

**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

(U 39 G)

Application 09-09-013

**AMENDMENT TO OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC
COMPANY ON PROPOSED DECISION ON THE SAFETY PHASE PROTOCOLS AND
PROCEDURES ADOPTED FOR PACIFIC GAS AND ELECTRIC COMPANY**

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Dated: June 29, 2011

APPENDIX A

PROPOSED CHANGES TO FINDINGS OF FACT AND CONCLUSIONS OF LAW

Modify Conclusion of Law 1 as follows:

1. The costs associated with the procedures and protocols adopted in today's decision shall be considered for ratemaking in the Gas Safety OIR, R. 11-02-019.

Deleted: covered by the revenues that the Commission recently authorized in D.11-04-031.

Modify Ordering Paragraph 1c as follows:

c. PG&E shall be required to incorporate the following changes, as described in section 3.4 of this decision, into its dispatch and emergency response procedures within 120 days of the effective date of this decision:

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(1) PG&E shall have personnel available 24 hours each day to answer emergency calls at its dispatch center, and to have qualified personnel available to respond to an emergency call involving its natural gas operations.

(2) PG&E shall provide all the fire departments and agencies in its service territory with the telephone number(s) for PG&E's emergency dispatch center.

(3) Upon receiving an emergency call, the PG&E dispatch center shall try to ascertain whether the incident involves a fire, natural gas leak or odor, the location or vicinity of the incident, the name of the person calling and a contact number, and shall immediately dispatch qualified PG&E emergency personnel who can timely respond to that particular type of emergency.

(4) If PG&E dispatch can ascertain that the fire or leak involves a PG&E gas transmission line, PG&E dispatch may contact PG&E's gas operations control to determine whether there are concurrent unusual readings, problems, or other abnormal operations on the gas transmission lines located in the area of the reported incident, and if so, PG&E dispatch shall immediately dispatch PG&E emergency response personnel qualified to respond to incidents involving gas transmission lines. PG&E dispatch may also contact Gas M&C directly if PG&E dispatch ascertains that the fire or leak involves a PG&E gas transmission line.

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(5) PG&E shall have all of the necessary valve shut-off tools and equipment that are used to respond to natural gas emergencies (with the exception of tools and equipment that are too large to be a standard piece of equipment on a vehicle) on board all designated PG&E emergency response vehicles, and at the PG&E maintenance yards that are used to respond to natural gas emergencies.

(6) The PG&E personnel dispatched to respond to the emergency call, and the PG&E dispatcher, shall follow the procedures set forth in numbered paragraphs 6 and 7 of section 3.4 of this decision.

(7) In an incident in which a fire department or agency has responded, PG&E dispatch shall notify the responding fire department or agency of the estimated time of arrival of the dispatched PG&E personnel.

(8) If a traffic-related or other problem delays the dispatched PG&E personnel from getting to the incident within the time estimated, the dispatched personnel shall contact PG&E dispatch (or, in the case of a Gas M&C crew, a Gas M&C supervisor) to update the estimated time of arrival. If the problem is likely to continue and prevent a timely response, PG&E's responding personnel shall ask PG&E dispatch to contact the responding fire department or agency and/or law enforcement for an emergency vehicle to escort the PG&E vehicle and personnel, if possible, so that PG&E personnel can timely respond to the incident, if the incident meets the criteria set forth for requesting an escort set forth in PG&E's policies and procedures. PG&E shall maintain an up-to-date list of the telephone number contacts of these emergency response departments and agencies for this purpose in case assistance is required.

(9) PG&E dispatch, gas control operations, and emergency response personnel, shall be trained on PG&E's dispatch and emergency response procedures once every two years, and a record of those attending the trainings shall be maintained.

(10) Within 180 days of the effective date of today's decision, PG&E shall transmit to the Executive Director, the director of CPSD, and the assigned ALJ, a copy of PG&E's emergency response and dispatch procedures that incorporate the dispatch procedures described above.

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