From: Redacted

Sent: 10/16/2012 5:10:43 PM

To: sunil.shori@cpuc.ca.gov (sunil.shori@cpuc.ca.gov)

Cc: Johnson, Kirk (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=MKJ2); Lewis IV, Charles (Law) (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=CRL2); Ramaiya, Shilpa R (/o=PG&E/ou=Corporate/cn=Recipients/cn=SRRd); Vallejo, Alejandro (Law) (/o=PG&E/ou=Corporate/cn=Recipients/cn=AXVU); Horner, Trina (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=TNHC); Malkin, Joseph M. (jmalkin@orrick.com) (jmalkin@orrick.com)

Bcc:

Subject: Line 300B Suspension Bridge Pressure Test

Sunil,

Last month PG&E filed a motion to restore 660 psig pressure to Line 300B between the Redacted and the Topock Compressor Station pursuant to CPUC Decision 11-09-006. Consistent with Ordering Paragraph 4 of that decision, PG&E submitted Supporting Information including complete hydrostatic pressure test results for that portion of the line in the High Consequence Area (HCA) from the station to the expansion joint at the base of the suspension bridge (OP 4D) and MAOP validation records for the non-High Consequence Area segment over the suspension bridge itself. As explained, PG&E did not pressure test that portion of Line 300B over the Colorado River because independent engineers had advised that such testing could compromise the bridge and threaten public safety. However, while PG&E did not pressure test the suspension bridge section of the line this year, this section of line was previously pressure tested immediately following construction in 1957. The purpose of this note is to describe that 1957 test.

As you know, Line 300B was built from the El Paso Natural Gas Company (EPNG) Topock Metering Station, across the Redacted to PG&E's Topock Compressor Station in 1956. (See Attachment 1, map of Topock Area El Paso to PG&E and SCG Co.) Thereafter, EPNG and PG&E conducted a series of pressure tests to Line 300B (known as Line 1113 in the EPNG system) which are detailed in the 1974 memo and attachments from J.W. Rowland of EPNG (Attachment 2) including: a hydrostatic test on the upstream (Arizona) side of the suspension bridge (February 10, 1957) and a gas test from the EPNG Metering Station east to the Franconia Jet (February 11, 1957).

Of particular relevance to the present PG&E pressure restoration motion was the gas pressure

test conducted on March 1, 1957 from Valve 15 in the EPNG Metering Station, through the Redacted crossing on Line 1113 (Line 300B) to the Valve 0.45B near the PG&E Compressor Station. (See Attachment 3, the annotated Topock Area El Paso to PG&E and SCG Co. map showing the location of the valves.) As stated in the 1974 memo, "The [Line 1113/300B pressure] test was to a minimum pressure of 880 psig for a period of 24 hour in March, 1957."

The 880 psig pressure test included the pipeline section over the Redacted suspension bridge. This pressure test was more than 130% of the standard 660 psig MAOP for this line. More significantly, the pressure test was more than 120% of the February 1, 2011 pressure exceedance. This would demonstrate that the brief 727 psig event would not over-stress the line.

In addition to the 1957 test, a factory hydrotest of the pipe on the L300B suspension bridge was conducted at 1215 psi. (See Attachment 4).

More importantly, however, we continue to believe that CPUC D. 11-09-006 clearly distinguishes between pressure restoration Supporting Information requirements for HCA and non-HCA pipelines, requiring pressure test results in HCAs (OP 4D) and MAOP validation records in non-HCAs (OP 4E). PG&E's Line 300B pressure restoration motion complies with these requirements. Nevertheless, we include the above referenced 880 psig gas pressure test information to confirm that the Colorado River suspension bridge portion of Line 300B (EPNG Line 1113) was pressure tested in 1957.

Redacted

Regulatory Affairs

Redacted