

PACIFIC GAS AND ELECTRIC COMPANY
Gas Transmission and Storage Rate Case 2015
Application 13-12-012
Data Response

PG&E Data Request No.:	ORA_070-06		
PG&E File Name:	GTS-RateCase2015_DR_ORA_070-Q06		
Request Date:	June 12, 2014	Requester DR No.:	ORA-GT&S-70
Date Sent:	July 8, 2014	Requesting Party:	Office of Ratepayer Advocates
PG&E Witness:	Sumeet Singh	Requester:	Dao Phan

SUBJECT: 2015 GAS TRANSMISSION AND STORAGE RATE CASE, PREPARED TESTIMONY, VOLUME 1 OF 2, CHAPTERS 4 AND 4A, PG&E'S REQUESTED EXPENSES FOR DIRECT ASSESSMENTS

QUESTION 6

On page 4-3 of the testimony PG&E identified 6,750 miles as the total of transmission pipe in its system. PG&E states that this is an increase of 920 miles of line pipe compared to the 5,808 miles previously identified in its 2012 PHMSA 7100 report.

- a. Has PG&E filed its 2013 PHMSA 7100 report? If yes, please provide a copy.
- b. If PG&E has not filed its 2013 PG&E PHMSA 7100 report, please state when the company plans to file and identify the number of miles of pipeline PG&E will identify as transmission pipe in this report.
- c. Does this mean that 920 miles will be removed from PG&E's distribution asset family for purposes of asset categorization, for instance in future general rate case proceedings?
- d. Provide supporting document confirming the redefining of an additional 920 miles of line pipe as transmission rather than distribution.

ANSWER 6

- a. Yes, PG&E filed its 2013 Pipeline and Hazardous Materials Safety Administration (PHMSA) 7100 report on March 14, 2014. Please see PG&E's response to IndicatedProducers_002-Q042 for the PG&E and StanPac 7100 reports as GTS-RateCase2015_DR_IndicatedProducers_002-Q042Atch01 and GTS-RateCase2015_DR_IndicatedProducers_002-Q042Atch02, respectively.
- b. See part (a), above.
- c. Yes, approximately 920 miles will be removed from PG&E's distribution asset family and assigned to the transmission asset family. However, as described in PG&E's response to TURN_006-Q01Rev01, the data relied upon for the forecast in the 2015 GT&S Rate Case indicated that all of the approximately 920 miles is pipe operating at greater than 60 psig. Therefore, the costs associated with mitigation, including

operations and maintenance activities, related to all of the approximately 920 miles of pipeline have historically been based on considering them as distribution, but included in PG&E's Gas Transmission and Storage Rate Cases and not PG&E's General Rate Cases (see PG&E's response to TURN_006-Q01Rev01).

- d. Please see the **draft** Utility Bulletin TD-4001B-004 and its associated attachments for documentation confirming the redefinition of approximately 920 miles of pipelines as transmission rather than distribution. These documents are currently in draft form and have not yet been approved by PG&E Management. They are scheduled to be published in late 2014.

Attachment	Description
GTS-RateCase2015_DR_ORA_070-Q06Atch01	Utility Bulletin: TD-4001B-004, Rev. 0
GTS-RateCase2015_DR_ORA_070-Q06Atch02	TD-4001B-004, Attachment 1 – Definitions: Gas Transmission and Distribution System Terms
GTS-RateCase2015_DR_ORA_070-Q06Atch03	TD-4001B-004, Attachment 2 – Questions and Answers about Gas Transmission and Distribution System Terms
GTS-RateCase2015_DR_ORA_070-Q06Atch04	TD-4001B-004, Attachment 3 – Gas Transmission and Distribution System Diagrams