

TAS/JSW 2/3/2011



FILED

02-03-11
03:08 PM

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company Proposing Cost of Service and Rates for Gas Transmission and Storage Services for the Period 2011-2014. (U39G)

Application 09-09-013
(Filed September 18, 2009)

RULING OF THE ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW JUDGE REGARDING THE SAFETY PHASE

1. Summary

Today's ruling addresses how the safety phase portion of this proceeding will proceed. This safety phase was added as a result of the safety and reliability concerns that arose following the September 9, 2010 gas explosion and fire involving Pacific Gas and Electric Company's (PG&E) gas transmission line in San Bruno.¹

The purpose of this safety phase is ensure the safe and reliable operation of PG&E's gas transmission and storage operations during the rate cycle covered by this proceeding, i.e., the four-year period from January 2011 through December 2014, and beyond. PG&E is obligated under Public Utilities Code Section 451 to "furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment and facilities ... as are necessary to promote the

¹ See the October 15, 2010 Revised Scoping Memo and Ruling Adding an Additional Phase (Revised Scoping Memo).

safety, health, comfort, and convenience of its patrons, employees, and the public.”

2. Background

This safety phase was initiated to address the kinds of immediate actions this Commission and PG&E should take “to ensure the integrity, safety, and reliability of PG&E’s gas transmission and storage operations during the upcoming four-year rate cycle.” (Revised Scoping Memo at 6.)

The Revised Scoping Memo invited all the parties to this proceeding to file opening and reply comments on the types of protocols and procedures the Commission should order to ensure the safe operation of PG&E’s gas transmission and storage operations over the next four years. The Revised Scoping Memo listed six different protocols and procedures, and requested parties to file opening comments on these issues by November 22, 2010, and reply comments by December 27, 2010.

In response to the process set forth in the Revised Scoping Memo, PG&E filed its “Comments Regarding Gas Transmission and Storage Safety Procedures and Protocols” (PG&E Comments) on November 22, 2010. No other comments or reply comments were filed.

3. Safety Phase Addressing Gas Transmission and Storage Safety Concerns

The Revised Scoping Memo requested that parties comment on six safety-related protocols and procedures the Commission is considering PG&E be required to undertake in the coming months. The purpose of these protocols and procedures is to address how the safety concerns raised by the explosion and fire can be addressed by PG&E during this rate cycle and beyond. These protocols and procedures focus on ensuring the safe operation of PG&E’s gas transmission

and storage operations, monitoring of PG&E's pipeline integrity management activities and pipeline safety and reliability efforts, and ensuring that safety and emergency protocols are in place so that PG&E and first responders can respond quickly to similar events in the future.

The first protocol and procedure involves PG&E's disaster and emergency response plan. PG&E announced its Pipeline 2020 program on October 12, 2010. As part of this program, PG&E plans to expand the use of automatic or remotely operated shut-off valves, and to work with local communities, public officials, and first responders over pipeline safety. Pending the implementation of PG&E's Pipeline 2020 program, the Revised Scoping Memo asked for comment on the following: what steps are in place, or what does PG&E plan to do to ensure that PG&E personnel can be rapidly deployed and transported to incident areas in the event of gas leaks or gas explosions; what type of coordination exists between PG&E and the city, county and state emergency personnel; are PG&E emergency contact numbers updated and provided to emergency personnel on a regular basis; and can these procedures be improved upon in light of the San Bruno explosion and fire.

The second type of protocol and procedure involves providing fire departments with location information about PG&E's gas transmission lines and shut-off valves. The Revised Scoping Memo asked parties to comment on the following: what steps has PG&E taken to inform city, county, and state emergency personnel about the availability of this type of information; should additional information or steps be taken to ensure that emergency personnel have the type of information they need to assess and manage situations involving PG&E's gas transmission lines.

The third protocol and procedure involves the frequency with which shut-off valves for gas transmission and gas storage are tested or monitored to ensure that the valves can be shut-off in the event of an emergency.

The fourth type of protocol and procedure involves the types of procedures that PG&E should have in place to ensure that it timely notifies the Commission of its reprioritization of its capital expenditures associated with its gas transmission lines, and what procedures the Commission staff should adopt to review and monitor the reprioritization of these capital expenditures.

The fifth protocol and procedure involves whether other safety-related protocols or procedures should be required of PG&E during the four-year rate cycle.

The sixth protocol and procedure involves whether workshops and/or evidentiary hearings are needed to determine what protocols and procedures PG&E should be required to have in place.

In deciding how this safety phase should proceed, we need to coordinate our efforts with the directives that the Commission has already ordered PG&E to pursue following the San Bruno explosion and fire so that the safety phase efforts do not overlap with the Commission directives. These directives are contained in various letters from the Commission's Executive Director to PG&E, and in Commission Resolution No. L-403 dated September 23, 2010, and Resolution No. L-410 dated January 13, 2011.² In addition, we need to coordinate the safety

² These directives are contained in the September 13, 2010, September 17, 2010, December 16, 2010, and the January 3, 2011 letters from the Executive Director to PG&E, and in the September 23, 2010 Resolution and the January 13, 2011 Resolution. All of these documents can be accessed under the "Sept. 9, 2010 San Bruno Explosion" link in the "Special Interest" section of the Commission's homepage website.

phase efforts with the investigations being conducted by the National Transportation Safety Board (NTSB) and the Independent Review Panel that was authorized in the September 23, 2010 Resolution. The members of the Independent Review Panel were announced on October 14, 2010, and they have begun their independent fact-finding investigation into the cause of the San Bruno explosion and the safety and integrity of PG&E's gas transmission lines. In addition, at the January 27, 2011 Commission meeting, President Peevey announced that a new proceeding to address the safe operation of all of the natural gas pipelines in California would appear on the Commission's February 24, 2011 agenda.

As a result of the explosion and fire, the Commission directives have ordered PG&E to undertake a series of actions. Among other things, PG&E has been ordered to: reduce the gas pressure on certain of its gas lines; to undertake an integrity assessment of all of its natural gas facilities around the San Bruno area; to conduct a leak survey of all of PG&E's gas transmission lines; review all gas transmission valve locations to determine where it would be prudent to replace manually operated valves with automated valves; in light of the NTSB's discovery that the pipeline that exploded was not "seamless" as reported by PG&E, PG&E was ordered to search for all records relating to pipeline system components, such as pipe segments, valves, fittings, and weld seams for PG&E's gas transmission lines in class 3 and class 4 locations, and class 1 and class 2 high consequence areas that have not had a maximum allowable operating pressure established through prior hydrostatic testing; and to use the traceable, verifiable, and complete records located by implementation of the NTSB's Safety Recommendation P-10-2 to determine the valid maximum allowable operating pressure (MAOP), based on the weakest section of the pipeline or component to

ensure safe operation, of PG&E's gas transmission lines in class 3 and class 4 locations and class 1 and class 2 high consequence areas that have not had a MAOP established through prior hydrostatic testing. PG&E is to provide verification of this pressure testing work to the Commission by March 15, 2011.

In the introduction to the PG&E Comments in response to the Revised Scoping Memo, PG&E states that since the San Bruno incident, "PG&E has undertaken leak inspections of the entire gas transmission system beyond its on-going practices to support public safety, beginning with highly populated areas, publicly released detailed information about PG&E's gas pipeline safety and maintenance practices, and is reviewing safety procedures of its natural gas system with first responders, including providing detailed maps to ensure they know where PG&E's facilities are located." Following the explosion and fire, PG&E began to develop its Pipeline 2020 program. According to PG&E, that program "is intended to strengthen PG&E's natural gas transmission system and advance industry best practices over the coming decade." (PG&E Comments at 1.)

In response to the first issue about PG&E's disaster and emergency response plan, PG&E described the procedures that are in place for investigating, detecting and resolving suspected and reported gas leak and odor concerns, including its gas leak immediate response process. PG&E also described its gas emergency operations plan, which PG&E's uses in the event of a gas-related emergency. PG&E's response also described how its emergency command structure operates, and how PG&E's emergency teams coordinate and train with local public agency responders. PG&E also provided a short description of its Pipeline 2020 program, and how PG&E's public safety and training efforts and pipeline location information are to be incorporated into this program.

In response to the second issue about providing fire departments with location information about PG&E's gas transmission lines and shut-off valves, PG&E stated that it has begun making available detailed information about the location of transmission lines and facilities to local fire authorities and other appropriate emergency personnel. PG&E has also contacted all cities and counties in its service territory to offer meetings on gas safety and gas pipeline facility locations, and as of November 18, 2010, PG&E has had 98 meetings to discuss pipeline facility locations and safety issues with local and county officials representing 88 jurisdictions.

In response to the third issue about the frequency with which gas transmission and gas storage shut-off valves are tested or monitored, PG&E stated that it operates and maintains these valves once per calendar year and not less than every 15 months. PG&E notes that this testing and monitoring is fully compliant with the valve maintenance procedures set forth in § 192.745 of Title 49 of the Code of Federal Regulations.

The fourth issue concerns the reprioritization of PG&E's capital expenditure projects, and whether Commission staff should review and monitor the reprioritization of these capital expenditures. PG&E states that it is committed to spending the full amount of capital that is contemplated in the Gas Accord V Settlement for pipeline integrity management and pipeline safety and reliability during the rate case period. PG&E notes that since conditions on the gas system are constantly changing, and to maximize the safety and reliability of its system, it must continue to have the flexibility to reassess which projects should have the highest priority. In light of PG&E's commitment to spend the full amount of funds that are allocated to pipeline safety capital programs, PG&E states it is not necessary for the Commission to adopt procedures to monitor the

capital spending prioritization process. PG&E plans to detail its actual capital spending in these areas in PG&E's next gas transmission and storage rate case. If the Commission believes that additional procedures are warranted, PG&E plans to work with the Commission staff to develop responsive procedures, and such procedures will be incorporated into its next rate case.

The fifth issue asked whether other safety-related protocols or procedures should be required of PG&E during this rate cycle. PG&E's response stated that it believes its safety-related public safety and emergency response protocols and procedures are sufficient for the rate case period. PG&E also expects that these protocols and procedures may be modified based on the NTSB investigation, the Independent Review Panel investigation, and the Commission's September 23, 2010 Resolution.

The sixth issue requested the parties to comment on whether workshops and/or evidentiary hearings are needed in determining whether PG&E should be required to have certain protocols and procedures in place during the rate cycle. PG&E's response stated that it believes that the safety-related protocols and procedures that it discussed provide a sufficient basis for assessing PG&E's public safety and emergency response procedures for this proceeding, and that no workshops or evidentiary hearings are needed at this time.

No replies to the PG&E Comments were filed. We have reviewed the PG&E Comments, considered the actions PG&E was ordered to take as a result of the Commission's directives, and have taken into account the ongoing investigations by the NTSB, the Independent Review Panel, the work activities associated with the September 23, 2010 Resolution and the January 13, 2011 Resolution, and any upcoming new proceeding. Based on these considerations, we have sufficient information to prepare a safety phase decision without the

need for an evidentiary hearing or holding of a workshop.³ We also note that the Commission may open other proceedings to examine issues specific to PG&E as a result of the explosion and fire, or take other actions that apply to all of the California gas utilities.

Accordingly, the next step in the safety phase portion of this proceeding will be to prepare a proposed decision for the Commission on the safety-related protocols and procedures that PG&E should be required to have in place during the four-year period covered by this rate cycle and beyond. Since PG&E already has a number of safety-related protocols and procedures in place, the proposed decision may require modifications to some of these existing protocols and procedures. In addition, in the proposed decision addressing whether the motion to adopt the Gas Accord V Settlement should be granted or not, the Commission may want to impose certain reporting requirements concerning the reprioritization of capital expenditure projects, and how the funds allocated for pipeline integrity management and pipeline safety and reliability are being spent.

³ Workshops could be appropriate in a rulemaking that applies to all the California gas utilities to explore ways in which the gas utilities can better coordinate natural gas emergencies with emergency response personnel.

IT IS RULED that:

1. No workshops or evidentiary hearings are needed for the safety phase of this proceeding.
2. A proposed decision on the safety phase issues shall be prepared.

Dated February 3, 2011, at San Francisco, California.

/s/ TIMOTHY ALAN SIMON

Timothy Alan Simon
Assigned Commissioner

/s/ JOHN S. WONG

John S. Wong
Administrative Law Judge

INFORMATION REGARDING SERVICE

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Dated February 3, 2011, at San Francisco, California.

/s/ ANTONINA V. SWANSEN

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N O T I C E

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