

From: zach.barrett@dot.gov  
Sent: 12/16/2013 10:36:58 AM  
To: Yura, Jane (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=JKY1);  
chris.hoidal@dot.gov (chris.hoidal@dot.gov)  
Cc: michael.robertson@cpuc.ca.gov (michael.robertson@cpuc.ca.gov);  
john.gale@dot.gov (john.gale@dot.gov)  
Bcc:  
Subject: RE: Class Locations, MAOP determination

John A Gale

Director, Standards and Rulemaking Division

USDOT/PHMSA

1200 New Jersey Ave, SE

Washington DC 20590.

**From:** Yura, Jane [mailto:JKY1@pge.com]  
**Sent:** Monday, December 16, 2013 12:34 PM  
**To:** Barrett, Zach (PHMSA); Hoidal, Chris (PHMSA)  
**Subject:** RE: Class Locations, MAOP determination

Zach, Chris – over the past months, we have been working with our California Public Utilities Commission Safety and Enforcement Division (SED), for assistance on an interpretation of 49 CFR 192.611 in relation to class locations and MAOP.

The SED has now advised us to contact PHMSA directly for assistance with an interpretation.

Could you please let me know who I should address the letter/email to?

Thank you,

Jane

**From:** [Zach.Barrett@dot.gov](mailto:Zach.Barrett@dot.gov) [mailto:[Zach.Barrett@dot.gov](mailto:Zach.Barrett@dot.gov)]  
**Sent:** Thursday, August 01, 2013 1:28 PM  
**To:** Yura, Jane; [chris.hoidal@dot.gov](mailto:chris.hoidal@dot.gov)  
**Cc:** [michael.robertson@cpuc.ca.gov](mailto:michael.robertson@cpuc.ca.gov)  
**Subject:** RE: Requesting discussion on MAOP determination

Just left you a voice mail message apologizing for being late getting back to you. Chris is correct the CPUC is the regulatory body with pipeline safety authority over PG&E and can require more stringent regulations for intrastate pipelines than the minimum federal standards. In regard to our Advisory Bulletin you reference below I would suggest you contact Alan Mayberry as he is listed as PHMSA's contact on the Advisory and can answer any questions pertaining to it. If you are looking for an alternate method of verifying MAOP than specified in the regulations you will have to apply for a waiver to use the alternate methodology which will have to be submitted to the CPUC for approval and then on to PHMSA for final approval. Hope this is helpful, "Zach"

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