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Sent: 10/9/2013 10:20:23 AM  
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Cc: Yura, Jane (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=JKY1); Doll, Laura (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=LRDD)  
Bcc:  
Subject: PG&E Response to CPUC Data Request re: Line 114 Return to Service Delay Impact

Liza,

From our meeting on September 25 when the CPUC and PHMSA were at PG&E's offices at Bishop Ranch in San Ramon to review Line 114 records, you had asked several questions in regards to the delay in putting Line 114 back into service. Provided below are the responses to your questions.

Regards,

**Frances Yee**

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**QUESTION 4309.01:** What is the work schedule impact by delaying putting Line 114 into service out by two to three weeks?

**RESPONSE 4309.01:** By delaying the tie-in for L-114, the crew will not be able to complete the project and move onto the next project, as planned. The crew is currently cleaning the removed section of L-114 while PG&E waits to tie in the new section of L-114. Cleaning will take approximately two weeks, after that the crew will need some direction on next steps with the project.

**QUESTION 4309.02:** What is the associated cost impact?

**RESPONSE 4309.02:** As the crew is working on cleaning, the associated cost is

\$5,000 to \$10,000 a day on equipment/traffic control that is associated with the tie-in delay. When the crew completes the current work, that cost will be \$45,000 a day. CNG/LNG costs are up to \$20,000 per location, per day.

**QUESTION 4309.03:** What is the customer impact?

**RESPONSE 4309.03:** Three distribution system stations are not being fed while L-114 is out of service. Other stations are able to compensate for this while customer loads are low, however, temperatures typically begin to decrease and loads increase in mid-October and that compensation might not be sufficient to serve customer loads past that time. CNG/LNG could be required to guarantee customer loads are met. Cost for this additional service is only one factor.

**QUESTION 4309.04:** What is the impact to our critical peak day and other gas planning scenarios?

**RESPONSE 4309.04:** If L-114 is not restored to service, LNG at two to three Brentwood locations would be required for Cold Fall Day and Cold Winter Day customer loads. This unanticipated, additional need could impact our ability to provide LNG at other previously identified locations that depend on it during winter peak days.

Additionally, we have active hydrotests that are scheduled through the end of November. If we needed to divert LNG to Brentwood, the customers being supported during the hydrotests would be at risk. There is the additional risk that the hydrotests themselves would need to be aborted to minimize customer outages.

**QUESTION 4309.05:** If Line 114 is kept out of service longer than 2-3 weeks, what is the impact for Questions 1-4?

**RESPONSE 4309.05:**

Currently, the costs could be very similar to those discussed in question 2 above if L-114 is kept out of service longer than two to three weeks. However, at this time, it is difficult to predict costs if extended into winter season due to the numerous variables in play and the various scheduling needs.

The requirement for CNG/LNG to support the L-114 loads past mid-October could impact a series of high priority, tightly spaced clearances which CNG/LNG resources are already supporting or are scheduled to support. This would delay those other clearances to later in the year when loads are even higher and CNG/LNG is also required for peak shaving. This domino effect could jeopardize our ability to complete these other safety-related clearances by their end-of-year deadlines.

Service to the customers being supported by CNG/LNG on in-progress hydrotests would be at risk if the equipment and workforce had to be diverted to Brentwood because L-114 was still not restored to service.

To tie-in L-114 after warmer October temperatures have passed, typically mid to late October, CNG/LNG that we had not scheduled/reserved would be needed, which could impact customers on in-progress hydrotests and other clearances in queue.

A longer delay in the tie-in of L-114 could also delay the L-303 Valve Automation clearance. The L-303 clearance requires the curtailment of a power plant and was scheduled to avoid high EG loads at the request of the ISO. Delaying the L-303 clearance past October places it into a period that the ISO wanted to avoid. Furthermore, finding a tolerable window for the delayed L-303 clearance in November or December will be extremely difficult because of increasing customer loads and conflicts with many other safety-related clearances still being performed in November. At a minimum, to perform the L-303 clearance during typical November/December conditions, CNG/LNG that we have planned on utilizing for the L-303 clearance would be required to serve customer loads in the Brentwood area. The existing safe injection CNG/LNG locations for L-303 are not guaranteed and as the clearance is pushed out it would require more time and money to prepare these locations. It takes advanced planning and preparation to have these injection locations ready. Any clearance delay makes planning and coordination work more impactful to the system and other clearances, and is more costly to perform. As is the case for needing CNG/LNG services for the L-114 outage or tie-in, needing them for the L303 clearance could also delay other high priority clearances.

A concurrent, unplanned outage on L-303, which parallels L-114 and supplies gas to some of the compensating stations, would result in outages to approximately 32,000 to 47,000 customers in the Oakley/Brentwood area. The longer L-114 remains out of service, the longer PG&E, and our customers, are exposed to this risk.

The table below lists outages scheduled for just L-303 and L-114 through the end of the year. Depending on when L-114 comes back online, this work may need to be adjusted (i.e. work scheduled for late October on L-303 would be at risk if L-114 is not tied-in).

**DESCRIPTION PSRS**

ID #	WORK TYPE	SYSTEM LINE/ STATION	Work MP Start	Work MP End
End Location (GOE/TSP)	Start Date (calendar)	End Date (calendar)		
Redacted (L-303N)	Line Clearance	23657 Valve Automation	Bay Area Loop	L-303
Tue, 10/1/13	Sat, 10/5/13			
Redacted PH. 1	30014 Valve Automation	Bay Area Loop	Antioch 0	0 Antioch
Terminal	Tue, 10/1/13	Fri, 11/1/13		
Redacted	23657 Valve Automation	Bay Area Loop	L-303	
Fri, 11/15/13	Fri, 11/15/13			
Redacted	23657 Valve Automation	Bay Area Loop	L-114	
Wed, 10/23/13	Wed, 10/23/13			