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January 21, 2014

Ms. Liza Malashenko, Deputy Director
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue, Room 2005
San Francisco, CA 94102-3298

Re: Courtesy Notification Regarding an Over-pressure event on the suction piping at Topock Compressor Station

Dear Ms. Malashenko:

This letter provides a courtesy notification regarding an over-pressure event that occurred on January 10, 2014 affecting the suction side piping at the Topock Compressor Station near the Arizona border. The piping experienced a pressure of 699 psig for 11 minutes, which is 6% above its Maximum Allowable Operating Pressure (MAOP) of 660 psig. The station Emergency Shutdown system (ESD) activated, and isolated the over-pressure event to only the station suction side piping. Transmission line L-300B was not affected by this event. The apparent cause of the event is the failure of the overpressure protection device to operate fast enough to control the pressure in the pipeline fed from Transwestern Interstate Pipeline. The controller-operated valve did close, but the station suction piping reached 699 psig.

Overpressure exceedances of 110% of MAOP on transmission pipelines require a notification to PHMSA per the 2011 Pipeline Safety Act. This event did not meet the requirement to notify PHMSA or the CPUC.

As background, on February 1, 2011, L-300B from mile point (MP) 0.00 to 0.45, and the station suction piping, experienced an over-pressure excursion reaching 727 psig (110.2% of MAOP). On February 2, 2011, the CPUC issued an order to reduce operating pressure by 20% below the MAOP of any transmission line that has segments in High Consequence Areas (HCAs) that is found to have experienced pressure greater than 10% above MAOP. Both L-300B between MP 0.00 and MP 0.45, and the station suction piping was lowered to a pressure below 528 psig (20% below the authorized MAOP of 660 psig). On September 12, 2011 PG&E filed a request to restore the MAOP of the station suction piping, supported by hydrostatic pressure test results. CPUC Decision 11-10-010, issued on October 12, 2011, authorized PG&E to restore the MAOP of the suction side piping at Topock Compressor Station to 660 psig.

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Since the station suction side piping has been pressure tested to qualify it for an MAOP that exceeds the January 10, 2014 pressure excursion of 699 psig, this is not considered a safety issue from an engineering perspective. However, since the pressure exceeded the MAOP established in Decision 11-10-010, we are providing a courtesy notification.

As stated above, the apparent cause of this event was a failure in the overpressure protection mechanism to activate in time to prevent the pressure excursion. PG&E is conducting a thorough investigation and will develop any appropriate corrective actions based on its findings.

Please contact [Redacted] at [Redacted] for any additional questions you may have regarding this notification.

Sincerely,

Bill Gibson
Director, Codes and Standards

cc: Dennis Lee, CPUC
Mike Robertson, CPUC
Sunil Shori, CPUC

[Redacted] &E
[Redacted] PG&E
Shilpa Ramaiya, PG&E
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