

From: Redacted
Sent: 10/8/2012 8:01:23 AM
To: Shori, Sunil (sunil.shori@cpuc.ca.gov) (sunil.shori@cpuc.ca.gov)
Cc:
Bcc:
Subject: Line 300B Pressure Restoration

Sunil

I should have the summary of the Line 300B pressure testing / bridge replacement options environmental review to you by this afternoon. However, I continue to believe that while we would have wanted to pressure test the bridge crossing, it is not required by either the Clanon letter or the CPUC decision.

Executive Director Clanon's letter of February 2, 2011 directed that PG&E reduce pressure on any pipeline that had experienced a pressure excursion in excess of 110% within an HCA. Subsequently, CPUC Decision 11-09-006 (issued September 13, 2011) directing the steps that PG&E had to take to restore pressure. That Decision clearly distinguish between the steps to be taken in HCA and non-HCAs directing that, for HCAs, PG&E had to submit hydrotest records (Ordering Paragraph 4D), while for non-HCA segments, PG&E was to submit MAOP validation records (Ordering Paragraph 4E).

The Topock station is an HCA but the bridge is not. While PG&E had considered pressure testing the bridge portion of the pipeline, independent engineering analysis concluded that testing the bridge pipeline with water could compromise the suspension bridge and testing with inert gas would be unsafe. However, I believe that the Supporting Information submitted for our Line 300B pressure restoration application fully complies with D.11-09-006.

In this case, we considered 10 options, from pressure testing (hydro or gas) on the existing suspension bridge, to installing new pipe on the existing highway bridge or arch bridge, to boring under the river. Since we were considering so many options (and since we did not want to get environmental agencies or the local media involved before we had advised the CPUC) we relied on regulatory and environmental experts with experience in the area to help us develop permit timelines. Again, I expect to send you the environmental permit review this afternoon.

In the meantime, if you have any questions about the Clanon letter or D.11-09-006, please call me.

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