PSEP Update Application Requirements

The following is PG&E's proposal for its PSEP Update filing application which incorporates comments made at the 3/26/13 workshop from DRA, TURN, CPUC ED and SED. Please refer to the original Power Point slide deck entitled, "PG&E Pipeline Safety Enhancement Plan (PSE-P) Expedited Application Workshop" circulated to the service list for additional detail.

PG&E's Update Application will include specific items below:

- Updated PSEP Project Workpapers, Table 3-1 (Capital Expenditures and Expenses by Maintenance Activity Type (MAT)), Table 3-2 (Capital Expenditures by Maintenance Activity Type(MAT)), Table 3-3 (Expenses by Maintenance Activity (MAT)).
- Each table will list every PSEP proposed project, length, original cost estimate.
- PG&E will identify the PSEP action for each project following MAOP records validation. (e.g. Test, Replace, defer to Phase 2, No Action).
- PG&E will identify the change in project length, if any.
- PG&E will provide updated Workpapers for each pipeline replacement and pressure testing project (Project Summary, Project Cost, list of pipe segments) that results in a requested cost recovery from the ratepayer. Project location maps will not be updated or provided.
- PG&E will update project cost responsibility (ratepayer & shareholder) based on CPUC Decision 12-12-030.
- Updated Tables for Revenue Requirements, Cost Allocation and Rates for Phase 1 resulting from validation per CPUC decision.
- PG&E will provide a process for stakeholders to have access to the Pipeline component level Records database to view the MAOP source documents at a PG&E facility, most likely in San Ramon.
- High level explanations of:
 - 1. New work that was not identified in the original filing that is proposed in update as "Other High Priority Projects"
 - 2. Work that has dropped out of original filing due to records validation
 - 3. Work that would drop out based on decision criteria (i.e., valid test pressure found) but is being kept in Phase 1
 - 4. Work that has already been done that would otherwise drop out based on updated data, e.g., replacement
- An updated PSEP database (electronic file) showing original data fields used in development of the PSEP Filing, plus <u>additional</u> columns that will show validated:

D ' 1' (
Pipe diameter
Yield strength
Wall thickness
Installation Date
Joint efficiency factor
Seam Type
Joint Type
HCA Status
Class location
% SMYS
Segment Length
Test Date
Test Medium
Test Witness
Test Pressure
Met Testing Requirement at time of
install
Met 49 CFR, Subpart J Test
Requirements
Met PSEP Criteria
Decision Tree Outcome
Phase Deviation
Project Type
MAOP for Pipeline

- The following detail will be also be provided for these additional columns:
 - 1. Operative Date: Include a field for "Operative Date", which represents the date that the PSEP project construction has been completed and pipe segments (old/new) were placed back into Operation. For past dates, give month as well as year, for work not yet complete provide year and approximate month.
 - 2. MAOP: Add a field for MAOP at time of test? (Decision pending) PG&E does not believe this information is required to support the Application. Sunil Shori/Tom Roberts to discuss further.
 - 3. Met Testing Requirements at time of install: For each time period, what is a complete test record, i.e., which test record elements are needed (include logic formulas).
 - 4. Met 49 CFR, Subpart J Requirements: Does the test records meet 49 CFR Subpart J requirements (test pressure, media, duration, witness). This allows a comparison between different testing requirements.
 - 5. Phase Deviation: explain the criteria in which a phase deviation is flagged-provide the list of 20+ codes that PG&E uses to define when an action is taken that is different than the PSEP Decision tree.
- Deliverables prior to filing :
 - 1. QA/QC documentation of the MAOP and records verification and validation process to TURN, DRA within 10 business days (4/9/2013)
 - 2. Current document(s) explaining Phase deviation codes to TURN, DRA within 10 business days

- 3. Provide a preview of a new segment level spreadsheet to TURN, DRA within 10 business days
- 4. Provide a preview of revised project level tables original project length, original proposed cost, total approved costs, CPUC identified ratepayer cost from the D. 12-12-030) and updated data with updated project length and updated project cost responsibility (ratepayer & shareholder) based on CPUC Decision 12-12-030.