



**Pacific Gas and
Electric Company®**

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Mr. John Gale
Regulations Director
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: Interpretation of Instructions to Complete PHMSA Form F7100.1-1

Dear Mr. Gale:

This letter is to request an interpretation of the intent of the instructions to complete PHMSA Form F7100.1-1 regarding the inclusion of non-hazardous leaks above the customer service (shut-off) valve on the meter set with other distribution and service pipeline leak repair statistics.

Part C of Form F7100.1-1 requires the operator to report the repair of gas leaks due to corrosion, earth movement or other natural forces, excavation or outside force damage, equipment failure or other causes. The Instructions for Completing Form PHMSA F7100.1-1 provides operator guidance for completing this section of the Form. Specifically, on page 3, the Instructions for Completing Form PHMSA F7100.1-1; "Part C – Total Leaks Eliminated/Repaired During Year" provides the following guidance:

A leak is defined as an unintentional escape of gas from a pipeline. A non-hazardous release that can be eliminated by lubrication, adjustment or tightening is not a leak. Include all leaks eliminated by repair, replacement or other reason during the reporting year.

Include all leaks eliminated by repair, replacement of other reason during the reporting year. Also include leaks reported on form PHMSA 7100.1, "Incident Report Gas Distribution Systems." A reportable incident is one described in §191.3. Do not include test failures.

For reference, I have enclosed a copy of PG&E's 2007 PHMSA Form F7100.1-1.

As you can see, in 2007, PG&E reported about 7,800 leak repairs for the year. Most of these were subsurface leaks on mains or service lines up to the shut-off valve on the customer riser. This number also included other meter set leaks (above the shut-off valve) where a customer called to report a gas smell that was the result of corrosion, natural forces, or outside forces like construction or vehicle accidents that required repair by a gas maintenance crew.

Traditionally, however, PG&E has not included other non-hazardous meter set leaks that were fixed by a gas customer service representative during the same service call. The vast majority of these meter set leak repairs can be eliminated by lubrication, adjustment or tightening and, according to the PHMSA instructions, are not leaks and are not reportable. However, each year, there are a handful of cases, where a customer service representative will repair a non-hazardous meter set leak by replacing a fitting, a regulator or some other part. This portion of reporting instructions seems unclear as to whether such meter set leaks need to be reported or not.

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Is it the intent of the instructions noted above to report any of the following types of non-hazardous meter set leaks repaired or eliminated on Form F7100.1? If so, what criterion do we use to distinguish reportable hazardous leak repairs from non-reportable non-hazardous repairs?

I have reviewed the PHMSA website and can find no further clarification regarding the criterion used to distinguish hazardous or non-hazardous meter set leaks.

I have provided the following examples of non-hazardous leak repairs typically completed by customer service representatives during the service call instead of calling a gas maintenance crew:

1. A venting service regulator that is eliminated by replacement.
2. A leak at a fitting that has the threads re-doped and is simply reinstalled.
3. A leak at a fitting that is eliminated by replacing the fitting.
4. A leak at a fitting that is eliminated by re-building the meter set.
5. A dielectric bushing that has become cracked and is replaced within the meter set.
6. A pin-hole leak on the meter swing pipe that is eliminated by a pipe clamp.
7. A pin-hole leak on the meter swing pipe that is eliminated by replacing the pipe.

Please contact Larry Berg, PE, at 925-974-4084 if you have questions or need additional information.

Thank you, in advance, for your attention to this matter. Your guidance on the intent of requirement to report meter set leaks repaired or eliminated would be appreciated.

Sincerely,



Glen Carter
Sr. Director
GT&D Gas Engineering

cc: Roger Little, PHMSA
Bob Howard, PG&E

Enclosure: PG&E 2007 PHMSA Form F7100.1-1


ANNUAL REPORT FOR CALENDAR YEAR 2007
GAS DISTRIBUTION SYSTEM

U.S. Department of Transportation
 Pipeline and Hazardous Materials
 Safety Administration

INITIAL REPORT
 SUPPLEMENTAL REPORT

PART A - OPERATOR INFORMATION

1. NAME OF OPERATOR
PACIFIC GAS & ELECTRIC CO

2. LOCATION OF OFFICE WHERE ADDITIONAL INFORMATION MAY BE OBTAINED
PO BOX 770000
 Number and Street
SAN FRANCISCO SAN FRANCISCO
 City and County
CA 94177
 State and Zip Code

3. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER
20071063 -- 7932
15007

4. HEADQUARTERS NAME & ADDRESS, IF DIFFERENT
 Number and Street
 City and County
 State and Zip Code

5. STATE IN WHICH SYSTEM OPERATES: / CA / (provide a separate report for each state in which system operates)

PART B - SYSTEM DESCRIPTION Report miles of main and number of services in system at end of year.

1. GENERAL

	STEEL				PLASTIC	CAST WROUGHT IRON	DUCTILE IRON	COPPER	OTHER	OTHER	TOTAL
	UNPROTECTED		CATHODICALLY PROTECTED								
	BARE	COATED	BARE	COATED							
MILES OF MAIN	213.3	0	0	20880	20528	182.6	0	0	0	0	41803.9
NO. OF SERVICES	17839	0	0	1203551	2005589	0	0	75037	0	0	330201

2. MILES OF MAINS IN SYSTEM AT END OF YEAR

MATERIAL	UNKNOWN	2" OR LESS	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8" THRU 12"	OVER 12"	TOTAL
STEEL	0	12690.14	5068.31	2573.18	410.21	351.46	21093.3
DUCTILE IRON	0	0	0	0	0	0	0
COPPER	0	0	0	0	0	0	0
CAST/WROUGHT IRON	0	65	106.7	58.25	11.41	5.59	182.6
PLASTIC	0	0	0	0	0	0	0
1. PVC	0	0	0	0	0	0	0
2. PE	0	16205.66	3751.59	566.56	4.19	0	20528
3. ABS	0	0	0	0	0	0	0
OTHER	0	0	0	0	0	0	0
OTHER	0	0	0	0	0	0	0
SYSTEM TOTALS	0	28896.449999	8926.6	3197.99	425.81	357.04999999	41803.9

3. NUMBER OF SERVICES IN SYSTEM AT END OF YEAR AVERAGE SERVICE LENGTH 55 FEET

MATERIAL	UNKNOWN	1" OR LESS	OVER 1" THRU 2"	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8"	TOTAL
STEEL	0	1140510	75913	4408	555	4	1221390
DUCTILE IRON	0	0	0	0	0	0	0
COPPER	0	74929	108	0	0	0	75037
CAST/WROUGHT IRON	0	0	0	0	0	0	0
PLASTIC	0	0	0	0	0	0	0
1. PVC	0	0	0	0	0	0	0
2. PE	0	1970123	34368	892	199	7	2005589
3. ABS	0	0	0	0	0	0	0
OTHER	0	0	0	0	0	0	0
OTHER	0	0	0	0	0	0	0
SYSTEM TOTALS	0	3185562	110389	5300	754	11	3302016

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4. MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION										
	UN-KNOWN	PRE-1940	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000-2009	TOTAL
MILES OF MAIN	0	2130.2	3277.7	6378.6	6401.3	7439.8	5832.6	5694.1	4649.6	41803.9
NUMBER OF SERVICES	0	120913	187003	438050	463878	652265	527209	512157	400541	3302016

PART C - TOTAL LEAKS ELIMINATED/REPAIRED DURING YEAR			PART D - TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED FOR REPAIR	
CAUSE OF LEAK	Mains	Services	6	
	CORROSION	240		
NATURAL FORCES	31	88		
EXCAVATION	483	2791		
OTHER OUTSIDE FORCE DAMAGE	13	104		
MATERIAL OR WELDS	368	1595		
EQUIPMENT	1	5		
OPERATIONS	0	0		
OTHER	166	726		
NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR <u>2126</u>			Input for year ending 6/30 <u>1.97</u> %.	

PART E - PERCENT OF UNACCOUNTED FOR GAS	
Unaccounted for gas as a percent of total input for the 12 months ending June 30 of the reporting year.	
[(Purchased gas + produced gas) minus (customer use + company use + appropriate adjustments)] divided by (purchased gas + produced gas) equals percent unaccounted for.	
Input for year ending 6/30 <u>1.97</u> %.	

PART F - ADDITIONAL INFORMATION	

PART G - PREPARER AND AUTHORIZED SIGNATURE	
<u>LAWRENCE BERG</u> (type or print) Preparer's Name and Title	<u>9259744084</u> Area Code and Telephone Number
<u>LMB5@PGE.COM</u> Preparer's email address	<u>9259744232</u> Area Code and Facsimile Number
<u>CHRIS WARNER MANAGER INTEGRITY MANAGEMENT AND (</u> Name and Title of Person Signing	<u>9259744248</u> Area Code and Telephone Number
_____ Authorized Signature	