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September 7, 2018

The Pipeline Safety Trust was formed as part of a court settlement encouraged by the U.S. Justice Department after a pipeline tragedy that occurred in Bellingham, Washington in 1999. Since that time we have worked with regulators, the pipeline industry, local governments, and citizens across the country to try to increase the safety of the 2.7 million miles of pipelines in this country. We are encouraged to see that the Lafayette City Council has provided an opportunity for citizens in your community, and representatives of PG&E and the California regulators to come together to better understand the pipeline issues at play in Lafayette, and hopefully set up a engagement system that helps ensure the safety of your residents as well as increasing the trust in the safety of the pipelines in your community.

In 2015 the Pipeline Safety Trust was asked by the Alamo Improvement Association of Contra Costa County to provide technical assistance to help that community better understand how pipelines are operated, maintained and regulated, and the risks that pipelines in that community pose. That initial effort focused on the Kinder Morgan hazardous liquid pipeline that runs along the Iron Horse Trail through Alamo. In 2018 we were again asked by the Alamo Improvement Association to return to Contra Costa County to hold another series of pipeline safety forums, as well as draft a report that focuses more on the PG&E pipelines that run through Alamo. You can learn more about those efforts at: <http://alamo.pstrust.org/>. As part of those efforts we talked with many members of your county, and learned some interesting information about PG&E's performance that we would like to share with you.

A few years ago the federal regulator for all pipelines in the country, the Pipeline and Hazardous Materials Safety Administration (PHMSA), began an effort to make their pipeline failure data more accessible and understandable for the general public. The Pipeline Safety Trust was part of that effort and the information below all comes from the PHMSA data. One thing PHMSA did was to make it easy to compare the safety performance (based on normalized incident rates) of individual pipeline operators. When we looked at the performance of both gas transmission and gas distribution pipeline operators of a similar size what we were surprised to learn is that PG&E has the highest failure rate in both categories. What is even more concerning is when you compare the ten-year average rates to the five-year average rates it appears that the failure rates are increasing not getting safer. We believe in part that this may be due to the fact that PG&E operates their pipelines in areas with relatively dense populations where people are more prone to damage pipelines through excavation damage or in other ways, and the data (see below) showing the cause of pipeline failures seems to support this in part. But clearly something else is going on here as well since when you compare PG&E's incident rates to other large companies operating in densely populated areas, such as Southern California Gas, you find that their incidents rates are roughly half of PG&Es.

At your upcoming forum on September 10th we hope you will inquire of both PG&E and the California Public Utility Commission to see if either entity has a good answer to why PG&E has the highest rates of pipeline failures and why those rates are increasing even after the San Bruno incident when we know that PG&E has devoted millions of dollars to improving the safety of their system. While the chance of a pipeline failure, even at these higher incident rates, on any particular section of PG&E pipeline is still really small, it would be good to ascertain whether they are spending the millions of dollars in ways that have been successful for other similar companies, and if so why are their failure rates per mile of pipeline still increasing?

We hope this information help in your inquiry. Please feel free to contact us if you have any questions or if we can help.

Thanks,

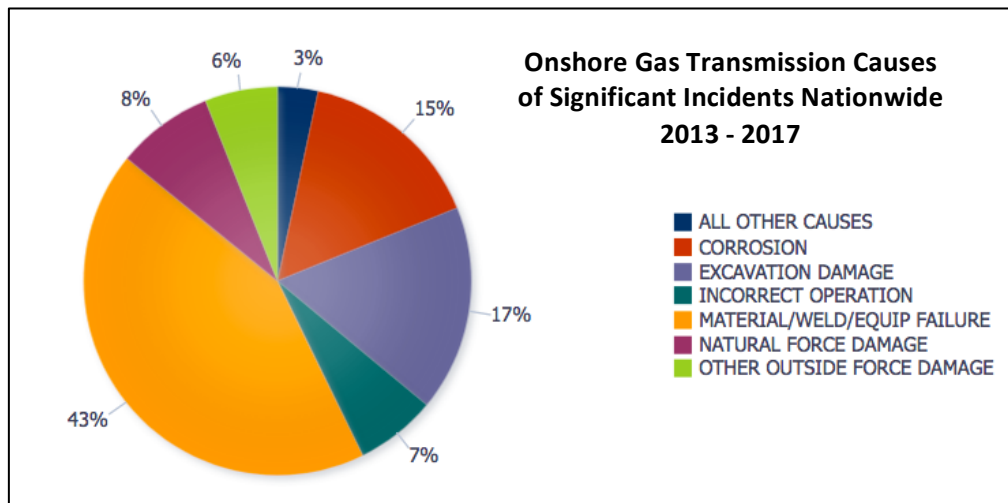


Carl Weimer, Executive Director
Pipeline Safety Trust

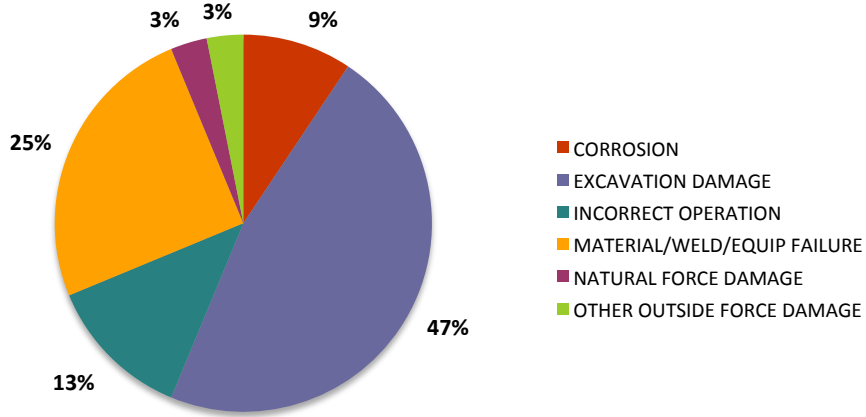
All the below data can be found at:
<https://www.phmsa.dot.gov/data-and-statistics/pipeline/data-and-statistics-overview>

Operator ID	Gas Transmission Operators with over 3000 Onshore Miles of Pipeline	10 Year Average (Significant incidents per 1,000 miles)	5 Year Average (Significant incidents per 1,000 miles)	10 Year Significant Incident Count	5 Year Significant Incident Count	2017 Miles
15007	PACIFIC GAS & ELECTRIC CO	0.56	0.80	34	25	6,535
602	ENABLE GAS TRANSMISSION, LLC	0.43	0.37	26	11	5,899
2620	COLUMBIA GULF TRANSMISSION, LLC	0.39	0.60	13	10	3,330
31711	SOUTHERN STAR CENTRAL GAS PIPELINE, INC	0.34	0.48	20	14	5,800
31618	ENTERPRISE PRODUCTS OPERATING LLC	0.31	0.19	14	4	4,034
31728	GULF SOUTH PIPELINE COMPANY, LP	0.30	0.34	20	11	6,550
19270	TEXAS GAS TRANSMISSION, LLC	0.25	0.33	15	10	5,959
19160	TENNESSEE GAS PIPELINE COMPANY	0.24	0.24	29	14	11,775
13845	NORTHWEST PIPELINE LLC	0.23	0.16	9	3	3,857
2616	COLUMBIA GAS TRANSMISSION, LLC	0.22	0.17	24	9	10,469
19570	TRANSCONTINENTAL GAS PIPE LINE COMPANY	0.22	0.22	18	9	8,392
405	ANR PIPELINE CO	0.21	0.19	20	9	9,252
5304	FLORIDA GAS TRANSMISSION CO	0.21	0.11	11	3	5,360
18516	SOUTHERN NATURAL GAS CO	0.20	0.17	14	6	7,003
18484	SOUTHERN CALIFORNIA GAS CO	0.20	0.29	7	5	3,448
13750	NORTHERN NATURAL GAS CO	0.18	0.18	26	13	14,776
2714	DOMINION ENERGY TRANSMISSION, INC.	0.17	0.11	6	2	3,563
15105	PANHANDLE EASTERN PIPELINE CO	0.17	0.10	10	3	5,975
22655	WBI ENERGY TRANSMISSION, INC.	0.17	0.16	6	3	3,657
31978	ATMOS PIPELINE - TEXAS	0.14	0.07	8	2	5,678
4280	EL PASO NATURAL GAS CO	0.13	0.08	13	4	10,062
32099	ENERGY TRANSFER COMPANY	0.12	0.15	8	5	7,752
2564	COLORADO INTERSTATE GAS CO	0.12	0.10	7	3	6,187
19235	TEXAS EASTERN TRANSMISSION, LP (SPECTRA ENERGY PARTNERS, LP)	0.12	0.14	10	6	8,617
13120	NATURAL GAS PIPELINE CO OF AMERICA (KMI)	0.11	0.11	10	5	9,042
1007	TALLGRASS INTERSTATE GAS TRANSMISSION, LLC	0.04	0.09	2	2	4,303
15359	BLACK HILLS ENERGY	0.02	0.05	1	1	4,054

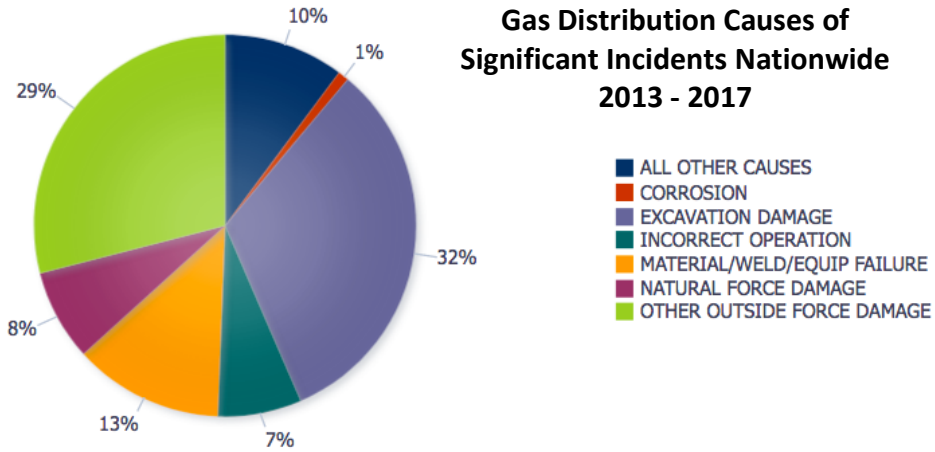
Operator ID	Gas Distribution Operators with over 25,000 miles of Pipeline	10 Year Average (incidents per million miles)	5 Year Average (incidents per million miles)	10 Year Significant Incident Count	5 Year Significant Incident Count	2017 Miles
15007	PACIFIC GAS & ELECTRIC CO	51.82	72.56	41	28	76,777.99
31348	ATMOS ENERGY CORPORATION - MID-TEX	47.49	57.92	19	12	41,391.11
2596	COLUMBIA GAS OF OHIO INC	43.28	52.77	18	11	41,685.92
15931	PUBLIC SERVICE CO OF COLORADO	42.33	35.09	14	6	34,666.98
2748	CONSUMERS ENERGY CO	41.56	62.97	21	16	51,481.78
12408	DTE GAS COMPANY	38.55	50.68	15	10	40,006.32
15359	BLACK HILLS ENERGY	33.06	25.60	7	3	40,010.21
15952	PUBLIC SERVICE ELECTRIC & GAS CO	31.76	28.70	11	5	35,081.71
792	ATLANTA GAS LIGHT CO	30.06	31.10	19	10	64,895.41
4060	DOMINION ENERGY OHIO	28.61	6.46	9	1	31,053.88
22189	PUGET SOUND ENERGY	27.69	23.55	7	3	25,690.57
22182	WASHINGTON GAS LIGHT CO	27.56	15.10	7	2	26,999.96
18484	SOUTHERN CALIFORNIA GAS CO	26.12	35.88	26	18	101,317.06
12350	CENTERPOINT ENERGY RESOURCES CORP., DBA CENTERPOINT ENERGY MINNESOTA GAS	24.05	15.63	6	2	25,745.82
13710	NORTHERN ILLINOIS GAS CO	23.70	15.86	15	5	63,201.67
18536	SOUTHWEST GAS CORP	23.06	18.89	12	5	53,545.92
4499	CENTERPOINT ENERGY RESOURCES CORPORATION	19.63	15.22	12	5	67,245.81
12876	DOMINION ENERGY UTAH/WYOMING/IDAHO	18.98	6.92	5	1	28,918.16
603	CENTERPOINT ENERGY RESOURCES CORP.	17.56	19.94	5	3	30,682.42
13730	NORTHERN INDIANA PUBLIC SERVICE CO	16.39	6.07	5	1	34,099.96
32513	AMEREN ILLINOIS COMPANY	10.17	13.54	3	2	29,551.86
15518	PIEDMONT NATURAL GAS CO INC	9.45	9.14	4	2	43,982.86



**PG&E Gas Transmission Causes of Significant Incidents
2013 - 2017**



**Gas Distribution Causes of Significant Incidents Nationwide
2013 - 2017**



**PG&E Gas Distribution Causes of Significant Incidents
2013 - 2017**

