

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

PG&E Data Request No.:	SED_001-02		
PG&E File Name:	GasPipelineSafetyOIR_DR_SED_001-Q02		
Request Date:	August 26, 2013	Requester DR No.:	001
Date Sent:	August 30, 2013	Requesting Party:	Safety and Enforcement Division
PG&E Witness:		Requester:	Darryl Gruen

**QUESTION 2**

For this set of questions, please refer to the Order referenced in question 1. At Pages 2 and 3, the Order references PG&E's "Errata to Pacific Gas and Electric Company's Supporting Documentation for Lifting Operating Pressure Restrictions on Line 101 and 147." that PG&E filed with the Commission on July 3, 2013. ("Errata") In particular, on Page 3, in reference to the Errata, the Order states, "PG&E concluded that the correct pipeline feature MAOP was 330 psig, not the 365 approved by the Commission in D.11-12-048."

- a. What exact date did PG&E conclude that the correct pipeline feature MAOP was 330 psig? Please provide all documentation and communications regarding this conclusion.
- b. What exact date did PG&E discover each of the facts referenced in the Errata that lead to PG&E's conclusion that the correct pipeline feature MAOP was 330 psig?
- c. How did PG&E discover each of the facts identified in the Errata that lead to PG&E's conclusion that the correct pipeline feature MAOP was 330 psig?
- d. What did PG&E do to resolve the problem that it had operated the pipeline with an MAOP of 365 psig rather than 330 psig?
- e. Prior to or since filing its errata, did PG&E file anything with the Commission containing subject matter relating to that in the errata?
- f. If the answer to question 2(e) is yes, please provide all such filings.
- g. Prior to or since attempting to file the Errata, did PG&E communicate with any state or federal agency regarding the matter raised by the Errata? If yes, please indicate the agencies, dates of communication with each agency, and please describe all such communications. If any of the communications were in writing, please provide them.
- h. Please provide the Errata.

## ANSWER 2

- a. Please refer to the “VERIFIED STATEMENT OF PACIFIC GAS AND ELECTRIC COMPANY’S VICE PRESIDENT OF GAS TRANSMISSION MAINTENANCE AND CONSTRUCTION IN RESPONSE TO RULING OF ASSIGNED COMMISSIONER AND ASSIGNED ADMINISTRATIVE LAW JUDGE,” that PG&E will submit on August 30.

PG&E is collecting the documentation and communications requested and will provide them when ready.

- b. – d. Please refer to the “VERIFIED STATEMENT OF PACIFIC GAS AND ELECTRIC COMPANY’S VICE PRESIDENT OF GAS TRANSMISSION MAINTENANCE AND CONSTRUCTION IN RESPONSE TO RULING OF ASSIGNED COMMISSIONER AND ASSIGNED ADMINISTRATIVE LAW JUDGE,” that PG&E will submit on August 30.
- e. PG&E interprets “file anything with the Commission” to mean submissions filed in formal proceedings before the Commission. Along with the errata filed in this proceeding (the Pipeline Safety OIR), PG&E simultaneously filed an errata in I.11-11-009 (the “Class Location OIR” – see attachment GasPipelineSafetyOIR\_DR\_SED\_001-02\_Atch01). The Commission’s Docket Office rejected the errata filed in the Class Location OIR, and PG&E re-submitted the filing as “AMENDMENT TO PACIFIC GAS AND ELECTRIC COMPANY’S SECOND UPDATE TO RESPONSE TO ORDER INSTITUTING INVESTIGATION” on August 2, 2013 (see attachment GasPipelineSafetyOIR\_DR\_SED\_001-02\_Atch02).
- f. Please refer to the response to 2(e).
- g. PG&E’s Nick Stavropoulos and Jesus Soto met with PHMSA’s Jeff Wiese on August 22, 2013 for a discussion on PG&E’s Gas Operations, as well as the “one-class-out” code provision. Attached as GasPipelineSafetyOIR\_DR\_SED\_001-02\_Atch03 is the presentation PG&E used at this meeting (note that the date on the presentation, August 21, is incorrect).
- In addition, Jane Yura from PG&E had a phone conference with Mike Brown from NTSB on August 26, 2013 that included general discussions about the Order to Show Cause and PG&E’s MAOP validation efforts.
- h. Please see attachment GasPipelineSafetyOIR\_DR\_SED\_001-02\_Atch04 for the errata filed in the Pipeline Safety OIR.