

From: Cherry, Brian K  
Sent: 5/10/2012 3:05:42 PM  
To: Clanon, Paul (paul.clanon@cpuc.ca.gov) (paul.clanon@cpuc.ca.gov)  
Cc:  
Bcc:  
Subject: FW: PHMSA Advisory Bulletin ADB 2012-06, Verification of MAOP Records  
These guys still are behind California....

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**From:** Yee, Frances  
**Sent:** Thursday, May 10, 2012 3:05 PM  
**To:** Gas Ops EVP Direct Reports; Gas Ops S&P Direct Rpts; Medina, Joe A; [Redacted]  
[Redacted] [Redacted] Wilson, Michelle (Law); Jordan, Lise (Law); Garber, Stephen (Law); [Redacted]  
[Redacted] Cherry, Brian K; Horner, Trina; Ramaiya, Shilpa R; Doll,  
Laura  
**Cc:** GT&D GE Regulatory Support & Analysis  
**Subject:** PHMSA Advisory Bulletin ADB 2012-06, Verification of MAOP Records

All,

On May 7, PHMSA issued Advisory Bulletin ADB-2012-06 regarding records verification for establishing MAOP for gas transmission pipeline. Beginning in 2013, PHMSA intends to require operators to submit data regarding verification of records in Class 3 and Class 4 locations and in Class 1 and Class 2 locations in High Consequence Areas (HCAs) via the Gas Transmission and Gathering Systems Annual Report. This information will then be used by PHMSA to develop additional guidance and/or rulemakings with regard to: (1) how operators will be required to bring their gas and liquid pipelines without verifiable records into compliance for the entire mileage of the pipeline; (2) how operators will be required to reestablish MAOP; and (3) whether to eliminate the grandfather clause under 192.619.

To access the advisory bulletin, click on the link below:

<http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Pipeline/Regulations/Advisc12-06.pdf>

On April 27, INGAA hosted a Webinar on PHMSA's proposed changes to the annual reports. The presentation is attached below.

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Gas Operations Regulatory Compliance will set up a meeting to discuss how this advisory bulletin impacts us and the status of our MAOP records validation process. At this time, it is not clear if PHMSA's intent is to have gas operators provide the MAOP records information beginning with the March 15, 2013 annual transmission

report for calendar year 2012. Regulatory Compliance will continue to find more clarification on the timeline.

Let me know if you have any questions. Thanks!

Frances Yee

Gas Operations | Standards & Policies

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