

CPUC Resolution ALJ-274 Self-Identified Non-Compliance Notification

Deactivated Pressure Regulation Station not Properly Disconnected in the City of Santa Clara, Santa Clara County

January 20, 2012

Affidavit of Tamon Norimoto

Pacific Gas and Electric Company (PG&E) hereby submits this supplement to its above-referenced January 20, 2012 Self-Identified Non-Compliance Notification to identify that the following local authorities have been contacted:

**City of Santa Clara:**

Carol McCarthy, Assistant City Manager  
[CMcCarthy@santaclaraca.gov](mailto:CMcCarthy@santaclaraca.gov)

Alan Kurotori, Assistant City Manager  
[AKurotori@santaclaraca.gov](mailto:AKurotori@santaclaraca.gov)

William Kelly, Fire Chief  
[WKelly@santaclaraca.gov](mailto:WKelly@santaclaraca.gov)

**Santa Clara County:**

Gwendolyn Mitchell, Information Officer  
[gwen.mitchell@ceo.sccgov.org](mailto:gwen.mitchell@ceo.sccgov.org)

Jim Schramm, Santa Clara County Roads & Airports  
[jim.schramm@rda.sccgov.org](mailto:jim.schramm@rda.sccgov.org)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 20, 2012 at San Jose, California.

Redacted

Redacted

Governmental Relations Representative  
Pacific Gas and Electric Company

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**Santa Clara County:**

Gwendolyn Mitchell, Information Officer  
[gwen.mitchell@ceo.sccgov.org](mailto:gwen.mitchell@ceo.sccgov.org)

Jim Schramm, Santa Clara County Roads & Airports  
[jim.schramm@rda.sccgov.org](mailto:jim.schramm@rda.sccgov.org)

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Governmental Relations Representative  
Pacific Gas and Electric Company

Redacted

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**From:** Redacted  
**Sent:** Friday, January 20, 2012 1:33 PM  
**To:** 'Jim Schramm'  
**Subject:** Self Identified Non-Compliance Issue  
**Attachments:** Ltr Self-Report OOS Reg Sta 1-20-12 Final.pdf; EP Gen.Provisions.pdf; EP36120020.pdf

Hi Jim,

Thank you for taking my call earlier. Please see attached letter that we have send to the CPUC in regards to the self identified noncompliance issue. In addition, I have attached the permit that allowed us to do the work.

There is no official press release but here is the basic information:

During a recent review of records, PG&E discovered that a deactivated regulator station in the city of Santa Clara had been isolated from the gas system since 2002, but had not been properly disconnected from the gas system. This is a violation of CPUC regulations that require all inactive gas lines to be disconnected from all sources and supplies of gas.

Upon detailed review of records that indicated the deactivated regulator station may still be connected to the gas system, PG&E immediately performed an inspection of the station, applied for work permits, and, on January 18, removed the deactivated equipment in the station vault and capped the ends of the remaining piping – the station's status is now in compliance with CPUC regulation. However, PG&E has further work planned on the station, as well as improvements to the company's policies and procedures regarding deactivated regulator stations.

Because the inlet and outlet valves have been maintained in the closed position since 2002, PG&E does not believe this situation has posed a public or employee safety issue. Please let me know if you have any questions.

Best regards,

Redacted

Government Relations Representative

Redacted

111 Almaden Boulevard, San Jose, CA 95113

Redacted

Note: Please excuse the brevity of my e-mails while I recover from a hand injury.

2/1/2012

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Redacted

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**From:** Redacted  
**Sent:** Friday, January 20, 2012 2:42 PM  
**To:** 'gwen.mitchell@ceo.sccgov.org'  
**Subject:** PG&E Self Identified Non-Compliance Issue  
**Attachments:** Ltr Self-Report OOS Reg Sta 1-20-12 Final.pdf

Hi Gwendolyn,

Thank you for taking my call. Please see attached letter that we have send to the CPUC in regards to the self identified noncompliance issue. We have worked closely with Jim Schramm in the County Roads and Airports office to obtain the necessary permits to conduct this work. If you can please inform Jeff Smith in regards to this information, I would greatly appreciate it.

There is no official press release but here is the basic information:

During a recent review of records, PG&E discovered that a deactivated regulator station in the city of Santa Clara had been isolated from the gas system since 2002, but had not been properly disconnected from the gas system. This is a violation of CPUC regulations that require all inactive gas lines to be disconnected from all sources and supplies of gas.

Upon detailed review of records that indicated the deactivated regulator station may still be connected to the gas system, PG&E immediately performed an inspection of the station, applied for work permits, and, on January 18, removed the deactivated equipment in the station vault and capped the ends of the remaining piping – the station's status is now in compliance with CPUC regulation. However, PG&E has further work planned on the station, as well as improvements to the company's policies and procedures regarding deactivated regulator stations.

Because the inlet and outlet valves have been maintained in the closed position since 2002, PG&E does not believe this situation has posed a public or employee safety issue.

PG&E is taking steps to ensure that this issue does not exist elsewhere in the system and will not happen again:

- By September 1, 2012, PG&E will have reviewed its system to ensure that other deactivated regulator stations are properly disconnected from the gas system.
- By the end of the first quarter of 2012, PG&E will have revised its work procedure for regulator station maintenance to clarify the steps for deactivating and disconnecting station facilities.

Please let me know if you have any questions.

Best regards,

Redacted

Government Relations Representative

Redacted

111 Almaden Boulevard, San Jose, CA 95113

Redacted

2/1/2012

Redacted

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**From:** Redacted  
**Sent:** Friday, January 20, 2012 2:59 PM  
**To:** 'Carol McCarthy'  
**Cc:** 'Alan Kurotori'; 'William Kelly'  
**Subject:** PG&E Self Identified Non-Compliance Issue  
**Attachments:** Ltr Self-Report OOS Reg Sta 1-20-12 Final.pdf

Hi Carol, Alan, and Bill,

Thank you so much for your assistance last week and this week on our request to do work on Monroe & Lawrence. As a result of the work, we have filed a letter to the CPUC in regards to the self identified noncompliance issue.

There is no official press release but here is the basic information:

During a recent review of records, PG&E discovered that a deactivated regulator station in the city of Santa Clara had been isolated from the gas system since 2002, but had not been properly disconnected from the gas system. This is a violation of CPUC regulations that require all inactive gas lines to be disconnected from all sources and supplies of gas.

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