

**PACIFIC GAS AND ELECTRIC COMPANY
San Bruno Explosion and Fire Oil
Investigation 12-01-007
Data Request**

Recipient:	Consumer Protection and Safety Division	
PG&E Data Request No.:	PGE-CPSD_004	
PG&E File Name:	SanBrunoExplosion-FireOil_DR_PGE_CPSD004!	
Request Date:	March 30, 2012	
Due Date:	April 13, 2012	

- Q 1: Please identify the integrity management programs, other than PG&E's, that the contributor(s) to the integrity management section (Section V.) of the CPSD Report has/have audited or reviewed.
- Q 2: Referring to page 25 of 171, please identify the integrity management requirements that were effective and in force as of December 17, 2002.
- Q 3: Referring to page 30 of 171, please state whether the CPUC's Transmission Integrity Management Program audit protocol, as it existed in 2005 and 2010, required the CPUC to review an operator's data gathering process. Please provide a copy of the CPUC's integrity management audit protocol for each year from 2005 through 2011, inclusive.
- Q 4: Referring to page 30 of 171, please explain the relationship between the use of improper default values for pipe SMYS and consideration of manufacturing threats in an integrity management program.
- Q 5: Referring to page 31 of 171, please state whether an operator's use of default pipe specification values (in the place of missing or uncertain data) that conservatively reflect the values of pipeline materials purchased by the operator at the time of installation of the segment in question is consistent with ASME B31.8S. If not, please explain in detail why not.
- Q 6: Please identify and provide copies of all documents and information that support the statement on page 33 of 171 referring to a longitudinal seam defect in DSAW pipe found on Line 132 in 1992.
- Q 7: Referring to pages 33-34 of 171, please state whether wedding bands, miter joints, and construction defects on girth welds are considered manufacturing threats under integrity management regulations and/or ASME B31.8S.
- Q 8: Identify and provide copies of all documents reviewed, and any other information, that support the statement on page 34 of 171 that a wedding band joint is not as strong as a full penetration butt weld.

- Q 9: Referring to page 43 of 171, please identify and provide copies of all regulations, interpretations, and/or other guidance documents from the CPUC or PHMSA that relate to or define the “actual HCA identification date.”
- Q 10: Referring to page 43 of 171, please identify all pages of CPUC_197-Q01Atch01 that support CPSD’s contention that PG&E identified segments 180 and 181 as high consequence areas prior to December 2003.
- Q 11: Referring to pages 44-45 of 171 and CFR 192.917(e)(3), please explain in detail the CPSD’s methodology for determining “the baseline MOP value for the specific segments being considered” and provide citation and copies of all regulations, interpretations and/or other guidance documents from the CPUC or PHMSA that support CPSD’s methodology.
- Q 12: Referring to page 46 of 171, please state whether the age of a pipe is considered when determining whether the pipe is subject to a manufacturing threat under integrity management regulations.
- Q 13: Referring to page 47 of 171, please state whether the mill hydrotesting process described by the Moody Engineering Report would render stable manufacturing threats introduced by the Berkeley Welding Unit process. If CPSD’s answer is anything but an unqualified yes, please explain in detail the basis for CPSD’s response and provide all documents that support it.
- Q 14: Referring to page 47 of 171, please identify and provide copies of all documents and other information that support CPSD’s contention that PG&E would have discovered Segment 180 to be DSAW pipe had it conducted a hydrotest on Segment 181.
- Q 15: Referring to pages 50-51 of 171, please explain how other natural gas pipeline operators incorporate cyclic fatigue into their integrity management programs. Please provide supporting documents.
- Q 16: Referring to pages 50-51 of 171, please identify and provide copies of all regulations, interpretations, and other guidance documents issued by the CPUC or PHMSA regarding incorporating cyclic fatigue into an integrity management program.
- Q 17: Please provide copies of all documents that discuss the incorporation of cyclic fatigue into integrity management from CPUC integrity management audits of other gas pipeline operators.
- Q 18: Referring to page 55 of 171, please identify and provide copies of all regulations, interpretations, and other guidance documents that support CPSD’s assertion that documentation is required “for the methods and procedures used in the risk algorithms, especially where assumptions are made that appear to be non-conservative.”

- Q 19: Please describe CPSD's understanding of the difference between threat identification and risk analysis, and provide all documents that support CPSD's understanding.
- Q 20: Referring to pages 57-59 of 171, identify and provide copies of all documents and other information that support CPSD's assertion that PG&E should adjust its risk analysis formulas in RMP-01, RMP-02, RMP-03, and RMP-05.
- Q 21: Identify and provide copies of all documents and other information that support CPSD's statement on page 59 of 171 that PG&E should have considered DSAW pipe to have a manufacturing threat.
- Q 22: Please identify and provide copies of all regulations, interpretations, and/or other guidance from CPUC or PHMSA stating that DSAW pipe has or should be deemed to have a manufacturing threat.
- Q 23: Referring to pages 59-60 of 171, please identify and provide copies of all regulations, requirements, and/or other guidance documents that instruct an operator to conduct a physical examination of pipe segments adjacent to segments that are to be hydrotested.