNIE JACKS: Thank you.
16 CHAIRMAN HERSMAN: Are there any other
17 questions?
18 JEFF WIESE: Sorry about that. You
19 know, I think if you allow me --
20 CHAIRMAN HERSMAN: No need to apologize,
21 Mr. Wiese.
22 JEFF WIESE: -- I'd like to follow the

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1 line of questioning that the city began there,
2 because I think we're very much interested,
3 clearly, as city regulators. And CPUC and PHMSA
4 would like nothing more, and the rest of our state
5 partners, than have brand new pipeline systems out
6 there.
7 So, I'm just interested more in
8 exploiting some of the impediments and I know some
9 of the states have been thinking about this a lot.
10 But they have different impediments on the federal
11 level. It goes to, how does a company recover
12 those costs?
13 So I didn't know if Mr. Metro wanted to
14 comment on any kind of innovative approaches he
15 may have seen in different states, or work that
16 may be going on at the state level.
17 PAUL METRO: Many states have pipeline
18 replacement programs.
19 Now, when you talk about putting in
20 valves, there's a limited source of dollars that
21 the states have, so, if they have a lot of cast
22 iron and unprotected bare steel to remove, it's

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1 going to be one or the other.
2 And from a risk assessment strategy, I
3 would look at replacing the bare steel and the
4 cast iron first.
5 JEFF WIESE: Thank you.
6 And then lastly, for Ms. Daugherty --
7 first of all, I appreciate Vice Chairman Hart's
8 comments. He and Member Sumwalt and I have been
9 in a number of interagency committees together,
10 which I always find fascinating. And NTSB has led
11 the way on a lot of initiatives.
12 Are there any other forums,
13 Ms. Daugherty, that you might want to comment on?
14 LINDA DAUGHERTY: Yes. Thank you for
15 reminding me about the oversight.
16 We are reaching out internationally.
17 There are a lot of countries that have pipeline
18 infrastructure. Some of it's older than ours, so
19 we are reaching out to them.
20 We also hope to have an international
21 forum this summer to pull some of our counterparts
22 around the world to sit down and talk about how we

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1 address some of these infrastructure issues.
2 Thank you.
3 CHAIRMAN HERSMAN: No additional
4 questions from the parties?
5 Member Weener.
6 MEMBER WEENER: I'd like to address this
7 to CPUC. We've talked a lot about regulations and
8 the operations at the federal level. I'd like to
9 understand how that flows down to the state level.
10 How does that -- what regulations --
11 what are the states' regulations relative to
12 PHMSA's regulations in terms of at the state
13 level? In other words, do you just flow down a
14 copy of them? Do you write your own regulations?
15 What's the relationship?
16 RICHARD CLARK: Well, we, in our general
17 order 112 which was first adopted in 1961, we set
18 the standards at our level for pressure testing in
19 a number of other areas.
20 When the Department of Transportation
21 first broke rules with regard to pipeline safety,
22 we changed our general orders so that it

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1 incorporated those rules in, and any modifications
2 and updates to those rules.
3 We have the authority at the state level
4 to expand upon those rules, and that's what we're
5 doing. We've done it in the past in terms of some
6 record-keeping issues. We're doing it now much
7 more -- we're taking a look at how we can broaden
8 and deepen that effort.
9 MEMBER WEENER: Does PHMSA in any way
10 then certify the state? Or are you -- are you
11 completely independent?
12 RICHARD CLARK: They review -- they
13 review our programs, and -- I've forgotten whether
14 we actually have a certification in this program
15 or not. We do, right? Right. I'm sorry. I have
16 so many programs, sometimes it's hard to recall.
17 But we do have a certification, yes.
18 MEMBER WEENER: Is this an annual
19 certification?
20 RICHARD CLARK: Yes.
21 MEMBER WEENER: Now, then, CPUC has an
22 inspector cadre, I presume.

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1 RICHARD CLARK: Yes.
2 MEMBER WEENER: Are these full-time
3 inspectors?
4 RICHARD CLARK: Yes.
5 MEMBER WEENER: They don't do anything
6 else other than pipelines?
7 RICHARD CLARK: That's the current
8 situation, yes. We used to have our entire safety
9 and reliability branch do electric safety,
10 communications safety and gas safety.
11 But about a year prior to, I think, San
12 Bruno, we decided that we needed to have people
13 specialize in pipeline safety, and the other side
14 does electric safety and communication safety.
15 MEMBER WEENER: Okay. So these folks,
16 then, conduct audits and inspections?
17 RICHARD CLARK: Yes. And investigations
18 of accidents.
19 MEMBER WEENER: And investigations. The
20 audits and inspections, are they a paperwork
21 exercise? Or do they really go out and kick the
22 tires?

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1 RICHARD CLARK: They're both. They're
2 primarily paperwork exercises, however, but -- but
3 we -- a number of years ago across all of our
4 safety programs -- said that we need to test what
5 we find. We need to look and go out and look over
6 the shoulder of the person who's doing the
7 inspection for the utility, or the maintenance
8 work for the utility. And if they're an
9 inspector, we need to, one, make sure that they're
10 finding what they're supposed to find; secondly,
11 that they're doing what they're supposed to do
12 with what it is that they're finding.
13 So we -- we don't simply rely upon the
14 records that we see. We go out and we verify that
15 that's -- that which we see in the records is that
16 which is happening on the ground.
17 MEMBER WEENER: And then what sort of
18 enforcement capabilities do you have when you see
19 something that you didn't want to see?
20 RICHARD CLARK: We have -- before the
21 ability to open an order instituting
22 investigation -- well, we have -- I should back up

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1 a little bit.
2 We have a progressive enforcement scheme
3 that we use, or staged enforcement scheme that we
4 use, which begins with telling the -- the
5 operator -- and this applies to the electric side
6 as well as the gas side -- all of our programs
7 have an escalated enforcement program where we
8 tell them to fix it within a particular timeframe,
9 give us a corrective action plan, and adhere to
10 that corrective action plan.
11 If we see that either that -- they're
12 not responding in a timely manner and taking care
13 of their responsibilities, or we're seeing a
14 pattern of egregious behavior, then we have the
15 ability to take an enforcement action against them
16 through an order instituting investigation at the
17 commission.
18 We're exploring now the Pennsylvania
19 model and the -- the Oregon model, where they have
20 statutory authority to impose just upon natural
21 gas pipeline operators specific penalties. It's
22 an issue for us of delegation from the commission

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1 to be able to issue a citation.
2 MEMBER WEENER: Thank you for clarifying
3 that.
4 RICHARD CLARK: Very welcome.
5 CHAIRMAN HERSMAN: Member Rosekind.
6 MEMBER ROSEKIND: Thank you for taking
7 us through your evaluation. And it's good to hear
8 the state of the industry is 97 percent.
9 So, just to keep this balanced, when you
10 do these audits, is there a scorecard?
11 How do they get collated into how an
12 organization is doing?
13 And then, can you benchmark that against
14 others in California?
15 RICHARD CLARK: Well, in reality, we
16 only have two operators in California, so it's
17 Pacific Gas and Electric and then the civil
18 utilities, San Diego Gas and Electric.
19 So it's -- it's more of a qualitative
20 assessment than it is a quantitative assessment of
21 how each one of the utilities are performing.
22 And then, in terms of looking out at

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1 what other -- the other utilities across the
2 nation are doing, that's an area of improvement
3 for us that PHMSA has requested that we undertake,
4 and our -- that was a -- it was an opportunity for
5 improvement that they pointed out to us in their
6 last audit. And they've agreed to work with us in
7 terms of defining what those criterion are by
8 which we can judge the performance.
9 MEMBER ROSEKIND: So you'll be able to
10 take those audits -- again, the benchmark within
11 the state is small, but looking at a company over
12 time or to set thresholds to where some kind of
13 intervention or enforcement is required, it helps
14 you to quantify those, and gives you a sense
15 across the country. But right now that's not
16 really the approach. It's more qualitative.
17 RICHARD CLARK: That's with respect to
18 the integrity management program.
19 Now, as I talked about with the other
20 member, we have general order 112 where we do
21 inspections of many, many aspects of the utilities
22 operation, and we capture that data in our

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1 databases, and we do use that to help target our
2 inspective activities.
3 Because before we go out and do a GO 112
4 audit, we look at the problems that we had in the
5 past; we look at any sorts of trends that are
6 developing, and then we go out and we do our
7 audit.
8 And again, in our audit, we look at the
9 paperwork, and then we -- then we test that on the
10 ground as much as we can, of course.
11 MEMBER ROSEKIND: And quantify that a
12 little bit more.
13 RICHARD CLARK: Yes.
14 MEMBER ROSEKIND: And the last question,
15 and I was curious about this, and the Chairman
16 helped sort of clarify it for me, actually.
17 I was wondering what happens when
18 there's sort of a difference between a federal and
19 state perspective on an issue. What the Chairman
20 had clarified was, you know, PG&E came with
21 something that nobody had ever done.
22 How does that get addressed and

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1 resolved?
2 RICHARD CLARK: Well, it's first
3 resolved via good communications with our friends
4 at PHMSA. And we talk about it.
5 And then if we decide that we want to
6 take a different approach at the state level, as
7 long as it doesn't interfere with interstate
8 commerce, we're free to do so.
9 LINDA DAUGHERTY: I would agree. When
10 the state always has the prerogative of
11 implementing regulations that are more stringent
12 than the federal regulations, in fact, that's a
13 great thing. They know the circumstances.
14 So many states adopt the federal
15 regulations directly. Some have more robust and
16 more stringent regulations, which they are
17 entitled to do.
18 MEMBER ROSEKIND: Great. Thank you.
19 CHAIRMAN HERSMAN: That's great.
20 Because that's exactly the direction I wanted to
21 go in.
22 Can -- states can have more stringent

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1 regulations than the federal regulations. But can
2 they have less stringent regulations than the
3 federal regulations?
4 LINDA DAUGHERTY: No.
5 CHAIRMAN HERSMAN: Okay. So they must
6 meet, or incorporate, those regulations.
7 LINDA DAUGHERTY: That is correct.
8 CHAIRMAN HERSMAN: Mr. Metro, how many
9 states actually go beyond the federal regulations
10 in certain areas?
11 PAUL METRO: I don't have that
12 information. That might be something that PHMSA
13 collects in their certification process.
14 LINDA DAUGHERTY: Go ahead.
15 ZACH BARRETT: We actually do not
16 collect that information. States have been more
17 stringent, but there have been some surveys that
18 we conducted with the National Association of
19 Pipeline Safety Representatives for I think quite
20 a few of a majority of the states have some
21 regulations usually in the reporting area that's
22 more -- more restrictive than what PHMSA has.

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1 CHAIRMAN HERSMAN: So, for a lot of
2 people watching this, this is an intrastate
3 pipeline.
4 And the feds don't really have any
5 jurisdiction here; is that right?
6 ZACH BARRETT: That's not completely
7 true. We certify the states for the safety
8 authority over the intrastate pipeline system. We
9 support their program with grant funding; we
10 evaluate the program, we support them in their
11 inspections but, you know, I think PHMSA could,
12 on -- for a given incident, for a given isolated
13 thing, we could take additional action if -- if
14 deemed necessary.
15 At the current time we're working with
16 California BEC. We're working well together.
17 We're going to do some joint work in looking at
18 the risk assessment documents with PG&E. We're
19 going in together. We're not leading that. We're
20 going in as partners in that.
21 So there is a -- it's a partnership,
22 then, is what we'll be doing.

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1 CHAIRMAN HERSMAN: Okay. But you all
2 have limited resources.
3 Mr. Clark, you had a conversation with
4 the technical panel, and we have FTEs, "full-time
5 equivalents"; you have PYs, you know, "person
6 years."
7 And so you have a -- you have less than
8 20 PYs that work on pipeline safety.
9 RICHARD CLARK: That's correct.
10 CHAIRMAN HERSMAN: How many FTEs do you
11 have on the federal side of investigators?
12 LINDA DAUGHERTY: We're currently
13 authorized a little over 200. I think the number
14 is 206. With, you know, turnover, we're probably
15 just at 200 as far as the entire organization.
16 Roughly half of that, a little over half of that,
17 a little over 26 are inspectors.
18 Now, that is spread throughout our five
19 region offices, and the inspectors, that is --
20 five region offices and district offices.
21 I would point out that, according to our
22 statistics, the state programs regulate roughly 80

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1 percent of the pipeline mileage, simply because of
2 the intrastate facilities.
3 And they, roughly, augment the federal
4 workforce of 200 people by an additional 300.
5 CHAIRMAN HERSMAN: Okay. So we have
6 about 500 assets nationwide to do oversight of
7 pipelines, some pipeline safety activities.
8 And so, how much of CPUC's program is
9 supported by federal dollars, Mr. Barrett?
10 ZACH BARRETT: For the calendar year
11 2009 activities, approximately 63 percent of the
12 total program costs for the program that year was
13 federal dollars.
14 We project we're in the middle of
15 looking at the -- and it's a reimbursable grant
16 that the state's calendar year 2010 activities are
17 currently taking place. They're sending us a
18 program cost; we're reviewing those costs and
19 we're refunding them.
20 I estimate that California PUC's
21 estimate of program costs reimbursed for 2010
22 would be about 63 percent.

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1 CHAIRMAN HERSMAN: Okay. So there's
2 kind of a symbiotic relationship here between the
3 states and the feds. We provide the federal --
4 the federal government provides resources for the
5 states to conduct their programs.
6 The states are providing data to the
7 federal government for their data collection risk
8 assessment type programs.
9 But when we look at what, kind of, the
10 scope of the regulatory activity is over the
11 years, when you all went to performance-based
12 regulations, you didn't take away any of the
13 prescriptive regulations; you built on what was
14 there before, what you had been doing in the past.
15 This was another layer on that; correct?
16 LINDA DAUGHERTY: (Nodding head)
17 CHAIRMAN HERSMAN: What do you all think
18 are the biggest challenges for safety regulators
19 when it comes to oversight of performance-based
20 programs?
21 Where do you all fall down?
22 LINDA DAUGHERTY: I will speak very

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1 directly on that.
2 Performance regulations are not easy to
3 oversee. They're very difficult. They require a
4 judgment call.
5 For decades our instructors, mostly
6 engineers, very technically oriented people who
7 were able to go out and evaluate a prescriptive
8 regulation by determining if the operator had
9 checked the number of valves they were supposed to
10 in the timeframe.
11 Now they're required to think in a
12 totally different manner. They have to evaluate
13 the adequacy of an operator's technical
14 justification. It is difficult. It's a difficult
15 way of evaluating the program, but it's effective.
16 And we believe it's effective, and we believe the
17 results are showing out.
18 We have had challenges in convincing our
19 own workforce that it's the right way to go.
20 We have right now both prescriptive
21 inspections, and the performance-based integrity
22 management inspections. And as our regulations

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1 develop, we will continue to maintain that, simply
2 because, as you pointed out, we have a baseline of
3 prescriptive regulations, and then we added on the
4 performance on top of that.
5 So we will always need people that can
6 focus on prescriptive compliance and also
7 performance-based.
8 I hope I answered your question.
9 CHAIRMAN HERSMAN: Well, maybe what I
10 can do is share with you a couple of accidents
11 that we've investigated in performance-based
12 oversight where we have seen that there are
13 problems. Maybe you can help me understand how
14 you address these.
15 We've looked at accidents in which
16 there's a segment of pipeline that should have
17 been identified as an HCA, but it wasn't by the
18 operator.
19 And so this is kind of, to me, a little
20 bit similar with the situation that we have with
21 the records here.
22 You're relying on the operator to

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1 provide to you information, and you at some point
2 have to accept that information as valid.
3 This goes back to Mr. Clark with the
4 "trust but verify," you know, take the information
5 they gave you but go out and make sure that what
6 they're telling you is the right thing.
7 It's very difficult, I think, on first
8 instance or review for you all to identify that,
9 whether it's that their underlying documentation
10 isn't there to support the description of the pipe
11 for this segment, or whether an area should be an
12 HCA or not.
13 If we get into even more detail --
14 looking at the Kingson accident. And in that
15 accident you all identified, in their integrity
16 management program, some things that were not
17 included that were -- that should have been.
18 You inspected their -- their program for
19 their anhydrous ammonia pipe, and the inspection
20 revealed that -- that they didn't have a number of
21 things with respect to their baseline assessments.
22 And the risk factors required by

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1 regulations that were not addressed by enterprise
2 was the operator noted the following risk factors
3 were not addressed: The seam type, results of
4 previous assessments, defect type, and size that
5 the assessment method can detect a defect.
6 You gave us this plan and all of these
7 required pieces of it were missing.
8 Okay. So that was great. Somebody
9 actually looked at it, and they gave feedback.
10 But they missed one thing. They missed
11 leak history, and that wasn't part of their plan.
12 And so then, when we come back -- and we
13 have 20-20 hindsight. We're coming in after the
14 fact, something's already happened, we have plenty
15 of time to take a look at it. But we identify
16 here we missed another one.
17 With performance-based, it's incumbent
18 upon you to find the needle in the haystack, where
19 you've been tripped, where you can't find
20 something. And the operator has a lot of ability
21 to put forward information, and you all might not
22 have the resource -- 500 people for the whole

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1 country, that's not very many. That's ten open --
2 you know, ten people per state.
3 How can you look at all of those plans,
4 and how can you look over everyone's shoulders,
5 and how can you verify that everything they gave
6 you? You go ahead and check that that's right.
7 LINDA DAUGHERTY: You raised very good
8 points, and we are definitely well aware that it
9 is a challenge to get out to those facilities and
10 find problems.
11 I would go back and mention that it
12 is -- it is not the regulator's responsibility to
13 assure that operators comply. It is the
14 operator's responsibility to assure that they
15 comply.
16 We know that when we go out and do
17 inspections, we're going to do the most thorough
18 job we can, and we're going to look at every
19 issue.
20 But, we are limited on resources, and we
21 can only spend six weeks on an integrity
22 management review, and we may take a team of

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1 people. We may scour through records, but there's
2 some -- there's some familiarity we will not have.
3 Because we look at, you know, dozens, hundreds of
4 company plans, we will not know them as detailed
5 and in-depth as the company personnel.
6 But we do bring a couple of things. We
7 learned from national review, or in this case, the
8 state's review of plans. We look for triggers and
9 flags, and we're trained to find those areas. We
10 don't catch them all. I wish we would. We do
11 miss some.
12 But I think the important point is that
13 we have to train our personnel to look for those
14 flags. We have to work side-by-side with our
15 states, and share that information of how to look
16 forward.
17 You mentioned performance regulations,
18 and I would point to a recent study done on Deep
19 Water Horizon. And that study looked at what
20 could have been done a little bit better. And I
21 believe that the results of that study said, look,
22 performance-based regulations are where we may

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1 want to go. They validated the approach that we
2 are taking.
3 I sound repetitive, and I apologize, but
4 it's not easy. It's hard. But it's worth the
5 effort. If we can get the job done right, then
6 we'll be focusing our resources on the risks;
7 we'll be addressing threats to the infrastructure,
8 and therefore making the public safer.
9 CHAIRMAN HERSMAN: All right. And I see
10 Mr. Clark wants to comment.
11 But can I ask you both to comment on the
12 sanctions, when you actually identify through
13 performance-based plans, when you identify
14 deficiencies or defects?
15 What tools do you have to get it to a
16 point where you incentivize the operator to not
17 have those defects, so that you don't have to take
18 the comb through and find them?
19 Is it the cost of doing business?
20 Or they -- you know, is there a real
21 disincentive for them to have an error in their
22 plan?

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1 LINDA DAUGHERTY: I'll speak to that
2 first, simply because my mic is on.
3 On the federal side, we have a variety
4 of enforcement mechanisms. When we find that an
5 operator has not complied with our rule, we can
6 issue a warning to them, depending on the degree.
7 We can issue a notice of amendment, or
8 we can issue a civil penalty. The civil penalties
9 can be quite large. And depending on the severity
10 of the violation, we will use those. And we have
11 shown that we will do those. We've -- we're in
12 the multimillions of civil penalties.
13 That is not the preferable way. The
14 preferable way is for an industry to stand in
15 compliance. But we will take action if we find an
16 operator is endangering the public by not
17 complying with the rules.
18 Now, you would suggest also that, in the
19 administration's proposal, we have looked at
20 raising our civil penalty limits such that we can
21 have an even stronger bite if somebody does
22 something wrong.

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1 Now, I will also mention something else.
2 You refer to whether an operator's incentive is to
3 comply or not to comply. That isn't a choice.
4 And if we ever find an operator that is
5 deliberately or intentionally not complying with
6 the regulations, we will turn them over to the
7 Inspector General or to the Department of Justice
8 for criminal enforcement.
9 RICHARD CLARK: One of the benefits of
10 participating in an NTSB hearing is the quality of
11 the questions that are asked us of, I must say.
12 Being a regulator, it's difficult to
13 stand on the outside and look inside what's going
14 on in an operation. So our first -- my first
15 direction to my people is that, I don't want them
16 to be on the outside looking in; I want them to be
17 on the inside looking around.
18 But even being on the inside looking
19 around, you can't know everything that the
20 operator knows. And if there is an expectation
21 that we achieve that, then that's an unrealistic
22 expectation.

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1 As far as performance-based regulation,
2 it's not only difficult to judge whether
3 performance has been achieved in the manner that
4 you want it to be achieved, but it's also very
5 difficult to enforce performance-based
6 regulations, because the case that you have to
7 bring to bear becomes quite complex. It's nuanced
8 in terms of whether or not there has been a
9 violation of one order or another and whether that
10 order of magnitude or that violation requires a
11 penalty to be assessed.
12 It does not mean that it cannot be done,
13 by any stretch of the imagination. It's just
14 more -- it's just easier when you have a linear
15 violation of -- of a prescriptive statute.
16 So, what we do, in terms of attempting
17 to address these sorts of issues, is that we take
18 a systems approach to safety, just as PHMSA does.
19 And we -- we look at -- so, here's the -- the
20 vision for my organization, and -- our
21 organization, I should say, not my organization --
22 and the culture that we try to develop within our

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1 organization. And that is, first of all, we have
2 to be experts in our field.
3 We have to know the rules; we have to
4 know the laws, we have to know as much as we can
5 about those that we are regulating and what
6 their -- what their incentives are, where it is
7 they're trying to go, all the different elements
8 of a system that you have to understand in order
9 to know where an organization is headed and how
10 they're trying to get there.
11 The second thing is that we have to be
12 objective. We can't bring emotion and personal
13 perspective. We have to -- we have to be critical
14 in our thinking. When we see something, we have
15 to go beyond, if it's written down on a piece of
16 paper, whether or not we then look and verify --
17 "trust and verify" as you aptly said.
18 And then you have to continuously
19 improve the system. And that means improving the
20 rules. And it also means taking enforcement
21 action when the time has come that you take
22 enforcement action.

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1 And so, part of my role is essentially
2 to act as a district attorney in terms of trying
3 to figure out when it is that it's time to -- to
4 bring an enforcement action.
5 And you know, you make mistakes in that
6 regard sometimes, but for the most part, when we
7 get to the point where we're not getting
8 compliance with the corrective action plans that
9 have been given to us by the utilities, and we
10 say, okay, this is applying a corrective action
11 plan, and we're not getting it, or we feel that
12 the utilities are misrepresenting the facts, then
13 we will absolutely take enforcement actions in
14 that regard.
15 It's important to have a just safety
16 culture also, which is important in terms of being
17 a regulator, a just regulator.
18 One of the problems with prescriptive --
19 the enforcement of prescriptive regulations is
20 that many times it becomes a "gotcha" game. We
21 don't want to have a "gotcha" conversation when it
22 comes to the safety of the natural gas system in

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1 the state of California.
2 We want to have a conversation about,
3 where are you going? How do you plan to get
4 there? Do we agree with where you're going? And
5 how you plan to get there? And are you making
6 good progress in that regard?
7 The commission, I believe, is moving in
8 the direction of taking a broader and deeper look
9 at that regulatory scheme, and the balance between
10 prescriptive regulation and performance-based
11 regulation, and free thinking, which gives us just
12 another insight into -- actually, a deep insight
13 into what's going on on the inside.
14 Because when you start looking at the
15 money and where it's going and what the priorities
16 are, then you're there.
17 CHAIRMAN HERSMAN: Do you want to add
18 anything, Mr. Metro?
19 PAUL METRO: Your assessment is accurate
20 about the 500 inspectors across the nation. For
21 every new state inspector, we would add 100
22 inspection days, which is a tremendous statistic

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1 that -- that would add additional safety measures
2 for the states.
3 Congress has authorized the states to
4 receive up to 80 percent funding, but they've
5 never appropriated that amount. We've been
6 booking at about 60 percent appropriation. It
7 could be less, could be more. We don't know until
8 this coming year.
9 The other point you brought up is
10 training. Training -- we only have one training
11 facility in the United States. It's in Oklahoma
12 City, Oklahoma. And that's for all 500 engineers
13 and inspectors. We need more training across the
14 nation, and more trainers.
15 CHAIRMAN HERSMAN: Thank you all very
16 much.
17 This has been a great panel; we've got a
18 lot of good information to talk about as we go
19 forward with our analysis and our report
20 preparation. We very much appreciate your
21 service, and your frank and candid answers to our
22 questions.

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1 I understand we do have one witness that
2 the tech panel would like to recall from
3 yesterday. Ms. Ward, we'll excuse this fourth
4 panel and recall a witness.
5 HEARING OFFICER WARD: Yes, Madam
6 Chairman. We'd like to recall Mr. Bob Fassett.
7 CHAIRMAN HERSMAN: Ms. Ward, he was
8 already sworn yesterday, so you don't need to do
9 it again; correct?
10 Mr. Budinski, did you have some
11 questions for Mr. Fassett?
12 BOB FASSETT,
13 previously sworn upon his oath
14 as a witness in this case
15 testified as follows:
16 MIKE BUDINSKI: I wanted to revisit our
17 integrity management session from yesterday's
18 session 2, just looking for a little more clarity.
19 And also I think I might set the stage for session
20 5 tomorrow.
21 I'd like to know a little bit more
22 about, if you could indicate the specific threats

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1 identified for line 132, section 180, as you knew
2 them before the accident.
3 BOB FASSETT: I don't recall
4 specifically. I believe, though, Mrs. Perraulta
5 mentioned that in the morning, and I referenced it
6 in response to Mr. Wiese yesterday afternoon.
7 But there was an inter -- an interacting
8 threat between corrosion and the outside force
9 associated with the fact that it's crossing --
10 that it's in a seismic area and it's an older
11 line.
12 MIKE BUDINSKI: So those -- so mainly
13 that's two threats, really, that you were
14 inspecting for; is that correct?
15 BOB FASSETT: That's correct.
16 MIKE BUDINSKI: And how did you arrive
17 at this list? And what was the criteria that you
18 used to establish those threats?
19 BOB FASSETT: It's through -- well, it's
20 through our risk assessment procedures established
21 in RNP6 that we discussed yesterday.
22 MIKE BUDINSKI: Okay. And how were they

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1 inspected, specifically?
2 BOB FASSETT: You mean the actual
3 inspections associated with the line --
4 MIKE BUDINSKI: Yeah, for those --
5 BOB FASSETT: -- was used to evaluate
6 the corrosion aspect of it, and we monitored to
7 determine if there was any outside force, any line
8 movement.
9 I believe we have records. I don't
10 recall if they were provided as an exhibit to a DR
11 or not, but we have records to show that there was
12 no outside force on that pipe.
13 MIKE BUDINSKI: Okay. Thank you.
14 That's all for my questions.
15 CHAIRMAN HERSMAN: Just to make sure
16 everyone else has an opportunity, did anyone else
17 want to follow up?
18 Seeing no requests, follow-up from the
19 members of the Board of Inquiry?
20 No. Thank you very much, Mr. Fassett,
21 for being able to come back.
22 And this concludes our deliberations for

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1 the day, and we will reconvene tomorrow morning at
2 9:00 o'clock to consider the testimony from the
3 final panel.
4 We're adjourned.
5
6 (HEARING CONCLUDED FOR THE DAY
7 AT 4:19 P.M.,
8 ON WEDNESDAY, MARCH 2, 2011)
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1 REPORTER'S CERTIFICATE
2
3 I, LORI BUCKNER, Registered Professional
4 Reporter and Certified Realtime Reporter,
5 California CSR # 13023, certify that I was
6 authorized to and did stenographically report the
7 above proceedings in the matter of
8 NTSB HEARING, DAY 2, MARCH 2, 2011; that the
9 transcript is a true and complete record of my
10 stenographic notes, with the caveat that I could
11 not see many of the parties speaking and the
12 speaker names are not always certain, and names
13 that were not spelled and not found in documents
14 may be phonetic.
15 I further certify that I am not a relative,
16 employee, attorney or counsel of any of the
17 parties, nor am I a relative or employee of any of
18 the parties' attorneys or counsel connected with
19 the action to my knowledge, nor am I financially
20 interested in the action.
21
22

1 Dated this 2nd day of March, 2011.

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