Pacific Gas and Electric Company ™

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July 8, 2013

VIA EMAIL: PAC@CPUC.CA.GOV

Paul Clanon
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: **R.11-02-019: PG&E's Request for Extension of Time to Comply with Ordering Paragraph 11 of Decision 12-12-030**

Dear Mr. Clanon:

PG&E requests an extension of time to comply with Ordering Paragraph (OP) 11 of Decision (D.) 12-12-030, pursuant to California Public Utilities Commission Rule of Practice and Procedure 16.6. For the reasons set forth below, PG&E requests 120 days to file the required Update Application showing the results of Maximum Allowable Operating Pressure (MAOP) validation and records search work, from the 30 days specified in D.12-12-030. PG&E completed its MAOP Validation and records search work on all of its gas transmission pipelines on July 1, 2013.[1]

Decision 12-12-030, concerning PG&E's Pipeline Safety Enhancement Plan (PSEP), requires PG&E to submit an Update Application 30 days after the conclusion of its MAOP validation and records search work, including an updated pipe segment database. (D.12.12-030, p. 115; OP 11). The decision also states that the "specific showing that PG&E will be required to provide in its application will be considered in a workshop to be held no later than 90 days from the effective date of this decision." (D.12-12-030, p. 115). That workshop was held at the Commission on March 26, 2013. PG&E and the parties did not reach complete agreement at the workshop regarding the filing requirements for the Update Application. Since the workshop, PG&E has continued discussions with the Division of Ratepayer Advocates (DRA), The Utility

[1] PG&E has consistently stated throughout this proceeding that it would complete MAOP validation of non- High Consequence Areas by the end of April 2013, and complete the Quality Assurance/Quality Control process by July 1, 2013.

Reform Network (TURN), the Safety and Enforcement Division (SED), and the Energy Division (ED).[2]

Although discussions regarding the requirements for the Update Application are ongoing, and the scope of the Application has not yet been finalized with the parties, regardless of how the scope is resolved, it is clear *now* that it will require more than 30 days from July 1, 2013 to prepare the Update Application. Now that MAOP Validation is complete, the updated pipeline segment data must be run through the Pipeline Modernization Program Decision Trees, and the results must be compared to the scope of work that PG&E forecasted in the original PSEP filing, in order to identify the changes resulting from MAOP Validation. The parties have asked, and PG&E has agreed to provide, a description of changes from the original PSEP filing to the Update Application resulting from MAOP Validation, at a granular level. In particular, PG&E will provide in the Update Application: (1) a description of work that no longer needs to be done due to records validation (e.g., PG&E has located records of a prior strength test); (2) a description of new work that was not identified in the original PSEP filing that is proposed to be completed in Phase 1 of PSEP; (3) a description of work that otherwise does not need to be done in Phase 1 of PSEP, but is being kept in Phase 1 for other reasons (e.g., efficiency); and (4) a description of work that has already been completed or is in progress as part of PSEP that would otherwise not need to be completed within Phase 1 (e.g. Class 2 non-adjacent pipe segments) had the updated MAOP Validation and records search been completed before Decision 12-12-030 or before project execution began.

Once PG&E has an updated forecast of projects that result from running the new data through the decision trees, it must develop work papers. PG&E has agreed to provide updated work papers for each proposed updated project, which will identify the proposed action for each project that resulted from running new, validated pipeline segment data through the decision trees. There will be a new work paper for each of the over 300 Pipeline Modernization projects (strength testing and replacement) that will include the following information: a comparison of the original filed project with the updated project, a summary of project changes, a summary of decision tree results for all segments in the project, and an updated project cost calculator. An example of an updated workpaper for a single project (which has been shared with DRA, TURN, SED and ED) is attached to this letter. PG&E anticipates that it will take two to three months to complete this work.

After the new work papers are completed, a new revenue requirement must be developed, and new gas rates must be produced. PG&E has agreed to provide an updated Results of Operations (RO) model showing all changes made to the RO from those adopted in D.12-12-030.

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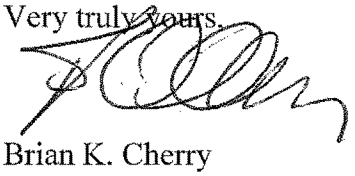
[2] PG&E indicated at the March 26 workshop, and in the discussions following the workshop, that it would need more than 30 days following the completion of MAOP Validation to prepare the Update Application. The schedule presented at the March 26 workshop indicated that PG&E would be able to file late August or early September. The 120 days PG&E now seeks reflects additional detail that the parties have requested after the workshop.

PG&E will also provide updated cost allocation and rate models showing all changes made to the rate model from those adopted in D.12-12-030, and show the changes to PSEP rates and illustrative class average rates.

Given the significant amount of work to prepare this filing, PG&E requests an extension of time (from 30 days to 120 days) to file an Update Application with the results of its records search and MAOP Validation as required by OP 11 of D.12.12-030.[3]

Very truly yours,



Brian K. Cherry
Vice President – Regulatory Relations

cc: Administrative Law Judge Division (aljextensionrequests@cpuc.ca.gov)
Commissioner Michel Peter Florio
ALJ Maribeth A. Bushey
Official Service List for R.11-02-019

[3] PG&E provided advance notice of the submission of this letter to DRA, TURN, SED, and ED.

ATTACHMENT

Pacific Gas and Electric Company
Implementation Plan-Update
Work Papers Supporting Chapter 2, Pipeline Modernization Program Update

PROJECT SUMMARY

D.12-12-30 Filing Project Name/Number:

FILING TITLE: L-109_4 REPL 6.84MI MP 24.84-33.26 PH1
FILING PSRS NO: 23692
OPERATIVE DATE: 12/1/2014
AFUDC ELIGIBLE: YES

Project Execution (list of individual project orders that make up the updated project):

Project Name	PSRS	Order	Operative Date Year	Untested Footage	Untested 1956 + Footage
L-109_4A REPL 3.95MI MP 24.84-30.11 PH1	26023	30842214	10/11/2014	12422	0
L-109_4B REPL 0.47MI MP 28.21-28.60	26024	30897895	12/13/2012	2650	0
L-109_4C REPL 1.25MI MP 30.52-31.76	26025	30897896	8/9/2014	6634	8
L-109_4D REPL 0.67MI MP 32.41-33.08	26026	30897897	12/13/2012	3533	0
L-109_4A_2 REPL 1.59MI MP 28.60-30.11	30667	31000408	12/1/2014	8364	384

Comparison of D.12-12-30 filed project with updated project:

Net Capital Financial Expenditure Forecast (Total cost less cost not recoverable through the PSEP filing, based on calculator, $ in thousands):

	2011	2012	2013	2014
D-12-12-030 Approved Expenditures:	150,000	349,995	3,458,951	35,625,495
Updated Expenditures:	0	7,770,000	0	29,442,064

Footage per pipe diameter (feet):

	12" and less	14" to 20"	22" to 28"	30" to 42"
D-12-12-030 Approved Footage:	0	0	36,133	0
Updated Footage:	708	0	28,677	5,161

Footage per area classification (feet):

	Non-Congested	Semi-Congested	Highly-Congested
D-12-12-030 Approved Footage:	15,425	18,577	2,131
Updated Footage:	16,334	17,504	708

Summary of Project Changes:

Description	Linear Feet	
Original Project Footage	**36,133**	A
Original Project Footage – PFL Validated	**36,431**	B=F+L+M
Other Filed Project Footage	**535**	C
Other Filed Project Footage – PFL Validated	**507**	D
Updated Project Footage	**34,546**	E=F+G+H+I+J+K
D.12-12-030 filed footage to be replaced	33,395	F
Other D.12-12-030 footage to be replaced	428	G
Added footage based on data validation	0	H
Added footage for program efficiency	6	I
Added from D.12-12-030 Test project	0	J
Added for re-route, buffers, etc.	717	K
Non-PSEP funded project-related footage	0	L
Footage Removed from Original project	**3,036**	M=N+O+P+Q
Records verified (found test records)	3,036	N
Transfer to Test project (see test WP for details)	0	O
Addressed prior to PSEP	0	P
Address in Future Phase	0	Q

Narrative related to project changes (if needed)

From the single project with 4 locations listed in the filing calling to replace 36,133 feet of pipe, this project was split into 4 smaller projects due various pipeline permitting and construction challenges, to address city concerns and to address integrity management (IM) issues on an expedited basis. 109_4A includes segments 158 to 160.8, 161.8 to 163, 166.5(partial) to 170 and taps. 109_4B includes segments 165.8 to 166 and 166.5 (partial) to 170 and taps. 109_4C includes segments 171.5 to 173.8 and taps. 109_4D includes segments 175 to 175.68 and taps. The original project was originally planned for construction in 2014. Segment 171 (2131 feet) was dropped from this project after test records were found for the segment. Segments 176 and 176.5 (905 feet) were dropped from this project after it was determined they could be pigged-they had been tested but were originally included in the work scope because of a concern they might

not be piggable. Several segments were replaced in 2012 to address IM concerns and the remaining scope of work will be constructed in 2014. This project will be completed essentially as it was originally envisioned with the changes from the filing plan noted below.

Summary of decision tree (DT) results and phase deviations for individual project orders:

L-109_4a Repl 3.95mi Mp 24.84-30.11 Ph1

#	Route	Segment	Footage	DT Code	Deviation Comment
1	109	158 , 158.3 , 159 , 159.3 , 160 , 160.2 , 160.3 , 160.6	5,031	M2 -> M3	PIGGABILITY
2	109	160.8	3	C2 -> C4	PIGGABILITY
3	109	161.8	4	C2 -> C7	PIGGABILITY
4	109	162	242	M2	NO PHASE DEVIATION
5	109	162.1 , 162.2 , 162.3 , 163	7,149	M2 -> M3	PIGGABILITY

Narrative for Summary above:
4A will be completed in 2014 and despite changes in decision tree outcomes, is still planned for replacement in order to make the line piggable.

L-109_4B REPL 0.47MI MP 28.21-28.60

#	Route	Segment	Footage	DT Code	Deviation Comment
1	109	165.8	11	C2 -> C6	PIGGABILITY
2	109	166 , 166.5-1	2,650	M2	NO PHASE DEVIATION
3	DFDS8457	701 , 702	6	0 -> D1	CONSTRUCTABILITY

Narrative for Summary above:
4B was completed in 2012. 2722 feet of 24" and a small amount of 22" and 30" transition pipe for line 109 was installed (slightly more than the PFL footage). Test records for segment 165.8 were found (11 feet long) but it was replaced as planned to make the line piggable. Due to their short length, and location within the clearance boundaries, tap DFDS8457 segments 701 and 702 were added to the replacement work for this project. They were replaced by DFDS14025 (34 feet long-2" OD) and DREG14069 (2 feet long-2" OD). These taps were not mapped in GIS 1.0 which served as the basis for the project scope in D.2-12-030.

L-109_4C Repl 1.25mi Mp 30.52-31.76

#	Route	Segment	Footage	DT Code	Deviation Comment
1	109	171.5 , 172 , 172.2 , 172.5 , 172.7 , 173 , 173.2 , 173.5 , 173.8	6,595	M2	NO PHASE DEVIATION
2	DREG4340	803	10	M4	PROXIMITY TO PH 1
3	X6434	501.7 , 501.8	29	M2	NO PHASE DEVIATION

Narrative for Summary above:
4C will be completed in 2014. 1,256 feet of 30" OD pipe was installed rather than 24" to reduce the number of 30" to 24" transitions. Changes in diameter of this magnitude make it more likely there will be speed excursions when the pipeline is inspected with a smart pig. Fewer transitions will help ensure fewer speed excursions, which are detrimental to a successful inspection of the pipeline. Due to their short length, and location within the clearance boundaries for this project, taps DREG4340 (10 feet long-2" OD) and cross tie X6434 (29 feet long-12" OD) are now planned to be replaced as part of this project rather than stand-alone taps projects. The main line was tested in 2012 to address Integrity Management identified threats but will still be replaced as planned to make the line piggable.

L-109_4D REPL 0.67MI MP 32.41-33.08

#	Route	Segment	Footage	DT Code	Deviation Comment
1	109	175 , 175.5 , 175.68	3,533	M2	NO PHASE DEVIATION

Narrative for Summary above:
4D was completed in 2012. 3,892 feet of 30" OD pipe was installed (more than the PFL footage) rather than 24" to reduce the number of 30" to 24" transitions. Changes in diameter of this magnitude make it more likely there will be speed excursions when the pipeline is inspected with a smart pig. Fewer transitions will help ensure fewer speed excursions, which are detrimental to a successful inspection of the pipeline. Due to their short length, and location within the clearance boundaries for this project, taps DCUST11006 (72 feet long-3/4"OD), DCUST14033 (126 feet long-3/4"OD) and DFDS14035 (46 feet long-3/4"OD) were added to the replacement work for this project. These taps were needed to tie the new main line back to the HPRs fed by this line. These taps were not mapped in GIS 1.0, which serve as the basis for the project scope in D.12-12-030.

L-109_4A_2 REPL 1.59 MI MP 28.60-30.11

#	Route	Segment	Footage	DT Code	Deviation Comment
1	109	166.5-2 , 167	5,307	M2	NO PHASE DEVIATION
2	109	167.3	197	C4 -> M2	NO PHASE DEVIATION
3	109	168 , 168.3 , 169 , 170	2,673	M2	NO PHASE DEVIATION
4	109	171 , 176.5	2,137	C3 -> C5	NO PHASE DEVIATION
5	DFDS3601	701 , 701.5	33	M4	SHORT LENGTH
6	DFDS3601	702	21	M2	NO PHASE DEVIATION
7	DREG4745	801.5 , 801.7	5	M4 -> C5	SHORT LENGTH
8	DREG4745	801.8	258	M4	SHORT LENGTH
9	DREG4745	802	72	M2 -> M4	SHORT LENGTH

Narrative for Summary above:
4A_2 will be completed in 2014. Due to their short length, mix of test/replace decision tree outputs, and location within the clearance boundaries for this project, taps DFDS3601(54 feet long) and DREG4745 (335 feet long) are now planned to be replaced rather than tested and to be replaced as part of this project rather than stand-alone taps projects. Test records that were assumed to exist for segment 167.3 were not found and it will be replaced to make the line piggable.

Original Route	Original Segment	Original MP1	Original MP2	Original Length, feet	Validated Length, feet	Validated Diameter, inches	Original Proposed Diameter, inches	PSEP Funded Diameter, inches	Validated Year Installed	Validated Test Met Code	Original Class Location	Validated Class Location	Validated HCA	Original PIR	Current PSRS	Original Decision Tree Outcome	Validated Decision Tree Outcome	Original Project Type	Validated Project Type	Validated Phase Deviation
109	158	24.84	25.12	1491.00	1491.00	22	24	24	1/1/1936	N/A	2	1	NO	293.959	26023	M2	M3	REPL	REPL	PIGGABILITY
109	158.3	25.12	25.14	91.00	91.00	22	24	24	1/1/1936	N/A	2	1	NO	293.959	26023	M2	M3	REPL	REPL	PIGGABILITY
109	159	25.14	25.32	959.00	1549.00	22	24	24	1/1/1936	N/A	2	1	NO	293.959	26023	M2	M3	REPL	REPL	PIGGABILITY
109	159.3	25.32	25.32	19.00	19.00	22	24	24	1/1/1936	N/A	2	1	NO	293.959	26023	M2	M3	REPL	REPL	PIGGABILITY
109	160	25.32	25.6	1507.00	1507.00	SPLIT	24	24	SPLIT	SPLIT	2	SPLIT	SPLIT	293.959		M2	SPLIT	REPL	SPLIT	SPLIT
109	160	25.32	25.6	1507.00	264.00	22	24	24	1/1/1936	N/A	2	1	NO	293.959	26023	M2	M3	REPL	REPL	PIGGABILITY
109	160.2	25.32	25.6	1507.00	1243.00	22	24	24	1/1/1936	N/A	2	1	No	293.959	26023	M2	M3	REPL	REPL	PIGGABILITY
109	160.3	25.6	25.61	45.00	45.00	22	24	24	1/1/1936	N/A	2	1	NO	293.959	26023	M2	M3	REPL	REPL	PIGGABILITY
109	160.6	25.61	25.68	345.00	329.00	22	24	24	1/1/1936	N/A	2	1	NO	293.959	26023	M2	M3	REPL	REPL	PIGGABILITY
109	160.8	25.68	25.6801	3.00	3.00	22	24	24	1/1/1972	YES	-2	1	NO	293.959	26023	C2	C4	REPL	REPL	PIGGABILITY
109	161	25.6801	25.89	1313.00	1470.00	SPLIT			SPLIT	SPLIT	2	SPLIT	SPLIT	320.683		C4	SPLIT		SPLIT	SPLIT
109	161	25.6801	25.89	1313.00	582.00	24			1/1/1972	YES	2	1	NO	320.683		C4	C4		N/A	NO PHASE DEVIATION
109	161.2	25.6801	25.89	1313.00	777.00	24			1/1/1972	YES	2	1	YES	320.683		C4	C7		N/A	NO PHASE DEVIATION
109	161.25	25.6801	25.89	1313.00	111.00	24			1/1/1972	YES	2	3	YES	320.683		C4	C7		N/A	NO PHASE DEVIATION
109	161.3	25.89	26	388.00	388.00	SPLIT			SPLIT	SPLIT	2	SPLIT	SPLIT	320.683		C5	SPLIT		SPLIT	SPLIT
109	161.3	25.89	26	388.00	196.00	24			1/1/1972	YES	2	3	YES	320.683		C5	C6		N/A	NO PHASE DEVIATION
109	161.4	25.89	26	388.00	192.00	24			1/1/1972	YES	2	1	YES	320.683		C5	C6		N/A	NO PHASE DEVIATION
109	161.6	26	26.03	162.00	191.60	24			1/1/1972	YES	2	1	YES	320.683		C5	C6		N/A	NO PHASE DEVIATION
109	161.8			4.00	4.00	22	24	24	1/1/1972	YES	2	1	YES	293.959	26023	C2	C7	REPL	REPL	PIGGABILITY
109	162	26.03	27.12	6682.00	6682.00	SPLIT	24	24	SPLIT	SPLIT	2	SPLIT	SPLIT	293.959		M2	SPLIT	REPL	SPLIT	SPLIT
109	162	26.03	27.12	6682.00	242.00	22	24	24	1/1/1936	N/A	2	1	YES	293.959	26023	M2	M2	REPL	REPL	PIGGABILITY
109	162.1	26.03	27.12	6682.00	886.00	22	24	24	1/1/1936	N/A	2	1	NO	293.959	26023	M2	M3	REPL	REPL	PIGGABILITY
109	162.2	26.03	27.12	6682.00	5554.00	22	24	24	1/1/1936	N/A	2	1	NO	293.959	26023	M2	M3	REPL	REPL	PIGGABILITY
109	162.3	27.12	27.15	145.00	145.00	22	24	24	1/1/1936	N/A	2	1	NO	293.959	26023	M2	M3	REPL	REPL	PIGGABILITY
109	163	27.15	27.26	585.00	564.00	22	24	24	1/1/1936	N/A	2	1	NO	293.959	26023	M2	M3	REPL	REPL	PIGGABILITY
109	164	27.26	27.93	3486.00	3492.00	30			1/1/1971	YES	2	1	NO	400.854		C4	C4		N/A	NO PHASE DEVIATION
109	164.3	27.93	27.94	63.00	70.00	30			1/1/1971	YES	2	1	NO	400.854		C3	C5		N/A	NO PHASE DEVIATION
109	164.6	27.94	27.9693	155.00	155.00	30			1/1/1971	YES	2	1	NO	400.854		C4	C4		N/A	NO PHASE DEVIATION
109	164.8	27.9693	28	162.00	161.00	30			1/1/1971	YES	2	1	YES	400.854		C7	C7		N/A	NO PHASE DEVIATION
109	165	28	28.0557	302.00	302.00	30			1/1/1971	YES	3	3	YES	400.854		C7	C7		N/A	NO PHASE DEVIATION
109	165.1	28.0557	28.0937	206.00	206.00	30			1/1/1971	YES	3	3	YES	400.854		C7	C7		N/A	NO PHASE DEVIATION
109	165.3	28.0937	28.21	630.00	630.00	30			1/1/1971	YES	3	3	YES	400.854		C7	C7		N/A	NO PHASE DEVIATION
109	165.8	28.21	28.2101	11.00	11.00	22	24	30	1/1/1971	YES	3	3	YES	293.959	26024	C2	C6	REPL	REPL	PIGGABILITY
109	166	28.2101	28.5097	1982.00	1962.00	22	24	24	1/1/1936	N/A	3	3	YES	293.959	26024	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	166.5	28.5097	29	3242.00	3207.00	SPLIT	24	24	SPLIT	SPLIT	3	SPLIT	SPLIT	293.959		M2	SPLIT	REPL	SPLIT	SPLIT
109	166.5-1	28.5097	29	3242.00	675.00	22	24	24	1/1/1936	N/A	3	3	NO	293.959	26024	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	166.5-2	28.5097	29	3242.00	2532.00	22	24	24	1/1/1936	N/A	3	3	NO	293.959	26023	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	167	29	29.56	2957.00	2788.00	22	24	24	1/1/1936	N/A	3	3	NO	293.959	26023	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	167.3	29.56	29.6	199.00	197.00	22	24	24	1/1/1964	YES	3	3	NO	293.959	26023	C4	M2	REPL	REPL	NO PHASE DEVIATION
109	168	29.6	29.82	1175.00	1176.00	22	24	24	1/1/1936	N/A	3	3	NO	293.959	26023	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	168.3	29.82	29.83	55.00	55.00	22	24	24	1/1/1936	N/A	3	3	NO	293.959	26023	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	169	29.83	30.01	935.00	908.00	22	24	24	1/1/1936	N/A	3	3	NO	293.959	26023	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	170	30.01	30.11	514.00	534.00	22	24	24	1/1/1940	N/A	3	3	NO	293.959	26023	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	171	30.11	30.52	2131.00	2131.00	30	24	24	1/1/1964	YES	3	3	NO	400.854		C3	C5	REPL	N/A	NO PHASE DEVIATION
109	171.5	30.52	30.5201	5.00	5.00	22	24	24	1/1/1964	NO	3	3	NO	293.959	26025	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	172	30.5201	31	2562.00	2562.00	SPLIT	24	24	SPLIT	SPLIT	3	SPLIT	SPLIT	293.959		M2	SPLIT	REPL	SPLIT	SPLIT
109	172	30.5201	31	2562.00	581.00	22	24	24	1/1/1936	N/A	3	3	YES	293.959	26025	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	172.2	30.5201	31	2562.00	670.00	22	24	24	1/1/1936	N/A	3	3	YES	293.959	26025	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	172.5	30.5201	31	2562.00	508.00	22	24	24	1/1/1936	N/A	3	3	YES	293.959	26025	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	172.7	30.5201	31	2562.00	803.00	22	24	24	1/1/1936	N/A	3	3	NO	293.959	26025	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	173	31	31.6554	3469.00	3471.00	22	24	24	1/1/1936	N/A	3	3	NO	293.959	26025	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	173.2	31.6554	31.6841	152.00	152.00	22	24	24	1/1/1936	N/A	3	3	YES	293.959	26025	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	173.5	31.6841	31.76	402.00	402.00	22	24	24	1/1/1936	N/A	3	3	YES	293.959	26025	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	173.8	31.76	31.7601	3.00	3.00	22	24	24	1/1/1964	NO	3	3	YES	293.959	26025	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	175	32.41	32.6002	1003.00	1003.00	22	24	30	1/1/1936	N/A	3	3	YES	293.959	26026	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	175.5	32.6002	32.7706	899.00	899.00	22	24	30	1/1/1936	N/A	3	3	YES	293.959	26026	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	175.68	32.7706	33.08	1631.00	1631.00	22	24	30	1/1/1936	N/A	3	3	NO	293.959	26026	M2	M2	REPL	REPL	NO PHASE DEVIATION
109	176	33.08	33.26	925.00	899.00	30	24	24	1/1/1967	YES	3	3	NO	400.854		C4	C4	REPL	N/A	NO PHASE DEVIATION
109	176.5	33.26	33.2601	5.00	6.00	30	24	24	1/1/1992	YES	3	3	NO	400.854		C3	C5	REPL	N/A	NO PHASE DEVIATION

Original Route	Original Segment	Original MP1	Original MP2	Original Length, feet	Validated Length, feet	Validated Diameter, inches	Original Proposed Diameter, inches	PSEP Funded Diameter, inches	Validated Year Installed	Validated Test Met Code	Original Class Location	Validated Class Location	Validated HCA	Original PIR	Current PSRS	Original Decision Tree Outcome	Validated Decision Tree Outcome	Original Project Type	Validated Project Type	Validated Phase Deviation
DFDS3601	701			2.00	2.00	2.375	2.375	2.375	7/27/1956	NO	3	3	NO	31.734	26023	M4	M4	REPL	REPL	SHORT LENGTH
DFDS3601	701.5			31.00	31.00	2.375	2.375	2.375	7/27/1956	NO	3	3	NO	32.775	26023	M4	M4	REPL	REPL	SHORT LENGTH
DFDS3601	702			21.00	21.00	3.5	3.5	3.5	7/27/1956	NO	3	3	NO	48.3	26023	M2	M2	REPL	REPL	NO PHASE DEVIATION
DREG4745	801			2.00	2.00	2.375	2.375	2.375	1/1/1956	NO	3	3	NO	32.775	26023	M4	M4	REPL	REPL	SHORT LENGTH
DREG4745	801.5			263.00	263.00	SPLIT	2.375	2.375	SPLIT	SPLIT	3	SPLIT	SPLIT	32.775		M4	SPLIT	REPL	SPLIT	SPLIT
DREG4745	801.5			263.00	4.00	2.375	2.375		1/1/1956	YES	3	3	NO	32.775		M4	C5	REPL	N/A	NO PHASE DEVIATION
DREG4745	801.7			263.00	1.00	2.375	2.375		1/1/2011	YES	3	3	NO	32.775		M4	C5	REPL	N/A	NO PHASE DEVIATION
DREG4745	801.8			263.00	258.00	2.375	2.375	2.375	1/1/1956	NO	3	3	NO	32.775	26023	M4	M4	REPL	REPL	SHORT LENGTH
DREG4745	802			72.00	72.00	2.375	3.5	3.5	1/1/1956	NO	3	3	NO	48.3	26023	M2	M4	REPL	REPL	SHORT LENGTH
DFDS8457	701				2.00	2.375		2.375	1/6/2006	YES		3	NO	0	26024		D1		REPL	CONSTRUCTABILITY
DFDS8457	702				4.00	2.375		2.375	1/6/2006	YES		3	NO	0	26024		D1		REPL	CONSTRUCTABILITY
DFDS3639	701			28.00	26.00	SPLIT	2.375		SPLIT	SPLIT	3	SPLIT	SPLIT	32.775		M4	SPLIT	REPL	SPLIT	SPLIT
DFDS3639	701			28.00	2.00	2.375	2.375		10/14/2011	YES	3	3	NO	32.775		M4	C5	REPL	N/A	NO PHASE DEVIATION
DFDS3639	702			28.00	24.00	2.375	2.375		10/14/2011	YES	3	3	NO	32.775		M4	C5	REPL	N/A	NO PHASE DEVIATION
DREG4340	801			8.00	3.00	SPLIT	2.375	2.375	SPLIT	SPLIT	3	SPLIT	SPLIT	31.734		M4	SPLIT	REPL	SPLIT	SPLIT
DREG4340	802			8.00	3.00	2.375	2.375	2.375	10/14/2011	YES	3	2	NO	31.734		M4	C5	REPL	N/A	NO PHASE DEVIATION
DREG4340	802			52.00	34.00	SPLIT	2.375	2.375	SPLIT	SPLIT	3	SPLIT	SPLIT	32.775		M4	SPLIT	REPL	SPLIT	SPLIT
DREG4340	802.2			52.00	25.00	2.375	2.375	2.375	10/14/2011	YES	3	2	NO	32.775		M4	C5	REPL	N/A	NO PHASE DEVIATION
DREG4340	802.25			52.00	2.00	2.375	2.375	2.375	10/14/2011	YES	3	2	NO	32.775		M4	C5	REPL	N/A	NO PHASE DEVIATION
DREG4340	802.3			52.00	8.00	2.375	2.375	2.375	10/14/2011	YES	3	2	NO	32.775		M4	C5	REPL	N/A	NO PHASE DEVIATION
DREG4340	802.5			52.00	5.00	2.375	2.375	2.375	10/14/2011	YES	3	2	NO	32.775		M4	C5	REPL	N/A	NO PHASE DEVIATION
DREG4340	803			52.00	10.00	2.375	2.375	2.375	11/19/1948	N/A	3	2	NO	32.775	26025	M4	M4	REPL	REPL	PROXIMITY TO PH 1

	22	26024
	24	26024
	30	26024
	2.375	26024
	30	26026
	1.05	26026
X6387	2.375	26025
X6434	2.375	26025
DCUST11006	1.05	26026
DCUST14033	1.05	26026
DFDS14035	1.05	26026

Project Cost

Pipeline Replacement Project Estimate Evaluation Form					
Project Name	L-109_4A_1 REPL 2.25MI MP 24.84-27.26 PH1				
PSRS ID	26023				
Pipeline Diameter	12" & Under				
Area Classifications & Unit Costs					
Non-Congested	0	ft	$	282	/ft
Semi-Congested	0	ft	$	489	/ft
Highly-Congested	0	ft	$	790	/ft
HDD	0	ft	$	550	/ft
Bore	0	ft	$	600	/ft
Estimated Move Arounds	0	ea	$	25,000	ea
Mob/Demob Charge	0	ea	$	45,000	ea
Project Diameter Range Total Estimated Cost					
Non-Congested	$ -				
Semi-Congested	$ -				
Congested	$ -				
HDD	$ -				
Bore	$ -				
Move Arounds	$ -				
Mob/Demob Charge	$ -				
Project Total	**$ -**		**#DIV/0!**		**/mile**

Pipeline Replacement Project Estimate Evaluation Form					
Project Name	L-109_4A_1 REPL 2.25MI MP 24.84-27.26 PH1				
PSRS ID	26023				
Pipeline Diameter	14" to 20"				
Area Classifications & Unit Costs					
Non-Congested	0	ft	$	347	/ft
Semi-Congested	0	ft	$	618	/ft
Highly-Congested	0	ft	$	980	/ft
HDD	0	ft	$	650	/ft
Bore	0	ft	$	650	/ft
Estimated Move Arounds	0	ea	$	30,000	ea
Mob/Demob Charge	0	ea	$	60,000	ea
Project Diameter Range Total Estimated Cost					
Non-Congested	$ -				
Semi-Congested	$ -				
Congested	$ -				
HDD	$ -				
Bore	$ -				
Move Arounds	$ -				
Mob/Demob Charge	$ -				
Project Total	**$ -**		**#DIV/0!**		**/mile**

Pipeline Replacement Project Estimate Evaluation Form					
Project Name	L-109_4A_1 REPL 2.25MI MP 24.84-27.26 PH1				
PSRS ID	26023				
Pipeline Diameter	22" to 28"				
Area Classifications & Unit Costs					
Non-Congested	12429	ft	$	515	/ft
Semi-Congested	0	ft	$	841	/ft
Highly-Congested	0	ft	$	1,268	/ft
HDD	0	ft	$	700	/ft
Bore	0	ft	$	800	/ft
Estimated Move Arounds	0	ea	$	35,000	ea
Mob/Demob Charge	1	ea	$	65,000	ea
Project Diameter Range Total Estimated Cost					
Non-Congested	$ 6,401,000				
Semi-Congested	$ -				
Congested	$ -				
HDD	$ -				
Bore	$ -				
Move Arounds	$ -				
Mob/Demob Charge	$ 65,000				
Project Total	**$ 6,466,000**		**$ 2,747,000**		**/mile**

Pipeline Replacement Project Estimate Evaluation Form					
Project Name	L-109_4A_1 REPL 2.25MI MP 24.84-27.26 PH1				
PSRS ID	26023				
Pipeline Diameter	30" to 42"				
Area Classifications & Unit Costs					
Non-Congested	0	ft	$	801	/ft
Semi-Congested	0	ft	$	1,253	/ft
Highly-Congested	0	ft	$	1,799	/ft
HDD	0	ft	$	1,700	/ft
Bore	0	ft	$	1,000	/ft
Estimated Move Arounds	0	ea	$	50,000	ea
Mob/Demob Charge	0	ea	$	95,000	ea
Project Diameter Range Total Estimated Cost					
Non-Congested	$ -				
Semi-Congested	$ -				
Congested	$ -				
HDD	$ -				
Bore	$ -				
Move Arounds	$ -				
Mob/Demob Charge	$ -				
Project Total	**$ -**		**#DIV/0!**		**/mile**

Complete Project Total Estimated Cost			
Non-Congested	$ 6,401,000		
Semi-Congested	$ -		
Congested	$ -		
HDD	$ -		
Bore	$ -		
Move Arounds	$ -		
Mob/Demob Charge	$ 65,000		
Subtotal	$ 6,466,000		
Peninsula Adder	$ 2,485,800	$200 per foot	
Customer Outreach	$ 187,514	2.9% of Above Costs	
Project Management Allowance	$ 161,650	2.5% of Above Costs	
Project Escalation	$ 870,570	Operative Date 10/11/2014 Operative Quarter Q4-14	
Project Total	**$ 10,172,000**	**$ 4,321,000**	**/mile**
Less Post-55 Cost	**$ -**	**cost of testing post-55 pipe without verifiable strength test**	
Net Cost	**$ 10,172,000**	**total project cost less the cost of post-55 pipe without verifiable strength test**	

Complete Project Total Estimated Footage		
Non-Congested	12,429	ft
Semi-Congested	0	ft
Congested	0	ft
HDD	0	ft
Bore	0	ft

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL OR U.S. MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department B30A, 77 Beale Street, San Francisco, California 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On July 8, 2013, I served a true copy of:

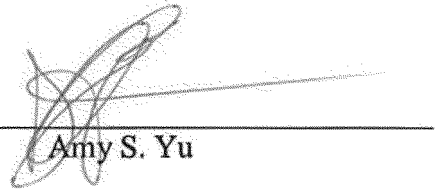
PG&E'S REQUEST FOR EXTENSION OF TIME TO COMPLY WITH ORDERING PARAGRAPH 11 OF DECISION 12-12-030

[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for R.11-02-019 with an e-mail address.

[XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service list for R.11-02-019 without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 8, 2013 at San Francisco, California.



Amy S. Yu