

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the
Commission's Own Motion to Adopt New
Safety and Reliability Regulations for Natural
Gas Transmission and Distribution Pipelines
and Related Ratemaking Mechanisms

R.11-02-019
(Filed February 24, 2011)

**PACIFIC GAS AND ELECTRIC COMPANY'S SUPPORTING
INFORMATION FOR SAFETY CERTIFICATION OF LINES 147
PURSUANT TO RULING OF ASSIGNED COMMISSIONER AND
ASSIGNED ADMINISTRATIVE LAW JUDGE**

ALEJANDRO T. VALLEJO
Pacific Gas and Electric Company
Law Department
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-1611
Facsimile: (415) 973-5520
E-Mail: AXVU@pge.com

JOSEPH M. MALKIN
Orrick, Herrington & Sutcliffe LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105
Telephone: (415) 773-5505
Facsimile: (415) 773-5759
Email: jmalkin@orrick.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

October 16, 2013

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the
Commission's Own Motion to Adopt New
Safety and Reliability Regulations for Natural
Gas Transmission and Distribution Pipelines
and Related Ratemaking Mechanisms

R.11-02-019
(Filed February 24, 2011)

**PACIFIC GAS AND ELECTRIC COMPANY'S SUPPORTING
INFORMATION FOR SAFETY CERTIFICATION OF LINES 147
PURSUANT TO RULING OF ASSIGNED COMMISSIONER AND
ASSIGNED ADMINISTRATIVE LAW JUDGE**

Pacific Gas and Electric Company (PG&E) submits additional Supporting Information for the updated Safety Certification ordered by the October 8, 2013 Ruling of Assigned Commissioner and Assigned Administrative Law Judge Directing Pacific Gas and Electric Company to File and Serve Updated Safety Certification for Line 147 and Setting Prehearing Conference, as authorized by ALJ Bushey's October 10, 2013 email.

The supporting information being provided at this time consists of the following:

1. Pipeline Features List for the Line 147 shorts¹
2. MAOP Report for the Line 147 shorts
3. Pipeline Centerline Survey Results for the remaining 1.37 miles of Line 147 mainline pipe and shorts
4. Safety Certification by PG&E engineering officer

Except for the Pipeline Centerline Survey Results, which are Attachment A to this document, and the Safety Certification, which is Attachment B to this document, the Supporting Information is found in Exhibit B.

This information reflects updated information, work and assessments completed on Line 147 to-date. It supplements or replaces the supporting information submitted in October and

¹ Along the route of Line 147, there are 15 smaller diameter pipelines tapped off the mainline that supply gas to individual customers, feed the distribution system (DFMs) or are required for pipeline operations (such as blow-downs or drips). Even though some of the DFMs may not be short in an absolute sense, all of these appurtenances to the mainline pipe are referred to as "shorts."

November 2011 in connection with PG&E's request to lift the operating pressure restriction on Line 147.

The supporting information in Exhibit B contains sensitive information concerning the location of critical infrastructure, the disclosure of which could pose a public safety risk. Consequently, PG&E is providing such portions of the supporting documentation to the Safety and Enforcement Division and Office of Ratepayer Advocates pursuant to Public Utilities Code § 583, and to the active parties that have signed a nondisclosure agreement or are subject to a protective order in these proceedings. Pursuant to the Notice of Availability served and filed on October 11, 2013, PG&E will make a complete set of Supporting Information available for viewing (but not copying) on Thursday, October 17, 12 noon to 4 p.m., at PG&E headquarters, 77 Beale Street, San Francisco, by other interested parties that contacted Allie McMahon (a2mx@pge.com) by noon on Wednesday, October 16.

Respectfully submitted,

/s/ Alejandro T. Vallejo

ALEJANDRO T. VALLEJO
Pacific Gas and Electric Company
Law Department
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-1611
Facsimile: (415) 973-5520
E-Mail: AXVU@pge.com

/s/ Joseph M. Malkin

JOSEPH M. MALKIN
Orrick, Herrington & Sutcliffe LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105
Telephone: (415) 773-5505
Facsimile: (415) 773-5759
Email: jmalkin@orrick.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

October 16, 2013

ATTACHMENT A

Pipeline Centerline Survey Results

Pipeline Centerline Survey Background

To further refine the geospatial accuracy of its pipelines, PG&E has undertaken the Pipeline Centerline Survey of its transmission system. In addition to confirming the geospatial accuracy, PG&E is able to identify any potential occupied and unoccupied structures as well as vegetation directly above or in close proximity to the pipeline. The survey consists of the following:

- The physical position of the pipeline centerline is located by impressing a signal on the pipeline and it is marked
- Survey-grade, Global Positioning System (GPS) coordinates are acquired for the pipeline's centerline
- Any potential occupied and unoccupied structure as well as vegetation directly above or in close proximity to the pipeline is identified
- The new centerline data will be uploaded into the new, enhanced Geospatial Information System that PG&E is implementing for its transmission system

Pipeline Centerline Survey Results

PG&E has now completed the survey of Line 147 mainline pipe. The results are as follows:

- There were no occupied or unoccupied structures identified directly above the pipeline
- There was vegetation identified in close proximity to the pipeline, and PG&E has a vegetation management clearance project to clear such vegetation as appropriate

ATTACHMENT B

Safety Certification

I, Kirk Johnson, state as follows:

1. I am currently Vice President, Major Projects and Programs, Gas Operations, for Pacific Gas and Electric Company (PG&E). Until October 1, 2013, I was Vice President, Gas Transmission Maintenance & Construction responsible for Pipeline Safety Enhancement Plan engineering, and prior to that gas transmission system engineering. Because of my prior involvement with PG&E's filing to restore pressure on Line 147 as well as my responsibilities up to October 1, I am the PG&E officer most familiar with the engineering of Line 147.

2. I received a B.S. in mechanical engineering from the University of California, Davis, in 1980. I have worked PG&E as an engineer since graduating, spending 30 years in gas operations.

3. I have reviewed the information in support of the safety of Line 147. I certify that:

- a. PG&E engineers have validated the engineering and construction through records review of piping and all associated components, including off-takes, as documented in the exhibits submitted in October and November 2011 and October 11 and 16, 2013; and
- b. PG&E successfully completed hydrostatic pressure testing of all pipe segments and components on Line 147 in HCAs and operating at or above 20 percent of specified minimum yield strength (SMYS) for which we do not have complete records of a prior pressure test in accordance with the applicable standards at the time they were performed, in accord with Title 49 of the Code of Federal Regulations, Part 192, subpart J, at pressures above those required to confirm the safe operation of Line 147 at a maximum allowable operating pressure of 330 pounds per square inch gauge (psig) with an additional margin of safety.

4. In my professional judgment, Line 147 is safe to operate at an MAOP of 330 psig.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at San Francisco, California, this 16th day of October 2013.

/s/ Kirk Johnson

KIRK JOHNSON, Vice President,
Major Projects and Programs, Gas Operations
PACIFIC GAS AND ELECTRIC COMPANY