

March 22, 2011

Mr. Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
12300 W. Dakota Ave., Suite 110  
Lakewood, CO 80228

**Regarding: CPF 5-2011-0004W**

Dear Mr. Hoidal:

On February 24, 2011, I supplied a written response to a warning letter addressed to Paul A. Cummings of the Redding Electric Utility (REU) regarding a probable violation of the §192.605(b)(1), because we have not been able to obtain the maintenance records for our supplier's pressure limiting equipment. In that letter I suggested that this is not applicable because the Redding Power Pipeline is not connected to a source that is capable of over-pressuring it. I would like to take this opportunity to expand on this topic.

The Redding Power pipeline is a 2.98 mile pipeline with the Redding Power Plant as the sole, end-use customer. This is a radial pipeline, and is teed off of a PG&E radial line with no breakdown regulator. The Redding Power pipeline receives the full PG&E line pressure of MAOP minus 10% (540 PSIG). 49 CFR 192.195(a) reads:

*(a) General requirements. Except as provided in §192.197, each pipeline that is connected to a gas source so that the maximum allowable operating pressure could be exceeded as the result of pressure control failure or of some other type of failure, must have pressure relieving or pressure limiting devices that meet the requirements of §192.199 and §192.201.*

The PG&E supplying pipeline MAOP is 600 PSIG. This was provided to REU upon request and is included in our original documents when the line was built. In accordance with §192.201(a)(2)(i), PG&E must have a pressure relief station or pressure limiting station or group of those stations installed to protect the pipeline with enough capacity to insure the pressure may not exceed their MAOP plus 10% (660 PSIG).

It is important to note that the regulation only applies to a pipeline in which the MAOP "could be exceeded as the result of pressure control failure or of some other type of failure". This failure language is singular, specifying a single-failure scenario. If the PG&E pressure limiting regulator were to fail, the pressure relieving devices will prevent the pressure from exceeding 660 PSIG. If the pressure relieving device were to fail, the pressure regulating device will still maintain the normal pressure. With a Redding Power pipeline MAOP of 720 PSIG and a single-failure situation as the regulation states, it is not possible to over-pressurize the Redding Power pipeline.

In an interpretation letter on the PHMSA web site it states:

*Each distribution system to which § 192.195 applies that is connected to a gas source that has higher pressure than the MAOP of the system must have certain overpressure protection devices.*

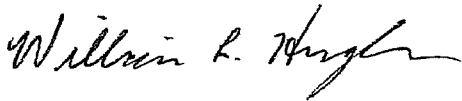
In this interpretation, the reference to the MAOP of the source pipeline determines the need of overpressure protective devices. Conversely, if the MAOP of the source is lower pressure than the MAOP of the system (the Redding Power pipeline in our case), there would be no overpressure protection device requirement. The interpretation letter is attached.

The requirement for overpressure protection devices is usually a safety requirement. However, in this case it is not. Sufficient protection is already installed and maintained on the PG&E system. If PG&E was the operator of this pipeline and in compliance with regulations as they attest, there would be no requirement to install these devices. The pipeline would still be safe and there would be no regulatory violations.

It is our hope that PHMSA will agree that in this case there is no requirement for REU to be in possession of PG&E maintenance records for pressure limiting equipment because it is not applicable. The Redding Power pipeline is not "connected to a gas source so that the maximum allowable operating pressure could be exceeded as the result of pressure control failure or of some other type of failure." Therefore, we suggest there is no violation of §192.605(b)(1).

Please feel free to contact me at (530)245-7025 or [bhughes@reupower.com](mailto:bhughes@reupower.com) if you have any questions.

Best Regards,



William L. Hughes  
Manager – Compliance & Operations Support  
Redding Electric Utility