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February 1, 2012

Ms. Michelle Cooke, Director  
Consumer Protection and Safety Division  
California Public Utilities Commission  
505 Van Ness Avenue, Room 2005  
San Francisco, CA 94102-3298

Re: CPUC Resolution ALJ-274 Self-Identified Non-Compliance Notification  
Update to December 30, 2011 Letter Regarding Missed Leak Surveys in  
Contra Costa County

Dear Ms. Cooke:

As indicated in our self-identified non-compliance notification submitted to you on December 30, 2011 regarding missed leak surveys in Contra Costa County, PG&E committed to "conduct a system-wide evaluation to determine if this issue is present in any other divisions and implement corrective actions as needed."

This letter provides the results of PG&E's system-wide evaluation to ensure all plat maps with distribution facilities have been included in PG&E's leak survey schedule.

PG&E discovered that plat maps were not consistently added to the leak survey schedule as the maps were updated or created. As a result, some facilities were not regularly leak surveyed. The procedure for incorporating plat maps into the leak survey schedule lacked an adequate quality control process. PG&E is implementing changes to our leak survey procedures to prevent a recurrence of this problem and is still working to improve the quality control process for future use.

As shown in the attached spreadsheet, the system-wide evaluation identified an additional 46 maps throughout PG&E's gas distribution system that were not included in the leak survey schedule and missed the five-year leak survey interval requirement. In some cases, new distribution lines and services were added to maps, but the maps were not included in the distribution leak survey schedule. These maps were not leak surveyed until discovered as part of the system-wide evaluation. In other cases, however, the lines and services were properly leak surveyed for many years since their installation but inadvertently dropped from the leak survey schedule more recently when the maps were changed. PG&E is continuing to confirm the number of missed leaked survey dates per map.

Ms. Michelle Cooke  
February 1, 2012  
Page 2

As of January 20, 2012, all leak survey schedules have been updated to include the missing 46 maps, and as of January 30, 2012, all of the distribution pipeline and services on these maps have been leak surveyed. The leak surveys identified 5 leaks. As of the date of this letter, two of the leaks have been repaired and the remaining three are scheduled to be repaired by the end of the month.

The additional 46 maps discovered represent 0.2% of PG&E's approximately 21,600 gas distribution system maps.

The local authorities for the affected cities and counties will be notified of the additional 46 maps that missed the required leak survey schedule for their respective jurisdictional areas, and PG&E will provide confirmation of notification as a supplement to this notification.

Please contact Redacted for any additional questions you may have regarding this notification.

Sincerely,



Bill Gibson  
Director, Regulatory Compliance and Support

Attachment

cc: Mike Robertson, CPUC  
Dennis Lee, CPUC

Redacted PG&E  
Redacted PG&E  
Shilpa Ramaiya, PG&E  
Frances Yee, PG&E