

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

PG&E Data Request No.:	LocalUnions246-342_003-09		
PG&E File Name:	GasPipelineSafetyOIR_DR_LocalUnions246-342_003-Q09		
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 9

In Table 2, Capital Expenditures by Maintenance Activity Type (MAT) of PG&E's Implementation Plan, 6 pipeline segments are listed for Upgrade in Phase 1 at lines 178-183. The Order Description then describes these segments in line 184 as "Total MAT 2H4 – Imp Plan ILI Pipeline Retrofit." For each of the segments listed, please provide the following, using ordinary language in your explanations:

- a. Please explain the "order description" in ordinary language, including the length of each segment to be replaced;
- b. Please describe the location of the segment to be replaced, by county and city or town; for those segments located outside a city or town, please describe the nearest geographical location, the distance of the segment to the geographic location, and the county;
- c. What criteria from the decision tree were in fact utilized for the segment, and how did the criteria cause the segment to be placed on the Phase I priority list?
- d. What did PG&E do to determine the length of the segment to be replaced?
- e. Please state whether testing was performed to identify the length of the segment to be replaced; if testing was performed, please describe it;
- f. Will the work be performed by an independent contractor, by PG&E's employees, or by a combination of the two? If it will be done by a combination of the two, how will work responsibilities be allocated between them?

ANSWER 9

Each line number and specific project within Table 2 of the Updated Workpapers Supporting Chapter 3, Pipeline Modernization Program (WP 3-3 through WP 3-6), includes a reference to a Project Workpaper (see column titled "Workpaper Reference")

and Location Map (see column titled “Map Reference”) for the 6 separate In-Line Inspection (ILI) projects. For example, Line No. 178, “L-131 MP 50.5-57.4 UPGRADE PH-1”, includes a workpaper Reference of WP 3-560 and a Map Reference of WP 3-747. Each project has 3 to 4 pages of supporting workpapers. Page 1 (“Project Summary”) includes a project description, financial expenditures, project length by diameter, project footage by classification, and justification. Page 2 contains the “Project Cost” estimate summary sheet. Page 3 is a “Project Detail Worksheet”.

- a. The projects “Order Description” in ordinary language is located on the respective Project Summary workpaper under the heading entitled, “Description”.
- b. Please see project specific workpaper and map.
- c. One of goals of the PG&E Pipeline Safety Enhancement Plan (PSEP) is to upgrade and inspect all pipelines operating at or in excess of 30% Specified Minimum Yield Strength (SMYS) for safe reliable passage of internal inspection devices (see direct testimony of Chapter 3 at page 3-2). In the ILI discussion starting on page 3-26, PG&E explains that although the majority of the ILI work that will be conducted in Phase 2, PG&E has identified 199 miles of retrofit work and 234 miles of ILI runs in Phase 1. The prioritization and scheduling of these segments in Phase 1 are consistent with the Work Prioritization and Scheduling scheme discussed in testimony starting on page 3-33.
- d. Each ILI project proposes pipeline upgrades consisting of ILI pig launcher and receivers, mainline valve, pipe fitting and select pipeline segment replacements where necessary, to accommodate the future use of ILI tools. These projects do not include funding for significant pipeline segment replacements; pipeline replacement lengths were not quantified. The full scope of pipeline upgrades (replacements, removals, or additions) to accommodate the planned ILI devices cannot be confirmed until the project engineering and Pipeline Features Lists have been completed for each respective project.
- e. No testing was performed to determine the scope of these ILI projects. A thorough review of all construction records by an experienced engineer will determine the locations and length of necessary pipe replacement, removal, or addition to accommodate future ILI devices.
- f. Project engineering, permitting, and construction will be performed with a combination of both PG&E resources and independent Contractors. PG&E will be responsible for defining the scope, schedule, and cost for each project. Project construction strategy, performed by either PG&E General Construction or Contractor, will be determined by the PG&E project construction execution team on a project by project basis.