QUESTION 3190: Now that PG&E has identified the incorrect data from your original May 31, 2012 response, please provide updated correct leak data in Excel spreadsheets for the five previous years by division, leak grade and status as per our original data request from May 24.

RESPONSE 3190:

A spreadsheet with leak data by division from 2007 to 2011 is attached as "*Leak Comparisons 2007-2011.xlsx.*" Note that when trying to reconcile the leaks **by grade** for any division within any given year, the totals will not add up (i.e., the Active Grade 2 Leaks on 01/01/2007, plus any Grade 2 leaks found in 2007, minus any Grade 2 leaks repaired in 2007, and minus any Grade 2 leaks cleared in 2007 will not necessarily equal the active Grade 2 leaks as of 12/31/2007). The reason is primarily because of leak re-grading associated with rechecks, i.e., leak indication grades may be changed up or down during the year, based on the rechecks.

The table below summarizes the total leaks for each year. Note that while the total leaks of **all grades** will not add up exactly, they are very close (except for Mission Division total leaks in 2008, which is off by 22, as shown in attachment "*Leak Comparisons 2007-2011.xlsx*"). One example of why the leak totals may be off by a leak, or two, would be the elimination of a leak from the database when it is determined that the leak is not on a PG&E pipeline, but rather on another utility's pipeline (e.g., City of Palo Alto). Additionally, sometimes it is determined through lab testing that the leak indication is not natural gas. While a leak number is initially assigned for these suspected leaks, these leak indications would be eliminated from our leak database once we determine they have nothing to do with natural gas or PG&E facilities. Because the numbers below come from "snapshots" of the database at various points in time, these eliminated leak indications contribute to the discrepancies in the numbers between the beginning of the year and the end of the year.

	Beginning of		Leaks	Leaks	Total Leaks in	Leaks at the	
Year	Year	Leaks Found	Repaired	Cleared	the Year	End of Year	Variance
2007	16,309	10,088	7,348	2,854	16,195	16,190	-5
2008	16,190	25,197	17,331	3,950	20,106	20,127	21
2009	20,127	84,102	55,908	7,783	40,538	40,534	-4
2010	40,534	38,271	18,477	11,198	49,130	49,133	3
2011	49,133	27,300	15,965	6,063	54,405	54,402	-3

System summary of all leaks by year

The leaks found for 2009 are especially high due to the accelerated gas leak survey that extended from late 2008 through early 2010 when PG&E leak surveyed the entire distribution system in less than two years, which would normally be leak surveyed over a five-year period.



Compenisons 20...