

**PACIFIC GAS AND ELECTRIC COMPANY
Gas Pipeline Safety OIR
Rulemaking 11-02-019
Data Response**

PG&E Data Request No.:	LocalUnions246-342_002-25		
PG&E File Name:	GasPipelineSafetyOIR_DR_LocalUnions246-342_002-Q25		
Request Date:	January 3, 2012	Requester DR No.:	002
Date Sent:	January 20, 2012	Requesting Party:	Plumbers/Pipe Fitters/Steamfitters Local Unions 246/342
PG&E Responder:	Redacted	Requester:	Sarah Grossman-Swenson

THE PUC'S INDEPENDENT REVIEW PANEL REPORT (IRPR) ISSUED IN JUNE 2011, ATTACHES AN APPENDIX G, WHICH APPEARS TO BE A PG&E DOCUMENT. THE FOLLOWING QUESTION ALL RELATE TO APPENDIX G.

QUESTION 25

What procedures and instructions does PG&E use to determine Work Error?

ANSWER 25

Event reporting instructions and reporting criteria are provided in TD 1465P-02 Gas Event reporting. There are two attachments provided with TD 1465P-02. One provides instruction for Non-Human Failure (HF) Work Procedure Error (WPE) events. The other provides instructions for Gas HF WPE reporting.

Events that meet the Non HF Event reporting criteria are:

- Equipment failure
- Natural forces
- CPUC Reportable
- DOT Reportable
- Transmission leaks requiring a system clearance for repair
- Damage to transmission facilities requiring an A-form
- Planned and unplanned outages impacting major customers or 5 or more residential/commercial customers

- Events costing a customer more than \$1 million
- Overpressure events that meet the non-human error criteria. For reporting purposes, an overpressure event is defined as any instance in which the pressure of a gas system, or any portion of a gas system, has exceeded the maximum allowable operating pressure (MAOP) or maximum operating pressure (MOP).

Events that meet the HF WPE Event reporting criteria are:

- Insufficient design resulting in an outage to customers or impacts to system reliability.
- Leaks due to construction defects requiring submitting a Form 62-4060, "Leak Repair, Inspection, and Gas Quarterly Incident Report (A-Form)."
- Service interrupted unintentionally to more than 500 customers/meters in any one event.
- Gas quality outside of established limits, including limits for British Thermal Units (BTUs), odorant, or hydrogen sulfide (H₂S).
- Transmission at-fault dig-in (AFDI).
- Distribution AFDI. Including cross bores
- Environmental releases (condensate, odorant, chemicals, etc.) from transmission pipeline facilities.
- Events resulting in loss of throughput equal to or greater than 500 million cubic feet per day (Mcf/d) or 1 billion cubic feet (Bcf) total per event.
- Overpressure events that meet the human error criteria. For reporting purposes, an overpressure event is defined as any instance in which the pressure of a gas system, or any portion of a gas system, has exceeded the maximum allowable operating pressure (MAOP) or maximum operating pressure (MOP).
- Events that require an investigation, as determined by senior director or director, even though they do not meet any of the other criteria listed above.

Near Hit Criteria reported is entered in to the HF WPE as needed.

A near hit is an occurrence (action, inaction, or unanticipated condition) on the gas transmission or distribution system that could have resulted, but did not result in, an outage to customers, damage to equipment, an HF/WPE-related safety issue, or an impact to system reliability.