

Citation Program Report Resolution ALJ 274

Subject: California Public Utilities Commission Resolution ALJ 274, self identified and self corrected violation notification.

Location: Various locations in Contra Costa County

Date of Discovery: December 21, 2011

Description: A PG&E gas mapping employee discovered that 16 plat maps had inadvertently not been included in the leak survey schedule resulting in approximately 13.83 miles of distribution pipeline and 1,242 services not leak surveyed within the five year time requirement which is a violation of 49 CFR 192.723(b)(2). The missed maps are located in Diablo Division, Contra Costa County in:

Brentwood (4.02 miles, 361 services),
Byron (0.01 miles, 1 service),
Concord (3.34 miles, 300 services),
Danville (0.11 miles, 10 services),
Discovery Bay (0.02 miles, 2 services) and
Pittsburg (6.33 miles, 568 services).

Corrective Actions: The following corrective actions have been completed.

- A leak survey of all of the distribution pipeline and services was completed December 29, 2011. The results of the leak survey are as follows:

City	Number of Leaks	Leak Grade *
Brentwood	15	3 Grade 2, 12 Grade 3
Byron	None	N/A
Concord	None	N/A
Danville	None	N/A
Discovery Bay	None	N/A
Pittsburg	7	1 Grade 1, 1 Grade 2+, 4 Grade 2 and 1 Grade 3
TOTAL	22	

* PG&E grades leaks as follows. We classify leaks into four grades:

Grade 1: A leak that represents an existing or probable hazard to persons or property, and requires immediate repair or continuous action until the conditions are no longer hazardous.

Grade 2+: A leak that is recognized as being non-hazardous at the time of detection, but justifies priority repair. These types of leaks are scheduled for a priority repair within 90 days or less.

Grade 2: A leak that is recognized as being non-hazardous at the time of detection, but justifies scheduled repair. These types of leaks must be repaired or cleared within 18 months. Beginning in 2012, PG&E will repair or clear grade 2 leaks in 12 months.

Grade 3: A leak that is non-hazardous at the time of detection and can be reasonably

expected to remain non-hazardous. Such leaks are recorded and monitored at each subsequent survey.

- PG&E has isolated and repaired the grade one (1) leak in Pittsburg as of December 30, 2011
- The grade 2+ leak will be repaired on Tuesday, January 3, 2012
- PG&E will repair the seven (7) Grade 2 leaks by no later than mid-January
- The thirteen (13) grade 3 leaks will be leak surveyed annually
- The sixteen (16) plat maps have been added to the 5-year gas distribution leak survey schedule.
- A review of all gas plat maps for Diablo Division has been completed and validated to ensure all plat maps are included in the 5-year gas distribution leak survey schedule.
- An additional step has been added to the Diablo Division's gas mapping process to ensure that all new maps are added to the 5-year distribution leak survey.

Additional Steps to be taken:

- Formal root cause analysis to determine cause and identify any additional corrective actions to be implemented.
- Conduct a system-wide evaluation to determine if this issue is present in any other divisions and implement corrective actions as needed.

Notification of Local Authorities: Affected local authorities will be notified shortly and PG&E will provide confirmation of notification as a supplement to this notification.