PG&E-Gas Operations

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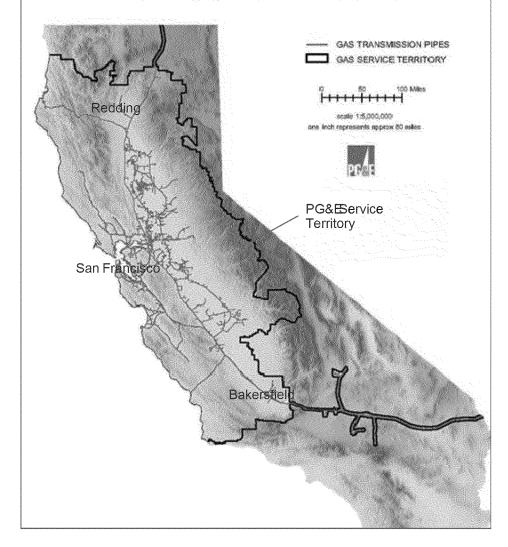


PG&<mark>E-</mark> PHMSA August 21, 2013

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PG&EGas Operations

PG&E GAS TRANSMISSION PIPES



4.3 million natural gas custome accounts.

Serves approximately 15 million people throughout a 70,000square-mile service area

Deliver 970 BCF/year (2.6 BCF/D

Operates approximately 6,800 miles of gas transmission pipeline~ 42,000 miles of gas distribution pipeline

47% of Transmission Pipe installed before 1961

25% of HCAmiles piggable

Approximately 105 BCFof gas storage

Approximately 203,000 HP of compression

Key Principles of Gas Safety Excellence

Our goal is zero incidents a perfect record of safety and reliability for the PG&Egas pipeline system.Wewill work every day toward this goal.

Weare committed to safety culture and a safety managemensystem as a critical dimension to continuously improve our safety performance.

Wewill be relentless in our pursuit of improving by learning from the past and anticipating the future.

Weare committed to applying risk managemenprinciples on a system-wide basis.

Wewill engage our stakeholders -from the local community to the national level so they understand and can participate in reducing risk.

n.safest, most reliable gas companyin the UnitedStates



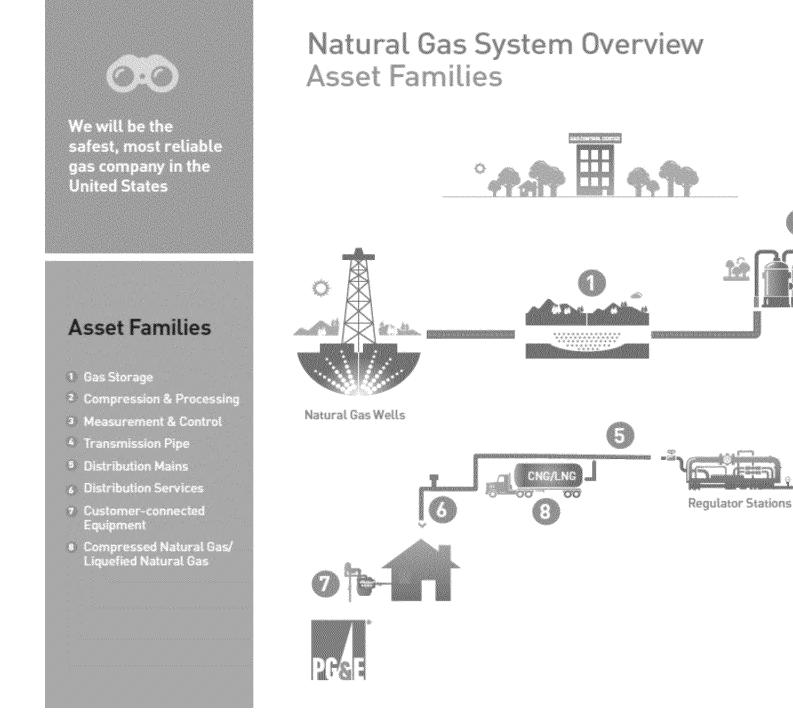


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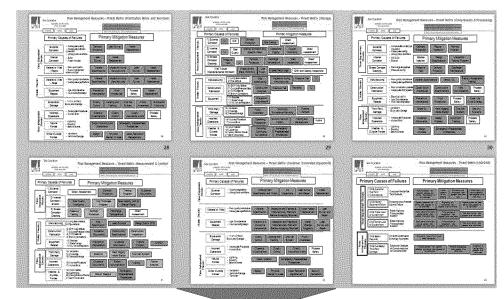
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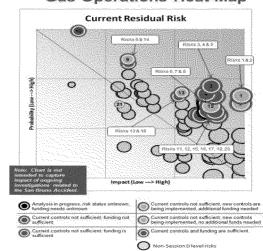


Understanding our Risks

- By asset family, we have ۲ an enhanced understanding of what risks we have to manage
- Using an impact and likelihood score we can rank these risks
- and use them to ۲ highlight and prioritize mitigation actions



Gas Operations Heat Map

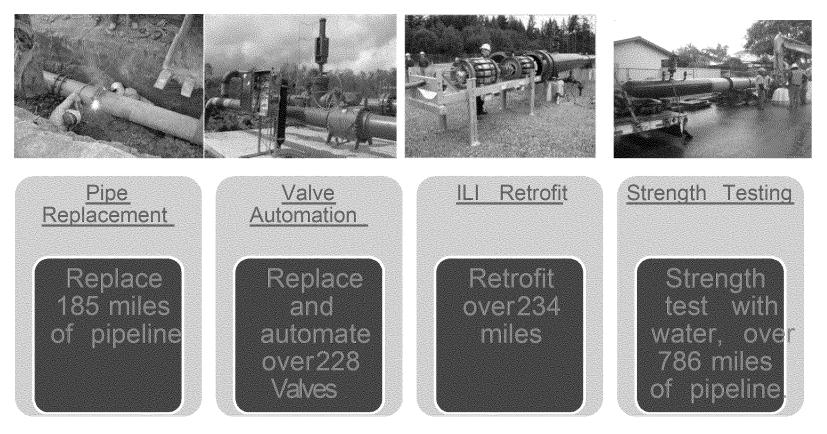


Final # Final - In order of highest ocn

	10	Transmission Statie - Manufacturing
1	9	Distribution: Time Dependent - Internal Company
	4	Distribution Tune Independent -Excavation Damage, Third Party - Rupture leading to potential impact on safety.
	5	Distribution: Time Independent -Excavation Gamage, Cross Bose
	0	Distribution Stable - Manufacturing
1	1	LNO/CNO. Time Independent - Equipment Falure, CNG Fueling Station
	0	Costomer Connected Equipment: All-Inside mater sets
	192	Transmission Time Dependent - External Concision
	(10)	Distribution Time independentTrint Party Excavation DamageNo rupture
j,	141	Distribution Time Independent - Incorrect Operations
8	12	Measurement & Control Time Independent - Large High Pressure Excursion
. 98	13	Storage Time Dependent - Internal Company Expansion
	14	Transmission: Time independent - Mechanical Damage
10	16	Storage Stable - Construction
	00	Storage Time Independent - Weather & Outside Forces - Flooding
Ĭ	1.7	Customer Connected Engineent, Stable - Manufacturing, meter sets
	10	LNGCD93 Time independent - Tool Party Damage
1000	59	Customer Connected Equipment Statile - Manufacturing, negalators
	20	Compression & Processing: Time independent - Incorrect Operations
1000	21	Rols of Non-Compliance
	with:	at Classification: Time Dependent = Likelihood of the threat increases time: Stable = Btable unless activated by a change in service conditions; incluseendent = Raedon, independent of time.
не	1.	Size of Bubble = Safety Impact
HS CONCERNMENT		 Conv. at instantly connectable, by Operations and practices could read in minor injury to employees or public.
iani .		Medium: a) Correctable health and safety impact, b) Operations and practices

SNEWCES High: a) Non-inversible feasible and safely impact, intellemental reaction in operations and practices that are probable to result in zerous ingines to employees or public.

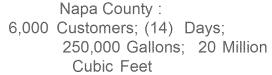
Profe Pipeline & Public Safety Work



- Committed to performing all the work Lowers Risk Profile
- Minimize impact to customers
- Drive efficiencies / Lower Costs

LNG & CNG Fleet & Capabilities

- LNG: Liquefied Natural Gas (-260 degrees; 600 times more volume)
- CNG: CompressedNatural Gas (3000 psi; 1% the volume)
- Replace pipelines without interrupting service;
- Test Longer pipeline sections; 42 Hydrotests in 2012
- Eliminate stopple & bypass configurations; \$4MMfor 1.5 miles





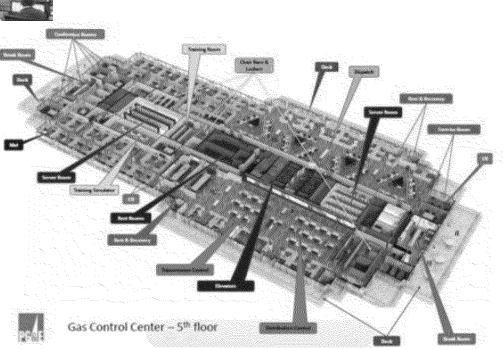
Lowering Costs to enable Affordability & Minimize Customer Impact

Gas Visibility and Control

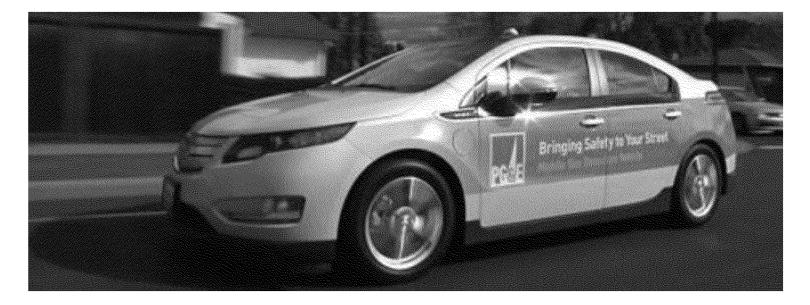


Accurate and reliable operating information Remote visibility and asset control

Front-line for emergency response Process control for operational activities Eliminate unplanned outages due to humanerror



Leak Detection ... Game Changer



Picarro car-mounted leak detection device

- 1,000 times more sensitive than traditional gas leak detection
- PG&Efirst utility in the world to use this technology Nowmounted on six vehicles in Northern and Central California
- Special Purpose Vehicle to Risk ManagemenTool

Strength Testing at Facilities

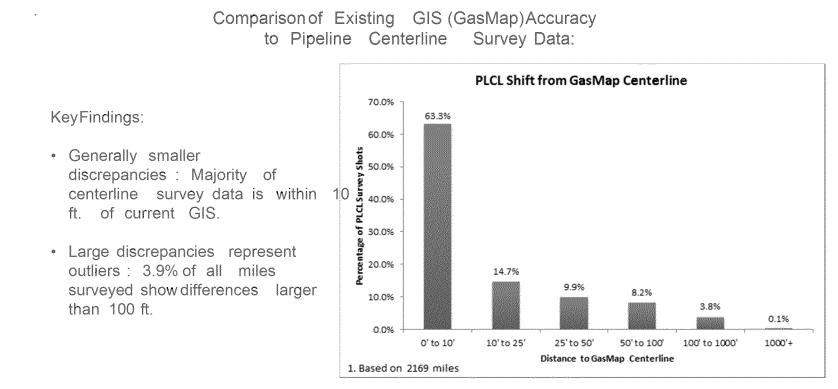
Risk	Description
Inability to remove from service	 Will result in station rebouilded of strength testing Could result in significant system outages
Workexecution	Performing strength testining GT stations presents inherent risk due to unique design and resulting clearance complexity
	• Strength testing will require the use of isolation valves as opposed to taking the station out of servicewasasecessary when strength testing the suction side at TopockCompressorStation .
	 Pipeline strength testing cance/by be performed by taking the asset out of service
Limited industry experience	 No precedence of post-constructionstrength testing to mitigate safety/risk or accomplish compliant for stations in the industry G2 industry benchmarking study will validate

Alternative methods to meet PHMSA' Fraceable, Verifiable, and Complete advisory for MAOR alidation presents lower risk than strength testing



PG&E'sefforts to enhance data quality:

- Performing Pipeline Cenerline Survey consisting offield locating all transmission pipelines (6,750 miles¹) to obtain survey grael pipeline centerline data and uploading the corresponding geospatial coordinates to GISby end of 2013.
- Leveraging the most modern commercially available technology for geo-spatial positioning and classification of structures in 2013.



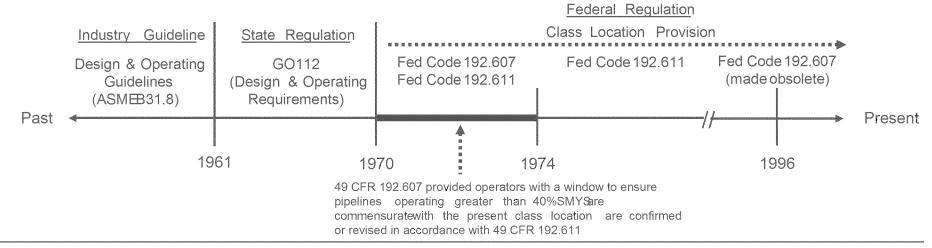
Compliance Plan for potential Class Changesas a result of enhanced data quality

• Implementation under 192.611

¹Based on an operating pressure of greater than 60 psig

Class Location: "One Class-Out" Provision

Timeline of Regulatory Requirements:



Current Discussion:

- 192.611 Provision: Pipelines can be operated 'one class out,' if:
 - 1. Class location changesafter the implementation of the federal regulations (1970).
 - 2. Class location confirmed to be non-commensate as a result of the 192.607 analysis during 1970-1974 and a Subpart J strength test performed in accordance with the provisions of 192.611 during that time-frame.
- Current Situation: As a result of refined asset knowledge of PG&E'spipelines, we are tine process of validating if the unrements of 192.607 were metby PG&E.Ourcurrent understanding of section 192.607 of the federal code is:
 - 1. Pipelines with strength tests beyond1974 are limited to a loweximurallowable operating stress level based on the respective class location as compared to similar pipelines with strength tests performed between 1970-1974 where the class location has not changed.

	MaximurAllowable Operating Stress Level (% SMYS)		
Class Location	Strength Test per 192.611 (1970 – 1974)	Strength Test per 192.611 (1974 and beyond)	
2	72%	60%	
3	60%	50%	
4	50%	40%	

What should be the appropriate consideration by operators regarding 192.607 given the recent increase of in-situ strength tests that typically include spike tests?