

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



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Order Instituting Rulemaking on the
Commission's Own Motion to Adopt New
Safety and Reliability Regulations for Natural
Gas Transmission and Distribution Pipelines
and Related Ratemaking Mechanisms.

Rulemaking 11-02-019
(Filed February 24, 2011)

**COMMENTS OF THE UTILITY REFORM NETWORK
ON PROPOSALS FROM REPRESENTATIVE SPEIER**



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May 27, 2011

**COMMENTS OF THE UTILITY REFORM NETWORK ON PROPOSALS
FROM REPRESENTATIVE SPEIER**

The Assigned Commissioner’s Ruling of April 7, 2011 asks parties to “comment on how best to incorporate [Congresswoman Speier’s] proposals into this proceeding.” TURN has reviewed the proposals in the April 1, 2011 letter from Congresswoman Jackie Speier to Executive Director Paul Clanon. TURN believes that the Commission can adopt or consider most of these proposals as part of this proceeding. We suggest that the proposals fall into three general categories. Some are fairly discrete and should be adopted in conjunction with proposed changes to GO 112-E, either immediately or during the course of evaluating the specific proposals contained in Attachments A and B of the Order Instituting Rulemaking. Other proposals already dovetail the directives provided in the Proposed Decision issued on May 10, 2011 and should be considered as part of the utilities’ Implementation Plans. A few proposals go beyond these two existing areas of inquiry and could be separately addressed in subsequent phases of this rulemaking.

The following table summarizes TURN’s preliminary comments on each proposal. We anticipate providing additional details as these proposals are fashioned into specific directives either in proposed decisions or in utility submissions.

No.	Proposal	TURN Preliminary Comments
1	Disclosure of pipeline location to first responders; contact info exchange; annual contact	Implement expeditiously. Can be addressed as part of detailed changes to GO 112-E.
2	Annual disclosure to customers w/I 2000 feet of transmission line	Implement with potential modification. TURN supports the proposal, but we suggest that exact cutoff (2000 feet) for notification should be evaluated based on an assessment of risk, cost and difficulty. We believe PG&E has agreed to provide such disclosure voluntarily.
3	Database of pipelines removed from service	Implement expeditiously.
4	Install remote or automatic valves every five miles in HCA.	Evaluate further. Consider appropriate valve replacements in Implementation Plans based on consideration of safety benefits versus costs and potential safety and operational drawbacks. Evaluate whether specific requirement should be based on distance or other operational criterion. Evaluate differences between automatic versus remote valves. ¹

¹ The Commission has tended to use the term “automatic or remote” valves without explicit distinction. TURN strongly recommends that the Commission closely evaluate the relative benefits of each type of valve. We caution that one of the apparent factors in the chain of events prior to the San Bruno explosion was the activation of an “automatic” valve: “[t]he electronic signal to the regulating valve for Line 132 was lost. The loss of the electrical signal resulted in the regulating valve moving from partially open to the full

No.	Proposal	TURN Preliminary Comments
5	Audit of integrity management plans every two years.	No Comment.
6	No use of spiking to maintain MAOP.	Implement expeditiously with GO 112-E modifications.
7	In no pressure test documentation exists, then reduce pressure, hydro test, or replace.	Partially covered by new Section 145 of GO-112E. Implementation plans should consider hydro testing or replacement in HCAs. Pressure reduction by itself probably insufficient within HCAs. Sufficiency of pressure reduction outside HCAs should be further evaluated, but is lower priority.
8	Rule for duration of pressure test.	Implement with GO 112-E modifications.
9	Define "most conservative segment" fro pipeline not tested.	No comment. May be moot if actual testing or replacement required.
10	Report any increase over MAOP within 24 hours.	Already addressed by revised Section 122.2 of GO 112-E?
11	Require replacement plan for pipelines installed pre-1961 in HCA.	Not clear if replacement necessary if passes hydro testing. Should evaluate this proposal as part of Implementation Plan.
12	Inspect and test or replace all Consolidated Western pipelines.	No comment.
13	Rule regarding how to consider pipeline age as a risk factor.	No comment.
14	Increase CPUC funding for inspectors.	No comment.

open position as designed. The pressure then increase to 386 psig." NTSB, Preliminary Report, October 13, 2010, p. 2.

May 27, 2011

Respectfully submitted,

By: _____/s/_____
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CERTIFICATE OF SERVICE

I, Larry Wong, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On May 27, 2011, I served the attached:

**COMMENTS OF THE UTILITY REFORM NETWORK
ON PROPOSALS FROM REPRESENTATIVE SPEIER**

on all eligible parties on the attached list **R.11-02-019** by sending said document by electronic mail to each of the parties via electronic mail, as reflected on the attached Service List.

Executed this May 27, 2011, at San Francisco, California.

/S/
Larry Wong

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