

| Qn Ref | SED Question  | PG&E Response  |
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| 6.1.1  | Where the NDE contractor issues mentioned in Q1 report for TCI as well or another contractor? When was the issue mentioned in Q1 observed?  | PG&E made no reference to NDE contractor issues in the PSEP Q1 quarterly compliance report. PG&E highlighted this issue within the Q2 report, where it solely related to the issue identified with TCI NDE services.   |
| 6.1.2  | Why did the Q1 report filed on April 30 <sup>th</sup> not mention the TCI issue weld inspection issue and it was reported later in the Q2 report?   | The first PSEP compliance report covers the period from program inception in April 2011 through March 31, 2013 and might have included some reference to this issue. However, the issue only came to light in the last days of the reporting period and there was limited information available directly until later in April, at which point we considered that there was insufficient time to fully analyze the issue for reporting purposes and still meet the April 30 reporting deadline. Reporting of the issue in the second PSEP quarterly compliance report, which covers the period April 1, 2013 through June 30, 2013 was consistent with PG&E's issuance of a stop all work notice to the contractor on April 1, 2013, the planning of re-inspection activities on the L-114 project, and the commencement of analysis into the extent of condition.  |
| 6.2    | The account of the conversation between Modena and PG&E staff has several inconsistencies. Can you provide me the names of the staff who Modena approached and a summary of that conversation? I understand that people may not remember exactly, but I need to understand the nature of that discussion and what specifically PG&E employees said to Modena. I believe the conversation took place on April 4, 2013. | <p>No person I have talked to (see details below) specifically remembers a discussion with Modena on April 4, 2013. However, there are a number of conversations noted below that took place between project field personnel and Modena during the period March 28 through August 1:</p> <p>Based upon my conversations with the following project field personnel: Terry Hipes (welding inspector - CANUS), Denis Kelso (coating inspector –CANUS), <span style="border: 1px solid black; padding: 0 2px;">Redacted</span> <span style="border: 1px solid black; padding: 0 2px;">Redacted</span> (ATS NDE inspector – PG&amp;E), <span style="border: 1px solid black; padding: 0 2px;">Redacted</span> (distribution supervisor - PG&amp;E), <span style="border: 1px solid black; padding: 0 2px;">Redacted</span> (G.C. Crew foreman - PG&amp;E), and <span style="border: 1px solid black; padding: 0 2px;">Redacted</span> (field engineer – PG&amp;E), I understand the following discussions with Modena may be relevant to the identification of the TCI inspection issue during the time period you identify (please note it is not possible to give a comprehensive listing of PG&amp;E employees or contractors that Modena may have approached, nor the nature of every discussion):</p> <ul style="list-style-type: none"> <li>• March 26 <span style="border: 1px solid black; padding: 0 2px;">Redacted</span> first described to Modena the identification of the TCI non-compliant inspection issue after she observed re-excavation of a pipe section that had previously been inspected by</li> </ul> |

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TCI, and which had been subsequently coated and partially backfilled. At that point [Reda] had only identified issues associated with two weld inspections and he provided Modena a summary of those findings.

- March 27-29 - various discussions were initiated by Modena with [Reda] as the original TCI crew was immediately dismissed from the job site and he supervised first a replacement TCI NDE crew on March 27, and then a new WIX NDE crew starting March 29.
- March 29 - [Reda] provided additional information to Modena regarding the potential wider TCI non-compliance issue and confirmed that a wider investigation of TCI's inspection on the project was underway, and that additional oversight would be maintained over the new NDE contractor (WIX) as the project progressed. Modena specifically asked about the requirement for "two versus three shots" during a radiographic test. [Reda] reviewed the applicable section of API 1104 with Modena using his field copy, explaining the 3-shot requirement in detail.

Additional discussions between project field personnel and Modena took place, throughout subsequent construction activities and in particular as re-inspection plans were communicated to the field on or around July 19. Ongoing contact was maintained with Modena as these re-inspection activities were undertaken through her eventual reassignment on August 1.

My understanding from my conversations is that field personnel were conscious of the need to keep their answers factual and they were forthright and consistently attempted to provide the information requested by Modena, including reviewing construction documents and re-inspection plans.

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| 6.3 | I'm also trying to clarify who was auditing work on March 26. Was there anybody present from CPUC or BV? | Consistent with the response to the previous question, Rudy Medina confirms that he held discussions directly with Modena Moore on March 26 at the construction site. My discussions with other project staff did not identify any other CPUC or BV personnel on site that day. |
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| 6.4    | <p>Can you also validate this statement:</p> <p>“Since portions of the pipeline where welds need to be re-inspected have already been buried, PG&amp;E has chosen ultrasonic testing as the NDT method. In-line inspection is an acceptable NDT method per API 1104 and also reduces the risk of damaging the pipe during excavation, which would need to take place if the welds were to be re-inspected using Radiographic Testing.”</p> | <p>The following paragraph updates the original response provided by email on 8/21/13: “Since portions of the pipeline where welds need to be re-inspected have already been buried, PG&amp;E has chosen Ultrasonic Testing as a supplemental NDT method to Radiographic Testing (RT x-ray). In-line inspection using this Ultrasonic Testing technology is an acceptable NDT method per API 1104. In addition, the use of this Ultrasonic Testing method reduces the number of excavations required to re-inspect all affected welds, which in turn reduces the potential risk of damaging the pipe during excavation and the possible negative impact of excavation activities to the local community.”</p> |
| 6.5    | <p>Can I please get a copy of the procedures that were used in the field during the Brentwood UT re-inspection work?</p>   | <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>Letter Concerning<br/>SPC UT System</p> </div> <div style="text-align: center;">  <p>883 GP Internal</p> </div> </div>   |
| 6.6    | <p>Any OQ requirements of the UAT operators you may have required or accepted per ASNT standards?</p>  | <p>Currently, PG&amp;E’s OQ program does not have OQ requirements for UT tools.</p>   |
| 6.7    | <p>Six of the welds re-inspection were faulty and three were found with re-xray, and three are found with AUT tool. Were the three found from re-x-raying on bends in the pipe?</p>  | <p>Yes, and consistent with my prior email three weld issues were identified via Radiographic Testing (RT or x-ray). Two of those welds were selected for re-inspection using RT due to the pipe configuration, e.g. bends, in those areas precluding re-inspection using the AUT tool. However, one of the three re-inspections was selected as it was part of a welder’s assessment.</p>  |

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| <b>6.8</b>    | The name of the API Industry Expert | David L. Culbertson<br>President, NDT Technical Services Inc.,<br>Email: david.culbertson@ndttechservices.com,<br>Cell Ph: 281-389-4304 |