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Subject: San Carlos motion to continue 11/18 hearing

Dear Administrative Law Judge Bushey,

Pursuant to Rule 11.1 and Rule 11.6 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure ("Commission Rules"), the City of San Carlos ("San Carlos") respectfully asks for a two week extension of the November 18, 2013 hearing in the Line 147 bifurcated proceedings in Rulemaking 11-02-019 ("R.11-02-019").

At the October 21, 2013 prehearing conference, Administrative Law Judge Bushey adopted a procedure to determine the safe operating pressure of Line 147. Administrative Law Judge Bushey set the hearing on the Line 147 bifurcated Order to Show Cause proceedings for November 18, 2013. At the hearing, San Carlos asked for 30 days from October 21, 2013 to hire an expert and to review the Line 147 data (see page 57 of 10/21/13 hearing).

Due to the expedited Line 147 schedule, San Carlos immediately retained Dr. Glen Stevick, Principal, Senior Mechanical Engineer, and Chief Executive Officer at Berkeley Engineering And Research, Inc., to assist San Carlos in assessing the safety of Pacific Gas and Electric Company's ("PG&E") Line 147 in San Carlos. After reviewing the extensive data requests and responses and other documentation, it is Dr. Stevick's position that he cannot adequately and properly assess the safety of Line 147 unless proper fracture testing is performed on the pipe. Specifically, the section of 20-inch diameter gas transmission pipe identified as L-147 MP 2.2 that PG&E submitted to Anamet by PG&E for metallurgical evaluation. In his expert opinion, Dr. Stevick wants to perform fracture testing to determine Charpy V-notch tests and KI values (stress intensity factor, easiest to determine from CTOD test) as a function of temperature. This is required for two reasons: (1) to estimate the maximum flaw size for crack growth calculations and (2) to establish the maximum allowable pressure based on fracture mechanics.

It is Dr. Stevick's opinion that Anamet would be able to perform fracture testing in a

week. Dr. Stevick would then like a week to analyze the results of the fracture testing. Therefore, Dr. Stevick would be able to submit his direct testimony on November 25, 2013. San Carlos requests that the Line 147 proceedings commence sometime the week of December 2, 2013.

The Intervenor's do not oppose San Carlos' motion. However, PG&E objects to San Carlos' motion on the basis that: "As cold weather approaches, PG&E needs to restore Line 147 to normal operation as soon as possible. As a result, we oppose the request to continue the hearing and extend the schedule" (quoted directly from an email from Mr. Malkin dated 11/7/13 at 3:40 p.m.).

Thank you for your consideration, Britt Strottman

Britt K. Strottman

Attorney at Law

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