

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

PG&E Data Request No.:	DRA_001-01		
PG&E File Name:	PSEP-Update_DR_DRA_001-Q01		
Request Date:	May 3, 2013	Requester DR No.:	DRA-TCR-1
Date Sent:	May 17, 2013	Requesting Party:	Division of Ratepayer Advocates
PG&E Witness:	Joe Medina	Requester:	Tom Roberts

SUBJECT: PG&E's PROPOSAL FOR UPDATED APPLICATION

QUESTION 1

Provide all PG&E management approved procedures used to ensure the MAOP validation process results in accurate and complete pipeline data for use in the PSEP update application.

ANSWER 1

Certain attachments to this response have been marked CONFIDENTIAL and are submitted pursuant to Section 583 of the Public Utilities Code because they include employee names.

On April 9, 2013, PG&E provided to parties, including DRA, documents supporting (1) its Quality Control (QC) and Quality Assurance (QA) process and (2) process maps for Pipeline Features List (PFL) uploads and Geographic Information System (GIS) Spatial Alignment.

Attached please find the following supporting documentation and procedures related to PG&E's Maximum Allowable Operating Pressure (MAOP) Validation Project that are used to ensure the MAOP validation process results in accurate and complete pipeline data for use in the PSEP Update Application.

Attachment Name	Attachment Description
PSEP-Update_DR_DRA_001-Q01Atch01	Presentation to the Safety and Enforcement Division of PG&E's MAOP Validation Effort
PSEP-Update_DR_DRA_001-Q01Atch02	Field Retrieval QC Checklist
PSEP-Update_DR_DRA_001-Q01Atch03CONF	PFL Checklist for PG&E Build &

	PG&E QC
PSEP-Update_DR_DRA_001-Q01Atch04	PFL Engineering QC Process
PSEP-Update_DR_DRA_001-Q01Atch05	MAOP Phase III QA Plan
PSEP-Update_DR_DRA_001-Q01Atch06CONF	MAOP Phase III QA Procedure – Document (PFL) Preparation
PSEP-Update_DR_DRA_001-Q01Atch07CONF	MAOP Phase III QA Procedure – Retrieval
PSEP-Update_DR_DRA_001-Q01Atch08CONF	MAOP Phase III QA/QC Procedure – Document Preparation
PSEP-Update_DR_DRA_001-Q01Atch09CONF	QA Plan for PFL Build
PSEP-Update_DR_DRA_001-Q01Atch10CONF	MAOP Phase III QA Procedure – MAOP Validation Report

Attachment PSEP-Update_DR_DRA_001-Q01Atch01 provides an overview of the MAOP data validation process. The quality processes are described in detail for each of the steps, particularly in PFL build. In addition, the attachment summarizes the QA program for PFLs. Below are some highlights and supporting documentation/examples.

Page 10 of PSEP-Update_DR_DRA_001-Q01Atch01 shows the QC points for the document collection/preparation process, which breaks down into five sub-processes:

1. Transmission plat walk
2. Distribution plat walk
3. Field document retrieval
4. PFL prep
5. PFL folder delivery

The process map shows that each of the steps has a “check” point to ensure quality and completeness of work. Attachment PSEP-Update_DR_DRA_001-Q01Atch02 shows the Retrieval QC checklist used for the project.

Pages 11 through 16 of PSEP-Update_DR_DRA_001-Q01Atch01 describe the build QC process in detail. The quality processes include:

- 100% PFL check process with flow chart (page 11)
- PFL quality enhancement tools, such as data validation macro and image check macro (page 11)
- Build and QC checklist to ensure traceable, verifiable, and complete documentation (page 13; see also attachment PSEP-Update_DR_DRA_001-Q01Atch03)

- “Issues-Errors” communication to allow for feedback and communication between upstream and downstream teams about individual PFLs (page 14)
- PFL quality metrics to track completeness and accuracy of each PFL build vendor (page 15)

Page 17 of PSEP-Update_DR_DRA_001-Q01Atch01 provides an overview of the PFL engineering process. The detailed PFL engineering QC instructions are shown in attachment PSEP-Update_DR_DRA_001-Q01Atch04.

Page 18 of PSEP-Update_DR_DRA_001-Q01Atch01 describes the QA program that was performed on the MAOP Validation Project. QA analysis was performed within each of the 5 steps of PFL production. The full description of the QA process and reporting is provided in attachments PSEP-Update_DR_DRA_001-Q01Atch05CONF through PSEP-Update_DR_DRA_001-Q01Atch10CONF.

In addition to the processes and procedures described above, the MAOP Validation Project also ensures quality by leveraging a PG&E internal website to provide PG&E’s MAOP builders and engineers with all the resources and guidance in one location.



PG&E's MAOP Validation Effort

Provided to the California Public Utilities Commission

Safety and Enforcement Division

Gas Safety and Reliability Branch

Asset Knowledge Management, PG&E

Date: March 21, 2013



Introductions / Building Safety

PG&E Gas Transmission Overview

San Bruno Incident and PG&E's MAOP Validation Effort

Pipeline Features List Creation

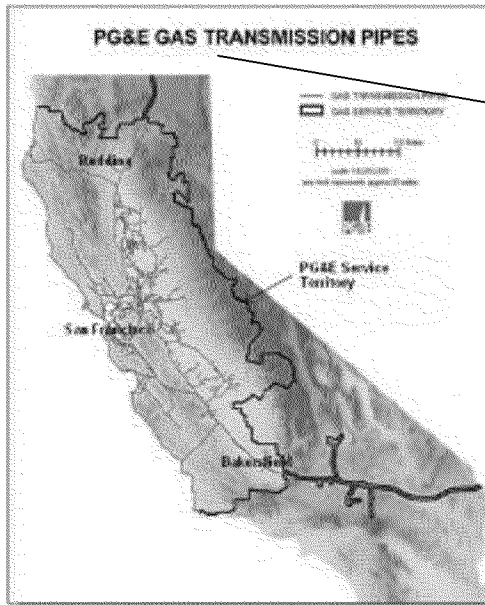
Quality Processes

Issues Resolution

PRUPF (Process for Resolving Unknown Features)



PG&E is one of the Largest Gas Utilities in the US



- Incorporated in California in 1905
- 2nd largest combined natural gas and electric utilities in the United States¹
- Serves approximately 15 million people (1 in 20 US Gas consumers²) through a 70,000-square-mile service area

- ~ 5,800 miles of DOT certified gas transmission pipeline
- ~ 42,000 miles of gas distribution pipeline
- 4.3 M Natural Gas Customers Accounts
- Deliver 970 BCF/year

1. By residential and total customers

2. Per total US Gas Consumers compiled by the US Energy Information Administration http://38.96.246.204/dnav/ng/nq_cons_num_dcu_nus_a.htm

3. ~6,800 miles based on criteria using greater than 60 psig operating pressure



San Bruno Incident and PG&E's MAOP Validation effort

Background

(Sep, 2010)

- 30 inch diameter gas pipeline ruptured near San Francisco, California
- 8 deaths, 58 injuries, 108 houses & 74 vehicles damaged or destroyed
- Records showed pipe as seamless while it contained longitudinal welds

Regulatory Action

(Jan, 2011)

- NTSB issued safety recommendations, requiring diligent records search and MAOP Validation of transmission pipelines located in urban areas
- Use traceable, verifiable, and complete records

PG&E Response

(Jan, 2011
to Apr, 2013)

- Validating MAOP of all gas transmission pipelines within its service area
- Ensuring that records accurately reflect pipelines' components and specifications
- Integrating results into an enhanced GIS platform

PG&E's MAOP Validation effort

Records Collection and Records Review

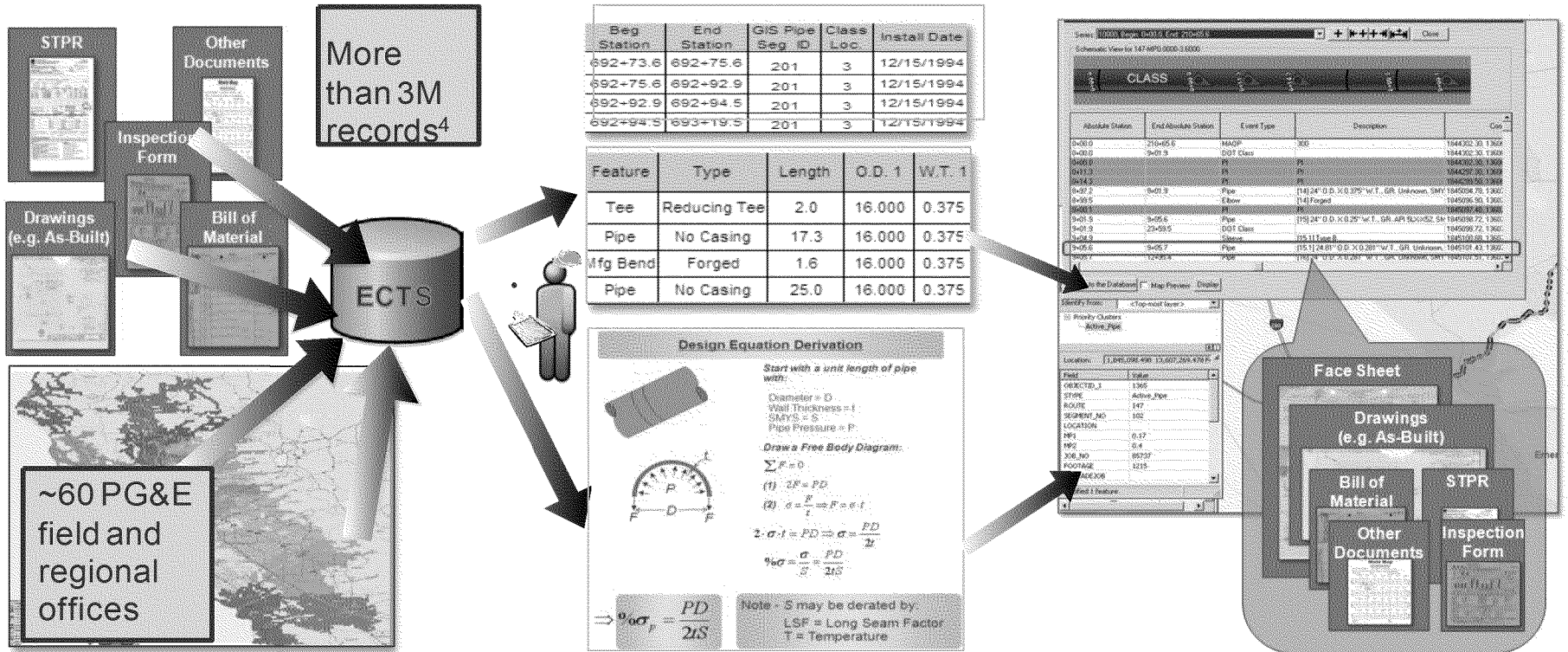
Retrieval, Scanning, Indexing and review of relevant documents

PFL Build and Engineering Analysis

Compilation of Pipeline Components and Specifications

MAOP Validation and Data Management

Leverage collected data to validate MAOP and integrate records in a core enterprise system, GIS



4. As of 3/31/2012



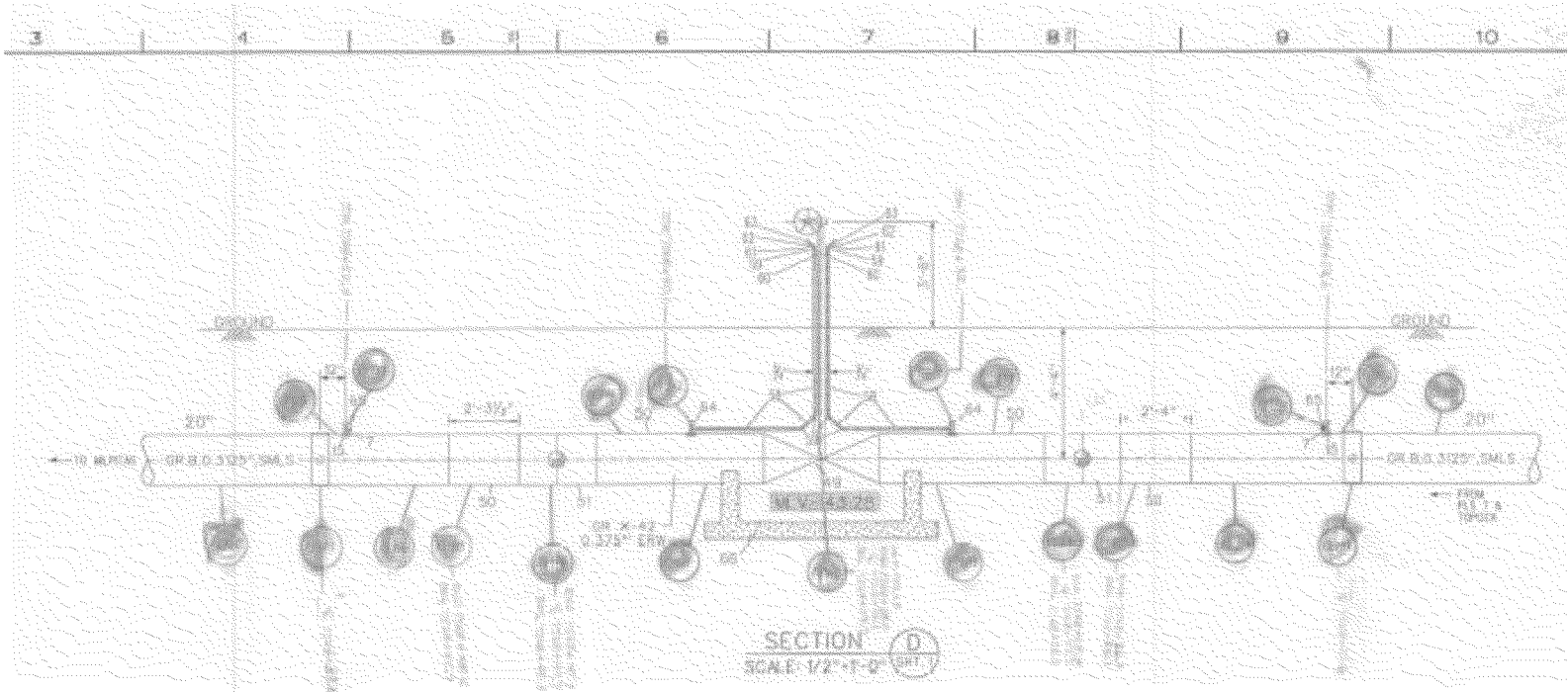
PG&E's Pipeline Features List – Developed

- Each row is a Feature - such as Pipe, Field Bend, Tee
- Each row has a unique Feature Number
- Material specifications, length and job information is collected
- Images associated with every row

PFL Spreadsheet for line 400												Mainline MP				MAOP Specifications				
Version	GIS Pipe Segment	Class Loc	Job Numb	Install Date	Feature Numb	Feature	Type	Length	Notes / Comments	Mile Point	Field Static	Pipe Static	O.D. 1	V.T. 1	O.D. 2	V.T. 2	Seam Type	Specification / Rating	SMYS	
23	0-09.0	100.6	1	145418	12/07/61	2.0	Pipe	No Casing	6.0	Image MAOP1001826.jpg is a purchase order for the casing			36,000	0.531			Double Submerged Arc Weld	API 5LX-X52	52,000	
	0-15.0	100.6	1 (in Public Road Crossing)	145418	12/07/61	3.0	Pipe	Casing	55.7	Length of pipe came from drawing. Image MAOP1001826.jpg is a purchase order for the casing. Casing is ASTM-A293 Grade C.			36,000	0.531	42,000	0.438	Double Submerged Arc Weld	API 5LX-X52	52,000	
	0-70.7	100.6	1	145418	12/07/61	4.0	Pipe	No Casing	18.0	Stationing off from length.			36,000	0.531			Double Submerged Arc Weld	API 5LX-X52	52,000	
	0-88.7	102	1	145418	12/07/61	5.0	Pipe	No Casing	30.0	Length of pipe came from the field station			36,000	0.438			Double Submerged Arc Weld	API 5LX-X52	52,000	
	1-18.7	102	1	145418	12/07/61	6.0	Field Bend	Unknown	0.0	Angle and orientation from As-built. Used Pipe specifications for field bend.	1-00.0		36,000	0.438			Double Submerged Arc Weld	API 5LX-X52	52,000	
	1-18.7	102	1	145418	12/07/61	7.0	Pipe	No Casing	111.0	Length of pipe estimated from stationing and GIS from the field station			36,000	0.438			Double Submerged Arc Weld	API 5LX-X52	52,000	
	2-29.7	102.1	1	30712203	10/14/70	7.1	Pipe	No Casing	15.0	Length from As-built.			36,000	0.500			Double Submerged Arc Weld	API 5L X-65	65,000	
	2-44.7	102.1	1	30712203	10/14/70	7.2	Tee	Reducing Tee	4.4	Scraper Bars.			36,000	0.500	30,000	0.625	Unknown > 4 inch	Y-70	70,000	
	2-49.1	102.1	1	30712203	10/14/70	7.3	Pipe	No Casing	15.0	Length from As-built.			36,000	0.500			Double Submerged Arc Weld	API 5L X-65	65,000	
	2-64.1	102.2	1	145418	12/07/61	7.4	Pipe	No Casing	192.0	Length of pipe estimated from GIS and T-List			36,000	0.438			Double Submerged	API 5L X-X52	52,000	

Bubble Sheets

- Multiple people review and quality check every PFL
- Image names included on each row of the PFL
- Indicates the exact feature number referenced to the drawing



Bubble Sheets Cont'd

- Indicates the exact feature referenced to the bill of material or other information.

For Material Specifications such as:

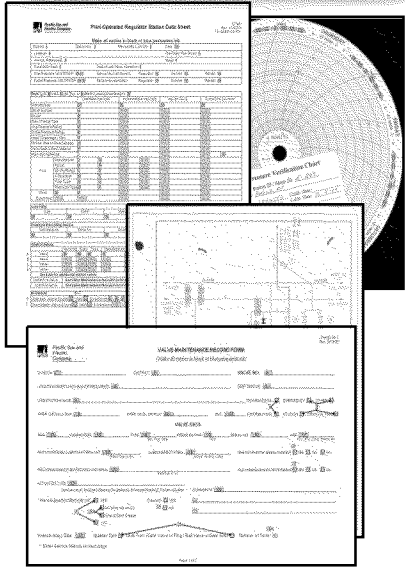
- Outside Diameter
- Wall Thickness
- SMYS – specified minimum yield strength
- Long seam

PG&E CODE	ITEM NO	QTY	UNIT	DESCRIPTION	CATALOG OR DRAWING REFERENCE	OTHER DATA
	222	54	FT	<p align="center">2009 CONSTRUCTION - PM 30603908 (FOR PIGGING)</p> PIPE, 20" O.D., X-42, 0.375" WT, SMLS, BARE	GS&S A-15, A-16	PO# 2500117628
	223	1	EA	TEE, STRAIGHT, 20", 0.375" WALL, Y42, WELD ENDS BEVELED TO MATCH 0.375" WT 20" PIPE, MANUFACTURED IN ACCORDANCE WITH SPECIFICATION MSS-SP-75, AND PG&E SPEC 4121, AND WITH SCRAPER BARS IN ACCORDANCE WITH PG&E 4117.	GT&D UO 4117 & 4121	PO# 2500079848
	224	1	EA	ELBOW, 20" PIPE, 0.375" WALL, 45 DEG, LONG RADIUS, Y42, WELD ENDS BEVELED TO MATCH 0.375" WT 20" PIPE, MANUFACTURED IN ACCORDANCE WITH MSS-SP-75 AND SPECIFICATION 4121, (SUITABLE FOR SEGMENTING)	GS&S B-20	PO# 2500079848
	225	1	EA	BALL VALVE, 20", FULL PORT, ANSI 300, GEAR OPERATED, WELD ENDS, ENDS BEVELED TO MATCH 0.375" WT, X42 PIPE. WITH HIGH HEAD EXTENDED GEARING, C-C VALVE TO HANDWHEEL ("A") = 6' 10". VALVE SHALL COMPLY WITH API-6D AND MANUFACTURED IN ACCORDANCE WITH PG&E GS&S F-21.1, FIGURE 1 (EXHIBIT 1). FOR NATURAL GAS AND BURIED	GS&S F-21.1, FIGURE 1 (EXHIBIT 1)	PO# 2500083755

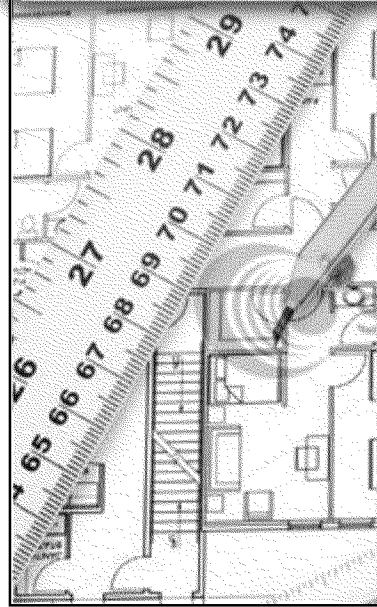
MAOP Validation Project Process

Quality Assurance (QA) and Quantitative Analysis

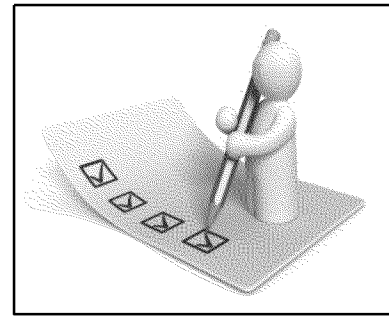
Document Preparation



PFL Build



PFL Build Quality Control (QC)



MAOP Validation

Design Equation Derivation

Start with a unit length of pipe with:

- Diameter = D
- Wall Thickness = t
- Seam Factor = S
- Pipe Pressure = P

Draw a Free Body Diagram:

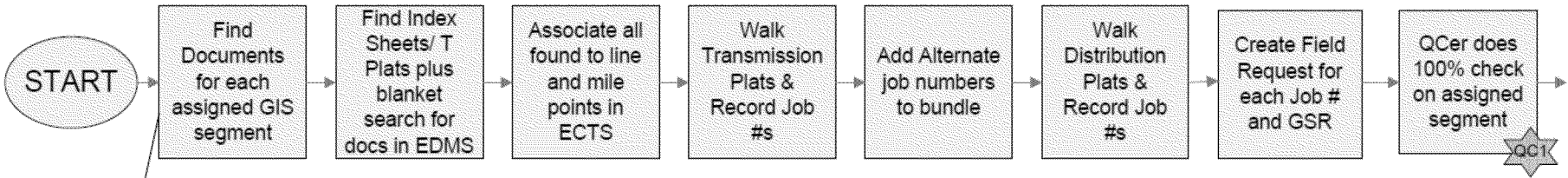
- $\sum F = 0$
- $SR = PD$
- $\sigma = \frac{SR}{2t} = \frac{PD}{2t}$
- $\sigma = \frac{P}{2} \cdot \frac{D}{t}$

Note - S may be derated by LSF = Long Seam Factor
 T = Temperature

$$\sigma = \frac{PD}{2tS}$$

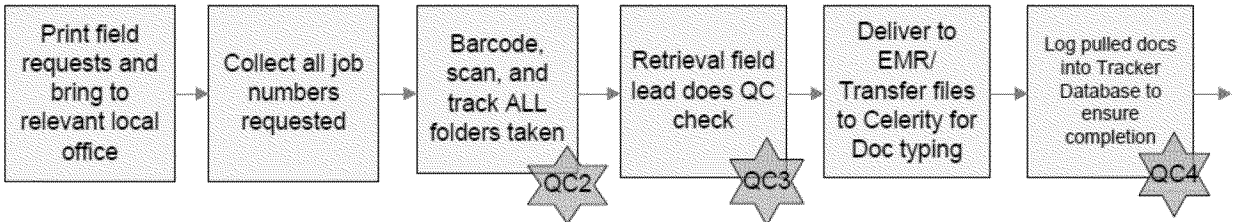
Document Preparation Process

Combined Plat Walk

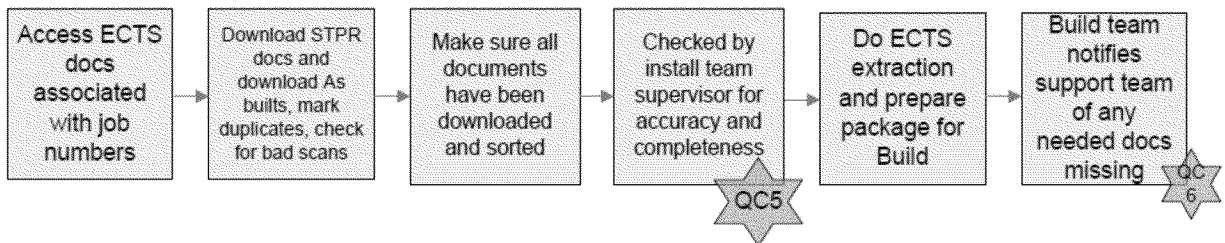


Retrieval

- D Plats
- H forms
- Operating Maps
- Operating Diagrams



Install Job and Delivery Team



= Internal support team quality control point-
QA methods applied by PWC recorded separately



Pipeline Features List: Build

PFL Build

- Engineers and GIS technicians review documents and record data into spreadsheet, identifying each feature on the “bubble sheets”

100% Check

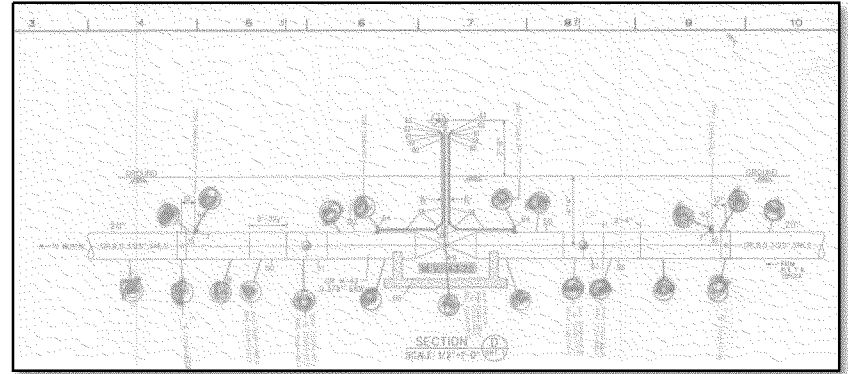
- Experienced builders perform a 100% review of the data collected during the PFL Build

Build Support

- Document Researchers support PFL builders and checkers by searching for relevant documentation to fill in any gaps

Quality Enhancement Tools

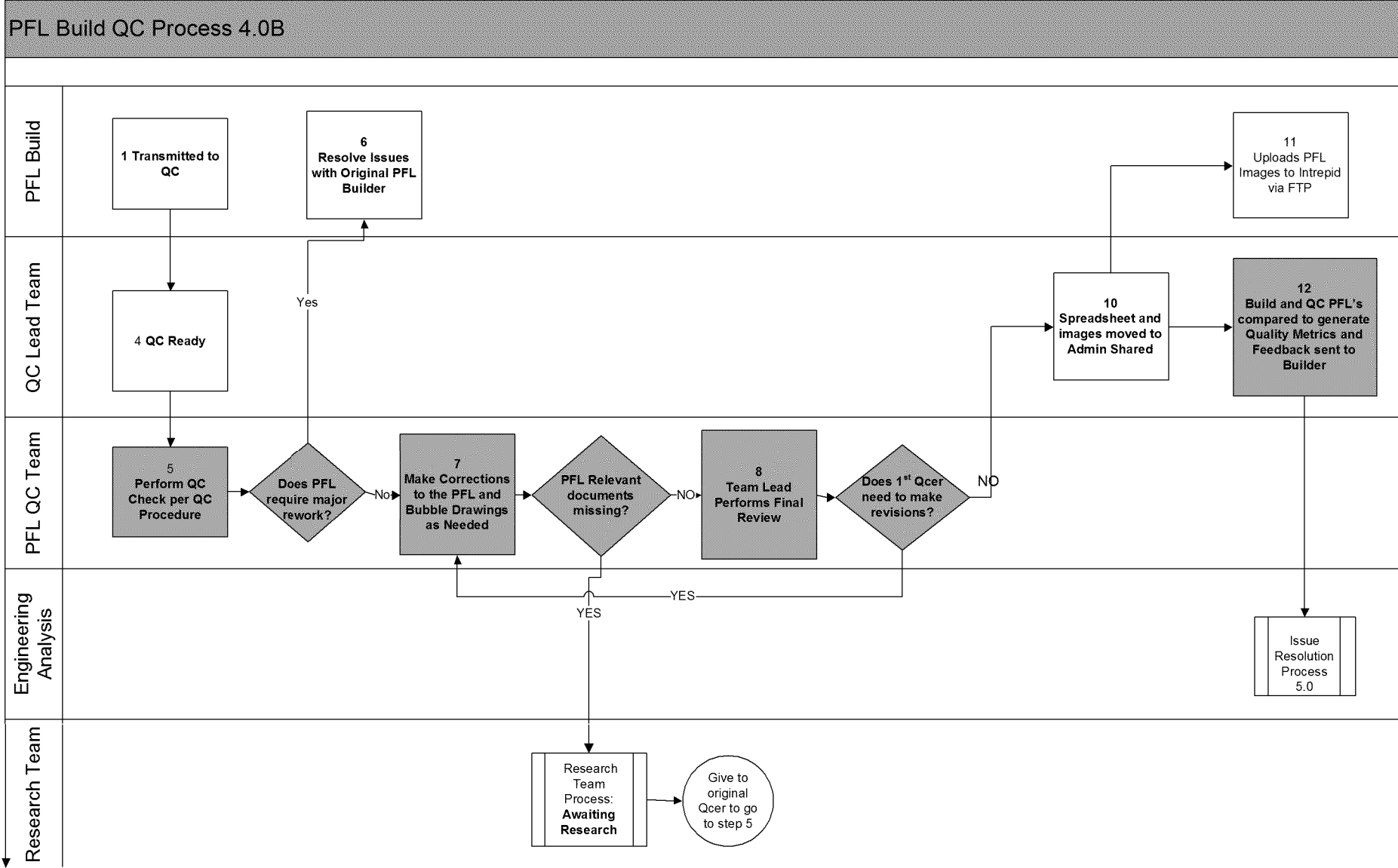
- Data Validation Macro*
 - Evaluates specifications captured in spreadsheet to validate required fields are present, valid data is entered
- Image Check Macro*
 - Reviews contents of transmittal to ensure all images are present (traceability)



PFL Spreadsheet for line						Mainline			
Beg Station	End Station	GIS Pipe Segment ID	Class Loc	Job Number	Install Date	Feature Number	Feature	Type	Length
0+00.0	0+00.0					1.0			
0+00.0	0+00.0					2.0			
0+00.0	0+00.0					3.0			
0+00.0	0+00.0					4.0			
0+00.0	0+00.0					5.0			
0+00.0	0+00.0					6.0			
0+00.0	0+00.0					7.0			
0+00.0	0+00.0					8.0			



PFL Build QC Process Map



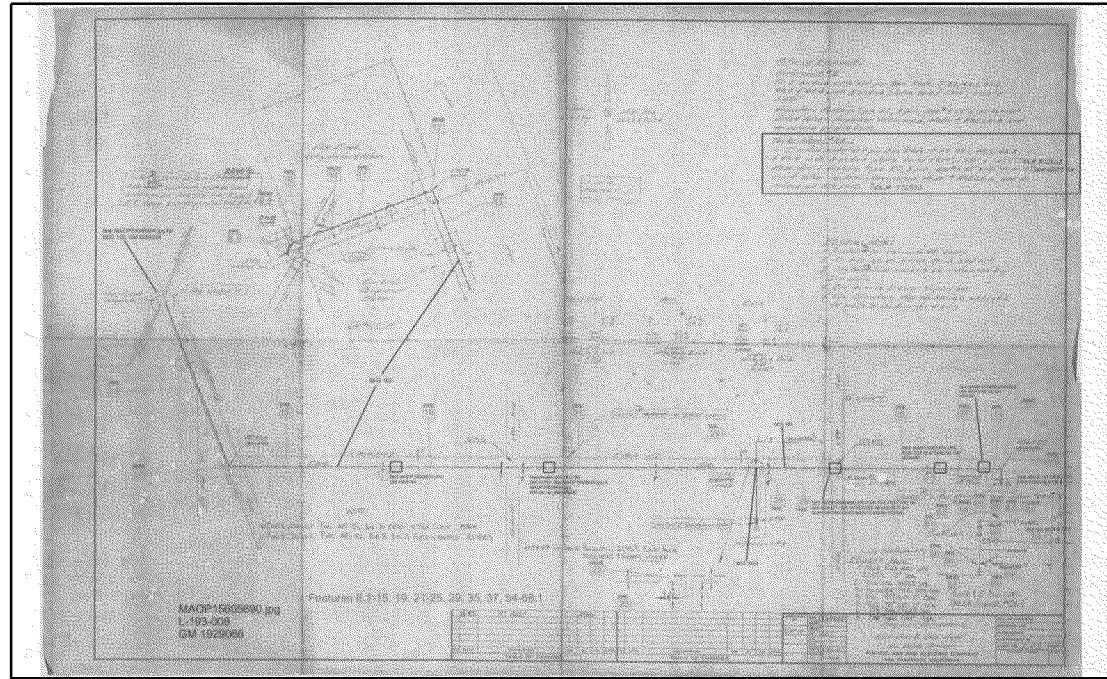
PFL Build QC Procedure

PFL Build QC utilizes a checklist to ensure the following:

- **Traceable**
 - The documents are clearly marked with “bubbles” that indicate the corresponding feature or feature range
 - The most recent versions of documents are included and earlier versions if they provide unique as-built data
- **Verifiable**
 - The most recent jobs were identified and each job was reviewed for as-built documentation
 - The documents were given an appropriate Quality (“Q”) Rating
 - Material Specifications were based on the highest quality documentation available (e.g. transport tags, mill test reports, signed delivery receipts)
- **Complete**
 - Ensure that all features are captured as seen on Maps, As-Builts, Gas Service Records (GSRs), etc.
 - Stress Test Pressure Reports (STPRs) for each job and any uprate jobs were found and incorporated

PFL Checklist for PG&E Build & PG&E QC			
Instructions: Complete this checklist during the build, check and QC process to provide consistency and help confirm adequate research and review is performed. Add, verify or correct the entered data and bubbled documents described in each item. Work items in any sequence. This checklist is not an exhaustive list.			
Build	Check	QC	Initial Scope Review
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check Out: Check out and open PFL in SharePoint and using the Properties feature in Excel, enter your name and change status accordingly.
N/A	<input type="checkbox"/>	<input type="checkbox"/>	Major Issues: Briefly review the entire PFL to determine if there are any major issues, such as missing job numbers, STPRs, or specs on recent jobs. [1]
N/A	<input type="checkbox"/>	<input type="checkbox"/>	Return for Revision: If the PFL should be returned to the builder for revision follow Note [2] instructions.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GIS Segments: Scope of PFL includes all GIS Segments for the route, and start and end MPs are based on GIS.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Feature Numbers: Feature numbers are sequential (gaps okay), and if not starting at MP 0, are based on 100 features per mile.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tie In Notes: Brief tie-in descriptive note for first and last PFL feature, as applicable. [3]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Class Locations: (from GasView 2.0) including properly identifying in station, road or bridge configurations.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Start and End Point Locations: When end points are not obvious, GIS segment lengths can be used to establish their location. (Identify significant GIS segment length errors in the Issues-Errors tab.)

QC Checklist utilized to maintain consistency



As-Built Documents are reviewed for Accurate Bubbles



Feedback Processes

Issues-Errors Tab

- Engineering assessments are outlined and justified
- Issues identified at any stage are described, assigned and resolved:

Date	Identified by Process Step	Assigned to Organization	Category	Description of Issue
05/23/12	Quality Control	PG&E Field Verify	Information	GIS shows BD712 occurring upstream of X6562; their source MP's reflect this as well. Construction drawing MAOP00068818.jpg indicates a reversed configuration.

Date	Identified by Process Step	Assigned to Organization	Category	Description of Issue
06/27/12	Quality Control	PG&E Build	Error_Value	Incorrect job for features 1-10. Do not blindly use the approved by GM number on drawings, especially for station drawings. The BOM callouts on these drawings need to be tied back to a BOM list that shows what job those features were installed on. In this case the drawings GM was 420580 but the BOM callouts for the features listed in the PFL were from GM 165626. This means that these features were installed under 165626. A search in ECTS under this jobs provides the original as-built drawing for these features.

PFLs Returned for Revision:

- If a PFL does not meet the Minimum Requirements*, it is returned to the builder for re-work

Bi-Monthly Conference Calls:

- The QC Team and Build vendors meet to discuss issues identified and any changes made to the process

Weekly “Tailboards”:

- Stand-up meeting / conference call to discuss recent quality issues, updates, general knowledge etc.

Build-QC Rotations: PFL Builders spend up to 6 weeks working within the internal PG&E QC to learn processes and techniques

*Minimum Requirements: Builder must identify all Jobs, As-Built documents, and STPRs and must correctly interpret the configuration of the pipeline features



PFL Build QC Metrics

QUALITY METRICS:

- **Completeness (%)**
 - Are all features present in the PFL?
- **Accuracy (%)**
 - Are the specifications for each feature accurate (based on the highest quality record available)?

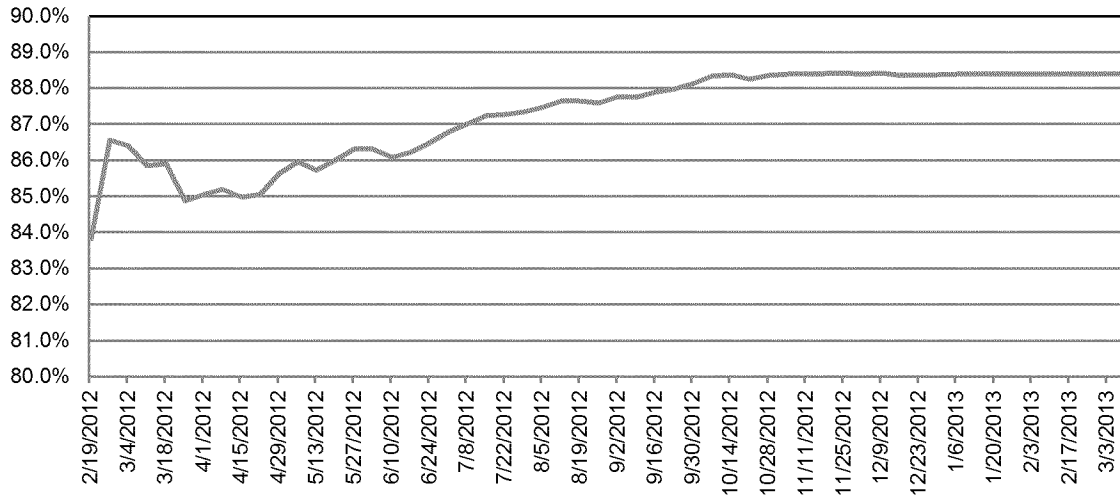
Feature Number	Seam Type	Specification / Rating	SMYS	ANSI- WOG Rating
1.0	Unknown > 4 inch	Grade B	35,000	Unknown
2.0	Unknown > 4 inch	Grade B	35,000	Unknown
2.1		Unknown	unknown	ANSI 300 #
3.1		Unknown	unknown	ANSI 300 #
4.0	Electric Resistance Weld	API 5LX-X42	42,000	
5.0	Unknown > 4 inch	Grade B	35,000	Unknown
6.0	Electric Resistance Weld	API 5LX-X42	42,000	
7.0	Unknown > 4 inch	Grade B	35,000	Unknown
8.0	Electric Resistance Weld	API 5LX-X42	42,000	
9.0	Unknown > 4 inch	Grade B	35,000	Unknown
11.0	Unknown > 4 inch	Grade B	35,000	Unknown

APPLICATION:

- **PFL Build Vendors that are efficient and that deliver a high quality product (Completeness and Accuracy) are assigned more work and are permitted to increase staff**
- **On-Site Build Team (individuals) that deliver a high quality product are promoted to 100% Check or Quality Control**

PFL Build QC Metrics Results

Cumulative Total Accuracy – All Vendors

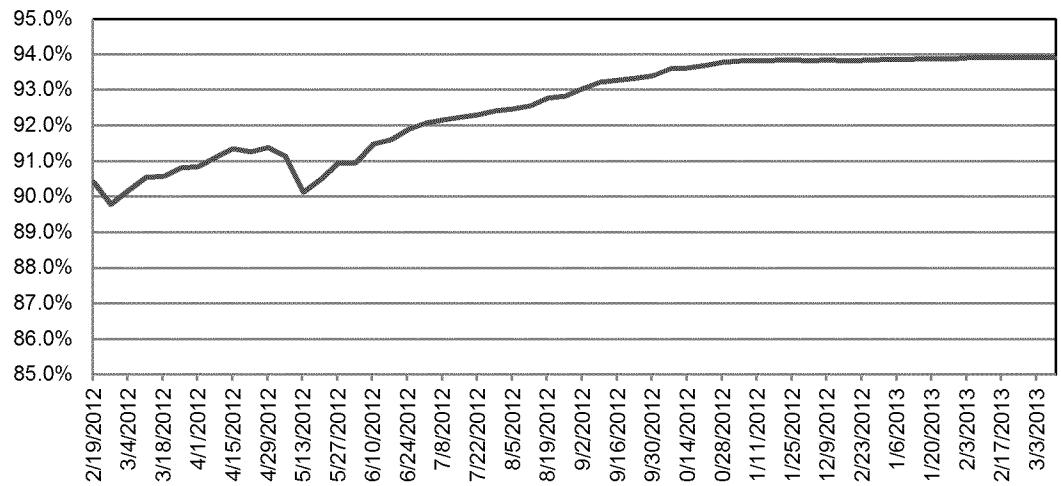


- Quality metrics illustrate the increase in PFL Build quality over time
- Low points represent the impact of process changes

QC Metrics provided the data used to make the following improvements:

- Low Quality Vendors are given fewer assignments or off-boarded from the project
- High Quality Vendors are rewarded with additional work
- High quality on-site build resources are promoted to Check/QC

Cumulative Completeness – All Vendors





MAOP Validation

Procedure for Resolution of Unknown Pipe Features (PRUPF)

- Unknown specifications are evaluated using purchase history and historic PG&E standards

Sound Engineering Judgment

- Pipeline engineers review the PFL Data and use knowledge founded on experience to ensure sound judgment is applied

Excavations

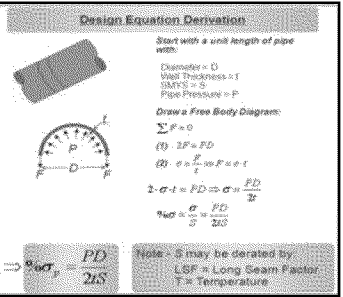
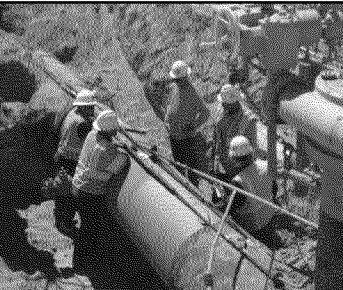
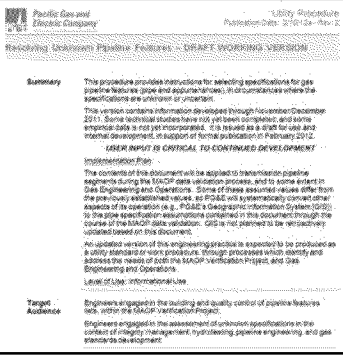
- Features and specifications that cannot be resolved or do not meet the MAOP of record are excavated and direct assessment is performed

MAOP Calculation

- PFL Data is evaluated in conjunction with assumptions to calculate the MAOP per design

Engineering Analysis QC

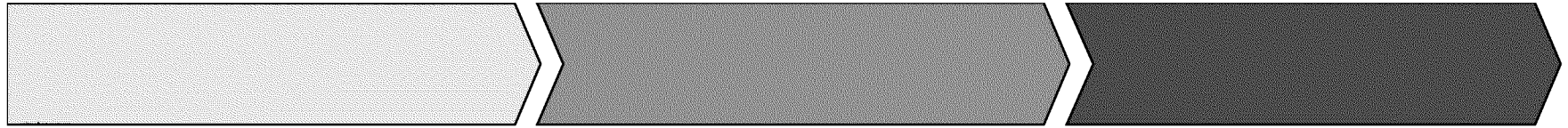
- Experienced engineers perform a QC of the steps performed in the MAOP Validation process





Quality Assurance – Overview of Control Points

- PwC performs analysis and provides QA Metric reports (next slide)
- Items are corrected and processes are reviewed for improvement



Plat Walk QA

- Identify required records on Transmission plat sheet
- Identify jobs, regulators and taps on distribution plat sheet

1 Retrieval Team QA

- Field search, scanning, and upload of requested documents

2 Doc Type Team QA

- Review and code 1.8 million documents for PFL-relevance

Alignment & Delivery

- Link documents to segments of line in ECTS
- Remove duplicates and extract documents

Assign PFL to Build team

- External vendors
- Internal PG&E

Build PFL QA

- External vendors
- Internal PG&E

PFL QC

- Check PFL for accuracy and standardization

3 Issue Resolution Team QA

- Solve for unknowns
- Assignment and completion of field verification, excavations, and/or NDE
- Utilize PRUPF assumed values

4

MAOP Report prepared

- Macros run on report spreadsheet

MAOP verified QA

- Calculated MAOP reviewed by segment and signed off

PFL data uploaded to system of record QA

- Current Plan is to upload reports into Intrepid

Report prepped for CPUC

- Printed, Pdfed, Bates stamp and produced on DVDs for delivery

Report QC/QA

- Completed report checked for accuracy and standardization
- Checked all segments covered in report

FIELD RETRIEVAL QC CHECKLIST

Field Request ID _____

Bundle ID _____

Field Office _____

Team Lead (LAN ID) _____

QC Date _____

CHAIN OF CUSTODY:

Signed and dated *Chain of Custody Agreement* upon arrival and prior to field office departure

Uploaded scanned documents to specified network location (YYYYMMDD_LOCATION_LANID_COC.jpg)

IMPORT SPREADSHEET:

Checked for Drag and Drop Errors

Verified Doc-Types

Removed Non-PFL Images

- Delete all Non-PFL images from both Import Spreadsheet and U: Drive folder

Checked Image Quality

- If print is not readable, re-scan the image(s); adjust resolution if necessary

ECTS:

Verified Retrieval Notes are Accurate in Line Evaluation Sheet

- For T&R Line Item Requests
 - All needed images are linked and corresponding MAOP #s are listed in Retrieval Comments.
 - All linked images satisfy the line item request of interest
 - For Other Line Item Requests
 - All retrieved images are listed by doc type, corresponding count of images, and total count of images are listed in Retrieval Comments.
- Discrepancies between line evaluation sheet request and documents retrieved are noted in Retrieval Comments (e.g., job # on Uploads Spreadsheet differs from job # on line item, some doc types requested not being found)

Balanced Number of Images

- Total number of images and corresponding Doc-types listed on Field Request match what will be sent through the upload process

Changed Field Request Status

- No Initial Request line items on Field Request
- Field Request status set to “Retrieval Complete”

Changed Bundles Status

- All Field Requests are “Retrieval Complete” or “Retrieval Checked” status
- Bundle status set to “Retrieval Complete”

I verify that I have performed a complete and comprehensive search for the requested PFL-related documentation and have checked the quality of the work performed to the minimum standards outlined above

Signature: _____

COMMENTS:

PFL Checklist for PG&E Build & PG&E QC

Route: _____

Instructions: Complete this checklist during the build, check and QC process to provide consistency and help confirm adequate research and review is performed. Add, verify or correct the entered data and bubbled documents described in each item. Work items in any sequence. This checklist is not an exhaustive list. Please submit any comments to Alex Hudgins (A1HW).

Build	Check	QC	Initial Scope Review
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check Out: Check out and open PFL in SharePoint and using the Properties feature in Excel, enter your name and change status accordingly.
N/A	<input type="checkbox"/>	<input type="checkbox"/>	Major Issues: Using the separate <i>Builder Final Quality Checklist</i> as a guide, review the entire PFL to determine if there are any major issues, e.g., missing job numbers from GIS or missing STPRs & specs on recent jobs. [1]
N/A	<input type="checkbox"/>	<input type="checkbox"/>	Return for Revision: If the PFL should be returned to the builder for revision follow Note [2] instructions.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GIS Segments: Scope of PFL includes all GIS Segments for the route, and start and end MPs are based on GIS.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Feature Numbers: Feature numbers are sequential (gaps okay), and if not starting at MP 0, are based on 100 features per mile.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tie in Notes: Brief tie-in descriptive note for first and last PFL feature, as applicable. [3]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Class Locations: (from GIS) including properly identifying in station, road or bridge configurations.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Start and End Point Locations: When end points are not obvious, GIS segment lengths can be used to establish their location. (Identify significant GIS segment length errors in the <i>Issues-Errors</i> tab.)
 PFL References			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	TPlats: TPlat index sheets (ELS DWG 385100) are reviewed for applicability and any available TPlats are reviewed and incorporated when they provide unique information.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DPlats: DPlats, when available, are reviewed for job numbers, taps and overall pipeline configuration.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	OP Maps: OP Maps or Diagrams are reviewed and incorporated when they provide useful information.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Legibility: Documents to be bubbled are legible or from the best legible source. [4]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bubbling: Bubbled documents include at least one orange bubble with feature or range of features anywhere on the document and also include route and filename in green in the lower right corner. Documents larger than 8 1/2" x 11" also include the feature or feature range in the lower right corner, in orange. [5]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Best Version: The latest version of drawings and BOMs from ECTS and ELS/EDMS are used, unless earlier versions provide unique as-built data.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ELS Format: ELS/EDMS filenames include sheet number when applicable without extensions (e.g., 123456s7).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ECTS Format: Documents with created filenames are already in ECTS or use the appropriate naming convention, such as bubbled DPlats, OP Maps or Diagrams.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	OP Map Format: OP Map or Diagram drawing numbers include sheet number when applicable (e.g., 123456-7). District Regulator OP Diagrams without 6 or 7 digit drawing numbers use filename (w/o ext.).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DPlat Format: DPlat numbers (e.g., 3208-A07) or Wall Map numbers (e.g., 3208) are correctly formatted.
 Traceability			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Concise Notes: Descriptions in the <i>Notes / Comments</i> column, when included, are concise and provide unique information about the features that are not captured elsewhere in the PFL.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required Notes: Descriptions in the <i>Notes / Comments</i> column identify if engineering assessments are made, the feature length is scaled or if material specs are obtained from non-obvious sources, such as STPR and material code.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Job History: The most recent job numbers are used and each job checked for as-built documents. One exception is when a newer job lowers a pipeline; the job number that installed the pipeline should be used.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	STPRs: Available STPRs for each job and any uprate jobs were found and incorporated. [6]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GSRs & VMRs: Available documents from the GSR Database and T&R Log were found and incorporated. [7]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Best Q Documents: Highest quality documents are used for material specifications (e.g., transport tags, mill test reports, signed delivery receipts, etc.).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	MAOP: Current MAOP value is obtained from drawing 086868 (Rev 21) or from the OP Maps or Diagrams. [8]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	References: Entered data in each row are fully supported by bubbled documents identified in the same row.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Highlighting: Cells are highlighted yellow for unknown data if the cell can only take numerical input. This is only necessary in the conditional formatting area (gray area).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Branch Lines: Tees, taps and branching PCFs include branch names or indicate <i>Connection</i> or <i>In Station</i> in the <i>Branch Line Number</i> column. Also, created branch names for any unnamed shorts are properly formatted.

Build	Check	QC	Issues-Errors Tab
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Assessments: Engineering assessments made during build are described and supported by sound reasoning or justification.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Safety: Potentially unsafe conditions or regulation code compliance issues are identified.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GIS Errors: Significant GIS errors are identified.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Issues Assigned: Issues are assigned to the appropriate organization.
N/A	<input type="checkbox"/>	<input type="checkbox"/>	Builder Feedback: Errors and general feedback are discussed with the builder, or for external builders are clearly documented and assigned to the builder. Be clear and factual with all comments and feedback.
N/A	<input type="checkbox"/>	<input type="checkbox"/>	Resolve Issues: Review, confirm and try to resolve all issues. Resolved issues are documented in the far right column, and any unresolved issues are assigned to the next process organization (<i>PG&E QC</i> or <i>PG&E Field Verify</i>). Do not delete issues, and use red or red bold font to distinguish changes made to existing issues or resolutions.
N/A	<input type="checkbox"/>	<input type="checkbox"/>	New Issues: Add any new issues or discrepancies found, and identify any material specs based on Q4 or worse documents.

Spreadsheet Integrity

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	External Links: Check for and eliminate any external links in the spreadsheet. Information in the lower right corner of the File tab will indicate if there are external links.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Stationing: Check consistency of stationing equations and correct by replicating down from an upper row, as required.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	MAOP Calculations: Check that the <i>Basic MAOP Calculations</i> fields have equations for each feature row. If any results are in red, revisit the feature's class designation and MAOP critical data (grayarea) for accuracy.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Delete Unused Rows: Delete unused rows after the last feature.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Validation Macro: Prior to PFL submittal, perform a final Validation macro check and review all red boxes and confirm that yellow highlighting is used properly. Save the file without clearing the validation formatting.

PFL Closeout

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reassemble Folder: Organize hard copies and confirm bubbled documents are saved and properly named in the appropriate U:\PFL folder. With the exception of DPlats, OP Maps and Diagrams, unbubbled versions of documents with created names that are not in ECTS must also be saved in the PFL folder (for ECTS upload).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check In: Change the SharePoint status accordingly, check in the PFL and hand in the hard copy folder.

Notes:

- [1] A PFL must cover every feature and segment within the boundaries of the assignment, regardless of whether or not another PFL contains that feature or segment. A PFL for contiguous GIS segments must not contain any gaps or skipped features. The *Builder Final Quality Checklist* doesn't get checked-off but should be performed in its entirety. Refer to the QC Continued Education slides for examples of its use.
- [2] At any point during the Checking or QC review, if the PFL should be returned for revision, (1) confirm the reasons with your Team Lead, (2) identify all major issues and explain necessary corrections in the *Issues-Errors* tab, and (3) change the status to *Returned for Revision*, check in the PFL and return the folder to the builder, or if in QC, hand in the PFL folder to Alex.
- [3] When reviewing adjacent PFLs include a comment to help tie the PFLs together, such as *this feature lines up with feature x of PFL y* (where x and y are the applicable feature number and PFL name). If an issue/error is noticed in an adjacent PFL, email a brief description of the issue/error to Alex Hudgins (A1HW).
- [4] If the original image is dark, faint or has excessive edge space, consider using common photo editing software to improve contrast and color, or to crop out edge space. Be sure to use high res images in ECTS.
- [5] All bubbles, notes and footer annotations shall have sufficient thickness and contrast to be clearly visible when plotted or viewed at reduced resolution. Refer to guideline AKM-MAOP-402G *Electronic Bubble Sheet Editing* for specific details.
- [6] STPR searches should include a review of the newer hydrotest logs (see U:\Admin Shared\Tools\4 Reference Material [Reference]). If STPRs were not found for jobs installed after 1980, check historic research requests and submit a request if none found.
- [7] The GSR Database and T&R Log (for VMRs and Reg Data Sheets) can be accessed from U:\Admin Shared\Tools\3 Data Sources [Data] or the PFL Builders website.
- [8] Drawing 086868 is the preferred source for current MAOP, followed by formally issued OP Maps and Diagrams, then the latest DREG OP Diagram. The issued OP Maps and Diagrams have 6 or 7 digit drawing numbers and are found using the GIS Tool Bar buttons. STPRs, or other job related construction documents are not valid for current MAOP.

PFL Engineering QC Process

1. Check-out file from MAOP Portal and open PFL file.
2. Get a general overview of the PFL
 - a. Open the “Summary Report” tab and scan MAOP, minimum test pressure, and minimum pressures for pipe, valves, fittings, etc.
 - i. Compare MAOP per R to 086868.
 - 1) If MAOP per R is less than the MAOP shown in Drawing 086868, open the “MAOP Final Report” tab to confirm the superscript “B” is indicated next to the MAOP of R. If this footnote is not shown, discuss with FVE.
 - 2) If the PFL line segment is not in 086868, open the “Pipe Data” tab to check for any FVE comments. If the FVE did not indicate the source(s) they used to determine MAOP per R, send an E-mail/speak to FVE and ask for a written explanation of documents used to substantiate MAOP per R.
 - 3) In some cases, PFL Build includes a copy of the operating diagram which indicates the MAOP per R.
 - ii. Open the “Pipe Data” tab (if not already open)
 - i. Activate the column header filter for sorting.
 - ii. Scan the PFL Header Data sections for information and/or missing information, especially the “Notes/Comments” column in the “Mainline MP” section.
 - iii. Pay special attention to the Job Number and STPR data.
 - 1) If there was a pressure test and the duration was at least 4 hours, ensure the Fabricated Assembly field in the FVE section is marked “Yes” for the affected features if the features meet the code requirement.
 - 2) Ensure that the pressure test is accounted for properly in the calculation of MAOP per Test.
 - iv. Customize the PFL to suit viewing preferences.
 - b. Open the “MAOP Final Report” tab.
 - a. Activate the column header filter for sorting.
 - b. Ensure all features (except taps, field bends, and appurtenances) are shown.

PFL Engineering QC Process

- c. Confirm that the additional features selected by the FVE for removal from the MAOP Report (rows of cells filled with red shading), if any, are correctly identified.
- d. Ensure all valves, flanges, and PCF features have ratings and “N/A” shown in the correct fields.
- e. Look for any yellow MAOP values under the “Feature MAOP” column.
 - i. If found, this indicates the calculated MAOP is less than the MAOP of R for the affected feature.
 - 1) Consult the original FVE that worked on the PFL/MAOP Report for clarification. Confirm the FVE has exhausted all research avenues
 - a) Research Support Team has completed request(s) and PLE (pipeline engineer) has been contacted for information and allowed at least 48 hours to respond.
- f. Confirm that the MAOP Engineering Manager has been consulted if a pressure reduction is recommended on the section of line covered by the PFL.
 - i. After discussion with the Manager and confirmation by the FVE that all research is complete and the MAOP must still be reduced
 - 1) Initiate the pressure reduction process by emailing the MAOP Validation Engineer a summary of the pressure reduction, including all the necessary attachments as described in the PR Process flow chart.
 - a) Upon concurrence, the MAOP Validation Engineer will forward the request to the PR Team. The PR Team in GOI will follow the S4125 process to seek approval of the PR.
 - b) Once the PR is approved, the QC Engineer will change the MAOP of R to the new MAOP and update the text in the Column (“Is the MAOP of R a Pressure Reduction?”) to “Yes.”
 - c) The QC Engineer will include an explanation of the pressure reduction in first FVE Comment cell and in the file comments when checking-in the PFL back into the portal.

PFL Engineering QC Process

- g. For any features where the MAOP is limited by the test pressure or the design pressure per 49 CFR part 192.611 (footnote “A”), select the “Pipe Data” tab and review the STPR data to confirm:
- i. Test is at least 4 hours for an above-ground test or at least 8 hours for segments tested in place.
 - ii. Strength Test Factor is correct for the class location and the year of the test.
 - iii. In the case of a change in class, the test duration must be a minimum of 8 hours and the appropriate multiplier applied to the test pressure (i.e. Class 2 = 0.8, Class 3 = 0.667, Class 4 = 0.555).
- h. Sort features by year installed subgrouping by pipes, valves, fittings, etc., for each year.
- i. Verify feature assumptions are correct (account for 10-year shift, as necessary). Use Tables 2-11, as well as Appendix E to verify assumptions. Make sure Appendix E-based assumptions are logical.
 - 1) Ensure sleeves have correct assumptions.
 - 2) Ensure caps are properly shown (i.e. not shown as “Other”).
 - 3) Ensure all fittings (bends, tees, and reducers) have either a complete Barlow calculation or a fitting rating and “Unknown” as seam type.
 - 4) Ensure reducer OD1/OD2 and WT1/WT2 are in the direction of PFL build and consistent.
 - 5) If errors are discovered, go to the “Pipe Data” tab and follow these steps while keeping a separate log of updates/changes made in the Pipe Data tab. Otherwise, go to Step 4 below.
 - a) Correct any flawed assumptions where HRD is indicated in the FVE column.
 - i. All QC changes are made in **bold red** and the cell filled with orange color. Add comments to FVE Comments column in **bold red** and fill the cell with orange color.
 - ii. Keep a log of changes made for entry later.
 - iii. Do not delete the FVE’s original comment. If the FVE comment is incorrect or not applicable, change the font to show a

PFL Engineering QC Process

- ~~striketrough~~ of the incorrect portion of their comment.
- b) If the FVE used SEJ for an assumption and it is determined to be unsupported, update the data (including the rationale) following the change convention above. If there are questions or additional work/research is needed, E-mail/speak to the FVE.
 - c) Verify that any other overwritten items (red text in the FVE Section of the Pipe Data tab) have a corresponding comment in the “FVE Comments” column and rationale updated, if necessary. If not, add appropriate comments for assumptions made using the above convention.
 - d) When all assumptions are validated, double-check the FVE comments added by the engineer(s) to make sure they are clear, concise, and defensible. Edit or clarify as needed using ~~striketrough~~, **bold red**, or orange fill as needed.
4. Unhide and open the “MAOP Report” tab to confirm that the changes made to the Pipe Data tab, if any, are reflected correctly with no discrepancies. Follow the same procedure for data review as used for the MAOP Final Report tab (Section 3.g.). There should be no yellow shading on the report. However, if QC changes have resulted in yellow shading (i.e. application of the 10-year shift has resulted in a lower feature MAOP), repeat the procedure for issues resolution (Section 3.d).
 5. Save, update status to “Engineering QC Complete”, and check-in the PFL file to the MAOP Portal being sure to enter your logged changes into the Comments Box.
 6. Save a copy of the file to your hard drive.

MAOP Phase III QA Plan

January 2012



MAOP Validation Project (Phase II) QA Overview

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I. MAOP Validation Project Overview

The MAOP (Maximum Allowable Operating Pressure) Validation Project's primary purpose is to verify the Maximum Allowable Operating Pressure for PG&E's Class 3 and 4, and class 1 and 2 (HCA) gas transmission pipeline.

a. Product Overview

The output for the MAOP Validation Project is a Pipeline Features List (PFL) which will be used to establish and report a maximum Allowable Operating Pressure (MAOP) for PG&E gas transmission pipeline segments.

b. Process Overview

The process to develop the PFL will utilize both PG&E employees and contractor personnel, and will consist of 4 main efforts (See diagram below):

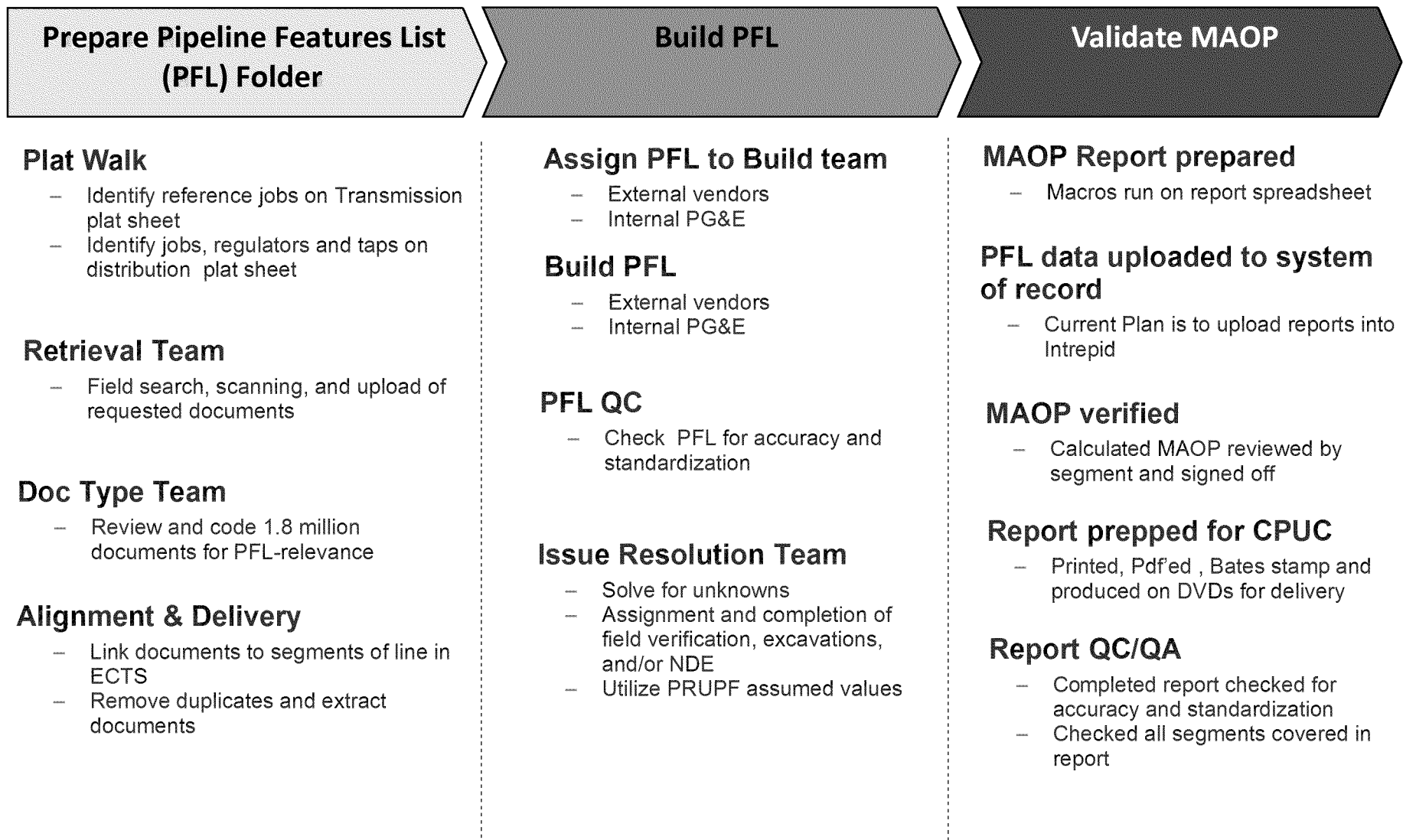
Each stage is described in more detail (descriptions and process maps) in the following stage process maps:

- **Document Preparation** - Documents necessary for the building of a PFL and the establishment of MAOP will be collected, scanned into an image, and uploaded into PG&E's Workflow management system (ECTS).
- **PFL Preparation** - Documents in ECTS will be assembled into PFL build "clusters" or "bundles" based on their relevance and applicability to certain gas transmission pipeline segments
- **PFL Build** - PFL "clusters" or "bundles" will be the framework for the PFL build. Pipeline features will be reviewed in the appropriate documentation in order to record the information required to establish MAOP.
- **MAOP Verification** – Completed PFL will be reviewed by Field Verification Engineer for calculation accuracy and
- **CPUC Report Preparation** – MAOP Report will be prepped for submission to the CPUC.
- **Data upload into Intrepid** – Once PFL build and MAOP calculation have been completed, data gathered will migrate to the Intrepid System.

MAOP Validation Project QA Plan

Publication Date: 01/10/2012 Rev: 1.1

The MAOP verification project consists of 3 main groups of activities:



II. Project QA Objectives and Scope

a. Purpose

- i. The purpose of this Project-Specific Quality Plan (the Plan) is to define the quality management system for the MAOP Validation Project in order to provide insight into whether the processes and procedures produce products that conform to the requirements specified.
- ii. This Plan is the principal quality document for the Project and is based on the Project requirements, Industry specific and PG&E governing documents (as applicable). The plan is modelled after ISO's 9001:2008.
- iii. The Plan covers the full Scope of Work related to MAOP Project and the Project quality organization and the specific responsibilities and authorities of personnel who will implement the plan.
- iv. The Plan is a Project Management document, which demonstrates that the Project has identified the Project objectives, confirmed its quality commitment and established a system of procedures to accomplish these ends. It assigns duties, delegates authority, and sets up suitable testing, inspection and assessment programs to verify that the required standard of performance is being achieved.

b. Quality Objectives

- i. To perform Work that produces products compliant the MAOP Validation Project standards established. To achieve these objectives, The Project will implement:
 - Project procedures to ensure that key Project Work processes and their quality requirements are clearly defined, well documented and fully integrated.
 - Quality Assurance Assessments to verify adequate and effective performance of the project activities.

c. Scope of Quality activities

- i. Project Quality Assurance oversight will cover all Product definition documents, Project process documents, Process Quality Control (QC) activities, for the following Project activities:
 - Document Preparation
 - PFL Preparation
 - PFL Build
 - MAOP Verification
 - CPUC Report Preparation
 - Data Upload to Intrepid
- ii. Quality Assurance (QA) is an independent function on the Project and has no in-line Project duties. QA is therefore free to assess and examine all areas of the Project, to highlight all identified non-compliances and to ensure that agreed corrective actions are taken.

- iii. Quality Control (QC) consists of procedures built into each of the sub-processes within the project.
- iv. The QA Plan will present the plan and approach for QA. The QC plan for each sub process will be planned and executed by the appropriate sub process team, and be reviewed by QA.
- v. Project Quality activities will apply to external vendors and contractors working on MAOP Validation Project activities.

d. Definitions

- i. Defective: A defective product contains a flaw that prevents it from achieving its intended purpose. A unit of product or service containing at least one defect, or having several imperfections that in combination cause the unit not to satisfy intended normal or reasonably foreseeable, usage requirements. "Defective" is appropriate or use when a unit of product/service is evaluated in terms of usage (as contrasted to conformance to specifications).
- ii. Defects: A nonconformity or deviation from a standard or specification. A defect will be considered an "imperfection" that does not affect the product's ability to meet the ultimate usage requirement (e.g. to serve as a basis for MAOP calculation).
- iii. Scheduled Assessment / Assessment: Scheduled QA assessments consist of both sample testing product and process assessment. They are scheduled at the appropriate cadence to ensure a representative sample is pulled from the population. Scheduled assessments could be at different times for each sub process, depending on the unique requirements of each sub process.
- iv. Ad Hoc Assessment / Assessment: Ad Hoc QA assessment requests come from MAOP Verification Project management and could consist of either sample testing or process assessment.
- v. PFL (Pipeline Features List): A Pipeline Features List ("PFL") consolidates the current pipe features (ex: pipe, valve, bend, reducer, tee, sleeve, tap, flange, PCF) into a common worksheet along with feature specifications (ex: pipe size, class, wall thickness, yield strength, seam, rating) using various original design drawings and as-built information. PFLs are intended to include the required information to calculate the Maximum Allowable Operating Pressure ("MAOP") of a segment of a pipeline. Furthermore, the PFLs in conjunction with the Marked-Up Drawings can provide traceable access to the verified and complete PG&E records of the transmission pipeline per the directive of the CPUC.

III. Quality Overview

a. QA Approach

The approach to Quality Assurance for the Project consists of the following high level activities:

- i. Assess whether the Project uses formally defined and documented processes
- ii. Assess whether those processes are designed and implemented using documented product specifications, and that those specifications flow from an appropriate governing standard

- iii. Apply Quality Assurance oversight by performing scheduled Quality Assurance assessments of Project processes, procedures, QC activities, and results in order to assess the existence of and compliance with the documented processes, procedures, and QC activities
- iv. Assess the effectiveness of the procedures and Controls in producing the desired results
- v. Perform QA assessments of specific Project activities as requested by Project leadership
- vi. Report to Project Leadership the results of the QA assessments/assessments, including recommendations for improvements

b. Quality Organization

i. Quality manager

- The Project quality management system is developed, implemented and maintained by the Quality Assurance Manager (QA Manager) who reports directly to the Project Director.
- Quality Assurance Manager has the authority and responsibility to ensure, as the Management representative (as defined in ISO 9001:2008) that the requirements of the Project quality system are established, implemented and maintained.
- Quality Assurance Manager is independent of all other managers on the Project and has no in-line Project duties. He is therefore free to assess and examine all areas of the Project, to highlight identified non-compliances and to ensure that agreed corrective actions are taken.

ii. The QA Manager will be responsible for establishing and monitoring Project quality in the following areas:

- Work performed on the Project by supporting departments related to MAOP Validation Project activities
- Basic and Detailed Engineering activities related to PFL Preparation and build

iii. The QA Manager will be indirectly responsible for the quality of the following groups:

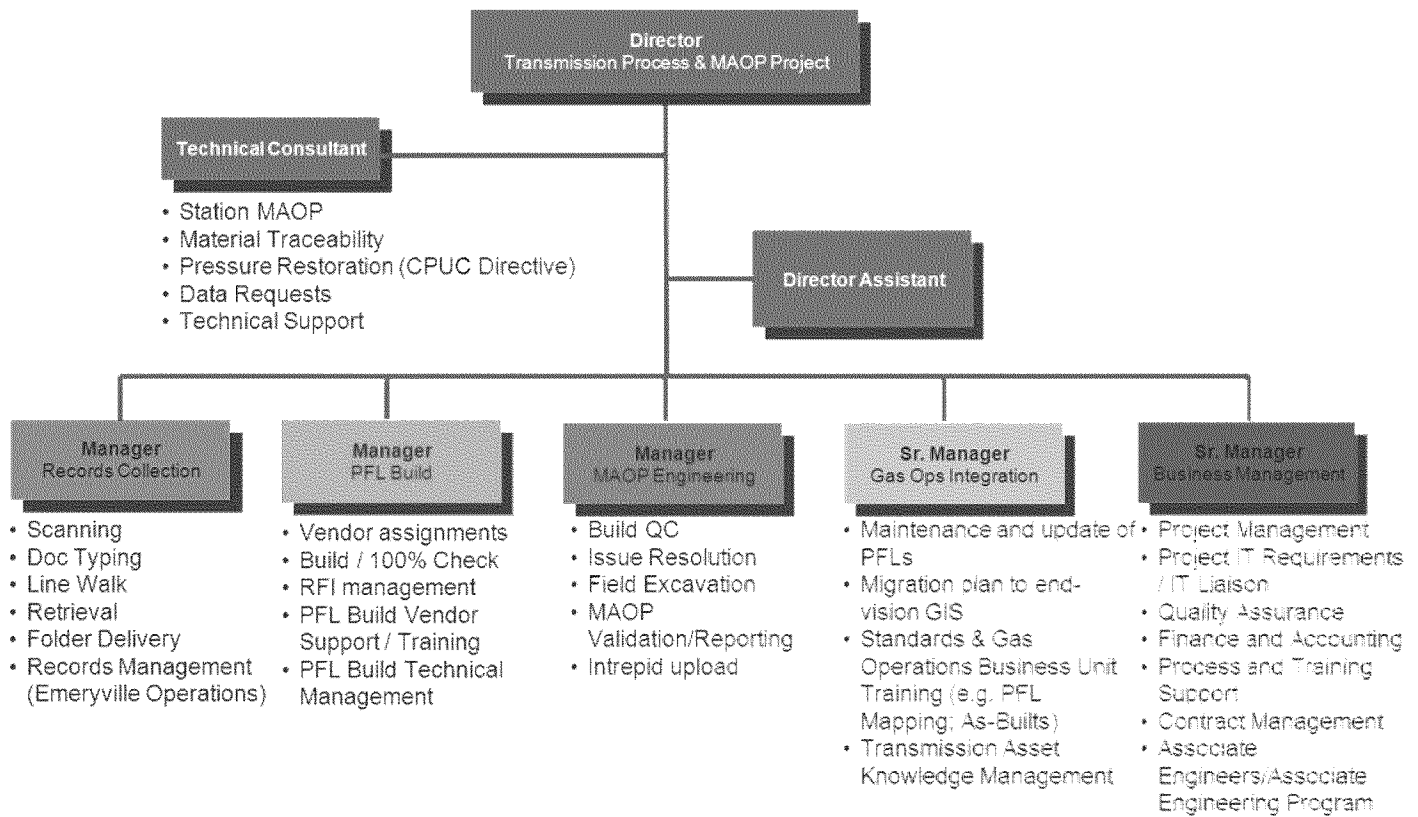
- Document prep Sub-contractors through their own QA Managers
- PFL Build Contractors through their own QA Managers

iv. The main responsibilities of the QA Manager include:

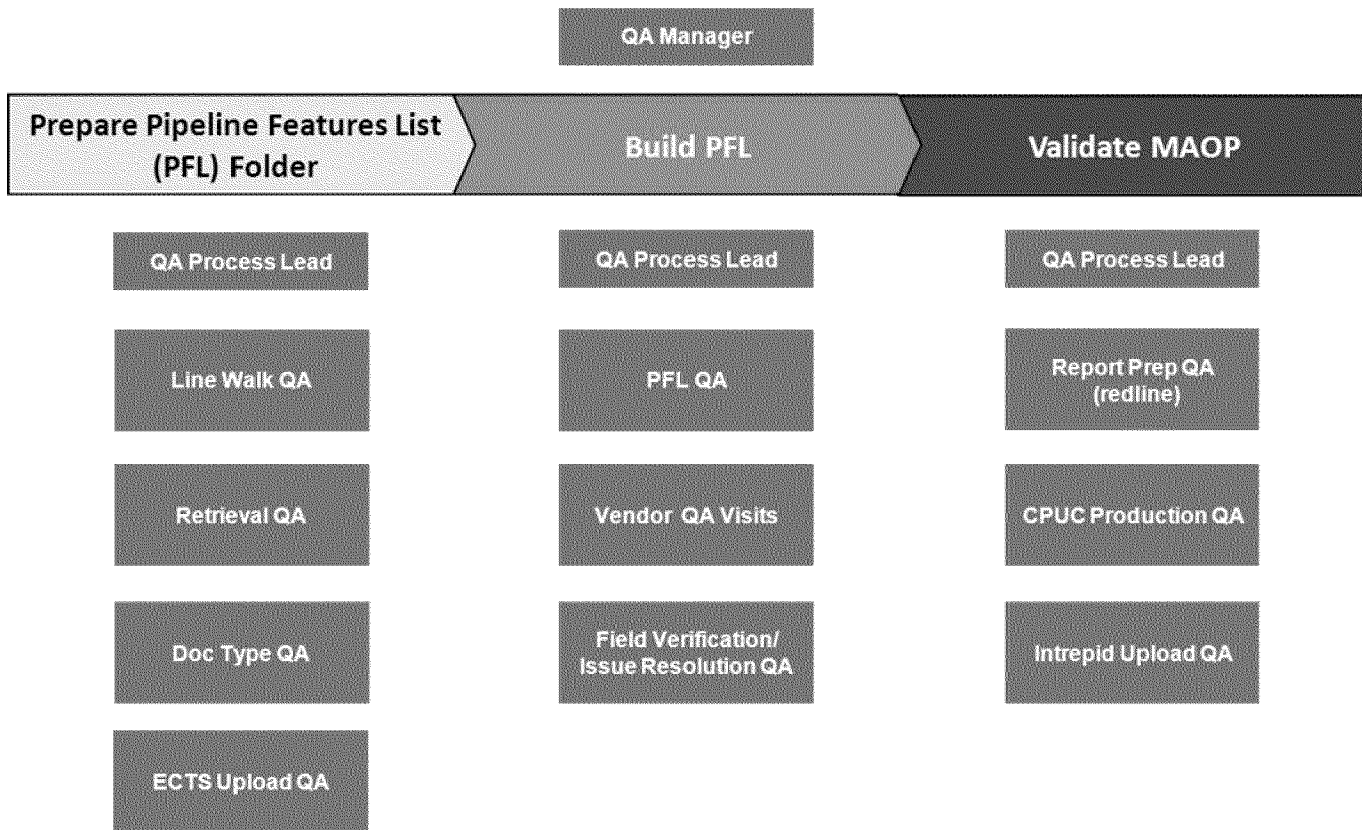
- Preparing the Project Quality Plan and quality related procedures.
- Overseeing internal and external quality assessments, and ensuring that all corrective actions are followed-up and closed-out.
- Liaising as required with the vendor QA representatives on Project quality matters.
- Liaising with the Project Director and other managers on quality related matters.
- Assessing the quality system documentation of contractors and suppliers.
- Developing and maintaining Internal Quality Assessment schedules.

- Developing and maintaining External Quality Assessment Schedules for assessments on selected contractors, sub-contractors and suppliers etc.
- Reviewing trend results for quality problems and initiating root cause preventive action, including monitoring quality assessment reports, nonconformance reports, material delivery deficiency reports, etc. for quality trends. Following-up identified quality problems and agreeing the necessary preventive actions with the managers concerned.
- Controlling and coordinating quality records, including establishing the requirements for filing and backing-up of quality records; and agreeing with contractors on the retention and handover requirements for quality records.

MAOP Organizational Structure below:

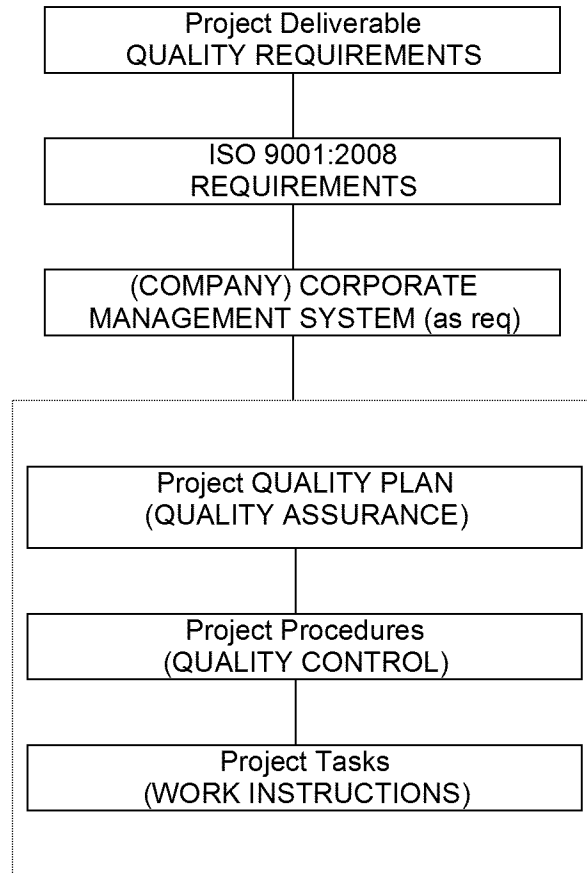


QA Organization Structure



Specifications and Standards

- i. The MAOP Validation Project's Quality Management Plan contains elements of applicable ISO 9001:2008 standards.
- ii. Certain elements of product and process could be subject to more stringent industry and/or PG&E governing documents and standards. Where this is the case, the more stringent will take precedence, as appropriate.
- iii. The applicable governing documents and standards should be defined, and the adherence to the standard described in the sub process product and process description.



c. Assessment Approach

The QA assessment approach will consist of the following general activities. More specific procedures will be documented in the appropriate functional area testing section.

- i. The Project Quality Assurance Manager will prepare, issue, and maintain a Project QA assessment schedule covering internal assessments of quality systems to include all aspects of work in accordance with this document.
- ii. The QA assessments will be performed by or under the direction of the Project Quality Assurance Manager at various stages throughout the duration of the Project, in accordance with the schedule. He will be assisted by others as necessary.
- iii. The QA assessments will cover Project interfaces, Project controls, including testing and quality records.
- iv. External assessment schedules will be prepared and performed to assess the effectiveness of the quality systems of external contractors and subcontractors.
- v. The results of the assessments will be documented in Assessment Reports and corrective action requests (CARs) will be raised, as appropriate, to require implementation of necessary remedial and/or corrective and preventive actions.

- vi. Assessment reports will be usually submitted within one week of completing the activity, followed by their respective closeout details when completed.

d. Statistical techniques and sampling

- i. (Note: this procedure was developed and written for PG&E's MAOP process using ANSI Z1.4 as a guide. It does not intend to implement the ASNI Z1.4 system which includes tightened, normal, and reduced sampling plans and rules for switching.) To select a statistically valid sampling plan, first, the objective of the inspection should be determined based on past performance, other controls that are in place, potential failure modes. Then the Acceptable Quality Level (AQL) of the sampling plan should be documented to demonstrate that the sampling plan meets this objective. Further, since different sampling plans may be statistically valid at different times during the life of a process, all sampling plans should be periodically reviewed. The sampling plan should answer the question: "Is the protection provided by the sample appropriate based on past performance and current controls?"

- ii. Definitions:

Inspection by Attributes - Inspection by attributes is one whereby either the unit of product is classified simply as defective or non-defective or the number of defects in the unit of product is counted, with respect to a given set or set of requirements.

Acceptable Quality Level - Quality level that is the limit of a satisfactory process average. Satisfactory process average can be established using avg % defective or avg defects / 100 units.

Defective - A defective product contains a flaw that prevents it from achieving its intended purpose. A unit of product or service containing at least one defect, or having several imperfections that in combination cause the unit not to satisfy intended normal, or reasonably foreseeable, usage requirements. "Defective" is appropriate or use when a unit of product/service is evaluated in terms of usage (as contrasted to conformance to specifications). For the MAOP Project, "defective" product is classified as a "failure."

Defects - A nonconformity or deviation from a standard or specification. A defect will be considered an "imperfection" that does not affect the product's ability to meet the ultimate usage requirement (e.g. to serve as a basis for MAOP calculation). For the MAOP Project, a defect is called an "error".

- iii. The purpose of each inspection should be clearly defined. Consider use of the following to determine the sample size selected:

Select samples for testing using attributes (vs. variables). The intent is to select a representative sample size that gives confidence that the results represent the overall population of PFLs. This method will be based on a 95% confidence of 2% errors with +/- 2% precision, which effectively means that the expected compliance rate is 98% with an uncertainty range of +/- 2%. The table below shows sample sizes required to achieve a 95% confidence for 2000 units. If a QA test discovers an error rate > than 2%, a recommendation could be to increase the sample size tested to correspond with the observed error rate in order to verify that the observed error rate can be expected throughout the entire population.

Attributes Sample Sizes (non-stratified)																
Population Size		2,000														
Confidence Level		95%														
		Desired Precision Level														
		1%	2%	3%	4%	5%	6%	7%	8%	9%	10%	11%	12%	13%	14%	15%
Expected Occurrence Rate of an Attribute	1%	320	91	42	24	16	11	8	6	5	4	4	3	3	2	2
	2%	548	173	81	46	30	21	16	12	10	8	7	6	5	4	4
	3%	718	246	117	68	44	31	23	18	14	12	10	8	7	6	5
	4%	850	312	152	89	58	41	30	23	19	15	13	11	9	8	7
	5%	955	372	185	108	71	50	37	29	23	19	15	13	11	10	9
	6%	1,041	427	215	127	84	59	44	34	27	22	18	15	13	11	10
	7%	1,112	477	245	146	96	68	50	39	31	25	21	18	15	13	12
	8%	1,172	523	272	163	108	76	57	44	35	28	24	20	17	15	13
	9%	1,223	565	298	180	119	84	63	49	39	31	26	22	19	16	14
	10%	1,268	604	323	196	130	92	69	53	42	35	29	24	21	18	16

$$n = \frac{z^2 P(1 - P)}{d^2} \div \left(1 + \frac{1}{N} \left(\frac{z^2 P(1 - P)}{d^2} - 1 \right) \right)$$

The current QA compliance standard is assessed versus the established statistical parameters, which are 95% confidence level of 98% compliance with a precision of 96% (+/-2%). These parameters lead to the following acceptance criteria:

$$\text{Error rate} = \frac{\# \text{ Errors}}{\text{Sample Size} \times \text{Attributes}} \times 100$$

e. Metrics and Reporting

- i. The purpose of collecting metrics is to analyse the results in order to pinpoint areas to focus root cause analysis and corrective actions.
- ii. Metrics will be captured by each of the individual QA teams representing each step of the process. Metrics will be presented and reviewed on a weekly basis, and archived on the following SharePoint site:

<http://wss/sites/GasProgramAndPerfMgmt/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2fsites%2fGasProgramAndPerfMgmt%2fShared%20Documents%2fSan%20Bruno%20Incident%20PMO%2fGT%20Data%20Validation%20Project%2fQA%5fQC%2fPhase%20I%20PFL%20Build%2f25%20Test%20Metrics%20Dashboard&FolderCTID=%26View=%7b82923FF0%2dA62E%2d43C0%2d981B%2d80024F56BC50%7d>

f. Corrective Actions

- i. Results of the QA assessments (both process and sample testing) are to be communicated to the process owner. The process owner and QA representative will agree on a plan and timeline for corrective action.
- ii. Corrective Actions will be logged in the appropriate tracker with owner and resolution date, and QA representative will record when corrective action is complete. Corrective action logs will be maintained in the QA SharePoint folder for each QA process.

g. Change Control

- i. Changes to processes as a result of QA assessments should follow the change control procedures for the MAOP project, located on the following SharePoint site:

<http://wss/sites/GasProgramAndPerfMgmt/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2fsites%2fGasProgramAndPerfMgmt%2fShared%20Documents%2fSan%20Bruno%20Incident%20PMO%2fGT%20Data%20Validation%20Project%2fMAOP%20Validation%20Operating%20Manual%20Source%20Documents%2fProcess%20Maps%2f02%2dDrafts&FolderCTID=&View=%7b82923FF0%2dA62E%2d43C0%2d981B%2d80024F56BC50%7d>

h. External Contractor QA

i. Suggested Vendor QA Requirements

- Contractors shall be required to implement the requirements of this section to the extent it is applicable to their scope of work. PG&E shall be the final judge as to which parts are applicable and which are not.
- Contractors shall nominate a member of management staff to act as the Quality Representative. The Quality Representative shall be provided with adequate resources and shall be delegated the necessary authority to enable the quality of work on the Contract to be managed effectively.
- The Contractor Quality System is to be capable of demonstrating that all the requirements of the Contract and all relevant standards, regulations etc are being met.
- The Contractor shall manage all Inspection and Testing activities in such a way as to be able to demonstrate that all specified requirements have been met. All defective products are to be resolved before final acceptance.
- PG&E MAOP Validation project representative will monitor the implementation of the Contractors QA / QC program by assessing procedures, work instructions, method statements etc, and by assessing whether Quality oversight and control exists for all significant activities. PG&E MAOP Validation project representative(s) will identify those activities they wish to witness and will assess adequate presence of activity documentation. PG&E MAOP Validation project QA group will perform scheduled quality assessments on the Contractors QC and inspection activities as directed by MAOP Project Management.

- PG&E MAOP Validation project representative and any authorized third parties shall have the right to conduct assessments, inspections and tests of all Contract works that are being executed by the Contractor, his consultants, subcontractors, suppliers and sub-tiers thereof, and to observe the execution of these activities by others.
- The Contractor, his consultants, subcontractors, suppliers and sub-tiers thereof shall make available for assessment all records necessary to demonstrate that the Contract works have been executed in accordance with the Contract. They shall also provide PG&E MAOP Validation project representative with documents that demonstrate that the Contract works are progressing in accordance with specified requirements. These are to be provided in a timely manner as the work progresses.

ii. Contractor Quality plan

- Contractors shall prepare a specific Project Quality Plan (PQP) which addresses all activities relevant to the Work and shall demonstrate how all work performed by Contractor will conform to the contract specified requirements. The Contractor's Quality Plan shall include the controls to be applied by subcontractors, suppliers and sub-tiers thereof, both directly and by identifying the Quality System documentation that subcontractors, suppliers and sub-tiers thereof are required to produce to meet the Contractor's requirements.
- The plan shall define the documented quality system to be applied by Contractor throughout the Work, and make reference to all of the Contractor's relevant procedures and manuals.
- The Plan shall address the interfaces between PG&E MAOP Validation project and Contractor and other relevant organizational entities. The Plan shall include an organization chart showing Contractor's corporate and Project organization responsible for managing, performing and verifying the Work. The organization chart shall be supported with a reporting and functional description of Contractor's project organization and identification of the quality and environmental related responsibilities of key positions.
- The plan shall be updated as necessary throughout the contract, to reflect any changes to Contractor's documented quality system. Contract Quality Plans shall, as a minimum:
 - Cover the relevant phases of the Contract (as applicable)
 - Incorporate or reference necessary quality control procedures
 - Describe the relationships and activities of the Contractor and any Subcontractors suppliers and consultants including provision of organization charts

iii. Processes and procedures

- Supporting the Quality Plan shall be Quality Processes/Procedures (QPs) for the works. The responsibility for review and approval of QPs is with the

Contractor. The primary activities addressed by QPs and to be implemented by the Contractor are to include:

- document control including preparation, checking, approval, updating, receipt and control of incoming documents, distribution, storage and maintenance of records;
 - design control including verification, approval and acceptance by others;
 - performance of quality verification reviews
 - monitoring the activities of any consultants, subcontractors, suppliers and sub-tiers thereof, to ensure their compliance with the Contract;
 - administration of non-conformity and reporting to the Project Director;
 - Production of weekly reports of quality issues including non-conformity records and KPIs as deemed appropriate.
- The Contractor, and through him, his consultants, subcontractors and suppliers etc, engaged in designing and supplying or any other service connected with the works, shall develop and maintain procedures for carrying out checks, reviews and verification activities appropriate for the services they provide. These procedures shall be subject to the review and acceptance of the PG&E Engineering Lead.
 - The Contract Quality Plan shall include or reference the controls to be applied by subcontractors, suppliers and sub-tiers thereof, both directly and by identifying the Quality System documentation that Subcontractors, suppliers and sub-tiers thereof are required to produce. The Contractor shall ensure that subcontractors, suppliers and sub-tiers thereof agree to and implement the applicable controls specified in the Contract Quality Plan and the identified Quality System documentation.

iv. Assessments

- The Contractor shall submit with his Quality Plan a schedule of his internal and external consultant, subcontractor and supplier assessments that are to be conducted by his personnel. The schedule, scope and method of the assessments are such as to enable the Contractor to verify that all aspects of the works are being conducted in accordance with contractual requirements.
- The Contractor shall allow PG&E MAOP Validation Project representative and authorized third parties to observe/participate in these assessments and to conduct additional independent assessments, as they consider appropriate to provide assurance that the works are being conducted in accordance with contractual requirements. The Contractor shall provide the facilities and access necessary for these assessments to be carried out effectively. The Contractor shall place similar requirements on his consultants, Subcontractors, and suppliers.
- All project related assessments performed by the Contractor, his consultants, subcontractors, suppliers and sub-tiers thereof, shall be reported and copied to PG&E MAOP Validation Project Director, who will review and analyze for serious findings and trends. The Contractor will close-out all assessment findings in a timely manner and instigate measures to prevent a recurrence. PG&E MAOP

Validation Project Director will monitor the closure of Contractor assessment findings through assessment, surveillance and review activities to demonstrate that the works are progressing in accordance with specified requirements.

v. Organization and resources

- The Contractor shall develop his own, and his, major subcontractors', consultants' and suppliers' their own, organization charts. The charts shall show the reporting structure of the key personnel on the Project. The charts shall identify all personnel responsible for Safety Critical Work and key activities.
- The Contractor shall demonstrate that adequate resources are provided to fulfill the requirements for quality and environmental management, inspection & testing and certification as detailed in the Contract. This shall include demonstrating that personnel possess the necessary qualifications and competencies required to carry out specific tasks.
- The Contractor shall provide regular and appropriate training to all personnel in the operation of the Quality System and as necessary to ensure their competence to do their work and shall maintain records of all such training.

vi. Recommendations for Acceptance criteria for PFL

- PG&E MAOP Validation Project will issue PFL acceptance criteria that will describe in detail the requirements with regard to assembly, compilation and content of final turnover documentation.
- Requests for Information (RFIs) shall be used by the Contractor to formally request from the Engineer information, clarification or agreement to a proposed action.
- Each PFL attribute requiring a concession or design change shall be referred to PG&E MAOP Validation Project by the Contractor for appropriate resolution.
- The Contractor shall be responsible for demonstrating that specified requirements have been met. This includes the implementation of effective controls to ensure that the checking, review, inspection and testing of the Contract works are completed.
- PG&E MAOP Validation Project shall manage the effectiveness of the Contractor's certification system through:
 - surveillance,
 - witnessing appropriate key activities,
 - review of certification and records,
 - monitoring and participation in the Contractor's assessment schedule,
 - Independent assessment.

vii. Contractor / Vendor Qualification

- Each vendor / external contractor shall demonstrate the ability to meet the following set of predetermined parameters through a "trial" demonstration period. The details

of the qualification activities shall be documented and the results recorded for each vendor performing PFL build activities.

IV. Project Sub process

i. The QA Plan for each of the Project Sub processes will be listed as separate appendices

- PGE_MAOP_01_PFL_Prep_QA_Procedure.docx
- PGE_MAOP_02_Retrieval_QA_Procedure.docx
- PGE_MAOP_03_Doc_Type_QA_Procedure.docx
- PGE_MAOP_04_PFL_Build_QA_Procedure.docx
- PGE_MAOP_05_IR_FVE_QA_Procedure.docx
- PGE_MAOP_06_Report_QA.docx

MAOP Phase III QA Procedure Document (PFL) Preparation

17 November 2011
version 1.5

REVISION CONTROL SHEET

Version	Date	Status	Modified	Comments
1.0	Nov. 17, 2011		Omar Rahman	Drafted PFL Prep testing procedure

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I. PFL Preparation Sub-Process Overview

1. Document Preparation QA Activities High-level Overview

The document preparation sub-process includes the following QA activities that will be reviewed accordingly for the MAOP Phase 2 efforts. This section is a high-level overview of the different QA activities. The detail procedures for these QA activities will be defined further in the subsequent sections.

Document Preparation Activities	Definition of the product	Definition of Defective product	Specifications and Reference Documents
1. PFL Prep	<p>Once documents are categorized, they are associated to specific jobs.</p> <p>The job files are then bundled together by specified line numbers and mile points. The resulting package is called a Bundle.</p> <p>A given Bundle must contain all relevant plat sheets and job numbers required for build.</p>	<p>Defective product for PFL prep would include the following criteria:</p> <ol style="list-style-type: none"> 1) Fail = For plat sheets (both d-plat and t-plat) that are missing from the Bundle but required for the Build. 2) Fail = For Job Numbers that are missing from the Bundle but required for the Build. 	N/A

II. PFL Prep

1. Stage Description

PFL Prep is the process by which documents are associated to job numbers, job numbers are organized into bundles, and bundles are delivered to the build team for use in building the Pipeline Features Lists (PFLs).

Stage Deliverable Definition:

The deliverable from the PFL Prep process is a bundle. A bundle is a package of documents pertaining to various line segments and SHORTS.

Documents in a bundle are organized by their corresponding job number and include; plat sheets, drawings, STPRs, BOMs, etc. At a minimum, bundles must contain all relevant plat sheets and job numbers for the lines and SHORTS that they represent. Once the bundle is complete, it is delivered to the PFL build team.

2. QA Data Collection & Sampling Details

The population of bundles are stored in the ECTS system. The sample size of bundles that will be reviewed will correspond to a 95% confidence level and 2% error rate. If the total population of bundles is not known in advance to use for sampling determination, sample at least 10% of bundles completed on a weekly basis, until the error rate falls to an acceptable level (determined by management).

3. QA Testing Process

The purpose of Quality Assurance oversight of the prep process is to give management confidence that the process is being executed as designed, and to provide an independent set of data to use in determining an acceptable level of errors for the process.

Testing Procedures: There are two tests that are done for PFL Prep. The first test is to ensure that all of the required plat sheets are included in the bundle. The second test is to ensure that all of the required job numbers are included in the bundle. Below is a high-level description of each QA process:

Plat Sheet QA

- 1) Login to ECTS and randomly select a completed bundle.
- 2) Open the bundle and verify that the plat walk and job number review has been completed and QC reviewed.
- 3) Record the line numbers, mile points, and SHORTS represented by the bundle in the QA log.
- 4) Open GIS Gas View and search for the appropriate line numbers, mile points, and SHORTS. Record all of the corresponding d-plats in the QA log.
- 5) Make a note of all transmission lines that are either in the vicinity of or taps directly off of the lines and SHORTS being reviewed. Record the transmission line numbers in the QA log.
- 6) Search ECTS for all documents associated to the bundle and all job docs within the PFL mileage for the required d-plats and t-plats identified in step 4 and step 5.
- 7) Compare the plat sheets identified on the QA log with the plat sheets in ECTS and note the gaps. These are the potential fails.
- 8) Perform a secondary QA for all potential fails with a supervisor from the PFL Prep team.

Job Number QA

- 1) Open all of the identified plat sheets one-by-one and walk the appropriate lines and SHORTS.
- 2) Record all of the job numbers that correspond to the lines and SHORTS in the QA log.
- 3) Search ECTS for all job numbers linked to the bundle.
- 4) Compare the job numbers identified on the QA log with the job numbers in ECTS and note the gaps. These are the potential fails.
- 5) Perform a secondary QA for all potential fails with a supervisor from the PFL Prep team.

4. Documentation of Results & Archiving

QA results for the PFL Prep process are detailed in an excel workbook and stored in the QA/QC folder in SharePoint. There are two worksheets in the excel workbook, one that corresponds to the plat sheet QA (see image 6 below) and one that corresponds to the job number QA (see image 7 below).

Image 6

PG&E MAOP Phase 3 QA								Total Pass	331	
PFL Prep QA Completeness								Total Fail	7	
Date Set Number	QA Test Date	QA Reviewer	PFL Bundle ID	D-Walk/ T-Walk Complete Date	Doc. Type	Image	Pass / Fail	Secondary QA (Y/N)	Failure Classification	
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	vol2583a6.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	vol2522/6.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	vol2522/7.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	2466/6.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	2528C4.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	2528C5.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	2528C6.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	2528B6.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	2526B7.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	2526A7.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	2526A8.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	2465/8.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	2466/1.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	2466/2.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	2466h2.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	2466h3.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	YOL2524h3.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	vol2524/5.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	vol2525/6.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	2525D1.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat	vol2583a3.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat		Fail	Yes	Missing Plat Sheet	
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	D-Plat		Fail	Yes	Missing Plat Sheet	
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	T-Plat	385100eB119.tif	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	T-Plat	580631s1 frame4.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	T-Plat	580631s1 frame5.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	T-Plat	580631s1 frame6.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	T-Plat	580631s1 frame7.pdf	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	T-Plat	580631s1 frame8.pdf	Pass	No		

Image 7

PG&E MAOP Phase 3 QA				Total Pass		547			
PFL Prep QA Completeness				Total Fail		5			
Data Set Number	QA Test Date	QA Reviewer	PFL Cluster ID	D-Walk/ T-Walk Complete Date	Job #	Pass / Fail	Secondary QA (Y/N)	Failure Classification	QA Notes
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	67599	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	57456	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	7045145	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	45834	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	458911	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	5199219	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	42220	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	4776A	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	73031	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	4540043	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	4893467	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	458911	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	60393	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	100363	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	101741	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	410930	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	4050F	Pass	No		
PPC001	11/1/2011	Omar Rahman	B30008	10/24/2011	169927	Pass	No		

5. Trend Analysis & Continuous Improvement

Testing exceptions will be compiled and analyzed to determine any pervasive process errors as well as where in the process they are being made. Based on this analysis, corrective action will be taken to address any identified process break downs.

Additionally, QA results will be compiled weekly in summary metrics and reported on. This will provide assurance that the PFL Prep process is running smoothly and within a specified error rate. The nature of and frequency of errors will be briefed with management, and a determination of the acceptable level of error or variation in the final product should be discussed with process owners and management. Corrective actions should be targeted to drive the error rate to an acceptable level as determined by management. Image 8 and Image 9 represent examples of the summary metrics.

Image 8

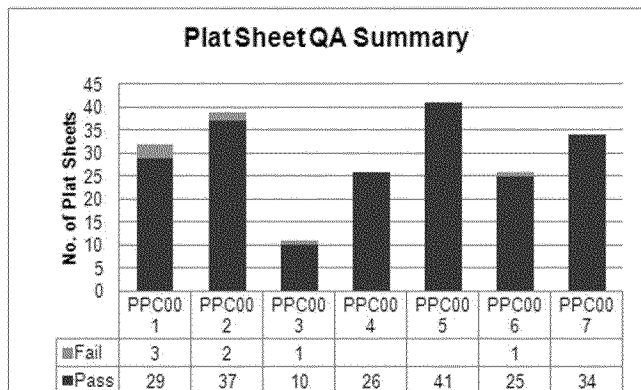
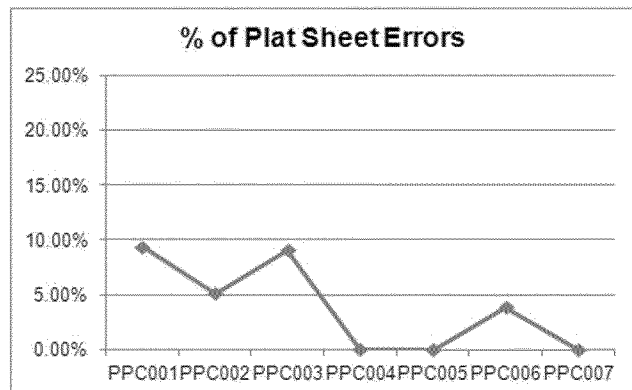


Image 9



MAOP Phase III QA Procedure Retrieval

11 April 2012
version 1.3

REVISION CONTROL SHEET

Version	Date	Status	Modified	Comments
1.1	November 18, 2011		Austin Clark	Included QA procedures that were reviewed / approved by Valda Sanders, Scott Toback, and Rich Martinez
1.2	April 11, 2012	DRAFT	Chris Montaña	Detail Retrieval QA to include processes that are currently in use.
1.3	April 12, 2012	DRAFT	Chris Montaña	Detail new Retrieval process developed with Austin Clark and Scott Toback.

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I. Phase III Retrieval Sub-Process Overview

1. Phase III Retrieval QA Activities High-level Overview

The Phase III Retrieval sub-process includes the following QA activities that will be reviewed accordingly for the MAOP Phase 3 efforts. This section is a high-level overview of the different QA activities within the Retrieval process. The detailed procedures for these QA activities will be defined further in subsequent sections.

Retrieval Activities	Definition of the product	Definition of Defective product	Specifications and Reference Documents
1. Emeryville Retrieval	The "Emeryville Retrieval" process consists of identifying jobs that reside in the Emeryville warehouse using the Filemaker system, and then searching for those identified jobs in the warehouse. QA activities will be performed on the Emeryville Retrieval process and will assess the accuracy of the process.	A defective product in the Emeryville Retrieval process would include the following: Jobs that physically reside in the Emeryville warehouse yet have inaccurate or incomplete data in the Filemaker system (e.g. no indication in Filemaker that job is located in Emeryville).	Reference documents include: + Retrieval Process map for Phase 1 and 2
2. Field Retrieval	The "Field Retrieval" process consists of identifying jobs that do not reside in the Emeryville warehouse, and then searching for those identified jobs in PG&E field offices. QA activities will be performed on the Field Retrieval process and will assess the consistency and accuracy of the process.	A defective product in the Field Retrieval process would include the following: Field Retrieval teams that do not consistently follow / complete the defined field retrieval approach, protocols, and documentation. A defined Field Retrieval approach that does not effectively find requested job files (i.e. too many "unfound" job files in the field)	Reference documents include: + Retrieval Process map for Phase 1 and 2
3. Transmittal	The "Transmittal" process consists of tracking images / job files discovered at the field office, transporting those documents to the central scanning facility in Emeryville, and receiving those images / job files. This process will utilize a "chain of custody" solution to track the location of specific job files. QA activities will be performed on the Transmittal process, with focus on the chain of custody solution, and will assess the accuracy of this process.	A defective product in the Transmittal process would include the following: Any difference in the image / job file count at the field office vs. the image / job file count at the central scanning facility for a particular package of job files.	Reference documents include: + Retrieval Process map for Phase 1 and 2

<p>4. Scanning</p>	<p>The "Scanning" process consists of creating readable and accurate digital images of the job files that are either retrieved from the field or pulled from the Emeryville warehouse. QA activities will focus on assessing the existing QC process for image scan quality.</p>	<p>A defective product in the Scanning process would include the following: An ineffective scan quality internal QC process manifested by unacceptable error rates in scan quality. Scan quality errors would be defined as an image that is missing pages, missing data on pages, or unreadable.</p>	<p>Reference documents include: + Retrieval Process map for Phase 1 and 2</p>
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2. Document Preparation Reporting and Archiving

All document preparation QA results will be available on SharePoint. Below is a link to the SharePoint site.

Note: Each QA activity will have its own folder where the results will be stored.

<http://wss/sites/GasProgramAndPerfMgmt/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2fsites%2fGasProgramAndPerfMgmt%2fShared%20Documents%2fSan%20Bruno%20Incident%20PMO%2fGT%20Data%20Validation%20Project%2fQA%5fQC%2fPhase%20I%20PFL%20Build%2f30%20QA%20%2dDocument%20Preparation&FolderCTID=%26View=%7bA976F191%2dDBF6%2d499D%2d9AD6%2d934F04648538%7d>

II. Emeryville Retrieval

1. Stage Description

The "Emeryville Retrieval" process consists of identifying jobs that reside in the Emeryville warehouse using the Filemaker system, and then searching for those identified jobs in the warehouse.

2. QA Data Collection & Sampling Details

The population consists of all hardcopy job files that currently reside in the Emeryville warehouse. The scientific sample size will be calculated based on defined precision, error rate, and confidence level (precision rate = $\pm 2\%$ = 4% precision rate, expected error rate = 2%, confidence level = 95%).

3. QA Testing Process

Below is a description of the QA testing procedures:

- Perform a statistical sample test of the entire population of physical job files stored at the Emeryville warehouse
 - Randomly sample Job File boxes and document shelf #, box #, bar coded JF # (e.g. JFN12345), and the Job File number from the site (e.g. WO 1234, GM 1432) located on the job file tab or inside the job file
 - Search Filemaker system using the site job file # (e.g. WO 1234)
 - Validate accuracy of all data elements collected from warehouse
- Error is defined as a job file with any incorrect information in the Filemaker system.
 - A Failure occurs when an error in the Filemaker incorrectly reports the location of a job file.

4. Documentation of Results & Archiving

Document the Test Results on the "Emeryville Retrieval - QA Testing Results" Excel spreadsheet.

Testing Date	Sample #	Job #	ECTS Record ID #	Box #	1	2	3	Pass or Fail	Notes
					Number of hard copy documents in job Folder	Number of hard copy job folder documents found in ECTS file	Number of hard copy job folder documents not found in ECTS file		
4/19/2011	1	4226270	849568	GTC060	22	22	0	Pass	
4/19/2011	2	7018397	849569	GTC060	12	12	0	Pass	
4/19/2011	3	4676D	806995	GTC060	5	5	0	Pass	
4/19/2011	4	138191	849563	GTC060	8	8	0	Pass	
4/19/2011	5	6098884	629383	GTC079	15	15	0	Pass	

5. Trend Analysis & Continuous Improvement

Testing exceptions will be compiled and analyzed to determine any process error trends and to enable root cause analysis. Based on this analysis, corrective action will be taken to address any identified process breakdowns.

III. Field Retrieval

1. Stage Description

The "Field Retrieval" process consists of identifying jobs that do not reside in the Emeryville warehouse, and then searching for those identified jobs in PG&E field offices.

2. QA Data Collection & Sampling Details

The QA process will collect and examine the documentation, processes, protocols, and level of detail utilized by the field teams. The QA process will also consist of independently meeting with field office supervisors / mappers to assess the accuracy and consistency of the retrieval approach. The QA process will be performed across the field teams, office types, and throughout different field office regions.

3. QA Testing Process

Below is a description of the QA testing procedures:

Test retrieval field team procedures during retrieval visits to sites. Assess consistency of documentation, level of detail, and protocol used during retrieval process. Independently meet with mapping site supervisors / mappers and assess accuracy of job file retrieval approach. Perform testing across all field teams, office types, and regions. QA measures the accuracy, completeness, and consistency, in both the processes followed by Retrieval Teams and the results they produce in documents retrieved.

Retrieval QA Metrics:

- Pass** – Procedures and processes followed and documents were accurately marked 'Not Found', 'NA' or Retrieved by Retrieval Team.
- Error** – Inconsistency in applying the retrieval procedures and processes, however, does not result in reduced information for the completeness of the PFL Build process. (if we call out an error, we need to clearly document it)
e.g. Document was incorrectly labelled 'Not Found' or 'NA' by Retrieval Team but no document requested was missed by the Retrieval Team.
- Fail** – Inconsistency in applying the retrieval processes that result in reduced information for the completeness of the PFL Build process.
e.g. Document was incorrectly marked 'Not Found' or 'NA' by Retrieval Team and consequently not retrieved.

Item	Description	When	Responsible
<p>1. Identify Field Office and Test Set</p>	<ol style="list-style-type: none"> 1. Obtain the Retrieval Schedule for the next week. 2. Use field retrieval schedule to identify a field office and team for the <u>weekly</u> Field Retrieval QA visit. 3. Use ECTS to select a sample of closed Job Requests for the selected field office that were determined to be "Not-Found" (NF). Select from the most recent document Field Retrieval visit. If there are not a reasonable number of NFs to test, select additional NFs from the previous visit. (note: this is not a statistically-driven sample population.) 4. Selection of field office, team, and closed Job Requests to test should be as random as possible. Given limited number of active retrieval sites, randomization was upon all documents retrieved from a given office within a 2 to 3 month window. 5. Notify Retrieval Lead of selected site. 6. Send an email to mapping lead and let them know that you will be on-site and would like to meet with them independently of the Field Retrieval Team. 	<p>Friday prior to week visit will take place.</p>	<ol style="list-style-type: none"> 1. Field Retrieval-QA Lead <ol style="list-style-type: none"> 1.1. PG&E Retrieval Supervisor 1.2. Field Retrieval-QA 1.3. Retrieval Lead 1.4. Retrieval Scheduler
<p>2. On-Site Retrieval QA (apart from Retrieval Team)</p>	<ol style="list-style-type: none"> 1. Independently meet with mapping lead. <ol style="list-style-type: none"> 1.1. Confirm all locations to search for documents. 1.2. Inquire about any secondary sites on premises where Job Documents may be stored. 1.3. Ask if the previous team met with mapping lead (or someone else) to review all NFs. 1.4. Ask if the current team has inquired with them for help in finding NFs or set up a meeting with them. 1.5. Give mapping lead a list of NFs that you are validating.- ask for assistance locating the NFs. 2. Conduct search for NFs. 3. Validate NFs on Plats/GIS. 4. Record each NF as "Pass", "Fail", "Error". (see definitions at the beginning of Process) 	<p>Day of visit</p>	<ol style="list-style-type: none"> 1. Field Retrieval-QA

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Item	Description	When	Responsible
<p>3. On-Site Process QA (with Retrieval Team)</p>	<ol style="list-style-type: none"> 1. Observe Retrieval Processes. <ol style="list-style-type: none"> 1.1. Ask Retrieval Team to narrate their process as they look for several Job Documents Requests. 1.2. Seek to impact Field Retrieval team workflow as little as possible. 2. Process QA Notes: <ol style="list-style-type: none"> 2.1. Observe Field Retrieval team processes for both NFs and documents that are retrieved. 2.2. Retrieval Team verifies that the retrieved documents match requested documents. 2.3. Retrieval Team verifies the record number of a current NF document using either GIS or Plat. 2.4. Retrieval Team searches any secondary sites identified by mapping lead. 2.5. Retrieval Team searches one Job Folder before and after the Job Folder for a current NF Job Request. 2.6. Retrieval Team has reviewed (or scheduled a meeting to review) NFs with mapping lead or other mapping staff. 2.7. GSRs and/or Preliminary Jobs: <ol style="list-style-type: none"> 2.7.1. Secondary search performed for NF GSR by team lead. 2.7.2. Retrieval Team searches one GSR Folder before and after the GSR Folder for a current NF GSR Request. 2.7.3. GRS and/or Preliminary Job are Added to Chain of Custody Letter 2.7.4. Scanned on-site 2.7.5. Returned to original location. 2.8. Bar code for Files and Boxes are scanned into project tracker. 	<p>Day of visit</p>	<ol style="list-style-type: none"> 1. Field Retrieval-QA 2. Field Retrieval Team
<p>4. After Visit</p>	<ol style="list-style-type: none"> 1. Check to see if Retrieval Checklist was completed (after field visit is closed out by Field Retrieval team,) 2. Check to see if Document Requests marked NA were documented in the appropriate ECTS retrieval field. 	<p>Next Day</p>	<ol style="list-style-type: none"> 1. Field Retrieval-QA

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Item	Description	When	Responsible
<p>5. Communications</p>	<ol style="list-style-type: none"> 1. Calculate metrics on: <ol style="list-style-type: none"> 1.1. Errors 1.2. Fails 2. Write up findings 3. Write up recommendations 4. Update slide and send to Field Retrieval-QA Lead for review. 5. Discuss metrics with Retrieval team and Retrieval Team Lead and Revise (if necessary) 6. Conduct detailed analysis on errors/fails/inconsistencies 7. Report out. 	<p>Next Day (if possible)</p>	<ol style="list-style-type: none"> 1. Field Retrieval-QA 2. Retrieval Lead 3. Retrieval Team

4. Documentation of Results & Archiving

Document the Test Results on the "Field Retrieval - QA Testing Results" Excel spreadsheet.

Testing Date	Sample #	Job #	ECTS Record ID #	Box #	1	2	3	Pass or Fail	Notes
					Number of hard copy documents in job Folder	Number of hard copy job folder documents found in ECTS file	Number of hard copy job folder documents not found in ECTS file		
4/19/2011	1	4226270	849568	GTC060	22	22	0	Pass	
4/19/2011	2	7018397	849569	GTC060	12	12	0	Pass	
4/19/2011	3	4676D	806995	GTC060	5	5	0	Pass	
4/19/2011	4	138191	849563	GTC060	8	8	0	Pass	
4/19/2011	5	6098884	629383	GTC079	15	15	0	Pass	

5. Trend Analysis & Continuous Improvement

Testing exceptions will be compiled and analyzed to determine any process error trends and to enable root cause analysis. Based on this analysis, corrective action will be taken to address any identified process breakdowns.

IV. Transmittal

1. Stage Description

The "Transmittal" process consists of tracking images / job files located at the field office, transporting those documents to the central scanning facility in Emeryville, and receiving those images / job files. This process will utilize a "chain of custody" solution to track the location of specific job files. (note: this step does not cover the upload into ECTS Process)

2. QA Data Collection & Sampling Details

The QA process will collect job file counts from the field office based on the chain of custody solution, as well as job file counts at the central scanning facility for the same package of job files. Since the chain of custody solution has not yet been implemented, the QA data collection is not completely defined.

3. QA Testing Process

Below is a description of the QA testing procedures:

- Document image count of job files discovered in the field through field tracking mechanism
 - Document image count of job files received in the central scanning facility
 - Document the return of images back to field office (as required)
 - Validate accuracy of image counts and report any deviations
- Failure is defined as any difference in image counts between docs removed from field office vs. docs in central scanning location.

4. Documentation of Results & Archiving

Document the Test Results on the "Transmittal - QA Testing Results" Excel spreadsheet.

Testing Date	Sample #	Job #	ECTS Record ID #	Box #	1	2	3	Pass or Fail	Notes
					Number of hard copy documents in job Folder	Number of hard copy job folder documents found in ECTS file	Number of hard copy job folder documents not found in ECTS file		
4/19/2011	1	4226270	849568	GTC060	22	22	0	Pass	
4/19/2011	2	7018397	849569	GTC060	12	12	0	Pass	
4/19/2011	3	4676D	806995	GTC060	5	5	0	Pass	
4/19/2011	4	138191	849563	GTC060	8	8	0	Pass	
4/19/2011	5	6098884	629383	GTC079	15	15	0	Pass	

5. Trend Analysis & Continuous Improvement

Testing exceptions will be compiled and analyzed to determine any process error trends and to enable root cause analysis. Based on this analysis, corrective action will be taken to address any identified process breakdowns.

V. Scanning

1. Stage Description

The "Scanning" process consists of creating readable and accurate digital images of the job files that are either retrieved from the field or pulled from the Emeryville warehouse.

2. QA Data Collection & Sampling Details

The QA process will collect and examine the documentation, processes, protocols, and level of detail utilized by the internal QC team at the central scanning facility. The QA process will assess the effectiveness of the existing internal QC process.

As necessary, perform a statistical sample test based on the daily population of scanned job files. The sample size will be calculated based on defined precision, error rate, and confidence level (precision rate = +/-2% = 4% precision rate, error rate = 2%, confidence level = 95%).

3. QA Testing Process

Below is a description of the QA testing procedures:

- Test accuracy of scanned images by comparing original hard copy job file to scanned image
- Confirm image accuracy by comparing 2 unique values on each page (original and scanned image)
- Failure is defined as a missing page or degraded quality of scan (e.g. cannot view all data on page)
- Incorrect page order is considered an inconsistency

4. Documentation of Results & Archiving

Document the Test Results on the "Scanning - QA Testing Results" Excel spreadsheet.

Testing Date	Sample #	Job #	ECTS Record ID #	Box #	1	2	3	Pass or Fail	Notes
					Number of hard copy documents in job Folder	Number of hard copy job folder documents found in ECTS file	Number of hard copy job folder documents not found in ECTS file		
4/19/2011	1	4226270	849568	GTC060	22	22	0	Pass	
4/19/2011	2	7018397	849569	GTC060	12	12	0	Pass	
4/19/2011	3	4676D	806995	GTC060	5	5	0	Pass	
4/19/2011	4	138191	849563	GTC060	8	8	0	Pass	
4/19/2011	5	6098884	629383	GTC079	15	15	0	Pass	

5. Trend Analysis & Continuous Improvement

Testing exceptions will be compiled and analyzed to determine any process error trends and to enable root cause analysis. Based on this analysis, corrective action will be taken to address any identified process breakdowns.

VI. Overall Retrieval Process Success rate

1. Description

On a periodic basis (monthly or fortnightly) assess the overall retrieval success rate by comparing the list of documents requested for retrieval successfully located to the list requested for retrieval. Determine which step in the above process could be a contributor to errors / gaps, and determine if corrective action has an impact on the overall accuracy and consistency of the retrieval process.

MAOP Phase III QA/QC Procedure Document Preparation

01 November 2011
version 1.4

REVISION CONTROL SHEET

Version	Date	Status	Modified	Comments
1.1	June 21, 2011		Rahima Butler	Updated Doc Typing Process Section (III) and updated formatting changes.
1.2	June 21, 2011		Yashoda Clark	Added doc type testing procedure narrative to supplement existing flowchart.
1.3	Oct. 21, 2011		Rafael Aquino	Updated Doc Typing Process Section (III)
1.4	Nov. 1, 2011		Rafael Aquino	Added Concordance Process Map in Doc Typing Process Section (III)

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I. Document Preparation Sub-Process Overview

1. Document Preparation QA Activities High-level Overview

The document preparation sub-process includes the following QA activities that will be reviewed accordingly for the MAOP Phase 2 efforts. This section is a high-level overview of the different QA activities. The detail procedures for these QA activities will be defined further in the subsequent sections.

Document Preparation Activities	Definition of the product	Definition of Defective product	Specifications and Reference Documents
<p>1. Doc Typing</p>	<p>All job document images that are imported into the ECTS tool go through the doc typing process. These document images are categorized based on their specific document type.</p> <p>Documents which are required for the PFL Build process are classified as "Primary," "Secondary," or Aid."</p> <p>Documents that are not relevant for PFL build are classified as "Non-PFL."</p> <p>Doc typing occurs currently in ECTS and in Concordance (Celery's doc typing database).</p>	<p>Defective product for doc typing would include the following criteria:</p> <ol style="list-style-type: none"> 1) Inconsistency = For images doc typed as a PFL Build image and categorized in an incorrect doc type category 2) Fail = For images doc typed as a Non-PFL Build Image (Non-PFL, Miscellaneous, or Soils/Trenching Information) but should have been doc typed as one of the specific PFL Build doc types 	<p>Reference documents include:</p> <ul style="list-style-type: none"> + Doc Typing Reference Document + Doc Typing Job Aid

2. Document Preparation Reporting and Archiving

All document preparation QA results will be available on SharePoint. Below is a link to the SharePoint site.

Note: Each QA activity will have its own folder where the results will be stored.

<http://wss/sites/GasProgramAndPerfMgmt/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2fsites%2fGasProgramAndPerfMgmt%2fShared%20Documents%2fSan%20Bruno%20Incident%20PMO%2fGT%20Data%20Validation%20Project%2fQA%5fQC%2fPhase%20I%20PFL%20Build%2f30%20QA%20%2dDocument%20Preparation&FolderCTID=&View=%7bA976F191%2dDBF6%2d499D%2d9AD6%2d934F04648538%7d>

II. Doc Typing

1. Stage Description: ECTS QA Framework

All job document images that are imported into the ECTS tool go through the doc typing process. These document images are categorized based on their specific document type. All job document images are either doc typed in ECTS or doc typed in an external system and then imported into ECTS.

The "ECTS QA" stage covers a sampling of the documents from the following sources:

- Images doc typed in ECTS (including images uploaded from the U: drive)
- Images doc typed in Concordance and subsequently imported into ECTS.

Document images are categorized based on their specific document type. The document types have been classified as primary (P), secondary (S), and aid (A) documents which are required for the PFL Build process. All documents that are not relevant for PFL build are classified as "Non-PFL" (NP). See "Image 1" for the high-level doc typing procedures in ECTS and "Image 2" for the high-level procedures in Concordance; as well as at which point in the processes QA activities will occur. See Image 3 for the full list of document types.

Stage Deliverable Definition:

All doc typing categories and definitions are detailed in the Doc Typing Manual and Job Aid. These documents were used as the guideline for the QA activities. (current version located at the Sharepoint site: <http://wss/sites/GasProgramAndPerfMgmt/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2fsites%2fGasProgramAndPerfMgmt%2fShared%20Documents%2fSan%20Bruno%20Incident%20PMO%2fGT%20Data%20Validation%20Project%2fQA%5fQC%2fPhase%20I%20PFL%20Build%2f30%20QA%20%2dDoc%20Type%2f50%20Doc%20Typing%20Job%20Aids%20and%20Reference%20Guides&FolderCTID=&View=%7b82923FF0%2dA62E%2d43C0%2d981B%2d80024F56BC50%7d>)

Image 1

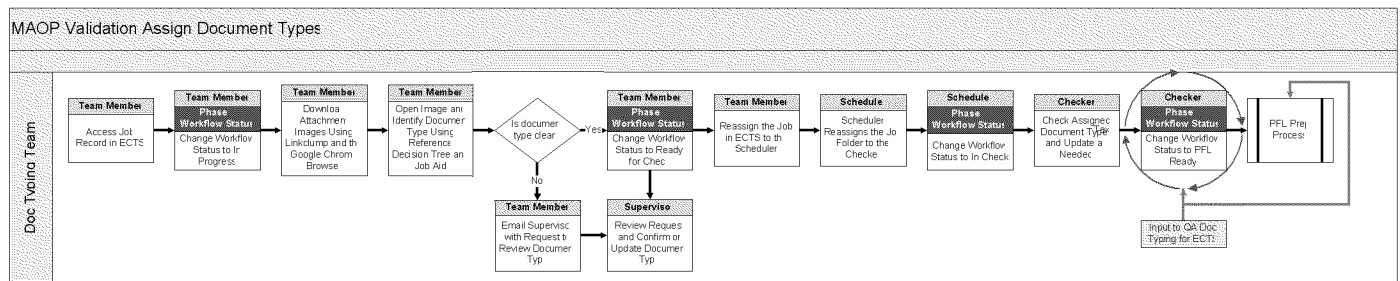


Image 2

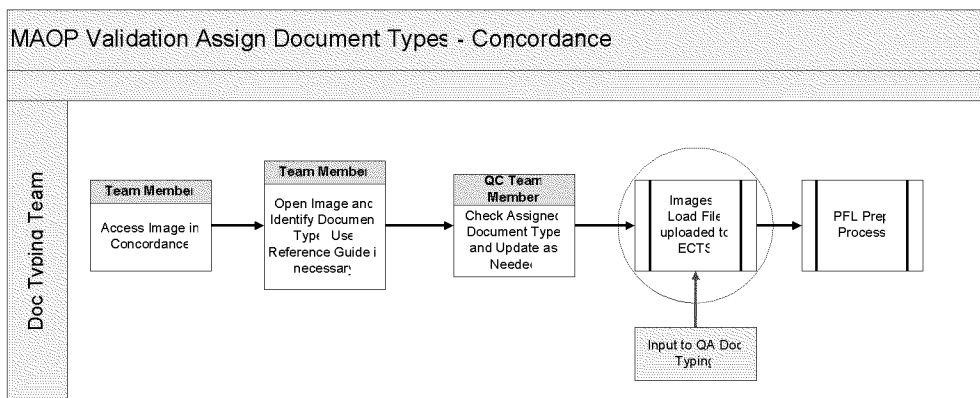


Image 3

Document Type	PFL Prep	P, S OR A	QA Frequency (D/PS)
Drawing-Distribution Plat	Yes	S	PS
Drawing-Transmission Plat	Yes	S	PS
Drawing-Other	Yes	S	PS
Drawing-Index	Yes	A	PS
Engineering Materials Memo (EMM)	Yes	S	PS
Invoice-Gas	Yes	S	PS
Material Requisition-Gas	Yes	S	PS
Mill Test	Yes	S	PS
Specifications	Yes	S	PS
Transport Tag-Gas	Yes	S	PS
Inspection/Test: Other	Yes	S	PS
Operating Pressure Chart	Yes	P	PS
Operating Pressure Log	Yes	P	PS
STPR	Yes	P	PS
STPR Chart	Yes	P	PS
STPR Log	Yes	P	PS
STPR Sketch	Yes	P	PS
Weld Map	Yes	S	PS
Journal Voucher-Gas	Yes	S	PS
Soils/Trenching Information	Yes	N/A	PS
Miscellaneous	Yes	N/A	D
Non-PFL	No	N/A	D
Drawing-Construction	Yes	P	D
Drawing-Detail	Yes	P	D
Drawing-Plan & Profile Sheet	Yes	P	D
Drawing-Vicinity	Yes	A	D
Detail Sheet	Yes	A	D
Face Sheet	Yes	A	D
Bill of Material	Yes	P	D
A-Form & Leak Test/Report	Yes	P	D
H-Form	Yes	P	D
Hydrostatic Test Plan	Yes	P	D
MAOP Document	Yes	P	D
Uprate Procedure	Yes	P	D
XRay Document (includes summary and detail)	Yes	A	D
Gas Service Record	Yes	P	D
Regulator Data Sheet	Yes	P	D
Valve Maintenance Record	Yes	P	D

2. QA Data Collection & Sampling Details

Samples will be taken from each data set (provided by PG&E's ISTS team by "PFL Ready Date") based on a 95% confidence level and a 2% error rate.

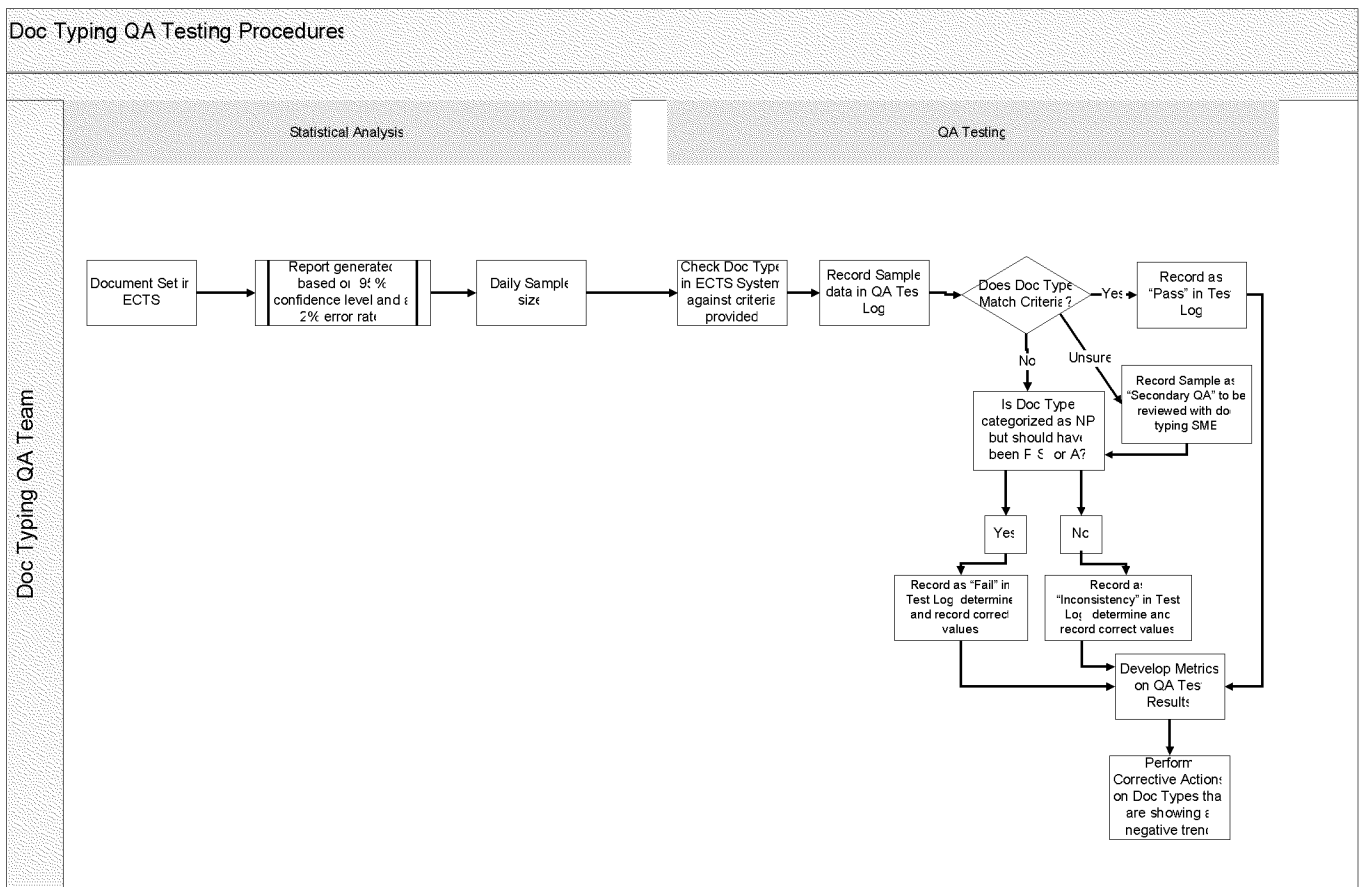
3. QA Testing Process

- QA Input: IT Batch process executed nightly to produce excel spreadsheets of all document doc typed for the day. This input is used to derive the sample size for the QA activities.
- Test Procedure Overview:
 1. Prepare the data set for testing:
 2. Extract images to be tested into test log

3. Verify that the doc type assigned to the image in ECTS is the actual doc type represented (i.e. if the image is categorized as "Drawing- Construction", ensure that it is actually "Drawing- Construction" and not mislabelled as a different category
 - i. If the assigned doc type matches the actual doc type, the image is recorded as "Pass"
 - ii. If the assigned doc type is categorized as Primary (P), Secondary (S), or Aid (A) and the assigned doc type does not match the actual doc type, record as "Inconsistency" and record correct values in test log (i.e. If a 'Hydrostatic Test Plan' (P) is incorrectly assigned as a 'Specification' (S), record as inconsistency and record 'Specification' and 'S' in the test log).
 - iii. If the assigned doc type is categorized as "Non- PFL" or "NP" (This includes Non- PFL, Miscellaneous, and Soils/Trenching Information) and actually is within the Primary (P), Secondary (S), or Aid (A) classifications, record as "Fail" and identify and record correct values in test log (i.e. If a 'Journal Voucher- Gas'(S) image is incorrectly assigned as a "Miscellaneous" (NP) image, record as 'Fail' and record 'Journal Voucher- Gas' and 'S' in the test log).
 - iv. If there is uncertainty whether the assigned document type matches the actual doc type, record as "Secondary QA" for subsequent subject matter expert review.
4. Develop metrics to capture relevant trends from the QA Test Results.
5. Perform corrective actions for Doc Types showing negative trends.

See "Image 4" below for the doc typing QA high-level procedure.

Image 4



4. Documentation of Results & Archiving

Document the Test Results on the "Doc Typing results" are detailed on the excel spreadsheet below in image 5 and archived on the QA/QC folder "40 Doc Typing Results" in SharePoint.

Image 5

data Set Number	Date Tested	Reviewer	Source	PFL Ready Set User	PFL Ready Date	Doc Type	Record ID #	QA Frequency (D/PS)	Priority (P, S, A or NP)	Pass / Fail / Inconsistency / Secondary C	Secondary QA (Y/N)	If Fail or Inconsistency - Correct Priority Classification (P, S, A or NP)	If Fail or Inconsistency - Correct Value	QA Notes
DT01	4/28/2011	Dean West	ECTS	TYNER N(NXTB)	04/18/2011	A-Forms	41547	D	P	Pass				
DT01	4/28/2011	Dean West	ECTS	ARANGO H(HXAN)	04/18/2011	A-Forms	80702	D	P	Pass				
DT01	4/28/2011	Dean West	ECTS	YEE G(GLY1)	04/18/2011	A-Forms	585245	D	P	Pass				
DT01	4/28/2011	Dean West	ECTS	VIGHT N(NLV1)	04/18/2011	A-Forms	1024787	D	P	Pass				

5. Trend Analysis & Continuous Improvement

Testing exceptions will be compiled and analyzed to determine any pervasive process errors as well as where in the process they are being made. Based on this analysis, corrective action will be taken to address any identified process break downs. At the conclusion of QA on each sample set, the preliminary results will be shared with the appropriate Doc typing group that performed the work. The two groups will agree on the errors, investigate root cause, and discuss and implement any changes to the process, training, and reference documentation. Once validated and communicated to the Doc Typing team, the results will be posted to the proper Sharepoint site and briefed to the MAOP Project team.

Pacific Gas and Electric Company

Records Verification and MAOP Validation Project Phase 3

Quality Assurance Plan for PFL Build

Version 06

May 29, 2012

Document Version Control

Version No.	Date	Amended By	Amendment Details
Ver. 01	June 15, 2011	AS	Using specification tolerances v1
Ver. 02	June 22, 2011	AS	Re-defined criticality based on impact to MAOP calculation Added Corrective Action Register (Appendix 4)
Ver. 03	Feb 07, 2012	RR	Updated to reflect current process, which now occurs after IR review
Ver. 04	Feb 08, 2012	RR	Updated based on peer review comments
Ver. 05	March 14, 2012	RR	Updated to reflect refinements to process
Ver. 06	May 29, 2012	RR	Updated to reflect current process

1. Purpose

The purpose of this document is to detail the Technical Quality Assurance (QA) test procedures related to the PFL build. Technical Quality Assurance is an independent function on the project and exists to highlight all identified non-compliances and to ensure that agreed-upon corrective actions are taken. The Pipeline Features List (PFL) Technical QA team is tasked with testing whether the PFLs are being developed in accordance with the PFL Build and IR procedures, **and that the data that is critical to the Maximum Allowable Operating Pressure (MAOP) calculation is traceable, verifiable, and complete.**

This procedure should be read in conjunction with the MAOP Validation Project (Phase III) QA/QC Overview.

2. References

MAOP Validation Project (Phase III) QA/QC Overview
Specification Ranking and QA/QC Tolerances
PFL Cluster Master
PFL Build QA Log Template
PFL Build QA Summary Template
PFL Build Random Sample - Priority 1
PRUPF (2/10/12 version A)

3. Definitions

Specification Ranking

Each feature has critical, required and non-critical specifications defined as follows:

- Critical: The value of the specification has a direct impact on the MAOP calculation.
- Required: The value of the specification may be used to justify an assumption of a critical specification.
- Non-critical: The specification is for information only (this is a combination of the PFL Build procedure rankings of "important", "useful", "nice to have", and "reference").

QA assessment for pass, error and fail

- Type 1 Pass: No error: the spec is within the defined tolerance range (refer to Technical QA/QC Tolerances)
- Type 2 Error: The error does not affect the MAOP calculation.
- Type 3 Error: The error affects MAOP, but the input value is more conservative than the correct value.
- Type 4 Error: The error affects MAOP, and the input value is less conservative than the correct value.
- Type 5 Error: Not only does the error affect MAOP, with the input value being less conservative than the correct value, but the MAOP of the entire PFL becomes lower when the correct value is input.

4. Methodology

There are two sets of PFLs which will be sampled by the Technical QA team each week. One set of PFLs will undergo a Technical QA evaluation post-QC, and the other set of PFLs will be evaluated post-FVE.

Post-QC Technical QA process

The PFLs which are tested post-QC are evaluated with a focus on Build and QC performance, in general, as well as with a focus on comparing performance amongst Build vendors. The Technical QA team will sample eight PFLs each week (one from each Build vendor, at random).

Process

- Starting on Thursday of each week, eight post-QC PFLs will be chosen randomly (ensuring only that one PFL is chosen from each of the eight Build vendors) for the post-QC Technical QA sample.
- Complete Technical QA review of the selected PFLs per guidance set forth in “Deliverable” guidelines outlined below, and enter information in Build-QC Technical QA status log, located on Sharepoint (Shared Documents > Phase II PFL Build > 50 QA –PFL Build FVE and Issues QA > Technical QA > Build-QC Technical QA Log_MMDDYYYY).
- Post-QC Technical QA summary results and suggested corrective actions will be communicated to the Build/QC Manager and Build/QC leadership team each week.
- Technical QA team and Build/QC team will collaborate to ensure corrective actions are communicated to appropriate team.

Post-FVE Technical QA process

For the second set of sample data, a PFL is complete and ready for post-FVE Technical QA evaluation when it has passed Engineering QC Complete and the IR Image macro has been run on the PFL. These are the same requirements for a PFL to become Ready for Upload into GIS. The Technical QA Team will sample a representative number of PFLs, as they become Ready for Upload. Technical QA of a PFL includes testing all aspects of the PFL, and in the meantime assessing the robustness of all PFL procedures, from Build/QC all the way through FVE, 100% QC and Image Macro check.

Process

- Starting on Thursday of each week, the first six PFLs that become Ready for Upload will be automatically diverted to the “Technical QA” status. These 6 PFLs become the weekly post-FVE Technical QA sample.
- Complete Technical QA review of the selected PFLs per guidance set forth in “Deliverable” guidelines outlined below, and enter information in Technical QA status log, located on Sharepoint (Shared Documents > Phase II PFL Build > 50 QA –PFL Build FVE and Issues QA > Technical QA > Technical QA Log_MMDDYYYY).
- If an error is found, change status of PFL to “Technical QA Issue”; If an error is not found, change status of PFL to “Ready for Upload”.
- Technical QA results and suggested corrective actions will be communicated to the FVE Manager and FVE leadership team each week. Technical QA team will update the status of the corrective actions log (included in Technical QA Status log) on a weekly basis.
- Technical QA team will work with the QA Manager to ensure that corrective action gets communicated to the entire FVE team. FVE Manager will be responsible for correcting PFLs with a status of “Technical QA Issues” and will possibly implement process changes within their team.
- After PFLs with Technical QA Issues are corrected, the team which made the correction will check in the PFL and change the status to “Ready for Upload”.

Deliverable

- PFL scope and accuracy – to check the appropriateness and accuracy of data for each feature.
- PFL traceability – to check that the recorded data can be traced to the source document(s) used
- Document Retention – to check that the electronic image of the documents referenced on the PFL are retained in the appropriate location.

A PFL is deemed to have passed if all of the following criteria are satisfied:

- All critical features within the assigned boundary end points are detailed on the PFL. A critical feature is defined as any feature with a true length (i.e., excludes tap, casing).

- All MAOP critical specifications for all critical features are correctly captured on the PFL and traceability exists to the source document or standards reference.

Each PFL will also be evaluated for the following:

- Accuracy of MAOP critical specifications.
- Accuracy of required specifications.
- Accuracy of non-critical specifications.
- STPR inclusion.
- Job Number information.
- Traceability of the data captured - to check that all data captured can be sourced from the referenced documents.

Special attention will be given to the FVE process, verifying that the unknown MAOP critical specifications have been resolved in a verifiable, traceable and complete manner. The Issues Resolution Field Verification Engineering Team solves each unknown specification by one of the following methods:

- Determining that the value is N/A, rather than unknown.
- Interpreting information on a document already referenced on the PFL.
- Finding a new document (not previously referenced on the PFL) and using data.
- Using the PRUPF tables to assign a value which represents a conservative historical minimum.
- Using Sound Engineering Judgment (SEJ)
- Excavating the pipe to inspect and/or test to ascertain specification properties.

One purpose of this Technical QA step is to check that the unknown properties have been assigned a value using one of the approved methods and that this has been done in accordance with documented procedures. Traceability of the resolution will be tested and recorded.

Review each feature and examine the cells that have been updated by the FVEs (denoted by red text). Each feature with a change should have an explanation of the change in the column labelled "FVE Comments." Review these notes and trace the reasoning. Examples of the changes that may have been made include, but are not limited to:

- Interpreting information on a document already referenced on the PFL.
- Finding a new document (not previously referenced on the PFL) and using data.
- Using PRUPF tables or appendices to assign a value which represents a conservative historical minimum.
- Excavating the pipe to inspect and/or test to ascertain specification properties.

If a document or a PRUPF table/appendix are referenced, then the source must be identified. To do this, consider the following:

- Document already referenced in PFL - open the PFL QC complete folder for the Line and MP being reviewed and look for the document referenced in the FVE comments. Examine the document for the information added.
- New document not referenced in PFL - use ECTS to search for and open the document referenced in the FVE comments. Examine this document for the information added.
- PRUPF Table or Appendix - Reference the Suggested Values columns and take note of whether the value that the FVE input is lower than the Suggested Value; since the Suggested Values come from the PRUPF and are the lowest historical value, an input value lower than that should be questioned. On that same note, if the FVE updates SMYS, WT, or Seam Type, referencing the PRUPF, and the input value does not match what was produced by the Suggested Values macro, the Technical QA checker should double-check the value using PRUPF logic. Excavation - assume this information is correct.

Process for reviewing changes based on the PRUPF:

- FVE uses any known information that exists for a feature to locate information in the PRUPF. The O.D. of the feature is all that is required, but install or purchase date and seam type for pipe may also be useful.
- If the FVE does not have the purchase date of the feature, the install date will be used. However, for pipe, a buffer of up to 10 years prior to installation is considered to assist in selecting the worst case scenario (weakest) specification of a feature. The weakest specification at any point during the 10-year period prior to install date should be used.
- Appendices are date specific. Therefore, use of an appendix may be invalid if the purchase date or 10 year buffer on installation date does not fall in this period.
- For fittings and valves that have unknown information, either an ANSI or WOG rating must be chosen. The following criteria apply for this assumption to be correct:
- Appendix E allows this assumption if the feature was installed post 1963. Check working pressure (psi) associated with any rating chosen and verify that this exceeds the lowest design pressure (DP) for a pipe within the year/job.
- Analyse all referenced paragraphs within the PRUPF and verify FVE correctly interpreted.

Process for reviewing the rationale for all changes

- For each change made in the FVE process, a rationale has to be given explaining why the change was made, and this must be verified.
 - The rationales are as follows:
 - Blank (0 after the QA macro is used) = a blank in the rationale column means there is sufficient evidence (in the engineer's judgment) that documentation supports the value, which can either be from an EDMS or ECTS image. This is referred to as Found a Supporting Document (FSD). A blank can also mean that the FVE is satisfied with the PG&E QC PFL data so no action is needed.
 - 1 = means an Assumed Allowable Minimum (AAM), Historical Record Documentation (HRD), or Sound Engineering Judgment (SEJ) was used by the FVE. This includes use of the PPRUPF to find specifications.
 - 2 = no information was available on the feature and assumptions for minimums could not satisfy (meet) a pressure that matches or exceeds one of the following pressures:
 - Installed pre 1963 - MAOP of record for the date the feature was installed.
 - Installed post 1963 - Design pressure of the pipeline system.
- Therefore, a dig was performed to validate the specifications of the pipe or fitting and to try to verify that the pressure did not have to be lowered to meet one of the above pressures.
- The process for reviewing the previous acronyms, referred to as categories, is explained in Section 8.

Process for reviewing the Assumption Category:

- The FVE must categorize each assumption that is made while choosing specs. These categories have been defined as:
 - FSD = Found supporting document (rationale of "blank").
 - AAM = Assumed allowable minimum (rationale of 1).
 - HRD = Historical record documentation (rationale of 1).
 - SEJ = Sound engineering judgment (rationale of 1).
 - FVD = Field verified dig (rationale of 2).
- These categories should reasonably match the comments provided by the FVE.

5. Sample

The QA statistical parameters being used for stabilized processes are: 95% confidence interval, 96% precision and an estimated 2% error rate. As the PFL Build is a new process which has not reached maturity, the estimated error rate has been raised to 5% for Priority 2 miles. As shown below, the total sample size based on these parameters is 108 PFLs.

Attributes Sample Sizes (non-stratified)																
Population Size		2,000														
Confidence Level		95%														
		Desired Precision Level														
		1%	2%	3%	4%	5%	6%	7%	8%	9%	10%	11%	12%	13%	14%	15%
Expected Occurrence Rate of an Attribute	1%	320	91	42	24	16	11	8	6	5	4	4	3	3	2	2
	2%	548	173	81	46	30	21	16	12	10	8	7	6	5	4	4
	3%	718	246	117	68	44	31	23	18	14	12	10	8	7	6	5
	4%	850	312	152	89	58	41	30	23	19	15	13	11	9	8	7
	5%	955	372	185	108	71	50	37	29	23	19	15	13	11	10	9
	6%	1,041	427	215	127	84	59	44	34	27	22	18	15	13	11	10
	7%	1,112	477	245	146	96	68	50	39	31	25	21	18	15	13	12
	8%	1,172	523	272	163	108	76	57	44	35	28	24	20	17	15	13
	9%	1,223	565	298	180	119	84	63	49	39	31	26	22	19	16	14
	10%	1,268	604	323	196	130	92	69	53	42	35	29	24	21	18	16

The sample of 108 PFLs will be Technical QA'd at a rate of about 12 PFLs per week for 10 weeks.

This estimated error will be reviewed for subsequent priorities based on results of the Priority 2 Technical QA effort and the optimization of the PFL build process. Upon review of the results, the sample size may increase or decrease accordingly.

6. Quality Assurance Assessment

Specification Criteria for Pass, Error and Fail

Tolerances have been agreed upon for each specification, based on the impact on the MAOP calculation; these are detailed on <Specification Ranking and QA/QC Tolerances> (Appendix 1).

Each feature will be evaluated for accuracy on critical, required and non-critical specifications, and the PFL's traceability on critical and required specifications. The test results will be recorded <Technical QA Log> and summarized on the <Technical QA Summary Slides>.

Corrective Actions

Corrective actions will be required where failures or errors occur on critical specifications, or when a process improvement is identified. These actions will be detailed on the <Technical QA Log>. The log will be maintained by the QA team to verify that corrective actions are closed out.

Communication of Results

QA results, including documentation of any errors in the PFL, shall be shared with the PG&E Build team, QC team and Issues Resolution team. The weekly Technical QA results will be shared with the QA/QC Manager by Thursday of each week.. The QA/QC Manager will then disseminate the results to the appropriate team manager and communicate the appropriate corrective action.

A summary of results will be presented weekly at the core team meeting and stored on the PG&E SharePoint at the following location:

<http://wss/sites/GasProgramAndPerfMgmt/Shared%20Documents/Forms/Standard.aspx?RootFolder=%2fsites%2fGasProgramAndPerfMgmt%2fShared%20Documents%2fSan%20Bruno%20Incident%20PMO%2fGT%20Data%20Validation%20Project%2fQA%5fQC%2fPhase%20I%20PFL%20Build%2f50%20QA%20%2dPFL>

[%20Build%20FVE%20and%20Issues%20QA%2f4%2e%20QA%20Test%20Results&FolderCTID=&View=%7bF1B22174%2d7BB3%2d4221%2dA760%2d7D195C604679%7d](#)

Appendix 1: Specification Ranking and QA/QC Tolerances

Records Verification and MAOP Validation Project			
PFL Build QA/QC Tolerances			
Overall PFL	Item	Property Ranking	Pass Criteria
	Features	Critical	No critical features missing (i.e.. features with >0 length)
	Boundary Points	Critical	Includes all features within assigned milepoints
	Boundary Points	Required	Includes additional features outside of MPs for the purpose of integrating PFLs
PFL Section			
PFL Section	Column Header	Property Ranking	Pass Criteria
Required Feature Information	Feature Number	Required	Exact
	Line No.	Required	Exact
	Main Line Size	Critical - all except tap & PCF	Exact
	Type	Required	Exact
	Beg Station	Required	Subsequent feature = end of previous feature
	End Station	Required	Feature with actual length: +/- 5ft or 10%, whichever is higher Sleeve (gas carrying with no independent length): 0.1 from begin Tap: 0.00 from begin
Reference only Columns	Milepoint	Reference	
	Field ST.	Reference	
	Pipe ST.	Reference	
	Project ST.	Reference	
From PG&E GIS Pipe, Valve, Bend, Reducer, Tee, Sleeve Data	Approx. Pipe Segment	Required	Exact
	CL. Loc.	Useful	Exact
	W.T.	Critical: Pipe, Bend, Reducer, Tee, Sleeve Required: Valve	Exact
	Pipe Spec	Required: Pipe	Exact
	SMYS	Critical: all except valve	Exact
	MFTR	Important	Exact
	Seam Type	Critical: Pipe, Bend Non-critical: Valve, Reducer, Tee, Sleeve	Exact
	Purchase Doc # Install Date	Important Important	Exact Correct year
External Coating	Coating Type	Important	
	DESC	Useful	
	Install Date	Useful	Correct year
Sleeve - Reinforcement Data	Beg Station	Important	+/- 5ft or 10% whichever is higher
	End Station	Important	Begin station + actual length
	Type	Critical	Exact
	Spec Rating	Required	Exact
	Material Type	Useful	Exact
	Actual OD	Critical	Exact
	Purchase Doc #	Important	Exact

Tap Data	Station	Required	+/- 5ft or 10% whichever is higher	
	Type	Important	Exact	
	Method	Useful	Exact	
	ANSI Pressure Rating	Required	Exact	
	Fitting Size	Required	Exact	
	MFTR	Required	Exact	
	Insertion	Useful	Exact	
	Drill Hole	Useful	Exact	
	Drip/Probe Length	Useful	+/- 20%	
Manufactured Bend Data	Station	Important	+/- 5ft or 10% whichever is higher	
	Type	Required	Exact	
	ANSI Pressure Rating	Critical	Exact	
	V Angle	Useful	+/- 20%	
	HZ Angle	Useful	+/- 20%	
	Radius (ft)	Useful	+/- 20%	
	Fabricated Assembly	Useful	Exact	
	Field Bend Data Point Event (zero length pipe event)	Type	Important	Exact
		Radius (ft)	Useful	+/- 20%
		V Angle	Useful	+/- 20%
		HZ Angle	Useful	+/- 20%
		Orient	Important	Y/N
Tee Data	Type	Useful	Exact	
	OD Main	Critical	Exact	
	WT Main	Critical	Exact	
	OD Branch	Critical	Exact	
	WT Branch	Critical	Exact	
	ANSI Pressure Rating	Critical	Exact	
Valve	Station Center	Useful	Station Center	
	Name	Important	Exact	
	Type	Important	Exact	
	Size	Important	Exact	
	ANSI Pressure Rating	Critical	Exact	
	Max Working Pressure	Useful	Exact	
	Operator Type	Useful	Exact	
	Serial Number	Nice to Have	Exact	
Shell Test Pressure	Useful	Exact		
Reducer Data	Station	Important	Station Center	
	Type	Useful	Exact	
	OD	Critical	Exact	
	WT	Critical	Exact	
	OD 2	Critical	Exact	
	WT 2	Critical	Exact	
	ANSI Pressure Rating	Critical	Exact	
Flange	Type	Useful	Exact	
	Size (in)	Important	Exact	
	ANSI Pressure Rating	Critical	Exact	

PCF or Misc Fitting	Station	Important	Station Center	
	Type	Useful	Exact	
	ANSI Pressure Rating	Critical	Exact	
	Name	Useful	Exact	
	Size	Important	Exact	
	Relief Valve	Type	Important	Exact
		ANSI Pressure Rating	Critical	Exact
		MFTR	Nice to Have	Exact
Install Date		Nice to Have	Exact	
Meter	Station	Important	Station Center	
	Type	Important	Exact	
	Name	Useful	Exact	
	MFTR	Nice to Have	Exact	
Reference Document Images Section 1	Drawing Number 1	Important	Exact	
	Drawing Quality 1	Important	Exact	
	Drawing Number 2	Important	Exact	
	Drawing Quality 2	Important	Exact	
	Image Name 1	Important	Exact	
	Image 1 Quality	Important	Exact	
	Image Name 2	Important	Exact	
	Image 2 Quality	Important	Exact	
	Image Name 3	Important	Exact	
	Image 3 Quality	Important	Exact	
	Notes Comments	Useful		
Reference Only	Feature Number	Required	Exact	
Strength Test Data	Beg Station	Required	+/- 5ft or 10% whichever is higher	
	End Station	Required	+/- 5ft or 10% whichever is higher	
	Type	Important	Exact	
	Media	Critical	Exact	
	Test Pressure	Critical	Exact	
	Duration (hrs)	Critical	Exact	
	Adj Test Pressure	Critical	Exact	
	Test Date	Critical	Exact	
	Supervisor	Critical	Exact	
	Test Company	Critical	Exact	
Job Number Data	Beg Station	Required	+/- 5ft or 10% whichever is higher	
	End Station	Required	+/- 5ft or 10% whichever is higher	
	Job Number	Critical	Exact	
	Install Date	Critical	Correct year	
Profile	Station	Nice to Have	Station Center	
	Elevation (ft)	Nice to Have	+/- 20%	
	Depth (in)	Nice to Have	+/- 20%	
Field Notes	Station	Nice to Have	Station Center	
	offset	Nice to Have	+/- 20%	
	Type	Nice to Have	Exact	
	Desc	Nice to Have		
	Comment	Nice to Have		
Appurtenance	Station	Nice to Have	Station Center	
	Type	Nice to Have	Exact	
	Desc	Nice to Have		
Pig Trap or Launcher	Station	Useful	Station Center	
	Type	Important	Exact	
	Name	Useful	Exact	
	Install Date	Useful	Correct year	

Casing Data	Beg Station	Required	+/- 5ft or 10% whichever is higher
	End Station	Required	+/- 5ft or 10% whichever is higher
	OD	Critical	Exact
	Type	Important	Exact
	Material	Nice to Have	Exact
	Vented	Useful	Exact
	Insulator Type	Useful	Exact
	Seal Type	Useful	Exact
	Install Date	Useful	Correct year
	Reference Document Images Section 2	Drawing 3 Number	Important
Drawing 3 Quality		Important	Exact
Drawing 4 Number		Important	Exact
Drawing 4 Quality		Important	Exact
Image Name 4		Important	Exact
Image 4 Quality		Important	Exact
Image Name 5		Important	Exact
Image 5 Quality		Important	Exact
Image Name 6		Important	Exact
Image 6 Quality		Important	Exact
	Notes Comments	Useful	
	Discrepancy List	Important	
	Tap List	Important	

MAOP Phase III QA Procedure

MAOP Validation Report:

31 August 2011
version 1.4 Draft

12/16/2011

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REVISION CONTROL SHEET

Version	Date	Status	Modified By	Comments
1.1	7/20/2011	Complete	Yashoda Clark	Made changes to entire procedure based on new testing methodology established after conversations with Joe Medina's team, Jane Carlock, and Eddie Edmondson.
1.2	7/25/2011	Complete	Yashoda Clark	
1.3	9/19/2011	In Progress	Cindy Yu	Updated for Sept 10th filing
1.4	12/16/2011	In Progress	Rafael Aquino	Updated section 3.1 for checks pertaining to P5&7

12/16/2011

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QA of MAOP Validation Report

1. Stage Description

This process is to validate that the data fields in the used for MAOP calculation in the "MAOP Validation Report" are accurate and complete. The Issue Resolution Team collects a QC Complete PFL spreadsheet from the MAOP Portal and begins analyzing the data/calculation to solve for any unknowns and other relevant variables.

The goal for this testing process is to focus on the validation of the inputs from the QC Complete PFL spreadsheet against what appears in the MAOP Validation Report. The testing procedure is described in detail below.

2. QA Data Collection & Sampling Details

The September 10th 2011 Filing (Priority 3&4) population consists of 302 miles of gas pipeline which we anticipate will translate into ~720 MAOP reports (including ~500 "Shorts"). 100% check of all MAOP Reports will be conducted.

3. QA Testing

3.1 Overview

QA Testing will validate that the data from the Pipe Data spreadsheet has been correctly and uniformly transferred to the MAOP Final Report. Below are the details of the QA checks that will be performed:

First Check- QC Rationale Check (performed on all versions of PFL spreadsheet):

The first check consists of the steps detailed below. If all the validation steps are completed against the FVE section of the Pipe Data spreadsheet from the Data section of the same spreadsheet, the Rationale Check is recorded as a "Pass." Below are guidelines on the Rationale Check.

1. **MAOP Rationale Validation** - the fields for Feature number, OD, WT, SMYS, Seam Type, are validated in the following manner.
 - a. If there is a difference when comparing two values between the Data section and the FVE section of the Pipe Data spreadsheet (i.e. there are blank cells that are populated in the FVE section, or if there are any other discrepancies), the rationale field is validated as well as the "Comments" column in the FVE section for an explanation. If no appropriate comment or Rationale is noted, this will be in the MAOP Portal as "QA Issues," will need to be re-evaluated by the engineering team, and re-processed
 - b. If the comment explaining a change references a Drawing there is no need for a Rationale
 - c. Seam Type changes from a value to "N/A" for all Fittings do not require a Comment or Rationale

Second Check- "STPR" and "Install Date" Check (performed only on versions prior to version 21 of PFL spreadsheet):

1. **STPR Range** – If the STPR range (including test pressure year) on the Strength Test section of the Pipe Data spreadsheet is not correctly applied to the corresponding beginning/end milepoints on the MAOP Validation Report, this will be in the MAOP Portal as "QA Issues," will need to be re-evaluated by the engineering team, and re-processed.
2. **Install Date** – If the Install Date for each feature on the Data section or FVE section of the Pipe Data Spreadsheet does not align with the Install Date on the MAOP Validation Report, status will be logged in the MAOP Portal as "QA Issues" and will need to be re-evaluated by the engineering team, and re-processed. Note: if no values exist, the installed year date should be "Unknown" on the MAOP Validation report.

12/16/2011

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Third Check- MAOP Summary Report Check (performed only on version 21 of PFL spreadsheet that were built using enhanced Unknowns Macro):

1. Suggested values for feature specifications are calculated for the "Unknowns" and "Blanks" under WT, SMYS and Seam Type. If the suggested value is not copied and pasted for the Blanks and Unknowns in the FVE section of the Pipe Data spreadsheet, this will be logged in the MAOP Portal as "QA Issues," will need to be re-evaluated by the engineering team, and re-processed.

3.2 MAOP Validation Report Fields NOT in scope

Field on MAOP Validation Report	Reason For Not Including in Scope
Fitting Rating	Calculated field
Joint Efficiency Factor	Calculated field
MAOP Per Design	Calculated field
MAOP Per Test	Calculated field
MAOP Per R	Calculated field
Class	N/A
%SMYS Per R	Calculated field
Operating in Class	Calculated field
MAOP Limit Factor	Calculated field
Feature MAOP	Calculated field

1. Trend Analysis & Continuous Improvement

Testing exceptions will be compiled and analyzed to determine if any systematic errors are occurring. PFLs that have "QA Issues" as status will be measured to track where errors are occurring. Based on this analysis, corrective action will be taken to address any issues.

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

PG&E Data Request No.:	DRA_001-02		
PG&E File Name:	PSEP-Update_DR_DRA_001-Q02		
Request Date:	May 3, 2013	Requester DR No.:	DRA-TCR-1
Date Sent:	May 17, 2013	Requesting Party:	Division of Ratepayer Advocates
PG&E Witness:	Todd Hogenson	Requester:	Tom Roberts

SUBJECT: PG&E's PROPOSAL FOR UPDATED APPLICATION

QUESTION 2

Provide all PG&E management approved procedures used to ensure the PSEP update application uses only accurate and complete data, and is consistent with D.12-12-030 and PG&E management approved engineering standards.

ANSWER 2

PG&E is in the process of documenting procedures that are being used to ensure the PSEP Update Application uses only accurate and complete data. PG&E will provide the procedures when they are finalized and approved.

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

PG&E Data Request No.:	DRA_001-03		
PG&E File Name:	PSEP-Update_DR_DRA_001-Q03		
Request Date:	May 3, 2013	Requester DR No.:	DRA-TCR-1
Date Sent:	May 17, 2013	Requesting Party:	Division of Ratepayer Advocates
PG&E Witness:	Todd Hogenson	Requester:	Tom Roberts

SUBJECT: PG&E’S PROPOSAL FOR UPDATED APPLICATION

QUESTION 3

The following questions relate to specific “project deviation codes” provided by PG&E on April 23, 2013.

- a. “Piggability” – Provide the criteria used by PG&E to determine if a pipeline diameter must be changed, or a pipe replaced, to provide inline inspection.
- b. “Piggability” – If not addressed in the response to the preceding question, describe the specific inline inspection instruments to be accommodated, and instrument carrier mechanism used.
- c. “Short lengths” – Provide the cost analysis that supports PG&E’s classification and treatment of “short segments.”
- d. “Less than 1 mile gap” - Does this logic mean that footage for this gap is included in the project cost?
- e. “Less than 1 mile gap” - Does this apply independent of the total length of the hydrotest, such that a 1 mile gap might be included in a 1.2 mile project?
- f. “Non-PSEP” – What is the “BASE budget”?
- g. “Non-PSEP” – In addition to the “BASE budget,” describe all proceedings or funding mechanisms which would be used to obtain cost recovery for “Non-PSEP” work.
- h. “Recently replaced/tested” – What is the disposition of these segments?
- i. “Other” –Will specific details be provided in the comment field for each of these segments which justify the deviation to CPUC staff and PSEP parties?
- j. “Additional Threats” – Will specific details be provided in the comment field for each of these segments which justify the deviation to CPUC staff and PSEP parties?
- k. “Constructability (Repl to test)” – Will specific details will be provided in the comment field for each of these segments which justify the deviation to CPUC staff and PSEP parties?

- l. “Downrate to distribution” – What is the disposition of these segments, removed from Phase 1 scope?
- m. “Replace with distribution” – What is the disposition of these segments, removed from Phase 1 scope?
- n. “Committed” – What is the disposition of these segments, kept in Phase 1 scope?

ANSWER 3

- a. Piggability decisions are based on existing Magnetic Flux Leakage (MFL) / In-Line Inspection (ILI) tool capabilities (i.e. bend radius, diameter changes).

PG&E responded to a similar question concerning PG&E’s August 26, 2011 PSEP Application, in GasPipelineSafetyOIR_DR_DRA_072-Q01, dated February 29, 2012, Question 1 (a-e). Single Diameter Axial Magnetic Flux Leakage (MFL) Tools exist for 6" through 42" diameter pipelines. Several MFL tools can collapse 20-25%, which enables them to inspect pipeline segments of varying diameters in one inspection run. Multi-diameter Axial MFL tool technology is currently available in the following diameter ranges : 12"-16", 14"-18", 20"-26", 24"-30", 30"-36". PSEP pipeline replacements are sized to accommodate future axial MFL inspections.

PG&E also responded to ILI questions in our PSEP rebuttal testimony dated February 28, 2012, Chapter 3, Section F, PG&E Proposed Pipeline Diameter Changes Are Warranted, pages 3-22 through 3-24.

- b. PG&E responded to a similar question in PG&E Data Request Response No. DRA_072-Q01, dated February 29, 2012, Question 1 (a-e). Axial Magnetic Flux Leakage (MFL) tools will be used to address internal corrosion, external corrosion, and latent third party damage. Transverse Flux Inspection (TFI) tools are used to detect cracks and defects within the long-seam. TFI and ultrasonic tools can only inspect a single pipeline diameter; they cannot inspect a multi-diameter pipeline.

Axial MFL, TFI and Ultrasonic tools are propelled using natural gas pressures and flows within the pipeline being tested.

- c. PG&E did not develop specific cost analysis for how to treat “Short Segments.” The decision on whether to pressure test or replace a short pipeline segment is based on PG&E’s estimating and construction experience along with project cost estimates and calculations used in the development of PSEP Workpapers. August 26, 2011 PSEP Testimony, Page 3-41, explains, “For project execution, operational impact and cost-efficiency purposes, PG&E established minimum project lengths for strength testing. Pipeline projects less than these prescribed minimums will be replaced instead of strength tested.”
 - PG&E outlined pipeline parameters for determining “short length” in the original filing testimony. For pipeline segments 12” in diameter or smaller, and project lengths 600 feet or less, the pipeline will be replaced.

- For pipeline segments 16” in diameter or larger, and project lengths 300 feet or less, the pipeline will be replaced.
- d. Yes, “Less than 1 mile gap” is used when a segment does not result in a decision tree result of phase 1 action, but is between filed phase 1 work areas and is no longer than 1 mile. The description is most commonly used for tests.
 - e. Yes, “Less than 1 mile gap” segments would be included in the total length of a test. (i.e., seg 100 = 2000’(M4), seg 101 = 2000’ (C3-Less than 1 mile gap), seg 102 = 2000’ (M4); test length is 6000’, not 4000’)
 - f. Base budget refers to the amounts authorized in Decision 11-04-031 as part of PG&E’s 2011 Gas Transmission and Storage (GT&S) Rate Case, Application 09-09-013.
 - g. The GT&S Rate Case and PSEP decisions are the only funding sources for PG&E’s gas transmission related work. Other costs such as the overall company level of administrative and general expenses, uncollectible, medical and pension costs and cost of capital are determined in other regulatory proceedings.
 - h. This represents any work performed outside of PSEP. No further action is planned for these segments in phase 1 unless it is less expensive to include them in a project than to exclude them.
 - i. Yes, specific details will be provided in the comment field for each of these segments which justify the deviation.
 - j. Yes, specific details will be provided in the comment field for each of these segments which justify the deviation.
 - k. Yes, specific details will be provided in the comment field for each of these segments which justify the deviation.
 - l. These pipe segments will be downrated from transmission pressure to gas distribution pressure (nominally 60 psig). The costs to convert these segments from Transmission to Distribution will be attributed to PSEP. However, the cost of conversion is typically significantly less than the cost to replace the existing gas transmission pipeline.
 - m. These pipe segments will be replaced with the installation of new gas distribution pipe (nominally 60 psig). The costs to convert these segments from Transmission to Distribution will be attributed to PSEP. These pipe segments will be a Gas Distribution asset once placed into operation. The cost to install a gas distribution pipe is typically significantly less than the cost to install a new steel gas transmission pipeline.
 - n. Yes, they will be kept in phase 1 for either test or replacement and will be described in the workpapers and the PSEP database.

**PACIFIC GAS AND ELECTRIC COMPANY
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Data Response**

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Date Sent:	May 17, 2013	Requesting Party:	Division of Ratepayer Advocates
PG&E Witness:	Todd Hogenson	Requester:	Tom Roberts

SUBJECT: PG&E'S PROPOSAL FOR UPDATED APPLICATION

QUESTION 4

The following questions refer to the segment level spreadsheet provided by PG&E on April 23, 2013.

- a. Will all columns of data from the original PSEP database, and all the original data, be in the updated PSEP database?
- b. Which data columns will be used in the cost models?
- c. How will the segment database and the cost models be linked?
- d. What is the tab "Change Codes 01.02.13", and where and how are the change codes used?
- e. This file is linked to another file. Is this link essential, or can it be avoided in the database provided with the application?
- f. Three colors are used for rows of data as discussed in the workshop and explained in the legend. These colors do not appear to be assigned based on conditional formatting. Is it possible to use conditional formatting to do this? If so, which column(s) of data will drive the color?
- g. Many colors are used for row headings. Do these colors have meaning that can be explained in the legend?
- h. Why include footage in Column DR if "most entries are incorrect" per the legend?
- i. What is the data in column GS?
- j. How does the data in column GS relate to the segment footages used in column DR?
- k. Columns EW to GR are currently blank. How will they be populated, and how will these columns be used?

- l. The logic of decision points 1H, 2F, and 3A refer to column **EN** data, which is titled “Pressure test met PSEP”, which is further described in the legend as “to be calculated by PSEP engineers.” Data in this column is a manual YES or NO entry, which does not provide visibility into what specifically leads to a YES entry, or the ability to confirm that the rationale is correct.
- m. What procedure will PG&E use to populate field **EN**?
- n. The cost allocation refers to column **EM** data, which is titled “Pressure test met code”, which is further described in the legend as “to be calculated by PSEP engineers.” Data in this column is a manual YES or NO entry, which does not provide visibility into what specifically leads to a YES entry, or the ability to confirm that the rationale is correct.
- o. What procedure will PG&E use to populate field **EM**?

ANSWER 4

- a. For the most part, yes. All of the key pipeline attribute information (year of install, diameter, wall-thickness, Specified Minimum Yield Strength (SMYS), seam-type, test pressure, test date, test duration, test media, PSEP decision tree outcome, etc.) has not been modified and will be included within the updated PSEP database. However, some of the data columns that had no bearing on the PSEP program that were deemed redundant or unnecessary have been removed. The PSEP database has constantly evolved and columns have been added to include pipeline segment attribute information from MAOP data validation.
- b. Columns DF (REPL PSRS Number), DQ (Validated Install date), EQ (Validated Project Type), DR (Validated pipeline footage) used for hydrotests, EM (Validated Test Met Code), DE (Test PSRS Number), DO (Validated diameter), and DL (Planned replacement diameter) will be used in the cost models. There will be a field added to reflect the urban congestion for new segments. As the database continues to be modified, the exact placement of these columns within the database may change and as the workpapers are developed, it may be determined that additional fields are required as well.
- c. For the Expedited Update Application, the cost calculators will be within the same workbook as the project’s segments. These segments will be copied from the database and pasted into the workbook.
- d. The change code tab is used to provide a list of possible entries for column DJ (CHNG_CODE) and is used to categorize changes in actual work compared to the original PSEP filing.
- e. It is not essential and it will not be linked in the updated database submittal.
- f. No, it is not possible to use conditional formatting to reproduce all the colors.
- g. There are a lot of columns in the database. Colors were used to group data for ease of locating columns at different points in the progression of the project but there are no rules about the meaning of each color.

- h. At the time of the initial validation effort, it was noted many of these entries were incorrect. In the Expedited Update Application, these will have been corrected and will be used for Hydrotest footages.
- i. Column GS is used to give the segment a geospatial length in GIS.
- j. There is no relation between column GS and DR.
- k. Columns EW-GL will be used as needed to capture summary info for split segments; children segments will populate them. Columns GM-GR are placeholders to be used for fatigue analysis.
- l. The engineers who perform the data validation manually run through file "GasPipelineSafetyOIR_DR_Joint-DT_Oral001-Q01Atch02" and enter a "yes" or "no". This attachment shows the requirements to meet PSEP criteria and criteria at the time of the test. We are exploring automating this process.
- m. Column EN will be populated as mentioned in response to part l.
- n. Column EM will be populated as mentioned in response to part l.
- o. Column EM will be populated as mentioned in response to part l.

**PACIFIC GAS AND ELECTRIC COMPANY
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Data Response**

PG&E Data Request No.:	DRA_001-05		
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PG&E Witness:	Todd Hogenson	Requester:	Tom Roberts

SUBJECT: PG&E's PROPOSAL FOR UPDATED APPLICATION

QUESTION 5

Provide the management approved procedures used by PG&E staff to group pipe segments into PSEP projects.

ANSWER 5

PG&E does not have a specific written management approved procedure to group pipe segments into PSEP projects. However, the process followed to define PSEP project scopes is described in various sections of the August 26, 2011 PSEP prepared testimony in Chapter 3, specifically sections A.3 (a-e, g(1-3)), A.5, C.9, and D.1. For the Expedited Update Application, PG&E will use the same process to group pipe segments into PSEP projects that it used for the August 26, 2011 PSEP Application.

Once the validated pipeline segment data is processed through the Decision Tree (DT), DT outcomes are reviewed and grouped together and combined into unique projects (replacement or strength-test). PSEP Engineers will also review adjacent pipeline segments looking for project synergy and Program efficiencies. As part of the engineering review process, PG&E may take an action that deviates from the Decision Tree results.

Decisions to deviate from the Decision Tree results are documented by Deviation Codes at the segment level. If the validated project scope differs from the original PSEP filing, the updated project scope is documented, and presented to both the Engineering and Program Management Office (PMO) Change Control Boards for review and approval (PSEP Testimony Chapter 7, Section D.2.d Program Management Office). This process ensures updated/revised PSEP project scopes are reviewed and approved by the Work Stream Leads and PSEP PMO for consistency and adherence to the overall PSEP Program.

**PACIFIC GAS AND ELECTRIC COMPANY
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Rulemaking 11-02-019
Data Response**

PG&E Data Request No.:	DRA_001-06		
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PG&E Witness:	Todd Hogenson	Requester:	Tom Roberts

SUBJECT: PG&E's PROPOSAL FOR UPDATED APPLICATION

QUESTION 6

Will the same excel spreadsheets be used to generate project level costs as were used to support the original application? If not, what changes will be made to the spreadsheets?

ANSWER 6

The excel spreadsheet cost calculators will differ slightly from the ones used in the original PSEP filing. They will utilize validated pipeline segment data and will be linked to project specific segments rather than the entire database. Unit costs will not change.

**PACIFIC GAS AND ELECTRIC COMPANY
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Rulemaking 11-02-019
Data Response**

PG&E Data Request No.:	DRA_001-07		
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PG&E Witness:	Todd Hogenson	Requester:	Tom Roberts

SUBJECT: PG&E’S PROPOSAL FOR UPDATED APPLICATION

QUESTION 7

The following questions refer to the disallowance tabs of the segment level spreadsheet provided by PG&E on April 23, 2013.

- a. Will project “disallowances” be calculated and applied to project costs in the same files, and in the same basic way as in the original application? (it is understood that different disallowance logic will be used)
- b. Are MP1 and MP2 data is used to calculate the disallowance?
- c. Is there a reason why these logical disallowance tests can’t be applied within the segment database for each segment, then summed for a project level disallowance?
- d. For total project footage, does the logic apply correctly even when a project has many discontinuous sections, such as with TAP and DFM projects?
- e. Mother segments are excluded from the calculations based on a “split” entry in column DQ. This is correct, but “split” is used in many columns. How will the “split” designation be entered into the database?
- f. How will PG&E ensure that this “split” designation is applied correctly to all the required columns for a split segment (e.g. how to ensure that “split” is correctly entered into columns DP, DQ, and DS, but not DR?)
- g. When calculating disallowances for hydrotests, the first logic criteria checks for the relevant hydrotest number in column CL, then the second criteria checks for a “Test” designation in column EQ. Why are both checks required?
- h. What situations would result in a hydrotest number in CL, but no “test” designation in EQ?
- i. Why does PG&E use “Test Number” as the project identifier for hydrotests, but “PSRS” number for replacement projects?

- j. Cost allocation calculations are based on the original segment length in column L of the segment database. If this is not the same data used in the cost models, explain why different data is being used.
- k. Do the “+” signs in the calculation of replacement footages result in a “or” logical statement, where a segment is counting in the project footage and disallowed footage if column EQ contains REPL, OR RTMT, OR ABD, OR TSFR?
- l. What is the meaning of “ABD” in the previous question?
- m. Why are segments transferred to distribution, retired, or abandoned counted when determining cost responsibility for replacement projects?

ANSWER 7

- a. Yes, the same cost calculators will be used to calculate disallowances, but the fields used will come from the validated data rather than the original GIS data.
- b. No. Segment footage will be used to determine length.
- c. Yes, project costs will be based on data validated DT footage or engineered installed/tested pipe footage depending on the stage of each project when the updated workpaper is developed. Specific disallowances (yes/no) will be determined at a segment level but actual disallowance cost will be a function of the total project length.
- d. Yes.
- e. The “split” designation will be entered using data validation that will be imported upon completion.
- f. A Quality Control review will be performed on all data validation and the information will be looked at carefully to make sure the segments have “split” in the correct columns and that the mother segment’s footage is equal to the sum of all its child segments.
- g. The hydrotest number in column CL was scheduled prior to data validation and checking EQ for “test” shows which segments after data validation remain in the hydrotest.
- h. If a test was planned, but data validation shows valid test records or that the project can be moved out of phase 1, then column CL will be populated but column EQ will not show “test”. The segment could also be planned as part of a hydrotest but then moved to replacement.
- i. Test numbers were established for hydrotesting projects because many of the projects had to be sub-divided into separate tests during engineering/design in order to maintain service to customers and to better manage test water storage, treatment and disposal. For the Expedited Update Application, all hydrotest projects will roll up to unique PSRS project identifiers.

- j. Column L will not be used because data validation is providing more accurate footage (column DR) from the Pipeline Features Lists (PFLs) and this will be used for cost allocation calculations.
- k. Yes.
- l. “ABD” stands for abandon but it is being substituted with “RTMT,” which stands for retirement.
- m. As stated in CPUC Decision 11-06-017 (page 1), Implementation Plans must be designed “to achieve the goal of orderly and cost effectively replacing or testing all natural gas transmission pipeline that have not been pressure tested. The Implementation Plan may include alternatives that demonstrably achieve the same standard of safety...”. Also as stated in CPUC Decision 12-12-030, Conclusion of Law, Item 34, “The Commission should impose strong incentives on PG&E to encourage efficient construction management and administration of the Implementation Plan.”

After pipe segment data validation, the Pipeline Engineer reviews the pipeline attribute data, Decision tree (DT) results, upstream and downstream adjacent pipe segments, the purpose, demand and use of the line (e.g., customers served, adjacent gas distribution system and demands). There are occasions where PG&E believes it makes sense to down-rate gas transmission pipeline segments from transmission pressure to gas distribution pressure (nominally 60 psig). The same methodology applies to retirements, abandonments and gas transmission replacements through a new gas distribution pipeline. The costs to down-rate, abandon, retire or replace gas transmission pipe with gas distribution pipe is being charged to PSEP because PG&E is doing this work in order to comply with the new CPUC regulation, not a preexisting regulatory requirement (see PG&E Rebuttal Testimony, R.11-02-019, Policy Chapter page 1-1), in lieu of hydrotesting or replacement with a new gas transmission pipeline. The costs to down-rate, abandon, retire or replace gas transmission pipe with gas distribution pipe is usually significantly less than the cost to install a new steel gas transmission pipeline.