Pacific Gas and Electric Company®

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Elizaveta Malashenko
Deputy Director
Office of Utility Safety and Reliability
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Request for Interpretation of Class Location and Established Maximum Allowable Operating Pressure

Dear Ms. Malashenko,

We request the assistance of the Safety and Enforcement Division in the interpretation of the current Title 49 Code of Federal Regulations (CFR) 192.611 to establish the maximum allowable operating pressure for pipelines that have had a class location change. There is no public safety issue, since these pipelines have all had a pressure test as required by 49 CFR 192.611.

Background: The pipelines in question may have had a class location change sometime before 1971, and have had a subsequent pressure test (after 1974) for a period of not less than 8 hours (in accordance with the relevant code sections). Historically, we have interpreted the requirements of 49 CFR 192.611 (a)(1)(i) based on the current language in the code which is as follows:

"(a) …the maximum allowable operating pressure of that segment of pipeline must be confirmed or revised according to one of the following requirements:

(1) If the segment involved has been previously pressure tested in place for a period of not less than 8 hours:

i. The maximum allowable operating pressure is 0.8 times the test pressure in Class 2 locations, 0.667 times the test pressure in Class 3 locations, or 0.555 times the test pressure in Class 4 locations. The corresponding hoop stress may not exceed 72 percent of SMYS of the pipe in Class 2 locations, 60 percent in Class 3 locations, or 50 percent of SMYS in Class 4 locations."

This requirement in the code is often referred to as operating a pipeline "one class-out" since appropriately tested pipelines can operate at pressures one class above the general design factors of 49 CFR 192.111(a). To illustrate, an originally designed class location 1 pipeline (that has been appropriately tested) can continue to operate as a class 2 location pipeline at 72% of SMYS:

Class Location	General Design 192.111(a)	One Class-Out 192.611 (a)(i)
1	72%	
2	60%	72%
3	50%	60%
4	40%	50%

The Problem: PG&E recently identified a repealed section of the code, 49 CFR 192.607 (Initial Determination of Class Location and Confirmation or Establishment of Maximum Allowable Operating Pressure). The repealed section required operators ***during 1970-1974*** to confirm the MAOP (in accordance with 49 CFR 192.611) relative to class locations by December 31, 1974. This regulatory requirement applied to pipelines operating at greater than 40% SMYS, and was removed from the code in 1996.

A very conservative interpretation of the repealed 49 CFR 192.607 could conclude that a pressure test conducted ***after 1974*** cannot be used to allow a pipeline to operate "one class-out" if that pipeline changed up in class before April 15, 1971, because the operator did not confirm a pipeline's class location during 1970-1974. This would mean that more recently conducted pressure tests, including those with spike tests, cannot support a pipeline operating "one class-out," but historic tests performed prior to 1974 can. This conservative interpretation is illogical from an engineering safety perspective.

Why this important to PG&E: PG&E has identified approximately 10 miles of non-contiguous pipelines with post-1974 pressure tests, but without records showing that the class location was confirmed during 1970-1974, and with indications that the class location may have changed prior to April 15, 1971. If more recent pressure tests cannot support the current "one class-out" operating pressures, pressure reductions for these pipelines will be required. The reduced operating pressures will have significant customer impacts during extreme cold weather conditions.

Our request: We request your confirmation and guidance on the interpretation of 49 CFR 192.611. In particular, we request your confirmation that we are not required to retroactively apply 49 CFR 192.607 that was repealed in 1996, and that we can rely on a post-1974 pressure test in the circumstances described above.

We have met with your staff, and have provided detailed information on the identified pipelines, and look forward to your guidance. Please contact me (415-308-6985) or Sumeet Singh (925-244-3189) for any additional information that you may require.

Sincerely,

Jane Yura
Vice President, Asset & Risk Management