

ATTACHMENT A

**Gas Safety Plan Deficiencies Details
Attachment A**

§§ 961 and 963	Description	CPSD's Interpretation/Applied Criterion:	From CPUC PD Attachment Deficiency Y=Acceptable N= Deficiency	PG&E Assessment of CPSD's Review Agree or Disagree	PG&E Plan References - Pages
961(b)(3)	Each gas corporation shall implement its approved plan	The Safety Plan must include a high level policy statement, reviewed, approved, and signed by an Officer of the gas corporation (Operator), that the Operator will implement its approved Safety Plan.	N	Disagree	<p>PG&E disagrees with CPSD. PG&E included a cover letter signed by Nick Stavropoulos and the Executive Summary indicates that PG&E has and will continue to implement our approved safety plan.</p> <p>Cover letter from Nick Stavropoulos - para. 2 and 4 <i>This plan provides a comprehensive overview of what we are doing to strive to make our natural gas pipelines the safest and most reliable in the country.</i></p> <p><i>Our long-term goal of becoming the nation's safest gas utility is not some pie-in-the-sky dream. Since the tragic San Bruno accident in September 2010, we've made monumental progress in testing, validating and strengthening our pipeline system. Equally as important, though, is that we've begun to make the very necessary changes to strengthen the climate at PG&E of safety first, above all other priorities. We are steadfast in our commitment to achieve these goals for the people of California and for our industry as a whole.</i></p> <p>Executive Summary - 3 page/para 7 <i>The submission of this plan further supports PG&E's commitment to implementing safety recommendations made by the NTSB (Attachment 1), PHMSA, the IRP and the CPUC.</i></p>
961(b)(4)	The commission shall require each gas corporation to periodically review and update the plan	The Gas Corporation (Operator) must specify in its Safety Plan a frequency on which the Operator proposes to review its plan. For any frequency period longer than once each calendar year and longer than 15 months, the Operator must provide a reasoning/justification for the proposed frequency.	N	Agree	PG&E agrees that this was not included as we were waiting for direction from CPUC which has now been provided.
961(c)	The plan developed, approved, and implemented pursuant to subdivision (b) shall be consistent with best practices in the gas industry and with federal pipeline safety statutes as set forth in Chapter 601 (commencing with Section 60101) of Subtitle VIII of Title 49 of the United States Code and the regulations adopted by the United States Department of Transportation pursuant to those statutes.	The Operator's Safety Plan must include information on the Operator's process(es) for staying informed on industry best practices (i.e., through trade groups and publications, active participation on technical committees working on gas pipeline safety issues, etc.), advisory bulletins issued by various parties, and regulatory changes applicable to its operations. The Safety Plan must detail the Operator's process(es) for evaluating how its operations, maintenance, and emergency response processes, procedures, and standards conform with, or differ from, national and statewide industry trends for similar operations. The Safety Plan must also detail how the Operator uses the results of its evaluation in determining, and supporting, its own practices.	N	Agree	PG&E agrees and will provide additional detail and clarification for this section.
961(d)(1)	Identify and minimize hazards and systemic risks in order to minimize accidents, explosions, fires, and dangerous conditions, and protect the public and the gas corporation workforce.	The Operators Safety Plan must include information on what processes and/or procedures it has in place to prevent accidental ignition of gas and to review its operations, maintenance, and emergency response activities to identify deficiencies in procedures, materials, or qualifications of employees performing covered tasks on its gas pipeline facilities.	N	Disagree	<p>PG&E disagrees with CPSD. PG&E's entire plan provides information on what is in place to prevent accidental ignition of gas as well as information on what we are doing to review, update and improve operations, maintenance and emergency response.</p> <p>Safety Approach - page 8/para. 8 The safety of the public and employees is PG&E's highest priority. PG&E has numerous programs, policies and procedures in place to identify and minimize hazards, risks, and dangerous conditions.</p> <p>Risk Management - page 11/para. 1 Risk management connects asset management planning and investments, and operational planning. It is PG&E's goal to support all gas asset investment decisions based on the quantifiable level of risk reduction – so that the highest risk activities are prioritized before lower risk activities.</p> <p>Risk Management - page 11/para. 3 PG&E has established a Gas Operations Risk and Compliance Committee to identify, assess, monitor, and mitigate risks.</p> <p>Standards, Policies and Procedures - page 12/para. 1 Gas Operations standards, work procedures and policies have been developed to ensure public and employee safety, and to meet or exceed regulatory requirements for design, construction, operations and maintenance and emergency response. Currently existing Gas Transmission and Distribution Maintenance and Operations manuals/plans include: • The Gas Distribution Maintenance Manual – TD 4380M Index (Attachment 6) • Gas Distribution Operations Manual - TD 4381M Index (Attachment 7) • The Gas Transmission Standards Manual Index (Attachment 8) • Gas Emergency Response Plan Index (Attachments 9 and 10)</p> <p>Standards, Policies and Procedures - page 12/para. 3 Over the next three years, PG&E plans to significantly update all standards and work procedures. PG&E has started a comprehensive process to improve safety and quality and incorporate best practices (including new technology, employee suggestions, training, and quality improvements). It is PG&E's intent to establish standards and work procedures which go well beyond minimum compliance.</p> <p>Contractor Standards and Contractor Oversight - page 2/para. 1 PG&E requires that its contractors complete safety plans and conduct all work to safeguard workers, and the public from injury. PG&E requires that all contract work be completed in compliance all with applicable federal, state, and local laws, rules, and regulations, for example the Occupational Safety and Health Standards, and the California Division of Occupational Safety and Health.</p>

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					<p>System Control - page 14/para.1 <i>PG&E's Transmission and Distribution Gas Control monitors and controls the pipeline continuously, 24 hours a day, 365 days per year, to ensure that natural gas is safely received and delivered to customers. There are significant safety improvements being implemented to increase system monitoring and control, emergency response, clearance procedures and capacity planning which are discussed below.</i></p> <p>System Control - page 14/para. 2 <i>The Gas Transmission Control Center monitors pressures, flows and system status at approximately 1,300 points, providing operational oversight of all compressor stations, storage fields, pipeline interconnections, and other key pipeline facilities. Gas Control operators can control system flows and pressures at approximately 800 points. In addition, Gas Control's SCADA system continually receives data from approximately 14,000 other points on the transmission system. The SCADA system utilizes alarms to warn Gas Control of changing conditions that could escalate to safety-related conditions unless corrective action is taken.</i></p> <p>System Control - page 14/para. 4 <i>Currently, PG&E is developing additional enhancements that will substantially expand the current SCADA visibility/control capability and implement/integrate technology tools to assist in predicting and proactively managing abnormal events on the transmission and distribution system. The three enhancements which are the foundation for building comprehensive controls framework to move to a predictive and proactive operational philosophy include:</i></p> <ul style="list-style-type: none"> - Automated Valve Program Implementation - Distribution Control Center creation - Data Historian integration with SCADA and Geographic Information System (GIS) <p><i>The three projects are the foundation of the broad initiative PG&E has undertaken to build a comprehensive controls framework implementing a control room strategy to move operational philosophy from monitoring and reactive to predictive and proactive.....</i></p> <p>PSEP - page 18/para. 1 <i>PG&E's PSEP Phase 1, which is currently before the CPUC, is PG&E's plan to enhance safety and improve operations by fundamentally changing the way PG&E manages its gas pipeline assets. Ultimately, PG&E will comprehensively assess all 5,786 miles of its natural gas transmission pipelines. The efforts included in PSEP are part of a broader coordinated Gas Operations strategy and are in addition to the improvements PG&E is making to its existing pipeline replacement and maintenance, risk mitigation and integrity management programs. PSEP Phase 1 covers 2011-2014, with Phase 2 commencing in 2015. There are four main components to PG&E's PSEP.....</i></p>
					<p>Asset Management and Maintenance - Page 21/para. 1 <i>PG&E's efforts to identify pipeline integrity threats and implement ways to mitigate risk include: Integrity Management (Transmission and Distribution); key transmission maintenance programs (PSEP including valve automation and records integration); key distribution maintenance programs (including plastic pipe initiative, leak survey improvements and records integration).</i></p> <p>Transmission Programs - Page 21/para. 1 <i>All pipeline operators are required by 49 CFR, Part 192, Subpart O – Pipeline Integrity Management, to implement a Pipeline Integrity Management Program to assess and manage the integrity of all gas transmission pipelines in HCAs. HCAs are based on the population density and types of critical facilities (such as schools and hospitals) around the pipeline. The Transmission Integrity Management rule has been implemented through PG&E's TIMP.....</i></p> <p><i>PG&E's TIMP is addressed via various Risk Management Procedures (RMP-01 through RMP-13).</i></p> <p>Distribution Programs - Page 23/para. 1 <i>PG&E's Distribution Integrity Management Program (DIMP), based on the federal DIMP regulation, is designed to enhance safety by identifying and reducing pipeline risks and is foundational to PG&E's overall gas distribution system safety. PG&E is aggressively building its DIMP as part of a broader asset management effort, consistent with federal regulation and PAS 55.</i></p> <p>Safety with Customers and First Responders - page 39/para. 1 <i>PG&E's policies and procedures have been developed and revised to provide effective system controls for both equipment and personnel to limit damage from accidents, explosions, fires and dangerous conditions. PG&E efforts in this area focus on ensuring appropriate public awareness as well as working closely with first responders to provide training, information and tools.</i></p>

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961(d)(2)	Identify the safety-related systems that will be deployed to minimize hazards, including adequate documentation of the commission-regulated gas pipeline facility history and capability.	The Operator's Safety Plan must include information on the Operator's process(es)/procedure(s) for identifying threats to its gas pipeline facilities, assessing the risk due to these threats, and prioritizing mitigation activities to address parts of its systems where its assessment determines such activities are warranted.	N	Disagree	<p>PG&E disagrees with CPSD. PG&E provided details regarding processes and procedures for identifying threats in multiple areas of the plan as shown in the following references. PG&E will work with CPSD to provide more detail based on the new criteria.</p> <p>Risk Management - page 11/para. 1 and 3 <i>Risk management connects asset management planning and investments, and operational planning. It is PG&E's goal to support all gas asset investment decisions based on the quantifiable level of risk reduction – so that the highest risk activities are prioritized before lower risk activities.</i></p> <p><i>PG&E has established a Gas Operations Risk and Compliance Committee to identify, assess, monitor, and mitigate risks.</i></p> <p>Asset Management and Maintenance - Page 21/para. 1 <i>PG&E's efforts to identify pipeline integrity threats and implement ways to mitigate risk include: Integrity Management (Transmission and Distribution); key transmission maintenance programs (PSEP including valve automation and records integration); key distribution maintenance programs (including plastic pipe initiative, leak survey improvements and records integration).</i></p> <p>Transmission Programs - Page 21/para. 1 <i>All pipeline operators are required by 49 CFR, Part 192, Subpart O – Pipeline Integrity Management, to implement a Pipeline Integrity Management Program to assess and manage the integrity of all gas transmission pipelines in HCAs. HCAs are based on the population density and types of critical facilities (such as schools and hospitals) around the pipeline.</i> <i>The Transmission Integrity Management rule has been implemented through PG&E's TIMP.....</i> <i>PG&E's TIMP is addressed via various Risk Management Procedures (RMP-01 through RMP-13).</i></p> <p>Distribution Programs - Page 23/para. 1 <i>PG&E's Distribution Integrity Management Program (DIMP), based on the federal DIMP regulation, is designed to enhance safety by identifying and reducing pipeline risks and is foundational to PG&E's overall gas distribution system safety. PG&E is aggressively building its DIMP as part of a broader asset management effort, consistent with federal regulation and PAS 55.</i></p>
961(d)(3)	Provide adequate storage and transportation capacity to reliably and safely deliver gas to all customers consistent with rules authorized by the commission governing core and noncore replacement, preventive maintenance, and reactive maintenance and repair of its commission-regulated gas pipeline facility.	The Operator's Safety Plan must describe, as applicable, the capacity of its gas storage facilities, if any, and its process(es) for routinely monitoring and confirming that its gas storage, transmission and/or distribution facilities provide adequate pressure and capacity, consistent with all Commission regulations, throughout its operating year and under peak load conditions. The Operator's Safety Plan must also detail the Operator's process for planning and implementing programs to address any deficiencies indicated by its monitoring.	Y	Agree	

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961(d)(4)	Provide for effective patrol and inspection of the commission-regulated gas pipeline facility to detect leaks and other compromised facility conditions and to effect timely repairs.	The Operator's Safety Plan must detail its process(es) for patrolling and leak surveying its pipeline facilities at locations, and on frequencies, mandated by GO 112-E. The Operator's Safety Plan must also provide details on the Operator's process for classifying, responding to, and repairing the deficiencies found by its patrolling and leak surveys process(es).	N	Disagree	<p>PG&E disagrees with CPSD. PG&E provided details regarding our patrolling and leak survey work in multiple areas of the plan as shown in the following references.</p> <p>Asset Management and Maintenance - Page 21/para. 1 <i>PG&E's efforts to identify pipeline integrity threats and implement ways to mitigate risk include: Integrity Management (Transmission and Distribution); key transmission maintenance programs (PSEP including valve automation and records integration); key distribution maintenance programs (including plastic pipe initiative, leak survey improvements and records integration).</i></p> <p>Patrolling and Monitoring - page 22/para. 1 <i>All pipeline operators are required by 49 CFR, Part 192, 613 to have a procedure for continuing surveillance of its facilities to determine and to take appropriate action for safe operations and changes in class location. The surveillance of the pipeline facilities include pipeline patrolling as described in this plan, and in PG&E's Utility Procedure TD-4127P and TD-4127S (Attachment 21 and 22), and requires an annual class location review of gas transmission and gathering pipelines.</i></p> <p>Patrolling and Monitoring - page 23/para. 2 and 3 <i>Consistent with 49 CFR, Part 192.611, if a class change is identified, the MAOP of the pipeline is reviewed and action is taken to assure the pipeline is commensurate with the class location. In addition 49 CFR, Part 192.609 requires the operator to immediately perform a study of the segments involved.</i></p> <p><i>As part of the PSEP, PG&E proposed to increase patrols to bi-monthly for all Class 4, Class 3, Class 2 and Class 1 HCA pipe segments for which there are not complete pressure test records.</i></p> <p>Leak Repair - page 33/para. 1 and 2 <i>Pipeline safety regulations require gas operators to repair hazardous leaks promptly. The Company prioritizes the severity of identified leaks and requires immediate response to all hazardous leaks. Grade 2 and Grade 3 leaks are periodically rechecked to determine whether repair should be performed earlier or on regularly scheduled repair date. Some classes of non hazardous leaks are repaired within three months; others are repaired within 15 months; others are only scheduled for recheck.</i></p> <p><i>All leak indications are graded based on a number of factors, including the amount of gas present, the proximity to structures, whether the below ground leak is covered wall to wall by concrete or other permanent covering, and whether or not the leak is above- or below ground.....</i></p> <p>Leak Repair - page 34/para. 1-5 <i>PG&E's grading rules exceed industry standards, as set by the ASME GPTC Guide for Gas Transmission and Distribution Piping systems, in that PG&E uses a Grade 2+ category with a scheduled priority repair within 90 days.</i></p>
961(d)(5)	Provide for appropriate and effective system controls, with respect to both equipment and personnel procedures, to limit the damage from accidents, explosions, fires, and dangerous conditions.	The Operator's Safety Plan must detail its process(es) for designing, monitoring, and maintaining the MAOP of its gas pipeline facilities with compliance of GO 112-E. As applicable, the Operator's Safety Plan must address its process(es) including the use of remote monitoring and/or gas flow control equipment (i.e., SCADA and automated valves), the installation of excess flow valves (EFVs), and/or training and procedures provided to its personnel to limit the flow of gas into an unsafe condition.	N	Disagree	<p>PG&E disagrees with CPSD. PG&E provided details regarding our system controls and MAOP work as referenced below.</p> <p>System Control - page 14/para.1-4 <i>PG&E's Transmission and Distribution Gas Control monitors and controls the pipeline continuously, 24 hours a day, 365 days per year, to ensure that natural gas is safely received and delivered to customers. There are significant safety improvements being implemented to increase system monitoring and control, emergency response, clearance procedures and capacity planning which are discussed below.</i></p> <p><i>The Gas Transmission Control Center monitors pressures, flows and system status at approximately 1,300 points, providing operational oversight of all compressor stations, storage fields, pipeline interconnections, and other key pipeline facilities. Gas Control operators can control system flows and pressures at approximately 800 points. In addition, Gas Control's SCADA system continually receives data from approximately 14,000 other points on the transmission system. The SCADA system utilizes alarms to warn Gas Control of changing conditions that could escalate to safety-related conditions unless corrective action is taken.</i></p> <p><i>Currently, PG&E is developing additional enhancements that will substantially expand the current SCADA visibility/control capability and implement/integrate technology tools to assist in predicting and proactively managing abnormal events on the transmission and distribution system. The three enhancements which are the foundation for building comprehensive controls framework to move to a predictive and proactive operational philosophy include:</i></p> <ul style="list-style-type: none"> • Automated Valve Program Implementation • Distribution Control Center creation • Data Historian integration with SCADA and Geographic Information System (GIS) <p><i>The three projects are the foundation of the broad initiative PG&E has undertaken to build a comprehensive controls framework implementing a control room strategy to move operational philosophy from monitoring and reactive to predictive and proactive.....</i></p> <p>Gas Transmission Control - page 14/para. 1 <i>The Gas Transmission Control Center monitors pressures, flows and system status at approximately 1,300 points, providing operational oversight of all compressor stations, storage fields, pipeline interconnections, and other key pipeline facilities. Gas Control operators can control system flows and pressures at approximately 800 points. In addition, Gas Control's SCADA system continually receives data from approximately 14,000 other points on the transmission system. The SCADA system utilizes alarms to warn Gas Control of changing conditions that could escalate to safety-related conditions unless corrective action is taken.</i></p>

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					<p>Gas Distribution Control - page 15/para. 1-4 <i>PG&E's gas distribution system covers an area of 58,000 square miles, with 826 hydraulically independent systems. The distribution system is currently monitored using methods that require manual intervention in the field, causing a lag between data collection and response, and a lack of visibility into the real time status of the system.</i> <i>Some limited real-time distribution oversight is currently provided by Gas Control at approximately 275 continuously monitored distribution locations, (district regulator stations). In addition, some local distribution oversight is enabled by approximately 350 alarmed electronic monitoring devices which alert local on-call distribution supervisors if pressure set points are exceeded. Should an electronic monitoring alarm activate, the local distribution supervisor is responsible to assess the nature of the alarm and, if appropriate, have PG&E personnel dispatched to take action.....</i></p> <p>Co-Located T&D Control and Dispatch - 16/para. 1 <i>By mid-2013, PG&E will locate transmission control center functions, distribution control center functions and gas dispatch functions into a single facility. The co location of these three functions will enable the company to increase system knowledge and situational awareness to provide superior emergency response coordination.</i></p> <p>Operations Clearance - page 16/para. 1 <i>An important part of public safety is the Transmission Clearance Process for work that impacts gas flows, pressures, or gas quality. If a transmission pipeline is to be taken out of service for repairs, a plan and procedure ("clearance") must be formalized in writing and reviewed by the field personnel scheduled to perform the work. Transmission system clearances are managed and approved by Transmission Gas Control.....</i></p> <p>PSEP - page 18/para. 1 <i>PG&E's PSEP Phase 1, which is currently before the CPUC, is PG&E's plan to enhance safety and improve operations by fundamentally changing the way PG&E manages its gas pipeline assets. Ultimately, PG&E will comprehensively assess all 5,786 miles of its natural gas transmission pipelines. The efforts included in PSEP are part of a broader coordinated Gas Operations strategy and are in addition to the improvements PG&E is making to its existing pipeline replacement and maintenance, risk mitigation and integrity management programs. PSEP Phase 1 covers 2011-2014, with Phase 2 commencing in 2015. There are four main components to PG&E's PSEP.....</i></p> <p>MAOP Validation - page 20/para. 1 <i>In 2011, as part of PSEP and to ensure safe operation of PG&E's natural gas transmission lines, PG&E determined the MAOP in class 3 and 4 locations and class 1 and 2 HCAs that had no previously established MAOP determined through prior hydrostatic testing.</i></p>
961(d)(6)	Provide timely response to customer and employee reports of leaks and other hazardous conditions and emergency events, including disconnection, reconnection, and pilot-lighting procedures."	The Operator's Safety Plan must detail the Operator's process(es) for receiving, classifying, and responding to reports of gas leaks, making the situation safe, and restoring gas service after service disruptions. The Safety Plan must also provide details on any programs the Operator has in place to periodically review the adequacy of its response process(es) including the timeliness of the response, actions taken by the responding personnel, adherence to procedures, and the identification for areas in need of improvement.	N	Disagree	<p>PG&E disagrees with CPSD. PG&E provided details regarding our risk management process, emergency preparedness and response as well as service response as referenced below.</p> <p>Asset Management and Maintenance - Page 21/para. 1 <i>PG&E's efforts to identify pipeline integrity threats and implement ways to mitigate risk include: Integrity Management (Transmission and Distribution); key transmission maintenance programs (PSEP including valve automation and records integration); key distribution maintenance programs (including plastic pipe initiative, leak survey improvements and records integration).</i></p> <p>Emergency Preparedness and Response - page 40/ para. 1-5 <i>PG&E Gas Operations has a dedicated Emergency Preparedness and Public Awareness (EP&PA) team to support coordination activities, training and communication with city/county/local first responders within PG&E's service territory. A primary function of this dedicated team is to provide pipeline and general safety training to local/state/volunteer first responders, as well as share the Gas Emergency Response Plan.....</i> <i>PG&E is constantly reviewing and improving emergency response procedures and institutionalizing them across Gas Operations as required by GERP.</i></p> <p>911 Process - page 41/para. 2-5 <i>PG&E has implemented geographical based north/south alignment of its gas system operators by operating console in order to improve focus on real time monitoring. At any given time, operators are now responsible for monitoring the northern service territory or the southern service territory, not both. Additionally, an enhancement to PG&E's SCADA system has been completed which prioritizes alarms for appropriate operator action upon activation. Alarm priorities are now configured based on four categories: Emergency, High, Medium, and Low. The SCADA enhancement also provides PG&E's operators with the capability to alarm filter based on priority, data type, and geographic location.....</i></p> <p>911 Process - page 42/para. 1 <i>The PG&E 911 Notification Process has triggers to immediately make 911 notifications based on a field employee and/or an external public entity communicating information concerning a transmission or distribution facility involvement in a natural gas related event. PG&E feels that the additional reliance on non-SCADA based information broadens its responsiveness to the 911 emergency centers.....</i></p> <p>Service Response - Page 42/para. 2-3 <i>In 2012, PG&E adopted a new safety standard of responding to customer calls reporting possible gas leaks classified as immediate response within 60 minutes 99 percent of the time as well as responding to gas leak reports within 30 minutes 75 percent of the time upon notification.....</i></p>

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961(d)(7)	include appropriate protocols for determining maximum allowable operating pressures on relevant pipeline segments, including all necessary documentation affecting the calculation of maximum allowable operating pressures.	The Operator's Safety Plan must provide details on the Operator's process(es) for confirming and establishing the MAOP on its gas pipeline facilities and the maintenance of documentation related to the process(es).	N	Disagree	<p>PG&E disagrees with CPSD. PG&E provided substantial detail for MAOP in the PSEP section of the plan as well as in the MAOP Validation area.</p> <p>PSEP - page 18/para. 1 <i>PG&E's PSEP Phase 1, which is currently before the CPUC, is PG&E's plan to enhance safety and improve operations by fundamentally changing the way PG&E manages its gas pipeline assets. Ultimately, PG&E will comprehensively assess all 5,786 miles of its natural gas transmission pipelines. The efforts included in PSEP are part of a broader coordinated Gas Operations strategy and are in addition to the improvements PG&E is making to its existing pipeline replacement and maintenance, risk mitigation and integrity management programs. PSEP Phase 1 covers 2011-2014, with Phase 2 commencing in 2015. There are four main components to PG&E's PSEP.....</i></p> <p>MAOP Validation - page 20/para. 1 <i>In 2011, as part of PSEP and to ensure safe operation of PG&E's natural gas transmission lines, PG&E determined the MAOP in class 3 and 4 locations and class 1 and 2 HCAs that had no previously established MAOP determined through prior hydrostatic testing.</i></p>
961(d)(8)	Prepare for, or minimize damage from, and respond to, earthquakes and other major events.	The Operator's Safety Plan must detail the Operator's process(es) for preparing for and responding to reports of gas leaks or other damages, that may occur quickly and affect a large portion of its overall gas pipeline system, as a result of an earthquake or other major event.	N	Disagree	<p>PG&E disagrees with CPSD. PG&E's plan provides information specifically addressing 961(d)(8) in multiple areas of the plan as detailed below.</p> <p>Safety with Customers and First Responders - page 39/para. 1 <i>PG&E's policies and procedures have been developed and revised to provide effective system controls for both equipment and personnel to limit damage from accidents, explosions, fires and dangerous conditions. PG&E efforts in this area focus on ensuring appropriate public awareness as well as working closely with first responders to provide training, information and tools</i></p> <p>Documents and Records - page 37/para. 2 <i>PG&E is focused on implementation of asset management projects for both transmission and distribution. By having both asset and associated future maintenance information in an integrated system engineers can more effectively evaluate system conditions, identify system component performance trends, enable timely preventative maintenance, reduce corrective maintenance and improve the overall safety and reliability of the system.</i></p> <p>Public Awareness - page 39/para. 1 <i>PG&E has made improvements to safety resources available to first responders and the general public. PG&E's public website for safety is now more easily accessible and includes tips and other materials for customers in emergencies, special materials have been created and a portal (described below) for first responders is now available. PG&E has developed specific informational flyers and has issued press releases to promote safety (such as for dig-ins which potentially damage infrastructure and for customer behavior around potentially dangerous infrastructure including downed power lines)....</i></p> <p>Emergency Preparedness and Response - page 40/ para. 1-5 <i>PG&E Gas Operations has a dedicated Emergency Preparedness and Public Awareness (EP&PA) team to support coordination activities, training and communication with city/county/local first responders within PG&E's service territory. A primary function of this dedicated team is to provide pipeline and general safety training to local/state/volunteer first responders, as well as share the Gas Emergency Response Plan.....</i></p> <p><i>PG&E is constantly reviewing and improving emergency response procedures and institutionalizing them across Gas Operations as required by GERP.</i></p>
					<p>911 Process - page 41/para. 2-5 <i>PG&E has implemented geographical based north/south alignment of its gas system operators by operating console in order to improve focus on real time monitoring. At any given time, operators are now responsible for monitoring the northern service territory or the southern service territory, not both. Additionally, an enhancement to PG&E's SCADA system has been completed which prioritizes alarms for appropriate operator action upon activation. Alarm priorities are now configured based on four categories: Emergency, High, Medium, and Low. The SCADA enhancement also provides PG&E's operators with the capability to alarm filter based on priority, data type, and geographic location.....</i></p> <p>911 Process - page 42/para. 1 <i>The PG&E 911 Notification Process has triggers to immediately make 911 notifications based on a field employee and/or an external public entity communicating information concerning a transmission or distribution facility involvement in a natural gas related event. PG&E feels that the additional reliance on non-SCADA based information broadens its responsiveness to the 911 emergency centers.....</i></p> <p>Service Response - Page 42/para. 2-3 <i>In 2012, PG&E adopted a new safety standard of responding to customer calls reporting possible gas leaks classified as immediate response within 60 minutes 99 percent of the time as well as responding to gas leak reports within 30 minutes 75 percent of the time upon notification.....</i></p>

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961(d)(9)	Meet or exceed the minimum standards for safe design, construction, installation, operation, and maintenance of gas transmission and distribution facilities prescribed by regulations issued by the United States Department of Transportation in Part 192 (commencing with Section 192.1) of Title 49 of the Code of Federal Regulations.	The Safety Plan must include a high level policy statement, reviewed, approved, and signed by an Officer of the gas corporation (Operator), that the Operator endeavors to design, construct, install, operate, and maintain its gas pipeline facilities at standards that meet or exceed GO 112-E, which references and adopts 49 CFR, Part 192.	N	Disagree	<p>PG&E disagrees with CPSD. PG&E included a cover letter signed by Nick Stavropoulos and the Executive Summary clearly indicates the controls in place to address 961(d)(9). Specifically, PG&E plan states that ".....PG&E's plan highlights current and committed work, and connects the dots between all of PG&E's efforts to ensure safe and reliable operations of its gas system. Has and will continue to implement our approved safety plan." Other sections of the plan that address this requirement re detailed below.</p> <p>Process Safety - page 10/para. 1-4 <i>Process Safety is a comprehensive, risk-based approach to reduce the chance of low frequency, high consequence incidents from occurring.</i></p> <p><i>Key activities that PG&E will evaluate for risks include facility design and modification, operational procedures, workforce competence, human factors, emergency arrangements, protective devices, instrumentation and alarms, inspection and maintenance, permit to work, asset records and data quality, and third party activities.</i></p> <p>Risk Management - page 11/para. 1 and 3 <i>Risk management connects asset management planning and investments, and operational planning. It is PG&E's goal to support all gas asset investment decisions based on the quantifiable level of risk reduction – so that the highest risk activities are prioritized before lower risk activities.</i></p> <p><i>PG&E has established a Gas Operations Risk and Compliance Committee to identify, assess, monitor, and mitigate risks.</i></p> <p>Transmission Programs - Page 21/para. 1 <i>All pipeline operators are required by 49 CFR, Part 192, Subpart O – Pipeline Integrity Management, to implement a Pipeline Integrity Management Program to assess and manage the integrity of all gas transmission pipelines in HCAs. HCAs are based on the population density and types of critical facilities (such as schools and hospitals) around the pipeline. The Transmission Integrity Management rule has been implemented through PG&E's TIMP.....</i></p> <p>Distribution Programs - Page 23/para. 1 <i>PG&E's Distribution Integrity Management Program (DIMP), based on the federal DIMP regulation, is designed to enhance safety by identifying and reducing pipeline risks and is foundational to PG&E's overall gas distribution system safety. PG&E is aggressively building its DIMP as part of a broader asset management effort, consistent with federal regulation and PAS 55.</i></p> <p>Quality and Improvements - page 45/para. 1-4 <i>PG&E is increasing the focus on quality starting with the recent formation of a dedicated Quality and Improvement (Q&I) department within Gas Operations. At a high level, the Q&I department is responsible for centralized Quality Control (QC), Quality Assurance (QA), and Work/Human Performance Improvement (W&HPI) activities.....</i></p>
963(b)(3)	<p>Ensure an adequately sized, qualified, and properly trained gas corporation workforce to carry out the plan.</p> <p>It is the policy of the state that the commission and each gas corporation place safety of the public and gas corporation employees as the top priority. The commission shall take all reasonable and appropriate actions necessary to carry out the safety priority policy of this paragraph consistent with the principle of just and reasonable cost-based rates.</p>	The Safety Plan must include a high level policy statement, reviewed, approved, and signed by an Officer of the gas corporation (Operator), that the Operator ensures that determinations made by the Operator as to the adequacy of its workforce (including the number of qualified personnel necessary to carry out the Safety Plan, the training provided to these personnel, and allocation of time allotted to operations and maintenance activities related to maintaining the safety of its gas system) are based, primarily, on a demonstrable analysis that places safety as the highest priority and assigns it a weighting commensurate with this priority.	N	Agree	<p>Although PG&E's plan does address this section in the areas provided below, PG&E will provide additional information in the June filing.</p> <p>Nick Stavropoulos cover letter</p> <p>Gas Organization - page 6/para. 1 <i>PG&E rebuilt the Gas Operations organization to clarify roles and responsibilities, provide effective governance, and establish a structure to improve key processes. This first key step, taken in 2011, separated Gas Operations from Electric Operations. The new Gas Operations organization was then structured around eight distinct functions and 22 key processes.</i></p> <p>Gas Organization - page 2/para. 2-3 <i>The second key change for the Gas Operations organization was to put in place, an appropriately sized, trained and technically skilled workforce. This required PG&E to identify resource needs, begin aggressive recruiting and hiring of trained professionals from throughout the industry to augment the existing workforce. Many of the key leadership positions within Gas Operations were filled by external candidates with extensive industry experience to improve overall performance.</i></p> <p>Employee Training - page 13/para. 1-4 <i>The cornerstone to ensuring PG&E's gas facilities are designed, constructed, maintained, and operated in a safe and reliable manner is maintaining a workforce of highly skilled and experienced technical employees. PG&E conducted a comprehensive study in the fourth quarter of 2011 through the first quarter of 2012 to compare PG&E gas training to best in class, and developed an extensive plan to elevate all PG&E gas training.....</i></p> <p>Operator Qualifications - page 13/para. 1 <i>The PG&E Gas Operator Qualification (OQ) Plan requires all individuals who operate and maintain pipeline facilities meet specific safety requirements (including meeting Title 49 Code of Federal Regulations (CFR) Part 192 Subpart N). Employees must be qualified, and able to recognize and react appropriately to abnormal operating conditions that may indicate a dangerous situation or a condition exceeding design limits.....</i></p>

**Gas Safety Plan Deficiencies Details
Attachment A**

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961(d)(11)	Any additional matter that the commission determines should be included in the plan.	An effective and meaningful Safety Plan should include elements beyond those listed in paragraphs (d)1-10 (above). The type and scope of any additional measures should be consistent with the size and the types of service provided by each company. Examples of additional safety measures include fire protection, compliance with worker safety rules, system security matters, developing an established process for conducting root cause analysis investigations, and conducting a design verification of gas system components to ensure that safety related functions can be performed. These types of issues will be further developed on an on-going basis, and as determined by Commission findings.	N	Disagree	<p>PG&E disagrees with CPSD. PG&E stated its commitment to continually working to identify risks and improvements to the gas operations as shown in the section "Building a Safety First Culture" as well as "PAS 55," which are both referenced below along with additional areas that are responsive to 961(d)(11).</p> <p>Nick Stavropoulos cover letter</p> <p>Process Safety - page 10/para. 1-4 <i>Process Safety is a comprehensive, risk-based approach to reduce the chance of low frequency, high consequence incidents from occurring.</i></p> <p><i>Key activities that PG&E will evaluate for risks include facility design and modification, operational procedures, workforce competence, human factors, emergency arrangements, protective devices, instrumentation and alarms, inspection and maintenance, permit to work, asset records and data quality, and third party activities.</i></p> <p>Building a Safety First Culture - page 5/para. 1-3 <i>PG&E is building a culture of safety in large and small ways every day with the understanding that making these deep-rooted changes takes time. The company is encouraging its employees to feel empowered to report and act on safety concerns, further fostering an environment of accountability and ownership where significant and essential behavioral changes can occur at all levels. These efforts include reinforcing clearly defined goals and expectations, structuring incentives to align with those goals, measuring progress using industry benchmarks, and effectively communicating with customers, regulators, and the community.</i></p> <p>PAS 55 - page 9-10 <i>PG&E is pursuing a best practice asset management certification offered by the British Standards Institute under its PAS 55. PAS 55 provides an objective certification and provides an independent assessment of the completeness and continuity of safety and reliability.</i></p> <p>Metrics and Goals - page 45/para. 1-2 <i>PG&E's 2012 goals include several measures based on the performance of Gas Operations and customer satisfaction:</i></p> <ul style="list-style-type: none"> • Safety Goals – 40% total weight • Customer Goals – 30%.....
961(e)	The commission and gas corporation shall provide opportunities for meaningful, substantial, and ongoing participation by the gas corporation workforce in the development and implementation of the plan, with the objective of developing an industry wide culture of safety that will minimize accidents, explosions, fires, and dangerous conditions for the protection of the public and the gas corporation workforce.	The Operators Safety Plan must include information on what processes and/or procedures the Operator has in place that: 1) provide opportunities for its workforce, including individual employees and employee organizations, to become aware of, and be able to participate in, the development and review of applicable portions of its Safety Plan; how the comments/suggestions submitted by such parties are received, tracked, reviewed, and considered by the Operator. The Safety Plan must also detail how the Operator documents the result of its analysis of such comments/suggestions, including the basis for accepting or rejecting submitted comments/suggestions.	N	Disagree	<p>PG&E disagrees with CPSD. PG&E provided information regarding how workforce input was gathered and captured as well as how it would be addressed going forward as detailed in the "Employee and Contractor Feedback" section of the plan.</p> <p>Employee and Contractor Feedback - page 7/para. 3and page 8/para. 1-7 <i>Communicating to employees about these issues and their resolution is critical to employee engagement. PG&E will share the issues raised, the actions to address them, and monitor and track their resolution. Some issues may require more long term effort, and PG&E is committed to their resolution. PG&E will leverage existing Union committees (Attachment 5) to continue discussions in these areas and will use broader Gas Operations communications to continue to inform employees about the issues and their disposition.....</i></p>