



**Pacific Gas and  
Electric Company\***

**Bill Gibson**  
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May 25, 2012

Brigadier General Jack Hagan, Director  
Consumer Protection and Safety Division  
California Public Utilities Commission  
505 Van Ness Avenue, Room 2205  
San Francisco, CA 94102-3298

Re: CPUC Resolution ALJ-274 Self-Identified Non-Compliance Notification  
Distribution Feeder Main 401-01 Missed Leak Surveys, Marin County

Dear Brigadier General Hagan:

Pursuant to Resolution ALJ-274, PG&E is providing notification of a self-identified non-compliance issue regarding missed annual leak surveys on a gas distribution feeder main located in Mill Valley, Marin County.

Distribution Feeder Main (DFM) 401-01 runs through the [Redacted]  
[Redacted] The DFM does not run under  
[Redacted] A special leak survey was conducted on DFM 401-01 on May 7,  
2012. After the leak survey was conducted, PG&E was reviewing prior leak survey  
records and discovered that leak surveys for DFM 401-01 were being conducted on a  
five year leak survey schedule when they should be conducted annually, per the  
requirements of General Order 112-E, Section 143.1. The high pressure regulator  
(HPR) set serving [Redacted] has been leak surveyed annually. In 2010, the  
DFM was leak surveyed along with lines operating above 60 psig after the San Bruno  
Incident. This special leak survey satisfied the public assembly requirements for 2010.  
However, this DFM did not get included on an annual leak survey schedule going  
forward, and the annual leak survey for 2011 was missed. For both leak surveys  
conducted in 2010 and on May 7, 2012, no leaks were found.

General Order 112-E, Section 143.1 states, "a gas detector survey must be conducted in  
business districts and in the vicinity of schools, hospitals and churches, including tests of  
the atmosphere in gas, electric, telephone, sewer and water system manholes, at cracks  
in pavement, and sidewalks, and at other locations providing an opportunity for finding  
gas leaks, at intervals not exceeding 15 months, but at least once each calendar year."  
Because DFM 401-01 runs through the [Redacted] property, it  
should be leak surveyed annually, rather than every five years.

DFM 401-01 has since been placed on an annual leak survey schedule. PG&E plans to conduct leak surveys on, and review leak survey records of, all DFMs in close proximity to churches, schools and hospitals. Any such DFM found on a 5 year schedule will be placed on an annual. Also, PG&E's procedure for conducting leak surveys on gas transmission and distribution facilities, Utility Operating Standard S4110, will be evaluated for language clarity specific to conducting annual leak surveys on DFMs in the vicinity of schools and public assembly areas. This work will be completed by July 31, 2012. If PG&E finds additional instances of the above issue, we will report them to the CPD.

Furthermore, PG&E has started a system-wide quality assessment of its Leak Survey Program to identify areas in need of improvement. The assessment includes a review of processes, procedures and field personnel training. PG&E plans to have this assessment completed by June 30, 2012 in conjunction with an overall improvement plan. PG&E plans to begin implementation of this Leak Survey Improvement Plan shortly thereafter.

Please contact [Redacted] at [Redacted] or [Redacted] for any additional questions you may have regarding this notification.

Sincerely,



Bill Gibson  
Director, Regulatory Compliance and Support

cc: Julie Halligan, CPUC  
Dennis Lee, CPUC  
Mike Robertson, CPUC  
Sunil Shori, CPUC

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