

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

PG&E Data Request No.:	LocalUnions246-342_003-11		
PG&E File Name:	GasPipelineSafetyOIR_DR_LocalUnions246-342_003-Q11		
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 11

In the Implementation Plan, at page 18, PG&E states that it plans to strength test 783 miles of pipeline in Phase I. At page 19, PG&E states that it plans to strength test 1700 miles of pipeline in Phase II. Additionally, at page 19, PG&E states that it plans to replace 186 miles of pipeline in Phase I. How many miles of pipeline in PG&E's system does that leave untested or unreplaced? Why are these miles of pipelines left untested or unreplaced?

ANSWER 11

Chapter 2 of PG&E's Pipeline Safety Enhancement Plan (PSEP) reports that PG&E operates 5,786 miles of DOT defined gas transmission and gas gathering pipelines. Using PG&E's Geographic Information System (GIS) data, we believe approximately 3,800 miles of gas transmission pipe segments have been pressure tested. PG&E's MAOP Validation Project (Chapter 5) will retrieve and review job records searching for pressure test records and confirming which pressure test records are accurate, complete and verifiable. Pipelines with complete pressure test records to modern standards will not require re-testing per CPUC Decision 11-06-017.

PG&E estimates that approximately 2,000 pipeline segment miles (5,786-3,800) will require pressure testing or replacement based on GIS data. This figure is lower than the 2,483 miles (783+1700) forecasted to be pressure tested as indicated in the Implementation Plan and in direct testimony because PG&E will re-test select pipeline segments during strength testing for project efficiency, gas operations and permitting requirements. These mileage figures will continue to be refined though the MAOP Validation Project and the development of the PSEP Phase 2 scope.

At the completion of Phase 2, all DOT transmission pipeline segments without complete records of a pressure test to modern standards will either be strength tested, or replaced.