

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

Application of Pacific Gas and Electric  
Company Proposing Cost of Service and Rates  
for Gas Transmission and Storage Services for  
the Period 2011-2014

Application No. 09-09-013

(U 39 G)

**PG&E'S COMMENTS REGARDING  
GAS TRANSMISSION AND STORAGE  
SAFETY PROCEDURES AND PROTOCOLS**

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November 22, 2010

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Pursuant to the Revised Scoping Memo and Ruling Adding an Additional Phase (Ruling), dated October 15, 2010, PG&E responds to each of the questions raised in the Ruling. PG&E recognizes the seriousness of its responsibility to fully review its policies, procedures and practices in light of events at San Bruno. Since the San Bruno accident, PG&E has undertaken leak inspections of the entire gas transmission system beyond its on-going practices to support public safety, beginning with highly populated areas, publicly released detailed information about PG&E's gas pipeline safety and maintenance practices, and is reviewing safety procedures of its natural gas system with first responders, including providing detailed maps to ensure they know where PG&E's facilities are located.

The Ruling seeks information and understanding of PG&E activities to ensure the safety and reliability of its gas transmission and storage system. In addition to the activities and processes described below, PG&E is developing its Pipeline 2020 program that is intended to strengthen PG&E's natural gas transmission system and advance industry best practices over the coming decade.

PG&E's responses to the six questions are set forth below. The first two questions are split into subparts for ease of reference.

**QUESTION 1:**

*PG&E's disaster and emergency response plan. On October 12, 2010, PG&E announced its Pipeline 2020 Program. As part of this program, PG&E plans to expand the use of automatic or remotely operated shut-off valves, and to work with local communities, public officials, and first responders over pipeline safety.*

- a) Pending the implementation of these Pipeline 2020 Program elements, what steps are in place, or what does PG&E plan to do to ensure that PG&E personnel can be rapidly deployed and transported to incident areas in the event of gas leaks or gas explosions?*

**RESPONSE 1.a.:**

PG&E's gas service representatives (GSRs) are trained to respond to gas leak concerns, whether they come from customers or are found during the course of other work on PG&E's gas system. With respect to gas leaks, PG&E maintains established procedures for investigating, detecting and resolving suspected and reported gas leak and odor concerns at, or in the immediate vicinity of, a customer's premise. PG&E's GSRs investigate each gas odor call or notification by contacting the customer, inspecting the perimeter of the location, applying the appropriate investigative tools for the particular circumstance, and repairing the leak, if one is found.

PG&E also maintains a gas leak immediate response (IR) process. This process requires PG&E service employees to respond immediately to IR field service orders to address potential hazards associated with gas leaks. IR field service orders are given first priority over planned and on-going work, and employees are to respond as soon as possible to the IR field service orders.

With respect to a natural gas emergency such as an explosion on one of PG&E's transmission or distribution lines, PG&E has established emergency response procedures to respond to system and customer needs.

PG&E maintains and utilizes a gas emergency operations plan in the event of a gas-related emergency. In addition, each of PG&E's 18 field divisions maintains and utilizes gas emergency plans. The gas emergency plans include the following elements:

- Operations Emergency Center Activation Procedures, which include roles and responsibilities of all members of the emergency response team
- System Operating Instructions
- Inventory of Materials, Tools, and Vehicles available for emergencies
- Public Agency Contact Lists
- Emergency Response Training Records
- Mutual Assistant Agreements
- Internal and External Communication Plans

*b) What type of coordination exists between PG&E and city, county and state emergency personnel? Are PG&E emergency contact numbers updated and provided to emergency personnel on a regular basis?*

**RESPONSE 1.b.:**

Emergency Plans

PG&E’s policy is to respond in a way consistent with the National Incident Management System (NIMS) principles, including the use of the Incident Command System (ICS) to protect the public and to restore essential utility service following emergencies. PG&E maintains NIMS-driven emergency plans for both its gas and electric operations. The ICS allows PG&E to integrate public and its own First Responders rapidly into a common management structure, including through the use of Liaison Officers or a Unified Command structure. The ICS event planning tool also ensures an integrated organizational structure that matches the demands of the incident.

Training First Responders

PG&E conducts annual training for local first responders on PG&E’s gas and electric emergency plans, and how PG&E emergency teams will use ICS to coordinate with local first responders to protect the public and restore essential utility services following the emergency:

- 1) Gas transmission safety scenario exercises with local public agency responders (fire, law enforcement, police, coast guard, etc.) ensure good coordination.

- 2) PG&E educates first responders through its public awareness program. The program focuses on a variety of areas related to PG&E's gas and electric facilities, including: Gas Dig-ins, wildland fires, gas safety, gas leak identification, downed power lines, etc. Local First Responder training and education is regularly available through [www.pge.com/firstresponder](http://www.pge.com/firstresponder). Since July 2009 PG&E has provided training classes to over 550 emergency services personnel, including fire fighters, police officers, and other first responder agencies.

#### How PG&E Coordinates with First Responders During an Emergency

In accordance with the Incident Command System, PG&E's emergency plans designate a Liaison Officer, who is part of the command staff, to coordinate with federal, state, and local agencies such as Cal-EMA, Federal Energy Regulatory Commission (FERC), California Highway Patrol (CHP), California Department of Transportation (Cal-Trans), Department of Transportation (DOT) and local first response agencies.

PG&E also has a liaison officer dedicated to the State Emergency Management Agency through the Business and Utilities Operating Center (BUOC). Following a major incident such as at San Bruno, there is always a formal channel to communicate information back and forth with the Cal-EMA. In the case of San Bruno, PG&E used its Situation Status Unit in the Planning and Intelligence section of the PG&E Emergency Operations Center to perform this function.

In recent years, PG&E has conducted joint emergency response exercises with emergency responders from numerous communities. In the course of those exercises, PG&E shares relevant portions of emergency plans with the emergency responders and this on-going engagement has served to continually strengthen PG&E's response capability and efficacy. PG&E promotes the unified command concept when coordinating with first responders in an emergency. In a unified command setting individuals from different agencies, public and private, rapidly fuse together under a single command structure.

All 911 dispatchers have a direct dial telephone number to PG&E gas service dispatch. When 911 dispatch calls come in, they are recorded, an immediate response is designated, and the work is automatically dispatched to a gas service representative in the area. This way, individual cities and counties do not need to maintain a roster of phone numbers and contact names, and can be assured of prompt response.

*c) Can these procedures be improved upon in light of the San Bruno explosion and fire?*

**RESPONSE 1.c.:**

One of PG&E's goals in adopting National Incident Management System principles among other best practices in emergency planning is to drive continuous improvement in its emergency response capabilities. Taking steps to directly enhance PG&E's public safety partnerships is one of the five major areas of focus of PG&E's Pipeline 2020 program. PG&E will build on its extensive pipeline safety awareness and training programs, and collaborate with local communities, public officials and first responders to develop model pipeline safety partnerships and responses to emergency situations.

**QUESTION 2:**

*On or about October 5, 2010 PG&E announced it would provide to fire departments, upon request, location information about PG&E's gas transmission lines and the shut-off valves.*

*a) What steps has PG&E taken to inform city, county, and state emergency personnel about the availability of this type of information?*

**RESPONSE 2.a.:**

PG&E has begun making available detailed information about the location of transmission lines and facilities to local Fire Chiefs and other appropriate emergency personnel. PG&E has contacted all cities and counties in our service territory to offer meetings on gas safety and gas pipeline facility locations. As of November 18, 2010, PG&E has met with officials representing 88 county, municipal and local jurisdictions within the Company's service area and has had 98 meetings to discuss pipeline facility locations and safety issues.

- b) *Should additional information or steps be taken to ensure that emergency personnel have the type of information that they need to assess and manage situations involving PG&E's gas transmission lines?*

**RESPONSE 2.b.:**

Ensuring that emergency personnel and local responders have the right information to effectively partner with PG&E to manage situations is an integral part of PG&E's Pipeline 2020 program. PG&E has already begun to provide detailed, customized information on pipeline locations. As part of the Pipeline 2020 program PG&E will continue this work and extend it to local emergency response plans, as well as enhanced annual emergency response training. It will also step up outreach and education to reduce the incidence of third-party dig-ins on PG&E's pipelines – the leading threat to pipeline safety and integrity.

**QUESTION 3:**

*How frequently are gas transmission and gas storage shut-off valves tested or monitored to ensure that they are in operating order?*

**RESPONSE 3:**

All gas transmission and gas storage valves must be operated and maintained once per calendar year and not less than every 15 months, meaning if PG&E inspects a valve in January of one calendar year, the next inspection must be done within the next 15 months and no later than April of the subsequent calendar year. PG&E is fully compliant with these valve maintenance procedures which comport with federal regulatory requirements. (*See, e.g.* 49 C.F.R. § 192.745).

**QUESTION 4:**

*What procedures should PG&E have in place to ensure that it timely notifies the Commission of its reprioritization of its capital expenditures associated with its gas transmission lines, and what procedures should the Commission staff adopt to review and monitor the reprioritization of these capital expenditures.*

**RESPONSE 4:**

In its September 20, 2010, comments in this proceeding, PG&E committed to spending the full amount of capital contemplated in the Gas Accord V Settlement for Integrity Management

and Pipeline Safety and Reliability during the rate case period.<sup>1</sup> This commitment ensures that funds earmarked in the settlement for Integrity Management and Pipeline Safety and Reliability will be spent in those program categories. As PG&E also explained, it uses its best judgment in developing its forecasts of capital projects in preparing its application. Two years have passed since that process began and conditions on the gas system have changed and will continue to change. Thus, within this program category and others PG&E must continue to have the flexibility to reassess which projects should have the highest priority and which work should be done most quickly. Retaining such flexibility is critical to maximize the safety and reliability of the system.

In light of PG&E's commitment to spend the full amount of the funds allocated to pipeline safety capital programs, it is unnecessary for the Commission to adopt new procedures to monitor the capital spending prioritization process in the Integrity Management and Pipeline Safety and Reliability Major Work Categories. In conjunction with its next Gas Transmission and Storage (GT&S) rate case, PG&E will detail the actual capital spending in these areas and, by so doing, provide the Commission with information allowing it to validate that PG&E fulfilled its full spending commitment in these categories.

If the Commission determines that additional procedures are nonetheless warranted, PG&E proposes to work with Commission staff to develop procedures that respond appropriately to the needs of the Commission and to incorporate these procedures in its next GT&S rate case application.

**QUESTION 5:**

*Other safety-related protocols or procedures that the Commission should require of PG&E during the rate cycle.*

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<sup>1</sup> In addition, PG&E pointed out that the settlement agreement contains a one-way balancing account for transmission Integrity Management expense work, which would require PG&E to refund any unspent amounts in this category to customers.



**RESPONSE 5:**

PG&E believes the safety-related public safety and emergency response protocols and procedures discussed in these responses to the Ruling are sufficient for the rate case period. PG&E expects it will further review and possibly modify its safety-related protocols and procedures based on the findings of parallel proceedings and activities, including the NTSB investigation, the Independent Review Panel fact-finding investigation, and the Commission's September 23, 2010 Resolution.

**QUESTION 6:**

*Are workshops and/or evidentiary hearings needed to determine the protocols and procedures PG&E should be required to have in place during the upcoming rate cycle?*

**RESPONSE 6:**

PG&E believes the safety-related protocols or procedures discussed in these responses to the Ruling provide a sufficient basis for assessing PG&E's existing public safety and emergency response procedures in the context of this GT&S Rate Case Settlement. Information about PG&E's public safety and emergency response protocols and procedures likely will be reviewed and made available in the course of existing parallel proceedings, including the NTSB investigation, the Independent Review Panel fact-finding investigation, and the Commission's September 23, 2010 Resolution (*See, e.g., ¶ 22*). Thus, no workshops or evidentiary hearings are needed at this time.

Respectfully submitted,

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By: \_\_\_\_\_ /s/

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November 22, 2010

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is 77 Beale Street, San Francisco, California 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On November 22, 2010, I served a true copy of:

**PG&E'S COMMENTS REGARDING  
GAS TRANSMISSION AND STORAGE  
SAFETY PROCEDURES AND PROTOCOLS**

**[XX]** By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for **A.09-09-013** with an e-mail address.

**[XX]** By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service list for **A.09-09-013** without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in San Francisco, California on November 22, 2010.

\_\_\_\_\_  
/s/  
TAUVELA V. U'U

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Last Updated: November 15, 2010

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