

From: Pruett, Greg S.  
Sent: 8/28/2012 3:14:20 PM  
To: Saine, Lauren (lauren.saine@cpuc.ca.gov)  
Cc:  
Bcc:  
Subject: Response to Congressman Denham's Question to Commissioner Simon

Lauren,

Here are the answers to your questions.

The most immediate response is that at this time PG&E does not have a Delta or Delta Levee specific emergency response plan. What we do have, however, follows below and is in the form of a broader more wide sweeping emergency response plan for catastrophic failures that could have severe consequences to facilities that support public safety. This is referred to as the "All Hazards" approach and is described below. Note, also, the highlighted portion below, which outlines a plan under development for our gas storage facility on McDonald Island, which will include a detailed plan for potential levee failure. I hope this is helpful to Commissioner Simon and please let me know if you or the Commissioner need further information.

Very best regards,

Greg

- Consistent with best practice in industry and government, PG&E uses an "all hazards" approach to prepare for emergencies, meaning that we focus on the methods we will use to make our system safe during an event, and then to expeditiously restore gas and electric service and recover our facilities when it is safe to do so. These methods are essentially the same regardless of the type of disaster. PG&E's Company Emergency Plan (beginning on page 1) identifies PG&E's emergency response objectives and describes the Company's emergency management practice. This plan does not specifically address levee breaks, but rather speaks to the functional activities that would be undertaken by PG&E in any natural or man-made disaster throughout the service territory, including levee breaks or other issues

affecting the Sacramento Delta. This plan, and the related emergency response plans (gas, electric, etc.) would be operational in the event PG&E were to respond to a levee break or other emergency in the Sacramento Delta.

While no plan documents are directly responsive to the information request, the following additional points may be of use as background information:

- PG&E has a gas storage facility (McDonald Island) located in the Sacramento Delta. A flood contingency plan for this facility is under development that will address specific measures to be taken for employee and equipment safety, and that will provide additional operational details for facility operators. This document is in draft form, is being prepared by Gas Transmission Ops, and is not available for review at this time.
- Gas facilities situated in the Sacramento Delta are designed to be operated even under flood conditions. Information about this design basis is not included in emergency plans, but can be found in the engineering documents associated with their construction. Similarly the footings of electric transmission towers in the Delta are designed in such a way as to keep the towers operational in flood conditions.
- As part of PG&E's emergency exercise program, levee breaks are occasionally introduced in scenarios to test PG&E's ability to respond. The 2008 Company Exercise, which was a Hayward Fault earthquake scenario, included notional breaches to 15 levees, resulting in simulated flooding in the Delta and operational issues at McDonald Island. Exercise participants addressed these notional problems successfully. Materials from this exercise were not published and the brief exercise summary that was submitted to the CPUC did not include specifics about levees, which were a minor part of the exercise.