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

Order Instituting Rulemaking )  
on the Commission's Own Motion )  
to Adopt New Safety and Reliability Regulations ) R. 11-02-019  
for Natural Gas Transmission and Distribution Pipelines )  
and Related Ratemaking Mechanisms. )

**COMMENTS ON THE PROPOSED DECISION OF ALJ BUSHEY**  
**In R. 11-02-019, issued May 10, 2011**  
**Of the**  
**UTILITY WORKERS UNION OF AMERICA (UWUA)**  
**LOCALS 132, 483, 522**

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**I. Introduction and Overview**

These Comments will primarily focus on the application of the Proposed Decision (hereafter MAOP Validation PD) to and implications for the Southern California Gas Company (hereafter SoCal). The UWUA supports the direction and the requirements of the MAOP Validation PD as applied to Southern California Gas specifically and the California natural gas industry generally. The PD imparts a strong sense of commitment to extending to the entire industry in California the most urgent lessons learned by the National Transportation Safety (NTSB) Board in its investigation of the San Bruno explosion. This is an entirely appropriate first step as the Commission begins the process of developing a comprehensive safety culture that seeks to identify hazards in the industry and eliminate them *before* they cause injury and damage.

From the perspective of UWUA the PD represents an important affirmation of a systems approach to safety:

This Commission is currently confronting the most deadly tragedy in California history from public utility operations. We are resolute in our commitment to improve the safety of natural gas transmission pipelines. In this context, it is absolutely essential that our regulated utilities display the highest level of candor and honesty. We understand that the issues at hand implicate substantial expenses and capital investments, and that the optimum means to address these safety issues may be subject to reasonable debate. To perform our Constitutional and statutory duties, we must have forthright and timely explanations of the issues, as well as comprehensive analysis of the advantages and disadvantages of potential actions. MAOP Validation PD, page 17

The NTSB is in the midst of a comprehensive root cause analysis of the San Bruno tragedy. It has identified uncertainty about PG&E's approach to determining

maximum allowable operating pressure for transmission pipe (MAOP) as a fundamental safety problem caused in part by inadequate documentation (both missing documents and inaccurate documents) and a resulting reliance on engineering-based assumptions about pipeline element quality and characteristics that may be factually inaccurate. The objective is to establish adequate safety margins above the level of normal pipeline operations for high pressure pipe located in densely populated areas. UWUA supports that objective.

As the entity that enforces gas safety in California pursuant to the Public Utilities Code,<sup>1</sup> including NTSB recommendations, the Commission has ordered all California gas utilities to assemble the materials needed to undertake an as-built document-based approach to calculation of MAOP and safety margins for all transmission pipe<sup>2</sup> located in high consequence areas<sup>3</sup> that has not been hydrostatically pressure tested. This represents nearly 50 % of all “criteria pipe” for SoCal. Document identification and a complete engineering analysis based on documents as a basis for MAOP validation has not been completely availing for any

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<sup>1</sup> The Commission cites PU Code section 451 as the basis for its action in the MAOP Validation PD; PU Code 761 is also authority for an order directing changes to correct conditions it finds to be unsafe or inadequate.

<sup>2</sup> Transmission pipe is described by federal regulation (adopted for state regulatory purposes by General Order 112-E, section 101.2) as pipe that is used to transport gas upstream of a distribution center and that operates at a “hoop stress of more than 20 % of SMYS.” 49 CFR 192.3 SMYS is in turn defined by 49 CFR 192.3 as “specified minimum yield strength” which is either (1) a manufacturer’s specification or (2) if there is no manufacturer’s specification either an assumption (24,000 psi) or a value developed through certain specified tests. 49 CFR 192.3; 49 CFR 192.107 and Appendix B – Qualified Pipe, Section II. Appendix B, section III creates special requirements for pre-1970 pipe. Defining transmission pipe based on operational characteristics and history suggests that there may be ambiguities in the scope of the MAOP Validation PD. See below, pp.

<sup>3</sup> The MAOP Validation PD applies to Class 3 and 4 locations and class 1 and 2 “high consequence areas.” These are locations defined by federal regulation as having relatively high concentrations of population and structures. 49 CFR 192.5 (definition of area classifications); 49 CFR 192.903 (definition of high consequence area)

of the state’s gas utilities. SoCal has concluded that an alternate approach – identification of historical pressure testing or pressurization records where possible – should be utilized.<sup>4</sup> SoCal proposes to utilize data from pressure tests using any medium including inert gases and – in a few cases -- natural gas, not restricted to hydrostatic pressure tests. UWUA supports SoCal’s approach to the use of testing media as practical under the circumstances.

The MAOP Validation PD adopts the fundamental skepticism of the CPSD and consumer advocate organizations TURN, Disability Rights Advocates and City/County of San Francisco about the use of engineering assumptions to establish MAOPs for transmission pipe in the absence of documentation, expressed in their responses to PG&E’s *Motion for Adoption of a Maximum Allowable Operating Pressure Validation Methodology*, filed April 21, 2011. It approves for all utilities the CPSD proposal that all transmission pipe that has not been properly pressure tested be tested or replaced. *MAOP Validation PD at page 20; Finding 7 at page 26; Ordering Paragraphs 4 and 6, pp. 29-30.* The drill of document compilation and analysis is to be continued for the potential value it might have for ongoing operation of the affected transmission pipe. *Ibid.* As detailed below, UWUA agrees with this suggestion. To sum up, the MAOP Validation PD seeks to bring all transmission pipe operated by gas utilities in densely populated areas up to what it characterizes as “modern standards for safety.” *MAOP Validation PD at 18*

UWUA recognizes that the MAOP Validation PD arises primarily out of the Commission’s interaction with PG&E in the aftermath of the San Bruno explosion, and that the context for evaluating its directives to the Sempra Companies, Southern California Gas and San Diego Gas and Electric, is factually different: there has been no comparable catastrophic explosion in Southern California. Nonetheless, UWUA fully supports the policy rationale underlying the PD: all of the residents and

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<sup>4</sup> “Report of Southern California Gas Company and San Diego Gas & Electric Company on Actions Taken in Response to the National Transportation Safety Board Recommendations,” filed April 15, 2011, hereafter “*April 15 Report.*”

businesses of California should have fundamentally similar assurances that the physical systems for delivering gas are safe. In this first stage of the Gas Safety Rulemaking all gas customers in California should have similar assurances, based on sound engineering practices and physical demonstrations, that the pipes carrying gas at high pressures in densely populated areas are operated with a substantial margin of safety built into the physical system.

The directive to the Sempra Companies to develop the documentation for SMYS and MAOPs for current levels of operating pressures to the extent feasible, and to develop a plan for testing and/or replacing transmission pipe for which no documentation of adequate pressure testing exists, will clearly and transparently establish a foundation for preserving that safety margin going forward. SoCal's proposed actions outlined in the *April 15 Report* are also generally in accordance with the Commission's direction in the MAOP Validation PD and UWUA is generally supportive of those proposals. SoCal proposes to test or replace all criteria pipe that has not been pressure-tested under its expanded test protocols (Category 4 pipe) Its enhanced testing apparently would include in-line inspection as a substitute for pressure testing where feasible. *C.f., April 15 Report*, pp. 11-12 UWUA supports SoCal's proposal to use in-line inspection as a complement to pressure-testing, with the caveat noted below at page 10 (suggestion (g)).

However, UWUA does not agree that transmission pipe in Class 4 locations that tests to 125 % of MAOP is adequate to comply with the Commission's objectives in the Gas Safety Rulemaking; *c.f., April 15 Report* at 7. Federal regulations, 49 CFR 192.619(a) and 192.620(a), appear to require safety margins of 1.4 times MAOP for pre-1970 pipe and 1.5 times MAOP for post-1970 pipe in those locations. The Commission should not accept grandfathered safety margins going forward. The *April 15 Report* should be updated to reflect actual test pressures for all criteria pipe --including pipe in Categories 1, 2 and 3 -- to assure compliance with modern safety

standards going forward. Pipe testing between 125% and 150% of MAOP in Class 3 and 4 locations should be identified and subjected to further scrutiny.

The Remainder of these Comments will situate the MAOP Validation PD in the larger Gas Safety Rulemaking and suggest potential improvements to the proposals contained in SoCal's *April 15 Report*, to be developed primarily through workshops as suggested by the MAOP Validation PD.

## **II. Scope of Gas Safety Rulemaking in Relation to MAOP Validation PD**

### (1) Transmission focus of MAOP Validation PD does not exhaust R. 11-02-019

The scope of the Gas Safety Rulemaking as respects facilities is not exhausted by the MAOP Validation PD. The adequacy of physical facilities associated with delivery downstream from high pressure transmission pipe – distribution, service lines, meters and pressure regulation devices associated with those facilities – is equally important to the public's sense of well-being and confidence in the safety of the gas service they receive. The aspiration of the Commission to create a comprehensive safety culture is broader than the MAOP Validation PD's entirely understandable focus on the urgent recommendations of the NTSB. UWUA will make a proposal at the PHC to be held on June 2 that the MAOP Validation Order, approving the MAOP Validation PD, be considered Phase 1 of the Gas Safety Rulemaking.

The anticipated MAOP Validation Order, as the first order of the Commission following its issuance of the Gas Safety Rulemaking, will establish a process that results, after workshops, in Commission approval of a testing/replacement plan for the pipe that fits within the scope of the transmission/HCA matrix that is the focus

of the NTSB Urgent Recommendations and SoCal's April 15 Report proposals.<sup>5</sup> That Order should note that a parallel process for distribution pipe integrity will be developed in the Gas Safety Rulemaking, in accordance with the proactive hazard mapping and elimination/mitigation approach in a comprehensive safety plan as proposed by UWUA in its Comments.

(2) Assuring Correct Identification of Transmission Pipe Covered by PD/Order

Another reason to reaffirm the broad scope of the Gas Safety Rulemaking is the arbitrariness in the definition of transmission pipe itself, based on operation of pipe at a specified percentage (20%) of the SMYS of the pipe. SoCal has identified 1416 "criteria miles" that fit within the location/operation matrix, and has categorized them based on a history of prior pressure testing. SoCal also operates a substantial amount of pipe it designates as "high pressure distribution pipe," which is located in densely populated areas – Class 3 and 4 locations and High Consequence Areas 1 and 2. C.f., the system map on SoCal's website:

<http://www.socalgas.com/safety/pipeline-maps/index.shtml>

This pipe is excluded from the remedial program outlined in the *April 15 Report* presumably because it is operated at less than 20 % of SMYS. If operational requirements or conditions fluctuate or change due to seasonal demand or commercial considerations, or due to longer-term factors such as population shifts, load growth from commercial activities such as increased natural gas vehicle fueling or new manufacturing or electric generation, these pipes may cross the definitional

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<sup>5</sup> The NTSB recommendations do not cover all transmission pipe, only pipe that is located in densely populated areas. The combined Sempra Companies note in the *April 15 Report* that their analysis identifies over 4000 pipe segments comprising 1622 miles (1416 attributed to SoCal). UWUA is concerned that this focus may be too narrow and underinclusive, because of the imprecise, arbitrary definition of transmission pipe (see above fn. 2.) That potential defect can be remedied by a clear expression in the MAOP Validation Order that the object under examination for safety is the SoCal system as a whole.

threshold, with safety implications and regulatory consequences that should be anticipated and covered as part of a comprehensive pro-active safety plan.<sup>6</sup> Any MAOP Validation Order should include an initial workshop to clarify and refine the application of the location/operation matrix for testing and validation purposes, to more accurately reflect the dynamic character of SoCal's system. UWUA notes that this may address a curious feature of the SoCal remedial program – the discontinuities in the pipe segments subject to remedial action under Category 4. The extremely chopped-up list of pipe segments in Appendix B to the *April 15 Report* suggests a rote application of the definition. The remedial activities could be made more thorough and coherent with a hands-on, operational understanding of the pipe as it exists in the field.

### 3) Dynamic nature of pipe integrity reflected in Operation and Maintenance History subsequent to a Pressure Test

Appreciating and capturing the spatially dynamic character of SoCal's system is important for accurately identifying pipe segments ripe for more intensive testing and/or replacement. Equally important is assessing possible changes in pipe integrity over time, through an evaluation of operation and maintenance of the pipe segment subsequent to the pressure test that establishes baseline pipe capability.

Pressure testing establishes pipe capabilities at a single point in time, either at the time of construction or later at the time of the test. But reliance only on the test presents a static and possibly outdated picture of pipe segment and element characteristics. Pipe operation and maintenance (O&M) is a dynamic process. The quality of O&M, especially cathodic protection and other corrosion control; leak identification and correction; repair history; direct and indirect inspection and

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<sup>6</sup> 49 CFR 192.609 and 192.611 include procedures for conducting these types of reassessments. The consequence of moving from a lower to a higher class area is a substantial reduction in MAOP or a required upgrade in pipe strength. This may provide a substantial deterrent to accurate classification of pipe segment location.

testing subsequent to installation are all key elements in assuring an ongoing safety margin for all pipe, particularly for the pipes operated at high pressures that are the subject of the MAOP Validation PD. The concern is that a static analysis at a single point in time will substitute for steady vigilance and attention to the possibility of change over time that degrades pipes' physical quality after testing or installation. Old pressure tests may not tell us enough.

One significant outcome of the document drill that the Commission has instituted and the MAOP Validation PD continues is to provide confidence that previously tested pipe has not degraded through internal and external corrosion, accidental penetration, inadequate maintenance, insufficient repairs, etc. While UWUA agrees with SoCal's basic premise that MAOPs and safety margins should be based on pressure tests and pressurization history, the issue of the quality of the pipe, particularly for old pipe, should also reflect actual operating history and performance. Pipe quality is a function both of initial quality (either at installation or at the time of the pressure test) and O&M history subsequent to the determination of initial pipe quality. The Commission should conduct workshops that enable the parties and CPSD to assess the probability that pipe segments in SoCal's Categories 1, 2 and 3 (previously pressure tested) have been adequately maintained since the pressure test and can be excluded from Category 4 treatment (new test or replacement to assure adequate safety margin above MAOP) based on current condition.

### **III. Treatment of "Category 4 Pipe" in the *April 15 Report***

As indicated above, the scope of the MAOP Validation PD/Order may be insufficient if it is limited to the pipe segments described in the April 15 Report. There may be more pipe than the identified 1416 miles of "criteria pipe." There may be more activity required than identification of a pressure test, whether hydrostatic or gaseous medium, to track pipe capability over time as affected by operation and

maintenance practices. These matters should be addressed in workshops as proposed in the MAOP Validation PD. This will enable the Commission and the parties to evaluate whether SoCal's identification of pipe segments in Categories 1, 2 and 3 are accurate and adequate, or whether there are more pipe segments to place into Category 4.

Be that as it may, it is apparent that there is plenty of remedial work to accomplish with respect to the pipe segments already identified and placed in Category 4 by SoCal, without inclusion of additional pipe based on the above considerations. UWUA is concerned that the Implementation Plan for testing and/or replacement of Category 4 pipe be effective, and offers the following considerations for additional workshop treatment. The purpose of these suggestions is to provide a sound interim approach to what promises to be an ongoing multi-year process for Category 4 pipe segments; in some respects it improves on current standard O&M practices.

- (a) Immediately institute expanded patrol and surveillance of all category 4 segments, with improved leak detection equipment and adequate time for on-ground patrol (no aerial patrol). This should include periodic direct inspection and excavation if necessary, based on the documentary O&M record.
- (b) Where O&M documentation is inadequate or missing, create appropriate baseline records based on direct inspection or non-destructive tests.
- (c) Monitor cathodic protection on a short interval and assure immediate correction of any break in cathodic protection.
- (d) Enhance warnings to excavators and other third parties with access to pipe segments to eliminate the possibility of inadvertent damage to pipe segments.
- (e) Train and deploy sufficient permanent employees to perform patrol, leak detection, inspection and repair activities on a bi-monthly basis (as proposed by SoCal).

- (f) Re-evaluate all Category 4 pipe, based on 150 % of MAOP, for test/replace prioritization purposes.
- (g) Supplement in-line inspection (ILI) as a test for pipe capability with external inspection, evaluation and testing to assess external corrosion.
- (h) Adopt a broad and aggressive public relations campaign about any testing program, (comparable to PG&E's) with expanded call-center involvement made effective through appropriate adjustments to staffing levels.
- (i) Perform a cost/benefit analysis of repair versus replacement for all priority pipe segments, with the intention of keeping revenue requirement impacts within reasonable levels.

#### **IV. Ratemaking for SoCal Gas**

The MAOP Validation PD specifically requests proposals for ratemaking treatment of the MAOP validation activities it proposes to order. This directive as applied to SoCal is significantly complicated by two considerations :

- (1) many of the activities and programs anticipated by the PD overlap with ongoing operation, maintenance, repair and replacement activities that SoCal would undertake anyway;
- (2) SoCal has commenced a general rate case (GRC), A.10-12-006 consolidated with A.10-12-005, in which going forward revenue requirements for these activities will be established.

The net effect of the MAOP Validation Order for SoCal will be to accelerate and re-prioritize certain testing, repair and replacement activities as compared with the proposals in the GRC, with consequent implications for revenue requirements and rates. UWUA supports the direction of the MAOP Validation PD, and the programmatic changes to enhance system safety and the public's confidence in system safety. UWUA also supports the PD's evident intention to make utility spending on safety transparent and to provide the public a sense of accountability

for safety-related expenditures. With respect to PG&E, the concern for accountability involves a directive to parties to consider proposals for sharing safety and remediation costs between shareholders and ratepayers. The same directive is not made with respect to the Sempra Companies and UWUA will not make any proposals in that vein.

UWUA is concerned that fragmentation and complexity of revenue requirement determination and cost recovery has made utility pricing opaque and impenetrable. Creating yet another off-set proceeding and related surcharge for SoCal may contribute to confusion, not clarity and accountability. At the present time, UWUA suggests that the MAOP Validation PD/Order as respects SoCal should focus on programmatic changes that contribute to improved safety and the perception of safety. The revenue requirement implications can then be reflected in updated exhibits in the SoCal GRC, which is scheduled for hearings in December.

This approach is particularly appropriate for SoCal because of the important accounting and ratemaking decisions to be made about expensing versus capitalizing the safety-related programmatic expenditures and the evident implications for the workforce that enhanced patrol, communications, accelerated testing, repair and replacement for pipe segments will entail. These devilish details should be addressed in a comprehensive and consistent manner in the GRC. The GRC Order can be structured in a way that makes new and enhanced safety-related initiatives and programs transparent for the public, and can provide for assurances that the public will not be exploited or abused in the name of enhanced safety.

### **CONCLUSION**

For the foregoing reasons, UWUA proposes that the Commission enter an Order substantially similar to the Proposed Decision of Administrative Law Judge Maribeth Bushey directing the creation of a test or replace Implementation Plan for

untested pipe, with the following supplemental elements included with respect to Southern California Gas Company:

(1) evaluation of the *April 15 Report* to assure identification of the complete complement of Criteria Pipe;

(2) evaluation of the *April 15 Report* to assure accurate identification of Category 4 Pipe, based on analysis of operation and maintenance of pipe classified as Categories 1, 2 and 3;

(3) approval of SoCal's proposal contained in the *April 15 Report* for enhanced patrol, operation and maintenance for Category 4 Pipe with the modifications, additions and improvements suggested in Part III above;

(4) workshops to develop the factual basis for the foregoing items;

(5) coordination of ratemaking and revenue requirement development for programs to validate MAOP pursuant to the Proposed Decision with the procedural schedule of the SoCal General Rate Case, A. 10-12-006 consolidated with A.10-12-005 in order to avoid fragmentation of the revenue requirement determinations for Southern California Gas.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing document

**COMMENTS ON THE PROPOSED DECISION OF ALJ BUSHEY**

**In R. 11-02-019, issued May 10, 2011**

**Of the**

**UTILITY WORKERS UNION OF AMERICA (UWUA)**

**LOCALS 132, 483, 522**

A copy was served as follows:

[X] **BY E-MAIL**: I sent a true copy via e-mail to all known parties of record in R. 11-02-019 who have provided e-mail addresses, as shown on the website of the California Public Utilities Commission, updated last on May 24, 2011, accessed May 30, 2011. [http://docs.cpuc.ca.gov/published/service\\_lists/R1102019\\_79735.htm](http://docs.cpuc.ca.gov/published/service_lists/R1102019_79735.htm) (names attached)

on the **30th** day of **May**, **2011**.

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