



**Pacific Gas and  
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August 14, 2012

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  
Missed Annual Leak Survey for Transmission Pipeline in Colusa County

Dear General Hagan:

Pursuant to Resolution ALJ-274, PG&E is providing notification of a self-identified non-compliance issue involving a missed annual leak survey for a section of Line 302 transmission pipeline in Colusa County. This missed leak survey is not in compliance with 49 CFR §192.706.

On April 21, 2012, sections of transmission pipeline Line 302 were aerial leak surveyed. An approximately one mile long section of Line 302, referred to as plat D04, and located in an unincorporated area of Colusa County, near the community of Meridian, was planned to be included in the April 2012 aerial leak survey. However, in a review of leak survey records PG&E recently received from the contractor who performed the aerial leak survey, records for plat D04 could not be located. This missed leak survey is in violation of 49 CFR §192.706, which states, "***Leakage surveys of a transmission line must be conducted at intervals not exceeding 15 months, but at least once each calendar year.***"

Plat D04 was immediately leak surveyed after District employees became aware of the missed leak survey. This leak survey was conducted by District employees on July 20, 2012, and no leaks were found.

This issue was reviewed further by the District Supervisor who coordinated the April 2012 aerial leak survey of Line 302. The District Supervisor found after this additional review of records that although he had intended to include plat D04 on the list of Line 302 sections to be leak surveyed in April 2012, he inadvertently did not include plat D04 in the list provided to the flight contractor.

As a corrective action measure, the District Supervisor recently implemented a system to keep track of the leak survey due dates for all pipeline sections submitted to a flight

contractor for leak surveying. To ensure a leak survey for a pipeline section submitted to the flight contractor is not performed late, the District supervisor plans to complete a foot leak survey on the pipeline section before its due date is exceeded.

PG&E plans to share this issue and the system developed by the District Supervisor described above with other Districts. Additionally, PG&E plans to develop a compliance calendar for the Districts, which will serve as an additional tool to track upcoming due dates for regulatory work, including leak surveys. Also, PG&E plans to create a Front End Report to notify District supervisors of upcoming due dates for leak survey work from our SharePoint tracking system. These action items will be completed by September 17, 2012.

PG&E will notify the local authorities for the County of Colusa of this issue and will provide confirmation of notification as a supplement to this letter.

Please contact [Redacted] at [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

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