

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

Recipient:	CCSF		
PG&E Data Request No.:	PGE-CCSF_001		
PG&E File Name:	SanBrunoExplosion-FireOil_DR_PGE_CCSF001		
Request Date:	May 21, 2012		
Due Date:	June 1, 2012		

- Q 1: Regarding page 4 (A9), please identify all documents, including any regulatory guidance, that support your contention that PG&E's use of notarized statements for establishing pressure under the grandfather clause is an abuse of the regulation.
- Q 2: Regarding page 5 (A11 and A12), please identify all documents, including regulations, regulatory guidance, consensus industry standards, or other industry guidance that support your contention that the leak identified in the March 1, 1989 TES memorandum constitutes a failure under TIMP regulations.
- Q 3: Please explain in detail the significance of identifying an unstable construction threat on transmission pipeline. Please provide copies of all documents, including regulations, regulatory guidance, consensus industry standards, or other industry guidance that form the basis of your explanation.
- Q 4: Regarding page 8 (A16), please identify all documents, including regulations, regulatory guidance, consensus industry standards, or other industry guidance that support your contention that pressure tests may be used to assess the stability of construction threats.
- Q 5: Regarding page 10 (A22), please identify and provide copies of any documents not already identified in your answer which are being referred to in your statement, "I have reviewed records of pipe seam inspection and of welding defects that are available in the records keeping investigation."
- Q 6: Regarding page 13 (A23), please state whether the identification of incomplete root penetration on Line 109 requires PG&E to conduct pressure testing on all high consequence area steel transmission pipeline that is over 50 years old. If your answer is anything other than an unqualified no, please identify all documents, including regulations, regulatory guidance, consensus industry standards, or other industry guidance that support your statement.
- Q 7: Please state your belief as to the effective date of 49 CFR 192.917.
- Q 8: Regarding to pages 17 and 18, please identify all documents, including regulations, regulatory guidance, consensus industry standards, or other

industry guidance that support your claim that “failure due solely to cyclic fatigue is rare[.]”

- Q 9: Regarding pages 17 and 18, please identify all documents, including regulations, regulatory guidance, consensus industry standard, or other industry guidance that support your statements regarding the steps pipeline operators must take to adequately consider the threat of cyclic fatigue on its pipelines.
- Q 10: Referring to page 20, please state all facts and identify all documents that support your statement that “PG&E admits that it did not monitor its pressure history prior to 2008.”