

**PACIFIC GAS AND ELECTRIC COMPANY
Gas Pipeline Safety OIR
Rulemaking 11-02-019
Data Response**

PG&E Data Request No.:	LocalUnions246-342_003-08		
PG&E File Name:	GasPipelineSafetyOIR_DR_LocalUnions246-342_003-Q08		
Request Date:	January 17, 2012	Requester DR No.:	003
Date Sent:	January 27, 2012	Requesting Party:	Plumbers/Pipe Fitters/Steamfitters Local Unions 246/342
PG&E Witness:	Todd Hogenson	Requester:	Sarah Grossman-Swenson

QUESTION 8

In the Implementation Plan, Table 2, Line 175, the Order Description states “Post Strength Test Emergency Replacements.” Please describe what is included in this description and line item, including, but not limited to:

- a. How many segments are anticipated to be replaced?
- b. What is the length of each segment to be replaced in this line item?
- c. Please describe the basis upon which these cost figures are derived.

ANSWER 8

Please see Chapter 3 workpaper WP 3-559 for further details of this response.

- a. It is unknown at this time how many segments are anticipated to be replaced because of the uncertainty around which pipe segments may fail during hydrotesting. Instead, it is an aggregate of anticipated pipe segment replacements totaling 2 miles per year. Please see the Project Summary Workpaper (WP 3-559) under the heading entitled, “Description.”
- b. Unknown. See response to part (a).
- c. As shown in Table 7-4 (page 7-34) in Chapter 7 of the Pipeline Safety Enhancement Plan (PSEP) direct testimony (see Errata to Prepared Testimony served January 20, 2012), it was PG&E’s engineering judgment that derived a 1% hydrotest failure rate¹, yielding approximately 2 miles of emergency pipe replacements per year. The project length and estimated cost per year is an engineering judgment based on the

¹ Table 7-4 is an engineering estimation of the frequency of failures PG&E could expect. Workpaper 3-559 is an engineering estimation of the total mileage of failed pipe PG&E could expect to replace in an expedited or emergency fashion.

variability in hydrotest failures per year requiring pipe replacement, the frequency and locations of the failures, pipe diameters, permitting requirements, and all other unknowns regarding an emergency pipe replacement.