



**Bill Gibson**  
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May 11, 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  
High Pressure Regulators not Maintained Annually

Dear Brigadier General Hagan:

Pursuant to Resolution ALJ-274, PG&E is providing notification of a self-identified non-compliance issue regarding high pressure regulators serving three or more services not being maintained annually. The non-compliance occurred at nine locations throughout PG&E's service territory.

PG&E defines a pressure limiting or regulating station to include a high pressure regulator (HPR) that serves three or more distribution service lines. 49 CFR §192.739(a) requires that each pressure limiting or regulating station must be maintained annually. HPRs serving one or two service lines are known as "farm taps" or "industrial taps." As part of PG&E's 2009-2011 effort to identify and inspect approximately 4,700 HPRs in its system for atmospheric corrosion per 49 CFR §192.481(a), a small number of HPR sets were identified as possibly serving three or more service lines.

PG&E has confirmed that nine HPR sets meet the definition of a pressure limiting or regulating station and performed annual maintenance of these HPR sets per §192.739(a) as of April/May 2012. See the attached table for the locations and completed scheduled maintenance dates of the nine HPR sets.

By May 15, 2012, these HPR sets either will have been placed into PG&E's preventative maintenance scheduling system for annual maintenance going forward, or will be planned for elimination later this year by installing distribution main and transferring the services onto the new main. PG&E has completed its system-wide review of its HPR sets, identified the non-compliant population of HPRs, and put corrective actions in place.

PG&E will notify the local authorities for the cities and counties where the affected HPRs are located and will provide confirmation of notification as a supplement to this letter.

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

Sincerely,

/S/  
Bill Gibson  
Director, Regulatory Compliance and Support

Attachment

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

Redacted

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

**CPUC Resolution ALJ-274 Self-Identified Non-Compliance Notification  
High Pressure Regulators Not Maintained Annually  
May 11, 2012**

| <b>Actual or Planned Date<br/>Reg Station Maintained</b> | <b>Actual or Planned Date of<br/>Adequate Relief Valve<br/>Capacity Documented</b> | <b>Division</b> | <b>City</b>    | <b>County</b> |
|--|--|-----------------|----------------|---------------|
| 5/15/12  | 5/15/12  | Mission         | Fremont        | Alameda       |
| 5/9/12   | not required*  | Sacramento      | Unincorporated | Colusa        |
| 5/15/12  | 5/15/12  | Sacramento      | Unincorporated | Sacramento    |
| 5/11/12  | 5/14/12  | Central Coast   | Unincorporated | Santa Cruz    |
| 5/11/12  | 5/14/12  | Central Coast   | Unincorporated | Santa Cruz    |
| 5/9/12   | 5/11/12  | North Valley    | Unincorporated | Butte         |
| 5/10/12  | 5/11/12  | North Valley    | Unincorporated | Butte         |
| 1/22/11  | 5/7/12   | De Anza         | Mtn View       | Santa Clara   |
| 4/12/12  | 5/4/12   | Sierra          | Unincorporated | Yolo          |

\* - this station has a monitor providing over pressure protection