From:	Shori, Sunil
Sent:	4/2/2012 10:29:03 AM
To:	Ramaiya, Shilpa R (/o=PG&E/ou=Corporate/cn=Recipients/cn=SRRd)
Cc:	Singh, Sumeet (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=S1ST56905772)
Bcc:	
Subject:	NTSB_027-001

Shilpa,

As we discussed during our March 13th teleconference, GSRB requests that PG&E provide the following:

1) Confirmation that at the time PG&E provided its response to NTSB_027-001, the company had confirmed that no transmission line segments throughout its entire system were operating above 72% SMYS in any class location, or above 60% of SMYS in any Class 3 location, for any segment in PG&E's transmission pipeline system.

2) From among all the segments for which PG&E's MAOP validation process, or other activities intended to accurately confirm pipeline and component specifications of pipeline facilities, has PG&E discovered any segment, component and/or pipeline facility that, at the MAOP or MOP established on September 10, 2010 for that segment, component or pipeline facility, would have subjected that component or pipeline facility to a hoop stress greater than 72% of SMYS?

3) Within PG&E's June 20, 2011 Data Response, Chapter 6C, sub-index 8, file P3-21016, there are multiple locations (i.e., pages 15, 17, 24, 43, etc.) where a segment is shown as operating at a %SMYS value, at the noted MOP, that exceeds 72%. Some of the data fields related to this (i.e., diameter, pressure, etc.) are shown as possibly being assumed conservative values (i.e., values denoted with a "-" label per PG&E's convention). However, on Page 60, Line 131-DREG 4718, is shown as having an operating SMYS of 61.2% SMYS and Line 132- Segment 106.5, is shown as having an operating SMYS of 51.8% SMYS. Both of these are in Class 3 locations and as such could never exceed 60% SMYS and in the case of Line 132 segment installed in 1995, could not exceed 50% SMYS. Both of these entries are <u>not</u> preceded by any conservative assumptions; therefore, how is that PG&E

operated these segments at pressures which exceeded 50% SMYS?

We request PG&E review the entire File P3-21016 and for every pipeline segment included in this file operating over 72% SMYS, and every pipeline segment that exceeds the highest %SMYS that the given segment could legally operate at based on the MOP and/or the MAOP shown for the segment in the June 2011 filing, PG&E must explain how the %SMYS values comply with regulations. For all segments included in the file where MAOP validation results have replaced assumptions with verified, actual, information, please provide details related to what the new data is vs. what the assumptions were, and what the %SMYS is based on validated data vs. what it was for the assumed data.

Please let me know if there are any questions related to this request.

Thanks, Shilpa.

Sunil Shori