


Answer: A design factor of 0.8 instead of 0.72 does not reduce the safety margin built into the design during an upset condition in the pipeline. Keystone requires that the pipeline be hydrostatically tested to a minimum of 125% maximum operating pressure and 100% of its specific minimum yield strength to a maximum of 110% SMYS. In granting a permit for the Keystone Pipeline to use a 0.8 design factor, PHMSA made a finding that the special permit is not inconsistent with pipeline safety and that the permit will provide a level of safety equal to or greater than that which would be provided if the pipeline were operated under the otherwise applicable regulations.

5. Does this conclude your rebuttal testimony?

Answer: Yes.

Dated this 16 day of October, 2009.



Meera Kothari