

**DOCKETED**


<b>Docket Number:</b>	21-IEPR-05
<b>Project Title:</b>	Natural Gas Outlook and Assessments
<b>TN #:</b>	238506
<b>Document Title:</b>	California Energy Commission Comments - DOT PHMSA 2020 PG&E Transmission Annual Report
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
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*Comment Received From: California Energy Commission  
Submitted On: 6/25/2021  
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**DOT PHMSA 2020 PG&E Transmission Annual Report**

*Additional submitted attachment is included below.*

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-IEPR-03
<b>Project Title:</b>	Electricity and Natural Gas Demand Forecast
<b>TN #:</b>	238036
<b>Document Title:</b>	DOT PHMSA 2020 PG&E Transmission Annual Report
<b>Description:</b>	As part of the supporting data, the IEPR Gas Forms submittal requires PG&E to provide the most recent U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA) Gas Distribution F7100.1-1, Gas Transmission and Gathering F7100.2-1, and Underground Natural Gas Storage F7100.4-1 submitted by the gas utility.
<b>Filer:</b>	Elizabeth Lopez
<b>Organization:</b>	PG&E
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	5/28/2021 11:36:26 AM
<b>Docketed Date:</b>	5/28/2021

 <p>U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration</p>	<p><b>ANNUAL REPORT FOR CALENDAR YEAR 2020 NATURAL OR OTHER GAS TRANSMISSION and GATHERING SYSTEMS</b></p>	<p><b>Initial Date Submitted</b></p>	<p><b>03/05/2021</b></p>
		<p><b>Report Submission Type</b></p>	<p><b>INITIAL</b></p>
		<p><b>Date Submitted</b></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 42 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><b>Important:</b> Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at <a href="http://www.phmsa.dot.gov/pipeline/library/forms">http://www.phmsa.dot.gov/pipeline/library/forms</a>.</p>			
<p><b>PART A - OPERATOR INFORMATION</b></p>		<p>DOT USE ONLY</p>	<p><b>20210561 - 38843</b></p>
<p>1. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER (OPID)</p> <p style="text-align: center;"><b>15007</b></p>	<p>2. NAME OF OPERATOR:</p> <p style="text-align: center;"><b>PACIFIC GAS &amp; ELECTRIC CO</b></p>		
<p>3. RESERVED</p>	<p>4. HEADQUARTERS ADDRESS:</p> <p><b>PG&amp;E - GAS OPERATIONS, REGULATORY COMPLIANCE 6111 BOLLINGER CANYON RD.,</b> Street Address</p> <p><b>SAN RAMON</b> City</p> <p>State: <b>CA</b> Zip Code: <b>94583</b></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><b>Natural Gas</b></p>			
<p>6. RESERVED</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 style="padding-left: 40px;">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 style="padding-left: 40px;">INTRAstate pipeline – List all of the States in which INTRAstate pipelines and or pipeline facilities included under this OPID exist. <b>CALIFORNIA</b> etc.</p>			
<p>8. RESERVED</p>			

**For the designated Commodity Group, PARTs B and D will be calculated based on the data entered in Parts L and P respectively. Complete Part C one time for all pipelines and/or pipeline facilities – both INTERstate and INTRAstate - included within this OPID.**

PART B – TRANSMISSION PIPELINE HCA MILES	
	Number of HCA Miles
<b>Onshore</b>	1581.8
<b>Offshore</b>	0
<b>Total Miles</b>	1581.8

PART C - VOLUME TRANSPORTED IN TRANSMISSION PIPELINES (ONLY) IN MILLION SCF PER YEAR (excludes Transmission lines of Gas Distribution systems)	Check this box and do not complete PART C if this report only includes gathering pipelines or transmission lines of gas distribution systems.	
	<input type="checkbox"/>	
	<b>Onshore</b>	<b>Offshore</b>
Natural Gas	809291	
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 <sup>1</sup>	Other	Total Miles
	Bare	Coated	Bare	Coated						
<b>Transmission</b>										
Onshore	1.4	6495.4	0	0	0	0	6.7	0	0	6503.5
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	1.4	6495.4	0	0	0	0	6.7	0	0	6503.5
<b>Gathering</b>										
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
<b>Total Miles</b>	1.4	6495.4	0	0	0	0	6.7	0	0	6503.5

<sup>1</sup>Use of Composite pipe requires a PHMSA Special Permit or waiver from a State

**PART E – RESERVED**

**For the designated Commodity Group, complete PARTs F and G one time for all INTERstate pipeline facilities included within this OPID and multiple times as needed for the designated Commodity Group for each State in which INTRAsate 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.**

<b>PARTs F and G</b>	
The data reported in these PARTs applies to: <i>(select only one)</i>	
<input type="checkbox"/>	Interstate pipelines/pipeline facilities
<input checked="" type="checkbox"/>	Intrastate pipelines/pipeline facilities in the State of CALIFORNIA <i>(complete for each State)</i>

PART F - INTEGRITY INSPECTIONS CONDUCTED AND ACTIONS TAKEN BASED ON INSPECTION	
<b>1. MILEAGE INSPECTED IN CALENDAR YEAR USING THE FOLLOWING IN-LINE INSPECTION (ILI) TOOLS</b>	
a. Corrosion or metal loss tools	358.2
b. Dent or deformation tools	358.2
c. Crack or long seam defect detection tools	245.6
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 )	962
<b>2. ACTIONS TAKEN IN CALENDAR YEAR BASED ON IN-LINE INSPECTIONS</b>	
a. Based on ILI data, total number of anomalies excavated in calendar year because they met the operator's criteria for excavation.	102
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.	103
c. Total number of conditions repaired WITHIN AN HCA SEGMENT meeting the definition of:	45
1. "Immediate repair conditions" [192.933(d)(1)]	28
2. "One-year conditions" [192.933(d)(2)]	0
3. "Monitored conditions" [192.933(d)(3)]	2
4. Other "Scheduled conditions" [192.933(c)]	15
<b>3. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON PRESSURE TESTING</b>	
a. Total mileage inspected by pressure testing in calendar year.	35
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.	0
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.	1
<b>4. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON DA (Direct Assessment methods)</b>	
a. Total mileage inspected by each DA method in calendar year.	66.7
1. ECDA	48.7
2. ICDA	18
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.	8
1. ECDA	3
2. ICDA	5
3. SCCDA	0
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	7
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)]	1
4. Other "Scheduled conditions" [192.933(c)]	6
<b>5. MILEAGE INSPECTED AND ACTIONS TAKEN IN CALENDAR YEAR BASED ON OTHER INSPECTION TECHNIQUES</b>	
a. Total mileage inspected by inspection techniques other than those listed above in calendar year.	7.4
1. Other Inspection Techniques	Low Stress Reassessment and Direct Examination
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.	14
c. Total number of conditions repaired in calendar year WITHIN AN HCA SEGMENT meeting the definition of:	12
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)]	12
<b>6. TOTAL MILEAGE INSPECTED (ALL METHODS) AND ACTIONS TAKEN IN CALENDAR YEAR</b>	
a. Total mileage inspected in calendar year. (Lines 1.e + 3.a + 4.a.1 + 4.a.2 + 4.a.3 + 5.a)	1071.1
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)	125
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)	65
d. Total number of actionable anomalies eliminated by pipe replacement in calendar year WITHIN AN HCA SEGMENT:	31
e. Total number of actionable anomalies eliminated by pipe abandonment in calendar year WITHIN AN HCA SEGMENT:	0
<b>PART G— MILES OF BASELINE ASSESSMENTS AND REASSESSMENTS COMPLETED IN CALENDAR YEAR (HCA Segment miles ONLY)</b>	
a. Baseline assessment miles completed during the calendar year.	1.4
b. Reassessment miles completed during the calendar year.	184.2
c. Total assessment and reassessment miles completed during the calendar year.	185.6

**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
	594.3	624.8	728.3	483.4	808.1	0	433	60.5	221.5
	22	24	26	28	30	32	34	36	38
	26.8	375.5	134	0	137.7	18.8	1032.5	521.7	0
	40	42	44	46	48	52	56	58 and over	
	0	302.4	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 - 0;								
6503.3	Total Miles of Onshore Pipe – Transmission								
Offshore	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 - 0;								
0	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	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
	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 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
<b>Transmission</b>						
Onshore	0	211	400.3	2110	1334.7	394.7
Offshore						
Subtotal Transmission	0	211	400.3	2110	1334.7	394.7
<b>Gathering</b>						
Onshore Type A	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0
Offshore						
Subtotal Gathering	0	0	0	0	0	0
<b>Total Miles</b>	0	211	400.3	2110	1334.7	394.7
Decade Pipe Installed	1980 - 1989	1990 - 1999	2000 - 2009	2010 - 2019	2020 - 2029	Total Miles
<b>Transmission</b>						
Onshore	575.8	874.8	254.2	348	0.2	6503.7
Offshore						
Subtotal Transmission	575.8	874.8	254.2	348	0.2	6503.7
<b>Gathering</b>						

Onshore Type A	0	0	0	0	0	0
Onshore Type B	0	0	0	0	0	0
Offshore						
Subtotal Gathering	0	0	0	0	0	0
<b>Total Miles</b>	<i>575.8</i>	<i>874.8</i>	<i>254.2</i>	<i>348</i>	<i>0.2</i>	<i>6503.7</i>

<b>PART K- MILES OF TRANSMISSION PIPE BY SPECIFIED MINIMUM YIELD STRENGTH</b>						
ONSHORE	CLASS LOCATION				Total Miles	
	Class 1	Class 2	Class 3	Class 4		
Steel pipe Less than 20% SMYS	382.2	129.4	1006.2	3.2	1521	
Steel pipe Greater than or equal to 20% SMYS but less than 30% SMYS	419	134.8	660.7	2.1	1216.6	
Steel pipe Greater than or equal to 30% SMYS but less than or equal to 40% SMYS	324.7	84.6	289.6	1.1	700	
Steel pipe Greater than 40% SMYS but less than or equal to 50% SMYS	559.9	84.3	235.1	0	879.3	
Steel pipe Greater than 50% SMYS but less than or equal to 60% SMYS	549.6	55.7	66.5	0	671.8	
Steel pipe Greater than 60% SMYS but less than or equal to 72% SMYS	1470.4	31.6	2.5	0	1504.5	
Steel pipe Greater than 72% SMYS but less than or equal to 80% SMYS	2.2	0.9	0.2	0	3.3	
Steel pipe Greater than 80% SMYS	0	0	0	0	0	
Steel pipe Unknown percent of SMYS	0	0	0.1	0	0.1	
All Non-Steel pipe	3.4	1	2.3	0	6.7	
<b>Onshore Totals</b>	<b>3711.4</b>	<b>522.3</b>	<b>2263.2</b>	<b>6.4</b>	<b>6503.3</b>	
<b>OFFSHORE</b>	Class 1					
Less than or equal to 50% SMYS	0					
Greater than 50% SMYS but less than or equal to 72% SMYS	0					
Steel pipe Greater than 72% SMYS	0					
Steel Pipe Unknown percent of SMYS	0					
All non-steel pipe	0					
<b>Offshore Total</b>	<b>0</b>					<b>0</b>
<b>Total Miles</b>	<b>3711.4</b>					<b>6503.3</b>

<b>PART L - MILES OF PIPE BY CLASS LOCATION</b>						
	Class Location				Total Class Location Miles	HCA Miles in the IMP Program
	Class 1	Class 2	Class 3	Class 4		
<b>Transmission</b>						
Onshore	3711.4	522.3	2263.2	6.4	6503.3	1581.8
Offshore	0	0	0	0	0	
Subtotal Transmission	3711.4	522.3	2263.2	6.4	6503.3	
<b>Gathering</b>						

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	
<b>Total Miles</b>	3711.4	522.3	2263.2	6.4	6503.3	

**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	9	2	0	0	12	0	0	0
Internal Corrosion	0	0	0	0	0	0	0	0
Stress Corrosion Cracking	0	0	0	0	0	0	0	0
Manufacturing	0	0	0	0	0	0	0	0
Construction	1	2	0	0	5	0	0	0
Equipment	65	233	0	0	12	0	0	0
Incorrect Operations	1	0	0	0	0	0	0	0
<b>Third Party Damage/Mechanical Damage</b>								
Excavation Damage	0	0	0	0	0	0	0	0
Previous Damage (due to Excavation Activity)	0	0	0	0	0	0	0	0
Vandalism (includes all Intentional Damage)	1	0	0	0	0	0	0	0
<b>Weather Related/Other Outside Force</b>								
Natural Force Damage (all)	0	1	0	0	0	0	0	0
Other Outside Force Damage (excluding Vandalism and all Intentional Damage)	0	2	0	0	0	0	0	0
Other	0	0	0	0	16	0	0	0
Total	77	240	0	0	45	0	0	0

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

<b>Transmission</b>	3	<b>Gathering</b>	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	0
		Onshore Type B	0
OCS	0	OCS	0
Subtotal Transmission	4	Subtotal Gathering	0
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 <sup>1</sup>	Other <sup>2</sup>	Total Miles
	Bare	Coated	Bare	Coated						
<b>Transmission</b>										
Onshore	1.4	6495.4	0	0	0	0	6.7	0	0	6503.5
Offshore	0	0	0	0	0	0	0	0	0	0
Subtotal Transmission	1.4	6495.4	0	0	0	0	6.7	0	0	6503.5
<b>Gathering</b>										
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
<b>Total Miles</b>	1.4	6495.4	0	0	0	0	6.7	0	0	6503.5

<sup>1</sup>Use of Composite pipe requires PHMSA Special Permit or waiver from a State

<sup>2</sup>specify 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 <sup>1</sup> Total	Other Incomplete Records	
Class 1 (in HCA)	39.2	0	10.8	0	3.5	3.5	5	0	10	2.7	0	0	2.4	0.6	
Class 1 (not in HCA)	1149.2		647.8		460		143.6		1183.3		0		56.6		
Class 2 (in HCA)	22.2	0	9.4	0	1.9	1.9	2.5	0	6.8	2.6	0	0	2.8	1	
Class 2 (not in HCA)	128.2		142		30.3		16.4		148.2		0		11.6		
Class 3 (in HCA)	327.7	0	524.9	0	58	58	131.7	0	366.1	138.6	0	0	51.1	13.8	
Class 3 (not in HCA)	80.5	0	335	0	33.5	33.5	27.9	0	295.6	165.3	0	0	31.2	17.3	
Class 4 (in HCA)	0.9	0	1.1	0	0	0	2.8	0	0.9	0	0	0	0	0	
Class 4 (not in HCA)	0.1	0	0.7	0	0	0	0	0	0	0	0	0	0	0	
<b>Total</b>	<b>1748</b>	<b>0</b>	<b>1671.7</b>	<b>0</b>	<b>587.2</b>	<b>96.9</b>	<b>329.9</b>	<b>0</b>	<b>2010.9</b>	<b>309.2</b>	<b>0</b>	<b>0</b>	<b>155.7</b>	<b>32.7</b>	
<b>Grand Total</b>									<b>6503.4</b>						
<b>Sum of Total row for all "Incomplete Records" columns</b>									<b>438.8</b>						

<sup>1</sup>Specify Other method(s):

Class 1 (in HCA)	Other, Total: Includes both Other, Complete and Other, Incomplete. Other, Complete includes transmission miles installed on or after July 1, 1970 with TVC strength test records meeting Subpart J but TVC design records are not available. The MAOP of design is calculated using conservative engineering assumptions in accordance with D.11-06-019 and Public Utilities Code §958	Class 1 (not in HCA)	Other, Total: Includes both Other, Complete and Other, Incomplete. Other, Complete includes transmission miles installed on or after July 1, 1970 with TVC strength test records meeting Subpart J but TVC design records are not available. The MAOP of design is calculated using conservative engineering assumptions in accordance with D.11-06-019 and Public Utilities Code §958
Class 2 (in HCA)	Other, Total: Includes both Other, Complete and Other, Incomplete. Other, Complete includes transmission miles installed on or after July 1, 1970 with TVC strength test records meeting Subpart J but TVC design records are not available. The MAOP of design is calculated using conservative engineering assumptions in accordance with D.11-06-019 and Public Utilities Code §958	Class 2 (not in HCA)	Other, Total: Includes both Other, Complete and Other, Incomplete. Other, Complete includes transmission miles installed on or after July 1, 1970 with TVC strength test records meeting Subpart J but TVC design records are not available. The MAOP of design is calculated using conservative engineering assumptions in accordance with D.11-06-019 and Public Utilities Code §958
Class 3 (in HCA)	Other, Total: Includes both Other, Complete and Other, Incomplete. Other, Complete includes transmission miles installed on or after July 1, 1970 with TVC strength test records meeting Subpart J but TVC design records are not available. The MAOP of design is calculated using conservative engineering assumptions in accordance with D.11-06-019 and Public	Class 3 (not in HCA)	Other, Total: Includes both Other, Complete and Other, Incomplete. Other, Complete includes transmission miles installed on or after July 1, 1970 with TVC strength test records meeting Subpart J but TVC design records are not available. The MAOP of design is calculated using conservative engineering assumptions in accordance with D.11-06-019 and Public

		Utilities Code §958		Utilities Code §958		
Class 4 (in HCA)				Class 4 (not in HCA)		
<b>Part R – Gas Transmission Miles by Pressure Test (PT) Range and Internal Inspection</b>						
Location	PT ≥ 1.25 MAOP		1.25 MAOP > PT ≥ 1.1 MAOP		PT < 1.1 or No PT	
	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	55.4	11.1	2.6	0.8	0.2	0.7
Class 2 in HCA	30.4	13.6	0.7	0	0.1	0.7
Class 3 in HCA	592	760.9	0	0.2	7.2	99.4
Class 4 in HCA	3	2.7	0	0	0	0
in HCA subTotal	680.8	788.3	3.3	1	7.5	100.8
Class 1 not in HCA	1345.7	1464	447.7	63.5	97.7	222
Class 2 not in HCA	121.3	283.8	5	0.4	10	56.2
Class 3 not in HCA	53.8	576.7	0	1.1	4.3	167.8
Class 4 not in HCA	0	0.8	0	0	0	0
not in HCA subTotal	1520.8	2325.3	452.7	65	112	446
Total	2201.6	3113.6	456	66	119.5	546.8
PT ≥ 1.25 MAOP Total			5315.2	Total Miles Internal Inspection ABLE		2777.1
1.25 MAOP > PT ≥ 1.1 MAOP Total			522	Total Miles Internal Inspection NOT ABLE		3726.4
PT < 1.1 or No PT Total			666.3	Grand Total		6503.5
Grand Total			6503.5			

**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**

**Susie Richmond**

Preparer's Name(type or print)

**(925)786-0267**

Telephone Number

**Manager, Regulatory Compliance**

Preparer's Title

**gsr8@pge.com**

Preparer's E-mail Address

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

**(925)244-4600**

Telephone Number

**Christine Cowser**

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

**VP, 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)

**christine.cowser@pge.com**

Senior Executive Officer's E-mail Address