



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Application of Pacific Gas and Electric
Company Proposing Cost of Service and rates
for Gas Transmission and Storage Services for
the Period 2015-2017 (U39G)

Application 13-12-012
(Filed December 19, 2013)

And Related Matter.

Investigation 14-06-016
(Filed June 26, 2014)

**PACIFIC GAS AND ELECTRIC COMPANY'S RESPONSE TO
THE MOTION OF THE OFFICE OF RATEPAYER ADVOCATES
FOR AN ORDER TO SHOW CAUSE**

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I. INTRODUCTION

The Commission should deny ORA’s motion for an order to show cause (Motion) because it (1) argues an issue that is outside the scope of this proceeding, seeking relief that is not within the scope of this proceeding; (2) raises issues already considered by the ALJ in Rulemaking (R.) 11-02-019 and addressed in several Commission decisions; and (3) is wrong on its merits – contrary to the premise of the motion, PG&E has complied with applicable regulatory requirements when calculating the maximum allowable operating pressure (MAOP) of its natural gas transmission system, and has done so consistently and transparently. In the alternative, if the Commission wishes to consider ORA’s Motion, it should be transferred to

R.11-02-019, where the issues have already been addressed.¹

The motion asks the Commission to issue an order to show cause based on the claim that PG&E “directs attention away from the fact that it is making assumptions to establish MAOP for a significant portion of its system” and because, ORA alleges, “in many instances, those assumptions are not consistent with the federal regulations.” Motion, p. 21. Both PG&E’s MAOP Validation process and the application of federal regulations to that process have been fully litigated and resolved in other proceedings and should not be subject to collateral challenge in this GT&S Rate Case. ORA also alleges that PG&E did not submit a “comprehensive plan” to test or replace untested transmission lines. Motion, p. 25. As shown below, PG&E has repeatedly and consistently explained its plan and methodology to complete its MAOP Validation, pressure testing and pipeline replacement projects in various submissions in R.11-02-019 (e.g., motions described below, Pipeline Safety Enhancement Plan (PSEP), PSEP Updated Application) and its GT&S Application.

Contrary to ORA’s claim, there is no ambiguity as to PG&E’s process to validate MAOP for its pipelines – including the use of conservative engineering assumptions where appropriate. This is a subject to which the Commission, the California legislature, the Safety and Enforcement Division (SED) and California operators have dedicated significant time and resources over the course of proceedings in which ORA was an active participant. Similarly, ORA’s views on the Commission’s interpretation of provisions of the Code of Federal Regulations relating to MAOP (Motion pp. 18-22) have been fully litigated in R.11-02-019, as ORA itself acknowledges. Motion, nn.39, 40 (“The ALJ in the Line 147 proceeding explicitly rejected ORA’s request that the Commission determine whether or not PG&E’s proposed MAOP for Line 147 was established consistent with the federal regulations.”).

If ORA wishes to challenge the Commission’s regulations, orders, rulings and processes relating to PG&E’s verification of MAOP for its natural gas transmission pipelines, such a

¹ As a courtesy, PG&E is also serving its response to ORA’s motion in the R.11-02-019 docket.

challenge is properly filed –if at all– in R.11-02-019, the docket from which those regulations, orders, rulings and processes arose. Instead, ORA now attempts to relitigate these issues by filing a procedurally defective motion supported by misstatements, conjecture and select, out-of-context information from other proceedings. ORA’s improper attempt to raise this issue yet again in a different proceeding and its misleading motion should be rejected. PG&E respectfully requests that the ALJ deny ORA’s motion or, in the alternative, reassign it to R.11-02-019 in which the substantive issues ORA raises have already been addressed.

II. DISCUSSION

A. ORA’s Motion Raises Issues And Seeks Relief Outside The Scope Of This Proceeding

As the title of ORA’s motion makes clear, the issues ORA addresses are PG&E’s “compliance with gas safety regulations” and PG&E’s alleged “failure to have in place a comprehensive gas pipeline ‘test and replace’ plan as required by California Public Utilities Code § 958.” This is a ratesetting proceeding, not an enforcement proceeding. The issues within the scope of this proceeding are set forth in the April 17, 2014 Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge (Scoping Memo).² The Scoping Memo lists twenty-four specific issues to be addressed in this proceeding. Conspicuously absent from that list is a determination of PG&E’s compliance with gas safety regulations, the appropriate methodology for calculating MAOP, or whether PG&E has a plan to test and replace gas pipelines that complies with Public Utilities Code Section 958. In addition, none of these issues was covered by the common briefing outline agreed upon by the parties (including ORA) and approved by the ALJ.

Because the issues ORA raises in its Motion are not within the scope of this case, almost all of the evidence upon which ORA relies to support its Motion is not in the record in this case.

² The second scoping memo issued on November 13, 2014, also does not include the issues raised in ORA’s motion. Indeed, in spite of the opportunity to raise additional issues in this proceeding, ORA failed to do so. The third scoping memo issued on June 11, 2015, addressed only the remedy costs stemming from the San Bruno OII Penalty Decision 15-04-024.

Specifically, neither the attachments to ORA's Motion, nor the transcript of the proceedings in R.11-02-019 to which ORA cites numerous times, are in the record in this case. The evidentiary record in this proceeding is closed and briefing on the principal issues was completed more than six months ago. ORA has presented no basis upon which to expand the scope of the proceeding and reopen the record to address here issues which, as discussed in below, have already been raised and resolved in R.11-02-019.

ORA's Motion does not even claim that these issues are within the scope of the GT&S Rate Case. Rather, ORA's Motion argues that the issues it raises "impact" the GT&S Rate Case. Motion, pp. 23-27. They do not. PG&E's application does not ask the Commission to endorse its MAOP Validation protocols, make any findings on whether PG&E has complied with applicable gas safety regulations or seek approval for its compliance in accordance with California Public Utilities Code § 958. The Commission's decision in this case will determine PG&E's just and reasonable revenue requirement. It will not, either explicitly or implicitly, determine whether PG&E has appropriately validated system MAOP or otherwise complied with applicable regulations.³

B. PG&E's MAOP Methodology and Use Of Appropriate Engineering Assumptions Is Widely Known And Specifically Endorsed By The Commission And Legislature

Before addressing ORA's allegations, PG&E below provides important background, information and facts related to R.11-02-019 that ORA omitted from its Motion.

1. Factual Background

In January 2011, the National Transportation Safety Board (NTSB) made recommendations P-10-2 and P-10-3 to PG&E regarding (1) aggressively and diligently searching for traceable, verifiable and complete (TVC) pipeline records for transmission lines in

³ As shown below, ORA already made these same arguments, and the ALJ in R.11-02-019 has heard and rejected them, numerous times. If the Commission wishes to allow ORA to reargue them, it should do so in R.11-02-019, not in this GT&S Rate Case.

High Consequence Areas (HCAs) that had not been pressure tested; and (2) use of TVC records to determine the valid MAOP based on the weakest section of the pipeline or component for transmission lines in HCAs that had not been pressure tested.⁴ The NTSB issued similar recommendations to the Commission to oversee PG&E's compliance.⁵ The Commission ordered PG&E's compliance with these NTSB recommendations via Resolution L-410, initiated R.11-02-019, and directed PG&E to file and serve its action plan in that proceeding.

On March 15, 2011 PG&E filed its report in R.11-02-019⁶ related to the progress it had made associated with its MAOP records retrieval and review effort including PG&E's strength test records and validation of records supporting the 1965-1970 highest operating pressure for

⁴As a result of PG&E's actions over the past several years, the NTSB has since closed out both of these Recommendations. Indeed, PG&E has satisfied 11 of the 12 NTSB Recommendations issued to PG&E. The 12th and final recommendation is considered "open – acceptable" by the NTSB.

⁵ The NTSB likewise closed out Recommendation P-10-5 to the Commission related to its oversight of PG&E's MAOP Validation process. In closing the Recommendation, on September 19, 2014, the NTSB stated:

We understand that, on July 1, 2013, PG&E completed MAOP validation of its transmission pipeline system, comprising approximately 6,750 miles, with these validation components: record search and retrieval efforts, building of pipeline feature lists, and MAOP engineering and validation. We note that you reviewed the PG&E MAOP validation project and confirmed the following:

- The MAOP for transmission pipeline components was established and supported by complete pressure test records in compliance with historical regulatory requirements and best practices.
- Material specifications critical to calculating MAOP of pipeline components were supported by existing records. ***Conservative engineering-based assumptions were used when those critical material specifications were unsupported by records.***
- MAOP validation was conducted in accordance with regulatory requirements, mandates, and Safety Recommendations P-10-2 and P-10-3.

Your April 25, 2014, final report [*See infra*, p. 12] concluded that PG&E's MAOP validation had satisfied state requirements; it also satisfies Safety Recommendation P-10-5, which is classified CLOSED—ACCEPTABLE ACTION.

http://www.nts.gov/_layouts/nts.recsearch/Recommendation.aspx?Rec=P-10-005

⁶ See, <http://docs.cpuc.ca.gov/PublishedDocs/EFILE/REPORT/132132.PDF>.

pipelines with MAOPs established under § 192.619(c).⁷ On March 16, 2011 then Executive Director Paul Clanon responded that:

PG&E's March 15 [2011] response contends that "PG&E understands the intent to be to identify reliable records confirming the performance of a pressure test *or the determination of MAOP based on the historical high operating pressure*"...

PG&E has no legitimate or good-faith basis for the conclusion quoted above in italics. As you well know, the whole purpose of the NTSB's urgent safety recommendations, and for the Commission's directive to PG&E, was to find, to the extent possible, a basis for setting [MAOP] by means *other than* the grandfathering method [*i.e.*, § 192.619(c)] described in PG&E's response.⁸
(emphasis in original)

Given this direction not to rely solely on § 192.619(c), on March 21, 2011 PG&E filed a Supplemental Report, explaining that, while PG&E had compiled and submitted the records supporting the grandfathered MAOP for pre-1970 pipelines, it intended to use records to calculate MAOP based on engineering specifications and then set the MAOP *at the lower of* the calculated or historical MAOPs. PG&E further stated that, "for many [grandfathered] pipelines, *we do not believe we will find [TVC] records of every component*. Instead, we are *making assumptions about certain components*, such as fittings and elbows, based on the material specifications at the time those materials were procured, sound engineering judgment, and conducting excavation and field testing of pipeline systems as appropriate."⁹

On March 24, 2011, the Commission issued Decision 11-03-047 finding that PG&E appeared to have failed to comply with Resolution L-410, and ordering PG&E to appear at a hearing and show cause why it should not be held in contempt and fined for its failure to comply. The decision stated: "PG&E appears to have attempted to merely justify the practice of setting

⁷ This is precisely what ORA suggests PG&E should be doing: "PG&E could legally calculate MAOPs under either subsection (a) *or (c) [the grandfather clause]*, provided it has adequate records to meet the regulation it is relying upon." Motion, n.43. (emphasis added).

⁸ See Attachment 1. (emphasis in original).

⁹ See <http://docs.cpuc.ca.gov/PublishedDocs/EFILE/MOTION/132593.PDF>.

MAOP for pre-1970 pipelines based entirely on historical high operating pressure [under § 192.619(c)]...it appears that PG&E's interpretation is contrary to the NTSB Safety Recommendations and the Commission's order because PG&E relies on historical highest operating pressure as a substitute for actual pipeline component analysis."¹⁰

That same day, PG&E and SED's predecessor, CPSD, jointly submitted a Stipulation to resolve the OSC issued against PG&E in D.11-03-047.¹¹ Pursuant to the Stipulation PG&E was required to: (1) carry out a compliance plan that was developed by PG&E *and Commission Staff* (the Compliance Plan); and (2) pay a \$6M penalty, \$3M of which would be suspended pending PG&E's completion of the Compliance Plan.¹² In the Compliance Plan, PG&E again acknowledged that "[f]or many of our older pipelines, we do not believe we will find '[TVC]' records of every component. Therefore, we are making assumptions about certain components, such as fittings and elbows, based on the material specifications at the time those materials were procured, sound engineering judgment, and conducting excavation and field testing of pipeline systems as appropriate."¹³ The Compliance Plan also unambiguously explained PG&E's MAOP calculation approach, including specific references to PG&E's engineering analysis using assumptions and § 192.619(a)(1):

The information in PG&E's [TVC] documents is combined with engineering analysis and any necessary assumptions and field-testing to create a Pipeline Features List (PFL). The PFL is a comprehensive reference for all necessary characteristics and appurtenances. The PFL will specify: (1) the weakest element of the segment of the pipeline as defined by the 49 CFR § 192.619(a)(1); (2) the criteria by which PG&E made this determination; and (3) whether this determination is based on TVC documents relating to the specific pipeline segment, or based on PG&E's assumptions...The PFL information is then used in the MAOP calculation.¹⁴

¹⁰ D.11-03-047, pp. 3, 10.

¹¹ See <http://docs.cpuc.ca.gov/PublishedDocs/EFIELD/STP/132626.PDF>.

¹² *Id.* at p.1. Despite the formulation of this Compliance Plan by PG&E and Commission Staff, and PG&E's subsequent fulfillment of that Plan, ORA now proposes that PG&E embark on a duplicative effort via the PHMSA waiver process under 49 U.S.C. § 60118. Motion, pp. 9-10.

¹³ *Id.* at Attachment 1, p. 2. (emphasis added).

¹⁴ *Id.*

On March 28, 2011 the Commission convened a hearing in R.11-02-019 pursuant to its March 24, 2011 OSC, at which assigned Commissioner Florio and Commissioner Sandoval were present. At the hearing PG&E again explained that to determine the MAOP of pipelines for which PG&E did not have records, it would make conservative assumptions based on the era during which the pipeline was constructed, the materials then available, and procurement practices at the time. PG&E also offered its MAOP Validation for Line 101 as an example of how it intended to approach the issue of missing records, including its methodology for using conservative assumptions. Moreover, at various times during R.11-02-019, including in data responses, progress updates and during the 2014 Line 147 proceedings, PG&E shared with SED (and other parties, including ORA) completed PFLs, which included a MAOP Validation Summary Report referencing PG&E's specific use of § 192.619, including subsection (a)(1), as detailed in the Compliance Plan.¹⁵

On April 21, 2011 PG&E filed a motion requesting adoption of its MAOP process described in the Compliance Plan, and again urged the Commission for guidance on its MAOP Validation methodology: "PG&E has embarked on the MAOP validation of PG&E's HCA Pipelines without pressure tests and needs guidance as to whether the methodology PG&E is using for the MAOP validation is acceptable to the Commission. Without such guidance, PG&E may complete a time-consuming and difficult MAOP validation process that does not satisfy the Commission's directive."¹⁶ PG&E again reiterated that for "many of its older pipelines that have not previously been pressure tested, PG&E does not believe it will find specific records for every component" and also noted that other California utilities reported to the Commission that 100% documentation is a "very difficult, if not infeasible, threshold to achieve."¹⁷ PG&E's motion also attached sample MAOP Validation Reports for Lines 101 and 132A, which stated that "[w]here there are unknowns we have based recommendations on industry practice and sound

¹⁵ See e.g., Attachment 2.

¹⁶ See <http://docs.cpuc.ca.gov/PublishedDocs/EFIELD/MOTION/133969.PDF>, p. 1.

¹⁷ *Id.* at p. 4. (emphasis added).

engineering judgment,” and further detailed PG&E’s use of conservative assumptions in a 2-page section titled “Data Interpretation and Evaluation.”¹⁸ PG&E’s motion concluded: “if the Commission does not consider PG&E’s methodology to result in a valid MAOP, PG&E’s Compliance Plan must be revised.”¹⁹ The Compliance Plan was not revised; in fact, as explained below the Commission ordered PG&E to continue its efforts to validate MAOP by component calculation, and ordered all California gas utilities to prepare and file a “comprehensive Implementation Plan to replace or pressure test all natural gas transmission pipeline in California that has not been tested or for which reliable records are not available.”²⁰

Accordingly, far from ORA’s unfounded allegations that PG&E has misrepresented the state of its records²¹ or the manner in which it intended to use assumptions and engineering judgment to calculate MAOP following the NTSB Recommendations and associated Commission orders, PG&E has been transparent about both issues dating back to early 2011. As an active participant in R.11-02-019, ORA is well aware of these facts, but rather than include them in its Motion, ORA attempts to assemble statements from different proceedings, annual reporting forms and responses to ORA’s data requests that were not propounded in connection with any particular proceeding to manufacture purported misrepresentations by PG&E.

2. The Commission And Legislature Endorsed The Use of Appropriate Engineering Assumptions In 2011

In mid-2011 the Commission required all natural gas transmission pipelines grandfathered under 49 CFR § 192.619(c) to have their MAOPs verified by a pressure test, or the pipelines replaced. That June 16, 2011 order, D.11-06-017 (which led to PG&E’s Pipeline Safety Enhancement Plan filing), went on to explain that in determining MAOP based on pipeline features, PG&E:

¹⁸ *Id.* at Exhibit 1, p. 2 and pp. 5-8.

¹⁹ *Id.* at p. 5.

²⁰ D.11-02-019, p. 18.

²¹ Then Commission extensively investigated and fined PG&E related to its transmission record-keeping practices in proceeding I.11-02-106.

may use engineering-based assumptions for pipeline components where complete records are not available. Such assumptions must be clearly identified, based on sound engineering principles, and, where ambiguities arise, the assumption allowing the greatest safety margin must be adopted...²²

California codified D.11-06-017 in October 2011. Public Utilities Code Section 958 states that: “Engineering-based assumptions may be used to determine maximum allowable operating pressure in the absence of complete records, but only as an interim measure until such time as all the lines have been tested or replaced, in order to allow the gas system to continue to operate.” (P.U. Code § 958(b)). This is precisely what PG&E did as it undertook an unprecedented records collection effort, digitally converting more than 3.8 million paper records, processing approximately 16,000 PFLs, 500,000 MAOP components and 40,000,000 data fields including 3,000,000 MAOP specifications.

In the years following D.11-06-017, PG&E has repeatedly shared with SED and other parties its methodology for calculating MAOP. As recently as May 2015, PG&E again detailed its use of § 192.619(a) (consistent with the 2011 Compliance Plan) and the fact that PG&E no longer relies on § 192.619(c).²³ PG&E validates MAOP for pipelines with incomplete records using engineering-based calculations, including conservative assumptions where appropriate, on an interim basis pending completion of a strength test. Contrary to ORA’s assertion that PG&E somehow seeks to obscure this widely-acknowledged fact, PG&E’s process for validating MAOP has been the subject of numerous public proceedings – proceedings in which ORA was an active participant.

3. Subsequent Proceedings Affirm PG&E’s Use Of Appropriate Engineering Assumptions

After D.11-06-017 the Commission conducted a series of extensive workshops and proceedings, including voluminous records reviews and productions, days of expert testimony,

²² D.11-06-017, Ordering Paragraph 1.

²³ See <http://www.cpuc.ca.gov/NR/rdonlyres/35B8F5D0-CC38-4235-B02F-0FFEF2C43B2C/0/PGER1102019MAOPWorkshopMay11122015.pdf>

and a full vetting of PG&E's PSEP. ORA, among others, participated actively in those proceedings. On December 28, 2012 the Commission issued Decision 12-12-030 approving PG&E's PSEP, which explicitly included the use of conservative engineering assumptions in its MAOP validation methodology.²⁴ Indeed, in D.12-12-030, the Commission reiterated PG&E's approach to MAOP determination, which was consistent with PG&E's approach dating back to the 2011 Compliance Plan:

To compile the electronic data set, PG&E will (1) code documents by type, such as as-built drawings or pressure test results, (2) identify missing items, and then (3) scan, code, and upload the records into the electronic data base. PG&E's engineers will then review the resulting data set ***and, where records are missing, make conservative engineering-based assumptions.*** The entire resulting pipeline features list [PFL] data set will then be reviewed by PG&E's engineers for quality control and quality assurance. ***PG&E will then use the ultimate data set to calculate the design-basis MAOP for the segment, which is then compared to the pressure test results based on PG&E's requirements, and PG&E's listed MAOP for the pipeline segment. PG&E will then choose the lowest of these three pressure levels as the new MAOP.***²⁵

In October 2013 PG&E again described its MAOP Validation project at length as part of its PSEP Update Application, A.13-10-017. In that application, PG&E explained that "older, historic records are not complete, and that records validation is an ongoing effort subject to continuous improvement. We will continue to discover new information about our pipelines through records validation and field testing of engineering assumptions." ORA actively participated in that proceeding, as well. Rather than contest the MAOP methodologies approved by the Commission and implemented by PG&E (as ALJ Bushey repeatedly invited ORA to do during the Line 147 proceedings²⁶), ORA chose to join the parties in settling PG&E's PSEP

²⁴ See D.12-12-030, Ordering Paragraph 1.

²⁵ See D.12-12-030, pp. 18-20 (emphasis added).

²⁶ MS. PAULL[ORA]: There's questions about how [MAOP] should be calculated because of questions of interpretation of the regulations. And the assumption -- what assumptions must be used.

ALJ BUSHEY: ...we have been at this for two and a half years now. You know. And if you want to pursue this, [PG&E's] updated [PSEP] application is in. I expect it will be assigned to me. And we'll put it in the scoping memo, and we can litigate it there and brief it there....

Update Application. The Commission approved the settlement in D.14-11-023. And while ORA has targeted PG&E in its motion, as ALJ Bushey presciently observed during the Line 147 hearings,²⁷ ORA's allegations are not limited to PG&E's MAOP Validation methodology. For example, Southern California Gas Company and San Diego Gas & Electric likewise use engineering assumptions, in a similar manner to PG&E, to calculate the design MAOP under § 192.619(a)(1).²⁸

ORA's Motion also accuses PG&E of conducting its MAOP Validation project "free of transparent regulatory oversight." Motion, p. 23. Nothing could be further from the truth. As shown above, PG&E's MAOP Validation methodology and program has been closely scrutinized by the Commission since 2011. ORA also ignores SED's active role in this process. For example, on April 25, 2014, SED released a report concluding that "***PG&E's validation of MAOP was generally consistent with the CPUC's requirements under D.11-11-017, D.12-12-030, and Res L-410.***" This report was the result of a detailed review by SED, which included a two week inspection of PG&E's PFLs, supporting documentation, and personnel involved in creating the PFLs that was conducted by six SED engineers. SED's oversight included its review of PG&E's use of engineering assumptions. SED's report stated that the review

ALJ BUSHEY: But we can litigate that in the update proceeding if you want to change the priorities....This [PSEP] process is well underway, and if you want to propose changing it, we have a proceeding to do that, but this isn't the one...

ALJ BUSHEY: Okay. So it sounds like ORA's objections go to the protocol for the entire PSEP plan, which we can take up in the broader proceeding...

ALJ BUSHEY: And to the extent you want to challenge the way, the protocol for the PSEP, that is something that should be addressed in the update application if you don't like the interpretation there, because it goes – it's not just to Line 147. It's everything throughout the state.

R.11-02-019, 18 RT 2741-50

²⁷ ALJ BUSHEY: We can brief this. And if PG&E is mistaken, then the Commission has been mistaken for two years. And if it's mistaken, ***it's not just Line 147 and it's not just PG&E. It's every natural gas operator in the state.*** So if you want to pursue that issue, it needs to be pursued in the sort of overall perspective in this proceeding. That's the place to make that argument and get everybody -- ***get every natural gas system operator's safety enhancement plan revised in accord with your perspective on the regulation, because right now all of the operators are using the rules as adopted by the Commission over the last two years.***

Id. at 2741. (emphasis added).

²⁸ See, <http://www.cpuc.ca.gov/NR/rdonlyres/BCCB38FF-5795-48CA-BE3B-4D99BFFE4DCD/0/SEMPRAR1102019MAOPWorkshopMay1122015.pdf>, pp. 6-7.

“exposed SED to [a] whole new level of understanding of the massive effort behind PG&E’s MAOP Validation efforts. . . .” SED characterized PG&E’s MAOP Validation effort as:

an unprecedented effort resulting in a substantial improvement over the previous system of record. This effort provides a level of detail not previously available and much can be learned from it. The opportunity for deeper understanding of PG&E’s transmission system can greatly contribute towards improved decision-making impacting the safety and integrity of the system beyond validation of the MAOP.

On June 19, 2014, the Commission in D.14-06-011 echoed SED’s Report:

[W]e find that PG&E has made great strides to improve its natural gas system records management from the time we began this proceeding, but that an on-going commitment to continuous improvement is needed to identify and correct remaining errors. Due in part to the lack of 100% reliable records, this Commission in D.11-06-017 ordered all California natural gas utilities to pressure test or replace all natural gas pipeline.²⁹

The Commission again affirmed PG&E’s use of appropriate engineering assumptions in D.13-12-042, dated (as modified) June 11, 2015, by citation to the relevant provisions of D.11-06-017 (D.11-06-017 “discusses the factors and assumptions that operators may use to complete their MAOP determinations”).

In short, there has been no ambiguity regarding PG&E’s use of conservative engineering assumptions and associated methodology where appropriate in validating MAOP for certain of its natural gas transmission pipelines. ORA’s allegations that PG&E is using less stringent assumptions are belied by the outlined facts and extensive record on this issue. PG&E’s MAOP methodology was formulated in 2011 in consultation with CPSD, in plain sight of all parties to R.11-02-019, and repeatedly confirmed by Commission decisions. Nothing in ORA’s Motion changes that conclusion; nor is this the appropriate forum for ORA to belatedly challenge a process acknowledged and endorsed in multiple prior proceedings in which ORA was an active party.

²⁹ D.14-06-011 at p. 12

4. **PG&E’s Annual Reporting Was Intended To Comply With Commission Directives And Follow The MAOP Validation Methodology Approved By The Commission**

Contrary to ORA’s allegations that PG&E willfully misrepresented its MAOP methodology in annual reporting forms, PG&E was simply following Commission directives and the MAOP methodology established and approved in R.11-02-019.

To comply with Commission orders and directives (including those enumerated above, which precluded PG&E from relying solely on § 192.619(c)), and consistent with the 2011 Compliance Plan developed by PG&E and CPSD and D.11-06-017 ordering that PG&E “must complete its [MAOP] determination based on pipeline features and may use engineering-based assumptions for pipeline components where complete records are not available,” PG&E reported that the MAOP of its transmission pipelines were established under § 192.619(a). There is nothing misleading or false about that. Consistent with PG&E’s approved MAOP Validation methodology, PG&E limits the MAOP of its pipelines to the lowest of the calculated component design pressure, test pressure, and historical operating pressure, even where the line has been hydro tested to a level that validates a historic operating pressure greater than the calculated design pressure, including those lines built before 1970.

Additionally, the instructions in Form PHMSA F 7100.2-1 quoted by ORA state that “for miles of transmission pipeline for which the operator *has not completed a records review*, include these miles in the ‘Incomplete Records’ column.” Motion, p. 16. PG&E completed its pipeline records review in July 2013 pursuant to the MAOP Validation project approved in D.12-12-030. Thus, in compliance with: (1) the various Commission directives that PG&E could not rely solely on § 192.619(c); (2) the PG&E/CPSD Compliance Plan that explicitly referenced § 192.619(a)(1) for PG&E’s calculated MAOP; and (3) D.11-06-017 ordering PG&E to complete its MAOP Validation, and allowing the use of engineering-based assumptions where complete records are not available, PG&E used the following rationale to report its transmission MAOP determination for years 2012-2014:

- 2012 – because PG&E’s MAOP Validation project was ongoing and its “records

review” was not yet complete, PG&E categorized its transmission lines under § 192.619(a)(1), § 192.619(a)(1) Incomplete, and § 192.619(a)(2).³⁰

- 2013 and 2014 – because PG&E had completed its MAOP Validation project in July 2013, and thus completed its “records review,” PG&E categorized its transmission lines under § 192.619(a)(1) and § 192.619(a)(2).³¹

As a result of the new guidance received from SED on November 5, 2015, PG&E will revise its reporting methodology to categorize the MAOP of its transmission pipelines under §§ 192.619(a)(1)-(4) and “Other” categories including both “Complete” and “Incomplete” records sections, respectively.³²

C. ORA’s Arguments Regarding The Intersection Of Federal And State Pipeline Safety Regulations Are Procedurally Improper And Inaccurate

ORA argues that an OSC is required because “in many instances” the engineering assumptions used by PG&E “are not consistent with the federal regulations.” Motion, p. 21. In so doing ORA seeks to revisit issues it has unsuccessfully advanced on several prior occasions, a fact ORA itself acknowledges. *See*, Motion, nn. 39, 40 (“The ALJ in the Line 147 proceeding explicitly rejected ORA’s request that the Commission determine whether or not PG&E’s proposed MAOP for Line 147 was established consistent with the federal regulations.”). It is procedurally improper for ORA to advance these arguments yet again in a different docket.

1. Having Failed In The Proper Forum, ORA’s Attempt At Raising This Issue In Yet Another Proceeding Should Be Rejected

In its Motion, ORA essentially argues that both PG&E and the Commission misapply provisions of the Code of Federal Regulations relating to MAOP of gas transmission pipelines, specifically 49 C.F.R. § 192.619. Motion, pp. 18-22. ORA has challenged the Commission’s treatment of 49 C.F.R. § 192.619 on numerous prior occasions. *See, e.g.*, Comments on Line 147 PD (Dec. 13, 2013) at 5-8; OB (Jan. 17, 2014) at 16; Application for Rehearing of D.13-12-

³⁰ *See* Attachment 3.

³¹ *See e.g.*, Attachment 4 (2013 Report).

³² *See* Motion, Attachment A.

042 (Jan. 23, 2014) at 13-17; RB (Jan. 31, 2014) at 8 n.37; Application for Rehearing of D.14-06-011 (July 21, 2014) at 9 n.26, 18; Comments on PD Adopting GO 112-F (Feb. 12, 2015) at 7. Each of ORA's prior attempts was rejected by the Commission. PG&E respectfully requests that the ALJ deny ORA's motion or, in the alternative, reassign it to the Rulemaking proceeding (R.11-02-019), where these issues have already been examined and litigated.

D. PG&E Has Consistently Communicated To The Commission Its Plan And Methodology To Complete Its MAOP Validation, Pressure Testing And Pipeline Replacement Projects

Contrary to ORA's allegations that PG&E has failed to provide a "comprehensive plan," as explained above, PG&E has done so repeatedly and consistently. First, PG&E entered into and satisfied the Compliance Plan described above. To further comply with Commission decisions and California state law, PG&E submitted its PSEP, which was approved in D.12-12-030. The strength testing scope of work for the first part of PSEP was completed in 2014. PG&E continues its Hydrostatic Testing Program in 2015, as described in the GT&S Rate Case. Completing all required strength testing to comply with the CPUC's Decision 11-06-017 is expected to take multiple years, as also explicitly outlined in the GT&S Rate Case.

PSEP (2011-2014): Addressed Highest Risk, Untested Pipe Segments

D.11-06-017 required California operators to develop a priority-ranked schedule to strength test pipe not previously tested and provide criteria for replacement in lieu of testing. The Commission's decisions adopted the NTSB's recommendations and required operators to prioritize untested pipe in: Class 3 and 4; and Class 1 and 2 in HCA.

PG&E's PSEP filing was consistent with the CPUC's decision and targeted pipeline segments in highly populated urban areas, with vintage seam welds that did not meet modern manufacturing, fabrication, or construction standards or that were "grandfathered" under 49 CFR Part 192 and had not been strength tested. Priority was given to untested pipe operating at or above 30% Specified Minimum Yield Strength (SMYS) located in Class 3 and 4, and Class 1 and 2 in HCA.

Non-strength-tested urban pipelines with manufacturing threats operating below 30% SMYS, all non-HCA untested rural pipelines, and previously strength-tested pipelines (not tested to 49 CFR Part 192 Subpart J requirements) would be addressed after 2014.

PG&E had already initiated its strength testing program as the referenced Commission decisions were being considered and approved. Accordingly, there were certain Commission-approved modifications referred to as “deferrals” from PSEP, which were necessary to maintain focus on the highest risk segments. There are two types of deferrals: Group 1 deferrals included pipe that was in the original 2011 filing, but met subsequent criteria (as defined in the PSEP decision) after the completion of the MAOP Validation process; and Group 2 deferrals included pipe that met the first criteria after the completion of the MAOP Validation process but were deferred due to being impractical to engineer and complete during by the end of 2014. The risk based approach to addressing these deferrals is included in the PG&E’s GT&S filing and was acknowledged in SED’s “GT&S Review.”

PG&E provided the Commission quarterly compliance reports to apprise the Commission of its progress. During PSEP (2011-2014), PG&E tested, replaced, or identified traceable, verifiable, and complete strength test records for 974 miles of pipe (674 miles tested, 127 miles replaced, and 174 miles records identified).

PSEP (2015 & Onward): Aligns with the GT&S Rate Case Timelines

As previously mentioned, PSEP (2011-2014) addressed the testing of the highest risk pipeline segments. At the time of the PSEP filing, PG&E did not provide a longer term list of projects/segments post-2014 because several factors made a definitive, long range list or schedule impractical. These issues included:

- Unforeseen higher risk work may develop, such as retests due to fatigue analyses or Integrity Management (IM) driven strength tests. While the primary focus of the Hydrostatic Testing Program is to first complete the tests that are the focus of the NTSB requirements (remaining Class 3 and 4, and Class 1 and 2 in HCA), the strength test program also includes a number of integrity management driven tests

that are being performed because of fatigue life analysis or manufacturing threat assessment as part of the Transmission Integrity Management Program.

- The untested pipe data has evolved from the original PSEP data set that was filed in 2011 due to the completion of the MAOP Validation effort. The PFL data that was captured during the MAOP Validation effort is in the process of being migrated to the new Gas Transmission GIS (PODS) database. In the meantime, PG&E has been performing a manual review of its PFL data to identify all remaining potential Class 1 and 2 HCA and Class 3 and 4 pipe for testing or replacement projects.
- The pace of completion of PG&E's strength testing program is also dependent on the outcome of the 2015 GT&S rate case and subsequent rate case decisions, based on the Commission's assessment of the risk-based prioritization included in PG&E's rate case applications.

In response to recent requests from SED, PG&E has provided additional information about its proposed testing and/or replacement schedules. However, PG&E stressed that, given the need to perform PG&E's Hydrostatic Testing Program on the basis of risk, it is not possible to provide a static list of all tests to be performed in a specified order. As PG&E's Hydrostatic Testing Program evolves, PG&E continues to aggressively move forward with its plan to test or replace previously untested pipelines "as soon as practical," based on risk and available resources.

In the meantime and consistent with Commission decisions and guidance, PG&E's MAOP Validation methodology includes a process to calculate the design MAOP for each pipeline feature using records and conservative engineering assumptions where necessary, identify the maximum pressure established by a qualifying strength test, and review PG&E's listed historic MAOP for the respective pipeline sections.

III. CONCLUSION

ORA's motion makes no legitimate attempt to demonstrate that an Order to Show Cause is merited. Instead, it seeks to revisit in this proceeding issues fully litigated and resolved in R.11-02-019. For the foregoing reasons, PG&E respectfully requests that the ALJ deny ORA's motion or, in the alternative, reassign the motion to the Rulemaking proceeding (R.11-02-019) in which the substantive issues ORA raises have been repeatedly addressed.

Respectfully submitted,

/s/ Alejandro T. Vallejo

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Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: December 30, 2015

ATTACHMENT 1

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 16, 2011

Christopher Johns, President
Pacific Gas and Electric Company
P.O. Box 770000
Mail Code B32
San Francisco, California 94177

Re: PG&E's Failure to Comply With Commission Rulemaking R.11-02-019, Resolution L-410, and National Transportation Safety Board Urgent Recommendations P-10-2, P-10-3, and P-10-4

Dear Mr. Johns:

In its response dated March 15, 2011, Pacific Gas and Electric Company ("PG&E") failed to comply with Commission Rulemaking R.11-02-019 and Resolution L-410, which directed PG&E "to determine the valid maximum operating pressure" (Maximum Allowable Operating Pressure, or MAOP) for certain high-risk gas transmission pipelines using "traceable, verifiable, and complete records" for which PG&E was directed to undertake an extensive search. This directive from the Commission to PG&E was based on National Transportation Safety Board ("NTSB") Recommendations P-10-2, P-10-3, and P-10-4, which the NTSB expressly identified as "Urgent."

In its March 15 response, PG&E failed to comply with this demand for information and analysis, and as a consequence PG&E is violating the Commission's order.

PG&E's March 15 response contends that "PG&E understands the intent to be to identify reliable records confirming the performance of a pressure test *or the determination of MAOP based on the historical high operating pressure.*" (PG&E Response, page 7 (emphasis added).)

PG&E has no legitimate or good-faith basis for the conclusion quoted above in italics. As you well know, the whole purpose of the NTSB's urgent safety recommendations, and for the Commission's directive to PG&E, was to find, to the extent possible, a basis for setting maximum allowable operating pressure by means *other than* the grandfathering method described in PG&E's response.

By its action, PG&E not only is refusing to comply with the plain terms of the Commission's orders and the NTSB's urgent safety recommendations, but worse, may be placing public safety in jeopardy. This is particularly inexcusable in the wake of the tragedy at San Bruno.

Christopher Johns, President
Pacific Gas and Electric Company
March 16, 2011
Page 2

I hereby direct PG&E forthwith to comply, fully and in good faith, with the terms of Commission Rulemaking R.11-02-019 and Resolution L-410. In particular, I direct PG&E to provide, to the fullest extent of its ability to do so, the information required by the foregoing Commission orders and by NTSB Urgent Safety Recommendations P-10-2, P-10-3, and P-10-4 for PG&E "natural 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."

Please be advised that Commission staff will be recommending that the Commission issue an Order to Show Cause why PG&E should not be fined for its failure to comply.

Sincerely,

A handwritten signature in cursive script that reads "Paul Clanon". The signature is written in black ink and is positioned above the printed name and title.

Paul Clanon
Executive Director

ATTACHMENT 2

MAOP Validation Summary Report

Referenced from: "AGA White Paper on Verification of MAOPs for Existing Steel Transmission Pipelines"



Identity of Pipeline/Distribution Area: 147 - MP 0.0000 to 4.0216

- A. Maximum Allowable Operating Pressure: Steel or Plastic Pipelines (Part 192.619); and High-Pressure distribution Systems (Part 192.621).

Part 192.619(a)(1) Design Pressure: Lowest design pressure
Part 192.621(a)(1) for any following system elements

Pipe (including service lines)	330
Valves	720
Flanges	N/A
Fittings	390
Mechanical Couplings	N/A
Leak Clamps	N/A
Instruments	N/A
Odorizers	N/A
Overpressure Protection Devices	N/A
Upstream Regulator(s) - Outlet	N/A
Pressure Rating	N/A
Downstream Regulators-Inlet	N/A
Pressure Rating	N/A
Other (list)	N/A

Part 192.619(a)(2) Pressure Test

Plastic Pipe: Test Pressure divided by 1.5	N/A
Steel Pipe operated at or over 100 psi: Test Pressure divided by Class	404

NOTE: Some features on this line are not covered by a pressure test

Part 192.619(a)(3) Historic Operations

Highest operating pressure between 7/1/65 and 7/1/70 unless the pressure test in (a)(2) was after 7/1/65 or an uprating in accordance with Subpart K has been conducted.

N/A

Referenced from: "AGA White Paper on Verification of MAOPs for Existing Steel Transmission Pipelines"

- B. Part 192.621: High Pressure Distribution Systems Only.

Part 192.621(a)(2) 60 psig unless all services have overpressure protection	N/A
Part 192.621(a)(3) 25 psig for any cast iron pipe with unreinforced joints	N/A

Exh A-64

Referenced from: "AGA White Paper on Verification of MAOPs for Existing Steel Transmission Pipelines"



B. Part 192.621: High Pressure Distribution Systems Only.

Part 192.621(a)(2) 60 psig unless all services have overpressure protection N/A

Part 192.621(a)(3) 25 psig for any cast iron pipe with unreinforced joints N/A

Part 192.621(a)(4) Pressure limit on joints N/A

C. Part 192.621(a)(3) and Part 192.521(a)(5): Additional Consideration for Transmission or High Pressure Distribution Lines.

Highest operating pressure consideration safe based on operating history 330

D. Part 192.623: Low Pressure Distribution Systems.

Highest delivery pressure which can be safely applied to customer piping and properly adjusted gas appliances. N/A

E. Part 192.619(c): Alternate consideration for transmission lines. Highest operating pressure between 7/1/65 and 7/1/70 (7/1/71 and 7/1/76 for offshore gathering lines.) N/A

F. Determination of MAOP.

Either item E, where applicable, or the lowest pressure on any of the above lines is the MAOP. MAOP: 330

Data Current as of: 10/11/2013

PFL Build Team: PG&E

MAOP Documentation Reviewed by: [Signature]
Technical Advisory Manager

MAOP Documentation Prepared by: [Signature]
Field Verification Engineer

MAOP Documentation Approved by: [Signature]
MAOP Engineering Director

ATTACHMENT 3

 <p>U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration</p>	<p>ANNUAL REPORT FOR CALENDAR YEAR 2012 NATURAL OR OTHER GAS TRANSMISSION and GATHERING SYSTEMS</p>	<p>Report Submission Type</p>	<p>INITIAL</p>
		<p>Date Submitted</p>	<p>6/15/2013</p>
<p>A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0522. Public reporting for this collection of information is estimated to be approximately 22 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.</p> <p style="text-align: center;">Important: Please read the separate instructions for completing this form before you begin.</p>			
<p>PART A - OPERATOR INFORMATION</p>		<p>DOT USE ONLY</p>	<p>20131026 - 27097</p>
<p>1. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER (OPID)</p> <p style="text-align: center;">15007</p>	<p>2. NAME OF OPERATOR: PACIFIC GAS & ELECTRIC CO</p> <p>IF SUBSIDIARY, NAME OF PARENT: PG&E Corporation</p>		
<p>3. RESERVED</p>	<p>4. HEADQUARTERS ADDRESS:</p> <p>77 BEALE STREET Street Address</p> <p>SAN FRANCISCO City</p> <p>State: CA Zip Code: 94107</p>		
<p>5. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP: <i>(Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)</i></p> <p>Natural Gas</p>			
<p>6. CHARACTERIZE THE PIPELINES AND/OR PIPELINE FACILITIES COVERED BY THIS OPID AND COMMODITY GROUP WITH RESPECT TO COMPLIANCE WITH PHMSA'S INTEGRITY MANAGEMENT PROGRAM REGULATIONS (49 CFR 192 Subpart O).</p>			
<p>7. FOR THE DESIGNATED "COMMODITY GROUP", THE PIPELINES AND/OR PIPELINE FACILITIES INCLUDED WITHIN THIS OPID ARE: <i>(Select one or both)</i></p> <p>INTERstate pipeline – List all of the States and OSC portions in which INTERstate pipelines and/or pipeline facilities included under this OPID exist. etc.</p> <p>INTRAstate pipeline – List all of the States in which INTRAstate pipelines and or pipeline facilities included under this OPID exist. CALIFORNIA etc.</p>			
<p>8. RESERVED</p>			

For the designated Commodity Group, complete PARTs B, C, D, and E one time for all pipelines and/or pipeline facilities – both INTERstate and INTRAsate - included within this OPID.

PART B – TRANSMISSION PIPELINE HCA MILES	
	Number of HCA Miles
Onshore	1040.3
Offshore	0
Total Miles	1040.3

PART C - VOLUME TRANSPORTED IN TRANSMISSION PIPELINES (ONLY) IN MILLION SCF PER YEAR (excludes Transmission lines of Gas Distribution systems)	<input type="checkbox"/> Check this box and do not complete PART C if this report only includes gathering pipelines or transmission lines of gas distribution systems.	
	Onshore	Offshore
Natural Gas	867452	
Propane Gas		
Synthetic Gas		
Hydrogen Gas		
Landfill Gas		
Other Gas - Name:		

PART D - MILES OF STEEL PIPE BY CORROSION PROTECTION										
	Steel Cathodically protected		Steel Cathodically unprotected		Cast Iron	Wrought Iron	Plastic	Composite ¹	Other	Total Miles
	Bare	Coated	Bare	Coated						
Transmission										
Onshore	8.7	5741.1	0	0	0	.8	0	0	0	5750.6
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	8.7	5741.1	0	0	0	.8	0	0	0	5750.6
Gathering										
Onshore Type A	0	3.9	0	0	0	0	0	0	0	3.9
Onshore Type B	0	0	0	0	0	0	0	0	0	0
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Gathering	0	3.9	0	0	0	0	0	0	0	3.9
Total Miles	8.7	5745	0	0	0	.8	0	0	0	5754.5

¹Use of Composite pipe requires a PHMSA Special Permit or waiver from a State

PART E – Reserved. Data for Part E has been merged into Part D for 2010 and 2011 Annual Reports.

For the designated Commodity Group, complete PARTs F and G one time for all INTERstate pipelines and/or pipeline facilities included within this OPID and multiple times as needed for the designated Commodity Group for each State in which INTRAsate pipelines and/or pipeline facilities included within this OPID exist. Each time these sections are completed, designate the State to which the data applies for INTRAsate pipelines and/or pipeline facilities, or that it applies to all INTERState pipelines included within this Commodity Group and OPID.

PARTs F and G
The data reported in these PARTs for the designated Commodity Group, complete PARTs F and G one time for all INTERstate pipelines and/or pipeline facilities included within this OPID and multiple times as needed for the designated Commodity Group for each State in which INTRAsate pipelines and/or pipeline facilities included within this OPID exist. Part F "WITHIN AN HCA SEGMENT" data and Part G may be completed only if HCA Miles in Part L is greater than zero applies to: <i>(select only one)</i>

PART F - INTEGRITY INSPECTIONS CONDUCTED AND ACTIONS TAKEN BASED ON INSPECTION	
INTRASTATE pipelines/pipeline facilities CALIFORNIA	
1. MILEAGE INSPECTED IN CALENDAR YEAR USING THE FOLLOWING IN-LINE INSPECTION (ILI) TOOLS	
a. Corrosion or metal loss tools	175.6
b. Dent or deformation tools	175.6
c. Crack or long seam defect detection tools	20.9
d. Any other internal inspection tools, specify other tools:	
1. Internal Inspection Tools - Other	
e. Total tool mileage inspected in calendar year using in-line inspection tools. (Lines a + b + c + d)	372.1
2. ACTIONS TAKEN IN CALENDAR YEAR BASED ON IN-LINE INSPECTIONS	
a. Based on ILI data, total number of anomalies excavated in calendar year because they met the operator's criteria for excavation.	81
b. Total number of anomalies repaired in calendar year that were identified by ILI based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.	49
c. Total number of conditions repaired WITHIN AN HCA SEGMENT meeting the definition of:	7
1. "Immediate repair conditions" [192.933(d)(1)]	7
2. "One-year conditions" [192.933(d)(2)]	
3. "Monitored conditions" [192.933(d)(3)]	
4. Other "Scheduled conditions" [192.933(c)]	
3. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON PRESSURE TESTING	
a. Total mileage inspected by pressure testing in calendar year.	1.49
b. Total number of pressure test failures (ruptures and leaks) repaired in calendar year, both within an HCA Segment and outside of an HCA Segment.	
c. Total number of pressure test ruptures (complete failure of pipe wall) repaired in calendar year WITHIN AN HCA SEGMENT.	
d. Total number of pressure test leaks (less than complete wall failure but including escape of test medium) repaired in calendar year WITHIN AN HCA SEGMENT.	
4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)	
a. Total mileage inspected by each DA method in calendar year.	250.5
1. ECDA	146
2. ICDA	104.5
3. SCCDA	
b. Total number of anomalies identified by each DA method and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.	6
1. ECDA	6

2. ICDA	
3. SCCDA	
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	3
1. "Immediate repair conditions" [192.933(d)(1)]	3
2. "One-year conditions" [192.933(d)(2)]	
3. "Monitored conditions" [192.933(d)(3)]	
4. Other "Scheduled conditions" [192.933(c)]	
5. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON OTHER INSPECTION TECHNIQUES	
a. Total mileage inspected by inspection techniques other than those listed above in calendar year.	
1. Other Inspection Techniques	
b. Total number of anomalies identified by other inspection techniques and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.	
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	
1. "Immediate repair conditions" [192.933(d)(1)]	
2. "One-year conditions" [192.933(d)(2)]	
3. "Monitored conditions" [192.933(d)(3)]	
4. Other "Scheduled conditions" [192.933(c)]	
6. TOTAL MILEAGE INSPECTED (ALL METHODS) AND ACTIONS TAKEN IN CALENDAR YEAR	
a. Total mileage inspected in calendar year. (Lines 1.e + 3.a + 4.a.1 + 4.a.2 + 4.a.3 + 5.a)	624.09
b. Total number of anomalies repaired in calendar year both within an HCA Segment and outside of an HCA Segment. (Lines 2.b + 3.b + 4.b.1 + 4.b.2 + 4.b.3 + 5.b)	55
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT. (Lines 2.c.1 + 2.c.2 + 2.c.3 + 2.c.4 + 3.c + 3.d + 4.c.1 + 4.c.2 + 4.c.3 + 4.c.4 + 5.c.1 + 5.c.2 + 5.c.3 + 5.c.4)	10
d. Eliminated by Replacement	
e. Eliminated by Abandonment	
PART G– MILES OF BASELINE ASSESSMENTS AND REASSESSMENTS COMPLETED IN CALENDAR YEAR (HCA Segment miles ONLY)	
a. Baseline assessment miles completed during the calendar year.	123.62
b. Reassessment miles completed during the calendar year.	66.05
c. Total assessment and reassessment miles completed during the calendar year.	189.67

For the designated Commodity Group, complete PARTs H, I, J, K, L, M, P Q and R covering INTERstate pipelines and/or pipeline facilities for each State in which INTERstate systems exist within this OPID and again covering INTRASTate pipelines and/or pipeline facilities for each State in which INTRASTate systems exist within this OPID.

PARTs H, I, J, K, L, M, P, Q, and R									
The data reported in these PARTs applies to: (select only one)									
INTRASTATE pipelines/pipeline facilities CALIFORNIA									
PART H - MILES OF TRANSMISSION PIPE BY NOMINAL PIPE SIZE (NPS)									
Onshore	NPS 4 or less	6	8	10	12	14	16	18	20
	371.4	437.7	589.9	403.7	764.4	.1	391.7	60.8	222.4
	22	24	26	28	30	32	34	36	38
	61.5	312.9	140.6	0	108.4	19	1045.6	519.2	0
	40	42	44	46	48	52	56	58 and over	
	0	301.3	0	0	0	0	0	0	
Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;									
5750.6	Total Miles of Onshore Pipe – Transmission								
Offshore	NPS 4 or less	6	8	10	12	14	16	18	20
	22	24	26	28	30	32	34	36	38
	40	42	44	46	48	52	56	58 and over	
Additional Sizes and Miles (Size – Miles;): -; -; -; -; -; -; -; -; -;									
	Total Miles of Offshore Pipe – Transmission								
PART I - MILES OF GATHERING PIPE BY NOMINAL PIPE SIZE (NPS)									
Onshore Type A	NPS 4 or less	6	8	10	12	14	16	18	20
	3.9	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0

	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;								
3.9	Total Miles of Onshore Type A Pipe – Gathering								
Onshore Type B	NPS 4 or less	6	8	10	12	14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0
	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;								
0	Total Miles of Onshore Type B Pipe – Gathering								
Offshore	NPS 4 or less	6	8	10	12	14	16	18	20
	22	24	26	28	30	32	34	36	38
	40	42	44	46	48	52	56	58 and over	
	Additional Sizes and Miles (Size – Miles;): - ; - ; - ; - ; - ; - ; - ; - ; - ;								
	Total Miles of Offshore Pipe – Gathering								

PART J – MILES OF PIPE BY DECADE INSTALLED						
Decade Pipe Installed	Unknown	Pre-40	1940 - 1949	1950 - 1959	1960 - 1969	1970 - 1979
Transmission						
Onshore	.8	245.6	408.7	1989	1169.6	339.4
Offshore		0				
Subtotal Transmission	.8	245.6	408.7	1989	1169.6	339.4
Gathering						
Onshore Type A	0	0	0	0	0	1.1
Onshore Type B	0	0	0	0	0	0
Offshore		0				
Subtotal Gathering	0	0	0	0	0	1.1
Total Miles	.8	245.6	408.7	1989	1169.6	340.5
Decade Pipe Installed	1980 - 1989	1990 - 1999	2000 - 2009	2010 - 2019	Total Miles	
Transmission						
Onshore	537.5	783.9	210	66.1	5750.6	
Offshore					0	
Subtotal Transmission	537.5	783.9	210	66.1	5750.6	

Gathering					
Onshore Type A	.8	2	0	0	3.9
Onshore Type B	0	0	0	0	0
Offshore					0
Subtotal Gathering	.8	2	0	0	3.9
Total Miles	538.3	785.9	210	66.1	5754.5

PART K- MILES OF TRANSMISSION PIPE BY SPECIFIED MINIMUM YIELD STRENGTH					
ONSHORE	CLASS LOCATION				Total Miles
	Class 1	Class 2	Class 3	Class 4	
Steel pipe Less than 20% SMYS	320.2	68	338.5	1	727.7
Steel pipe Greater than or equal to 20% SMYS but less than 30% SMYS	434.9	128.9	579.5	0	1143.3
Steel pipe Greater than or equal to 30% SMYS but less than or equal to 40% SMYS	346.1	80.6	311.5	.4	738.6
Steel pipe Greater than 40% SMYS but less than or equal to 50% SMYS	610.7	86.3	264.9	0	961.9
Steel pipe Greater than 50% SMYS but less than or equal to 60% SMYS	553.5	50.6	63.9	0	668
Steel pipe Greater than 60% SMYS but less than or equal to 72% SMYS	1480.4	29.7	0	0	1510.1
Steel pipe Greater than 72% SMYS but less than or equal to 80% SMYS	0	0	0	0	0
Steel pipe Greater than 80% SMYS	0	0	0	0	0
Steel pipe Unknown percent of SMYS	0	0	0	0	0
All Non-Steel pipe	0	0	.8	0	.8
Onshore Totals	3745.8	444.1	1559.1	1.4	5750.4
OFFSHORE	Class 1				
Less than or equal to 50% SMYS					
Greater than 50% SMYS but less than or equal to 72% SMYS					
Steel pipe Greater than 72% SMYS					
Steel Pipe Unknown percent of SMYS					
All non-steel pipe					
Offshore Total					
Total Miles	3745.8				5750.4

PART L - MILES OF PIPE BY CLASS LOCATION						
	Class Location				Total Class Location Miles	HCA Miles in the IMP Program
	Class 1	Class 2	Class 3	Class 4		
Transmission						
Onshore	3745.8	444.1	1559.1	1.4	5750.4	1040.3
Offshore	0	0	0	0	0	
Subtotal Transmission	3745.8	444.1	1559.1	1.4	5750.4	

Gathering						
Onshore Type A	0	3.9	0	0	3.9	
Onshore Type B	0	0	0	0	0	
Offshore	0	0	0	0	0	
Subtotal Gathering	0	3.9	0	0	3.9	
Total Miles	3745.8	448	1559.1	1.4	5754.3	1040.3

PART M – FAILURES, LEAKS, AND REPAIRS

PART M1 – ALL LEAKS ELIMINATED/REPAIRED IN CALENDAR YEAR; INCIDENTS & FAILURES IN HCA SEGMENTS IN CALENDAR YEAR

Cause	Transmission Leaks, and Failures					Gathering Leaks		
	Leaks				Failures in HCA Segments	Onshore Leaks		Offshore Leaks
	Onshore Leaks		Offshore Leaks			Type A	Type B	
	HCA	Non-HCA	HCA	Non-HCA				
External Corrosion	1	5	0	0	0	0	0	
Internal Corrosion	0	0	0	0	0	0	0	
Stress Corrosion Cracking	0	0	0	0	0	0	0	
Manufacturing	0	5	0	0	0	0	0	
Construction	5	7	0	0	0	0	0	
Equipment	9	34	0	0	2	0	0	
Incorrect Operations	0	0	0	0	0	0	0	
Third Party Damage/Mechanical Damage								
Excavation Damage	2	2	0	0	0	0	0	
Previous Damage (due to Excavation Activity)	0	0	0	0	0	0	0	
Vandalism (includes all Intentional Damage)	0	0	0	0	0	0	0	
Weather Related/Other Outside Force								
Natural Force Damage (all)	0	0	0	0	0	0	0	
Other Outside Force Damage (excluding Vandalism and all Intentional Damage)	0	1	0	0	0	0	0	
Other	1	9	0	0	0	0	0	
Total	18	63	0	0	2	0	0	

PART M2 – KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR

Transmission	2	Gathering	0
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PART M3 – LEAKS ON FEDERAL LAND OR OCS REPAIRED OR SCHEDULED FOR REPAIR

Transmission		Gathering	
Onshore	4	Onshore Type A	
		Onshore Type B	
OCS	0	OCS	
Subtotal Transmission	4	Subtotal Gathering	
Total	4		

PART P - MILES OF PIPE BY MATERIAL AND CORROSION PROTECTION STATUS										
	Steel Cathodically protected		Steel Cathodically unprotected		Cast Iron	Wrought Iron	Plastic	Composite ¹	Other ²	Total Miles
	Bare	Coated	Bare	Coated						
Transmission										
Onshore	8.7	5741.1	0	0	0	.8	0	0	0	5750.6
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	8.7	5741.1	0	0	0	.8	0	0	0	5750.6
Gathering										
Onshore Type A	0	3.9	0	0	0	0	0	0	0	3.9
Onshore Type B	0	0	0	0	0	0	0	0	0	0
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Gathering	0	3.9	0	0	0	0	0	0	0	3.9
Total Miles	8.7	5745	0	0	0	.8	0	0	0	5754.5

¹Use of Composite pipe requires PHMSA Special Permit or waiver from a State

²specify Other material(s):

Part Q - Gas Transmission Miles by §192.619 MAOP Determination Method

	(a)(1) Total	(a)(1) Incomplete Records	(a)(2) Total	(a)(2) Incomplete Records	(a)(3) Total	(a)(3) Incomplete Records	(a)(4) Total	(a)(4) Incomplete Records	(c) Total	(c) Incomplete Records	(d) Total	(d) Incomplete Records	Other ¹ Total	Other Incomplete Records
Class 1 (in HCA)	16	5.7	42.6	0	0	0	0	0	0	0	0	0	0	0
Class 1 (not in HCA)	1766.6		1917.4		0		0		0		0		0	
Class 2 (in HCA)	11.1	6.6	23.8	0	0	0	0	0	0	0	0	0	0	0
Class 2 (not in HCA)	203.2		205.2		0		0		0		0		0	
Class 3 (in HCA)	399.7	242	546.4	0	0	0	0	0	0	0	0	0	0	0
Class 3 (not in HCA)	273.6	161.8	343.5	0	0	0	0	0	0	0	0	0	0	0
Class 4 (in HCA)	.3	.3	.5	0	0	0	0	0	0	0	0	0	0	0
Class 4 (not in HCA)	.7	.7	0	0	0	0	0	0	0	0	0	0	0	
Total	2671.2	417.1	3079.4	0	0	0	0	0	0	0	0	0	0	0
Grand Total									5750.6					
Sum of Total row for all "Incomplete Records" columns									417.1					

¹Specify Other method(s):

Class 1 (in HCA)		Class 1 (not in HCA)	
Class 2 (in HCA)		Class 2 (not in HCA)	
Class 3 (in HCA)		Class 3 (not in HCA)	
Class 4 (in HCA)		Class 4 (not in HCA)	

Part R – Gas Transmission Miles by Pressure Test (PT) Range and Internal Inspection						
	PT ≥ 1.25 MAOP		1.25 MAOP > PT ≥ 1.1 MAOP		PT < 1.1 or No PT	
Location	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE
Class 1 in HCA	21	20.2	0	1.5	5.9	10.1
Class 2 in HCA	7.8	14.9	0	0	1.6	10.7
Class 3 in HCA	140.6	390	0	0	99.7	315.7
Class 4 in HCA	0	.5	0	0	0	.28
in HCA subTotal	169.4	425.6	0	1.5	107.2	336.78
Class 1 not in HCA	465.8	1304.5	48.6	90.6	279.8	1494.6
Class 2 not in HCA	31.6	170.1	.1	0	15.8	190.7
Class 3 not in HCA	36.7	295.4	0	.5	21.1	263.4
Class 4 not in HCA	0	0	0	0	0	.7
not in HCA subTotal	534.1	1770	48.7	91.1	316.7	1949.4
Total	703.5	2195.6	48.7	92.6	423.9	2286.18
PT ≥ 1.25 MAOP Total			2899.1	Total Miles Internal Inspection ABLE		1176.1
1.25 MAOP > PT ≥ 1.1 MAOP Total			141.3	Total Miles Internal Inspection NOT ABLE		4574.38
PT < 1.1 or No PT Total			2710.08	Grand Total		5750.48
Grand Total			5750.48			

For the designated Commodity Group, complete PART N one time for all of the pipelines and/or pipeline facilities included within this OPID, and then also PART O if any gas transmission pipeline facilities included within this OPID have Part L HCA mile value greater than zero.

PART N - PREPARER SIGNATURE

Charles Chang

Preparer's Name(type or print)

(925) 974-4248

Telephone Number

Associate Compliance Engineer

Preparer's Title

CYC8@PGE.COM

Preparer's E-mail Address

PART O - CERTIFYING SIGNATURE (applicable only to PARTs B, F, G, and M1)

Nickolas Stavropoulos

Senior Executive Officer's signature certifying the information in PARTs B, F, G, and M as required by 49 U.S.C. 60109(f)

(415) 973-2020

Telephone Number

Nickolas Stavropoulos

Senior Executive Officer's name certifying the information in PARTs B, F, G, and M as required by 49 U.S.C. 60109(f)

Executive Vice President of Gas Operations

Senior Executive Officer's title certifying the information in PARTs B, F, G, and M as required by 49 U.S.C. 60109(f)

N1SL@PGE.COM

Senior Executive Officer's E-mail Address

ATTACHMENT 4

 <p>U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration</p>	<p>ANNUAL REPORT FOR CALENDAR YEAR 2013 NATURAL OR OTHER GAS TRANSMISSION and GATHERING SYSTEMS</p>	<p>Initial Date Submitted</p>	<p>03/14/2014</p>
		<p>Report Submission Type</p>	<p>INITIAL</p>
		<p>Date Submitted</p>	

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0522. Public reporting for this collection of information is estimated to be approximately 22 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: Please read the separate instructions for completing this form before you begin.

PART A - OPERATOR INFORMATION	DOT USE ONLY	20142265 - 28608
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<p>1. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER (OPID)</p> <p style="text-align: center;">15007</p>	<p>2. NAME OF OPERATOR: PACIFIC GAS & ELECTRIC CO</p> <p>IF SUBSIDIARY, NAME OF PARENT: PG&E Corporation</p>
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<p>3. RESERVED</p>	<p>4. HEADQUARTERS ADDRESS:</p> <p>77 BEALE STREET Street Address</p> <p>SAN FRANCISCO City</p> <p>State: CA Zip Code: 94107</p>
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5. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP: *(Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)*

Natural Gas

6. CHARACTERIZE THE PIPELINES AND/OR PIPELINE FACILITIES COVERED BY THIS OPID AND COMMODITY GROUP WITH RESPECT TO COMPLIANCE WITH PHMSA'S INTEGRITY MANAGEMENT PROGRAM REGULATIONS (49 CFR 192 Subpart O).

7. FOR THE DESIGNATED "COMMODITY GROUP", THE PIPELINES AND/OR PIPELINE FACILITIES INCLUDED WITHIN THIS OPID ARE: *(Select one or both)*

INTERstate pipeline – List all of the States and OSC portions in which INTERstate pipelines and/or pipeline facilities included under this OPID exist. etc.

INTRAstate pipeline – List all of the States in which INTRAstate pipelines and or pipeline facilities included under this OPID exist. **CALIFORNIA** etc.

8. RESERVED

For the designated Commodity Group, complete PARTs B, C, D, and E one time for all pipelines and/or pipeline facilities – both INTERstate and INTRAsate - included within this OPID.

PART B – TRANSMISSION PIPELINE HCA MILES	
	Number of HCA Miles
Onshore	1076
Offshore	0
Total Miles	1076

PART C - VOLUME TRANSPORTED IN TRANSMISSION PIPELINES (ONLY) IN MILLION SCF PER YEAR (excludes Transmission lines of Gas Distribution systems)	<input type="checkbox"/> Check this box and do not complete PART C if this report only includes gathering pipelines or transmission lines of gas distribution systems.	
	Onshore	Offshore
Natural Gas	830841	
Propane Gas		
Synthetic Gas		
Hydrogen Gas		
Landfill Gas		
Other Gas - Name:		

PART D - MILES OF STEEL PIPE BY CORROSION PROTECTION										
	Steel Cathodically protected		Steel Cathodically unprotected		Cast Iron	Wrought Iron	Plastic	Composite ¹	Other	Total Miles
	Bare	Coated	Bare	Coated						
Transmission										
Onshore	8.7	5728	0	0	0	0	0	0	0	5736.7
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	8.7	5728	0	0	0	0	0	0	0	5736.7
Gathering										
Onshore Type A	0	0	0	0	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0	0	0	0	0
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Gathering	0	0	0	0	0	0	0	0	0	0
Total Miles	8.7	5728	0	0	0	0	0	0	0	5736.7

¹Use of Composite pipe requires a PHMSA Special Permit or waiver from a State

PART E – Reserved. Data for Part E has been merged into Part D for 2010 and 2011 Annual Reports.

For the designated Commodity Group, complete PARTs F and G one time for all INTERstate pipelines and/or pipeline facilities included within this OPID and multiple times as needed for the designated Commodity Group for each State in which INTRAsate pipelines and/or pipeline facilities included within this OPID exist. Each time these sections are completed, designate the State to which the data applies for INTRAsate pipelines and/or pipeline facilities, or that it applies to all INTERState pipelines included within this Commodity Group and OPID.

PARTs F and G
The data reported in these PARTs for the designated Commodity Group, complete PARTs F and G one time for all INTERstate pipelines and/or pipeline facilities included within this OPID and multiple times as needed for the designated Commodity Group for each State in which INTRAsate pipelines and/or pipeline facilities included within this OPID exist. Part F "WITHIN AN HCA SEGMENT" data and Part G may be completed only if HCA Miles in Part L is greater than zero applies to: <i>(select only one)</i>

PART F - INTEGRITY INSPECTIONS CONDUCTED AND ACTIONS TAKEN BASED ON INSPECTION	
INTRASTATE pipelines/pipeline facilities CALIFORNIA	
1. MILEAGE INSPECTED IN CALENDAR YEAR USING THE FOLLOWING IN-LINE INSPECTION (ILI) TOOLS	
a. Corrosion or metal loss tools	257.34
b. Dent or deformation tools	257.34
c. Crack or long seam defect detection tools	0
d. Any other internal inspection tools, specify other tools:	0
1. Internal Inspection Tools - Other	
e. Total tool mileage inspected in calendar year using in-line inspection tools. (Lines a + b + c + d)	514.68
2. ACTIONS TAKEN IN CALENDAR YEAR BASED ON IN-LINE INSPECTIONS	
a. Based on ILI data, total number of anomalies excavated in calendar year because they met the operator's criteria for excavation.	90
b. Total number of anomalies repaired in calendar year that were identified by ILI based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.	40
c. Total number of conditions repaired WITHIN AN HCA SEGMENT meeting the definition of:	3
1. "Immediate repair conditions" [192.933(d)(1)]	1
2. "One-year conditions" [192.933(d)(2)]	2
3. "Monitored conditions" [192.933(d)(3)]	0
4. Other "Scheduled conditions" [192.933(c)]	0
3. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON PRESSURE TESTING	
a. Total mileage inspected by pressure testing in calendar year.	2.92
b. Total number of pressure test failures (ruptures and leaks) repaired in calendar year, both within an HCA Segment and outside of an HCA Segment.	2
c. Total number of pressure test ruptures (complete failure of pipe wall) repaired in calendar year WITHIN AN HCA SEGMENT.	0
d. Total number of pressure test leaks (less than complete wall failure but including escape of test medium) repaired in calendar year WITHIN AN HCA SEGMENT.	0
4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)	
a. Total mileage inspected by each DA method in calendar year.	194.16
1. ECDA	111.83
2. ICDA	82.33
3. SCCDA	0
b. Total number of anomalies identified by each DA method and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.	4
1. ECDA	4

2. ICDA	0
3. SCCDA	0
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	1
1. "Immediate repair conditions" [192.933(d)(1)]	1
2. "One-year conditions" [192.933(d)(2)]	0
3. "Monitored conditions" [192.933(d)(3)]	0
4. Other "Scheduled conditions" [192.933(c)]	0
5. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON OTHER INSPECTION TECHNIQUES	
a. Total mileage inspected by inspection techniques other than those listed above in calendar year.	0
1. Other Inspection Techniques	0
b. Total number of anomalies identified by other inspection techniques and repaired in calendar year based on the operator's criteria, both within an HCA Segment and outside of an HCA Segment.	0
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	0
1. "Immediate repair conditions" [192.933(d)(1)]	0
2. "One-year conditions" [192.933(d)(2)]	0
3. "Monitored conditions" [192.933(d)(3)]	0
4. Other "Scheduled conditions" [192.933(c)]	0
6. TOTAL MILEAGE INSPECTED (ALL METHODS) AND ACTIONS TAKEN IN CALENDAR YEAR	
a. Total mileage inspected in calendar year. (Lines 1.e + 3.a + 4.a.1 + 4.a.2 + 4.a.3 + 5.a)	711.76
b. Total number of anomalies repaired in calendar year both within an HCA Segment and outside of an HCA Segment. (Lines 2.b + 3.b + 4.b.1 + 4.b.2 + 4.b.3 + 5.b)	46
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT. (Lines 2.c.1 + 2.c.2 + 2.c.3 + 2.c.4 + 3.c + 3.d + 4.c.1 + 4.c.2 + 4.c.3 + 4.c.4 + 5.c.1 + 5.c.2 + 5.c.3 + 5.c.4)	4
d. Eliminated by Replacement	0
e. Eliminated by Abandonment	0
PART G- MILES OF BASELINE ASSESSMENTS AND REASSESSMENTS COMPLETED IN CALENDAR YEAR (HCA Segment miles ONLY)	
a. Baseline assessment miles completed during the calendar year.	16.82
b. Reassessment miles completed during the calendar year.	155.29
c. Total assessment and reassessment miles completed during the calendar year.	172.11

For the designated Commodity Group, complete PARTs H, I, J, K, L, M, P Q and R covering INTERstate pipelines and/or pipeline facilities for each State in which INTERstate systems exist within this OPID and again covering INTRASTate pipelines and/or pipeline facilities for each State in which INTRASTate systems exist within this OPID.

PARTs H, I, J, K, L, M, P, Q, and R									
The data reported in these PARTs applies to: <i>(select only one)</i>									
INTRASTATE pipelines/pipeline facilities CALIFORNIA									
PART H - MILES OF TRANSMISSION PIPE BY NOMINAL PIPE SIZE (NPS)									
Onshore	NPS 4 or less	6	8	10	12	14	16	18	20
	359.1	439.3	573.6	403.4	759.8	.1	400.7	60.7	222
	22	24	26	28	30	32	34	36	38
	50.5	333.8	140.6	0	109.7	19	1045.7	517.4	0
	40	42	44	46	48	52	56	58 and over	
	0	301.3	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;								
5736.7	Total Miles of Onshore Pipe – Transmission								
Offshore	NPS 4 or less	6	8	10	12	14	16	18	20
	22	24	26	28	30	32	34	36	38
	40	42	44	46	48	52	56	58 and over	
	Additional Sizes and Miles (Size – Miles;): -; -; -; -; -; -; -; -; -;								
	Total Miles of Offshore Pipe – Transmission								
PART I - MILES OF GATHERING PIPE BY NOMINAL PIPE SIZE (NPS)									
Onshore Type A	NPS 4 or less	6	8	10	12	14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0

	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;								
0	Total Miles of Onshore Type A Pipe – Gathering								
Onshore Type B	NPS 4 or less	6	8	10	12	14	16	18	20
	0	0	0	0	0	0	0	0	0
	22	24	26	28	30	32	34	36	38
	0	0	0	0	0	0	0	0	0
	40	42	44	46	48	52	56	58 and over	
	0	0	0	0	0	0	0	0	
	Additional Sizes and Miles (Size – Miles;): 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0; 0 - 0;								
0	Total Miles of Onshore Type B Pipe – Gathering								
Offshore	NPS 4 or less	6	8	10	12	14	16	18	20
	22	24	26	28	30	32	34	36	38
	40	42	44	46	48	52	56	58 and over	
	Additional Sizes and Miles (Size – Miles;): - ; - ; - ; - ; - ; - ; - ; - ; - ;								
	Total Miles of Offshore Pipe – Gathering								

PART J – MILES OF PIPE BY DECADE INSTALLED						
Decade Pipe Installed	Unknown	Pre-40	1940 - 1949	1950 - 1959	1960 - 1969	1970 - 1979
Transmission						
Onshore	.1	222.1	395.6	1978.6	1148.4	338.1
Offshore		0				
Subtotal Transmission	.1	222.1	395.6	1978.6	1148.4	338.1
Gathering						
Onshore Type A	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0
Offshore		0				
Subtotal Gathering	0	0	0	0	0	0
Total Miles	.1	222.1	395.6	1978.6	1148.4	338.1
Decade Pipe Installed	1980 - 1989	1990 - 1999	2000 - 2009	2010 - 2019	Total Miles	
Transmission						
Onshore	536.6	783	211.5	122.8	5736.8	
Offshore					0	
Subtotal Transmission	536.6	783	211.5	122.8	5736.8	

Gathering					
Onshore Type A	0	0	0	0	0
Onshore Type B	0	0	0	0	0
Offshore					0
Subtotal Gathering	0	0	0	0	0
Total Miles	536.6	783	211.5	122.8	5736.8

PART K- MILES OF TRANSMISSION PIPE BY SPECIFIED MINIMUM YIELD STRENGTH					
ONSHORE	CLASS LOCATION				Total Miles
	Class 1	Class 2	Class 3	Class 4	
Steel pipe Less than 20% SMYS	319.6	74.8	366	1.1	761.5
Steel pipe Greater than or equal to 20% SMYS but less than 30% SMYS	419.7	128.8	555.9	.1	1104.5
Steel pipe Greater than or equal to 30% SMYS but less than or equal to 40% SMYS	340.7	83.9	322.3	.4	747.3
Steel pipe Greater than 40% SMYS but less than or equal to 50% SMYS	598.7	83.2	262.6	0	944.5
Steel pipe Greater than 50% SMYS but less than or equal to 60% SMYS	549	54.7	64.5	0	668.2
Steel pipe Greater than 60% SMYS but less than or equal to 72% SMYS	1480.7	30	0	0	1510.7
Steel pipe Greater than 72% SMYS but less than or equal to 80% SMYS	0	0	0	0	0
Steel pipe Greater than 80% SMYS	0	0	0	0	0
Steel pipe Unknown percent of SMYS	0	0	0	0	0
All Non-Steel pipe	0	0	0	0	0
Onshore Totals	3708.4	455.4	1571.3	1.6	5736.7
OFFSHORE	Class 1				
Less than or equal to 50% SMYS					
Greater than 50% SMYS but less than or equal to 72% SMYS					
Steel pipe Greater than 72% SMYS					
Steel Pipe Unknown percent of SMYS					
All non-steel pipe					
Offshore Total					
Total Miles	3708.4				5736.7

PART L - MILES OF PIPE BY CLASS LOCATION						
	Class Location				Total Class Location Miles	HCA Miles in the IMP Program
	Class 1	Class 2	Class 3	Class 4		
Transmission						
Onshore	3708.4	455.4	1571.3	1.6	5736.7	1076
Offshore		0	0	0	0	
Subtotal Transmission	3708.4	455.4	1571.3	1.6	5736.7	

Gathering						
Onshore Type A	0	0	0	0	0	
Onshore Type B	0	0	0	0	0	
Offshore	0	0	0	0	0	
Subtotal Gathering	0	0	0	0	0	
Total Miles	3708.4	455.4	1571.3	1.6	5736.7	1076

PART M – FAILURES, LEAKS, AND REPAIRS

PART M1 – ALL LEAKS ELIMINATED/REPAIRED IN CALENDAR YEAR; INCIDENTS & FAILURES IN HCA SEGMENTS IN CALENDAR YEAR

Cause	Transmission Leaks, and Failures					Gathering Leaks		
	Leaks				Failures in HCA Segments	Onshore Leaks		Offshore Leaks
	Onshore Leaks		Offshore Leaks			Type A	Type B	
	HCA	Non-HCA	HCA	Non-HCA				
External Corrosion	2	3	0	0	0	0	0	0
Internal Corrosion	0	1	0	0	0	0	0	0
Stress Corrosion Cracking	0	0	0	0	0	0	0	0
Manufacturing	0	1	0	0	0	0	0	0
Construction	1	1	0	0	0	0	0	0
Equipment	18	47	0	0	4	0	0	0
Incorrect Operations	0	0	0	0	0	0	0	0
Third Party Damage/Mechanical Damage								
Excavation Damage	0	0	0	0	0	0	0	0
Previous Damage (due to Excavation Activity)	0	1	0	0	0	0	0	0
Vandalism (includes all Intentional Damage)	0	0	0	0	0	0	0	0
Weather Related/Other Outside Force								
Natural Force Damage (all)	1	2	0	0	0	0	0	0
Other Outside Force Damage (excluding Vandalism and all Intentional Damage)	0	1	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	22	57	0	0	4	0	0	0

PART M2 – KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR

Transmission	Gathering
0	0
PART M3 – LEAKS ON FEDERAL LAND OR OCS REPAIRED OR SCHEDULED FOR REPAIR	
Transmission	Gathering
Onshore	Onshore Type A
	Onshore Type B
OCS	OCS
Subtotal Transmission	Subtotal Gathering
0	0
Total	0

PART P - MILES OF PIPE BY MATERIAL AND CORROSION PROTECTION STATUS										
	Steel Cathodically protected		Steel Cathodically unprotected		Cast Iron	Wrought Iron	Plastic	Composite ¹	Other ²	Total Miles
	Bare	Coated	Bare	Coated						
Transmission										
Onshore	8.7	5728	0	0	0	0	0	0	0	5736.7
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	8.7	5728	0	0	0	0	0	0	0	5736.7
Gathering										
Onshore Type A	0	0	0	0	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0	0	0	0	0
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Gathering	0	0	0	0	0	0	0	0	0	0
Total Miles	8.7	5728	0	0	0	0	0	0	0	5736.7

¹Use of Composite pipe requires PHMSA Special Permit or waiver from a State

²specify Other material(s):

Part Q - Gas Transmission Miles by §192.619 MAOP Determination Method

	(a)(1) Total	(a)(1) Incomplete Records	(a)(2) Total	(a)(2) Incomplete Records	(a)(3) Total	(a)(3) Incomplete Records	(a)(4) Total	(a)(4) Incomplete Records	(c) Total	(c) Incomplete Records	(d) Total	(d) Incomplete Records	Other ¹ Total	Other Incomplete Records	
Class 1 (in HCA)	14.4	0	48.4	0	0	0	0	0	0	0	0	0	0	0	
Class 1 (not in HCA)	1621.8		2023.8		0		0		0		0		0		
Class 2 (in HCA)	9.6	0	29.5	0	0	0	0	0	0	0	0	0	0	0	
Class 2 (not in HCA)	168.3		248		0		0		0		0		0		
Class 3 (in HCA)	239.8	0	733.5	0	0	0	0	0	0	0	0	0	0	0	
Class 3 (not in HCA)	223.5	0	374.6	0	0	0	0	0	0	0	0	0	0	0	
Class 4 (in HCA)	0	0	.8	0	0	0	0	0	0	0	0	0	0	0	
Class 4 (not in HCA)	0	0	.7	0	0	0	0	0	0	0	0	0	0	0	
Total	2277.4	0	3459.3	0	0	0	0	0	0	0	0	0	0	0	
Grand Total									5736.7						
Sum of Total row for all "Incomplete Records" columns									0						

¹Specify Other method(s):

Class 1 (in HCA)		Class 1 (not in HCA)	
Class 2 (in HCA)		Class 2 (not in HCA)	
Class 3 (in HCA)		Class 3 (not in HCA)	
Class 4 (in HCA)		Class 4 (not in HCA)	

Part R – Gas Transmission Miles by Pressure Test (PT) Range and Internal Inspection						
	PT ≥ 1.25 MAOP		1.25 MAOP > PT ≥ 1.1 MAOP		PT < 1.1 or No PT	
Location	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE	Miles Internal Inspection ABLE	Miles Internal Inspection NOT ABLE
Class 1 in HCA	27.8	19.5	0	1.1	5.1	9.3
Class 2 in HCA	9.3	20.3	0	0	3.3	6.1
Class 3 in HCA	206.3	527.1	0	0	48.5	191.3
Class 4 in HCA	.5	.3	0	0	0	0
in HCA subTotal	243.9	567.2	0	1.1	56.9	206.7
Class 1 not in HCA	488.2	1389	48.5	98.1	456.3	1165.5
Class 2 not in HCA	26.4	221.6	0	0	22.4	145.8
Class 3 not in HCA	40.1	334.6	0	0	21.1	202.4
Class 4 not in HCA	0	.7	0	0	0	0
not in HCA subTotal	554.7	1945.9	48.5	98.1	499.8	1513.7
Total	798.6	2513.1	48.5	99.2	556.7	1720.4
PT ≥ 1.25 MAOP Total			3311.7	Total Miles Internal Inspection ABLE		1403.8
1.25 MAOP > PT ≥ 1.1 MAOP Total			147.7	Total Miles Internal Inspection NOT ABLE		4332.7
PT < 1.1 or No PT Total			2277.1	Grand Total		5736.5
Grand Total			5736.5			

For the designated Commodity Group, complete PART N one time for all of the pipelines and/or pipeline facilities included within this OPID, and then also PART O if any gas transmission pipeline facilities included within this OPID have Part L HCA mile value greater than zero.

PART N - PREPARER SIGNATURE

Charles Chang

Preparer's Name(type or print)

(925) 328-5727

Telephone Number

Gas Compliance Engineer

Preparer's Title

cyc8@pge.com

Preparer's E-mail Address

PART O - CERTIFYING SIGNATURE (applicable only to PARTs B, F, G, and M1)

Nickolas Stavropoulos

Senior Executive Officer's signature certifying the information in PARTs B, F, G, and M as required by 49 U.S.C. 60109(f)

(415) 973-2020

Telephone Number

Nickolas Stavropoulos

Senior Executive Officer's name certifying the information in PARTs B, F, G, and M as required by 49 U.S.C. 60109(f)

Executive Vice President of Gas Operations

Senior Executive Officer's title certifying the information in PARTs B, F, G, and M as required by 49 U.S.C. 60109(f)

N1SL@PGE.COM

Senior Executive Officer's E-mail Address