

Right of Way Encroachment
Root Cause Analysis/Investigation
Compliance Plan

This Root Cause Analysis/Investigation will be conducted by PG&E to determine the who, what, where, when, and how of the following:

1. PG&E's failure to maintain an accurately marked and clear right of way (ROW) of its natural gas pipelines and accurate records of the location of the center line all of their natural gas pipelines.
2. The ROW's associated with PG&E's natural gas pipelines became so encroached (trees, structures, etc.) by property owners over very long periods of time (years) without PG&E either not knowing about the encroachments or not taking action to abate these encroachments per the pipeline safety laws.
3. Identification of PG&E's periodic leak surveys, pipeline patrols, and integrity management efforts conducted on its transmission lines despite significant encroachment issues.
4. Remedial efforts conducted since encroachment issues identified.

How did this problem of encroachment, failure to maintain a clear right-of-way, and inaccuracy of records as to the centerline of the natural gas pipelines, get to this magnitude without anyone in PG&E either knowing about these problems or not taking appropriate actions to correct them.

Specific Tasks:

1. What Federal, State, and PG&E Company laws, General Orders, regulations, etc were violated by:
 - a. Not maintaining the ROWs properly.
 - b. Leak surveys, pipeline patrols, and integrity management efforts (assessments) conducted without identification of encroachments.
 - c. Not keeping the centerline of the pipelines clearly accurately marked on the ground
 - d. Not maintaining accurate records on the location of the centerline of the pipelines.
2. Who is or was responsible for #1 above.
3. What corrective or disciplinary actions have been taken or will be taken to those individuals who have been identified in #2 above.
4. What is the plan to correct the problems in #1 above, and keep these problems from reoccurring?

The ROW compliance plan will contain the following:

1. Background
2. Mission
3. What is the President's intent. Why is PG&E doing this and what does success look like.
4. Specified Tasks. What are the specific things that need to be accomplished.
5. Implied Tasks. What are the underlining things that need to be accomplished in order to accomplish the Specified Tasks.
6. Time line with milestones, objectives, and deliverables.
7. Detailed execution plan.
8. A joint (PG&E and CPUC) inspection plan to ensure this does not occur again.
9. Tracking of remedial measures and additional safety measures required as a result of encroachment issues.
10. Separate accounting for remedial measures and additional safety measures required as a result of encroachment issues.

The Root Cause Analysis/Investigation and the ROW Compliance Plan should be conducted and developed simultaneously and as soon as possible.