

ATTACHMENT P2-1479



Asset Type: **Gas Transmission and Distribution** Date Issued/Updated: **October 2008**

Function: **Estimating and Construction** Page: **1** of **6**

Title: Gas Overbuilds

Overview This work procedure establishes uniform procedures to correct overbuild conditions that impair access/clearances or create potential hazards on gas transmission, distribution, and service facilities.

Governing Document UO Standard S4100 "Gas Pipeline Maintenance and Construction Requirements" – *Expected publication 2008*

Safety This work procedure promotes safety by reducing potential hazards from overbuilds on gas transmission, distribution, and service facilities.

Gas Overbuilds Procedure

1. Determining if a Gas Overbuild Exists

A. The following gas-competent employees are qualified and likely to detect gas overbuilds during their scheduled work:

- Leak surveyors
- Gas Mark and Locate employees
- Gas Construction employees
- Gas Measurement and Control employees
- Gas Estimating employees
- Gas Engineering employees
- Gas Field Service employees
- Gas Transmission mechanics
- Corrosion mechanics

B. Employees without the background to be gas-competent employees may observe and are expected to report conditions in the field that they suspect may be gas overbuild conditions. This group includes, but is not limited to the following employees:

- Meter readers
- Work and Resource coordinators
- Service Planning employees other than gas estimators

C. Reporting Detected Gas Overbuilds

- (1) The employee immediately reports to the appropriate supervisor any conditions that could result in imminent danger to life or property, including but not limited to leak indications (see UO Standard S4110 "Leak Survey and Repair of Gas Transmission and Distribution Facilities").
- (2) The employee notifies the supervisor at the end of the work day about any other gas overbuild condition observed.
- (3) The supervisor reviews the information and contacts the appropriate maintenance and construction (M&C) supervisor. If the supervisor is not in M&C, the appropriate supervisor completes a Gas Distribution Corrective Work Form in the Systems Applications and Products/Work Management (SAP/WM) program. If a gas transmission line is involved, the appropriate M&C supervisor completes a Gas Transmission Corrective Work Form in SAP/WM.
- (4) The M&C supervisor reviews the form from the above Section 1.C.(3) for accuracy and completeness and processes it like all other corrective work forms. The pre-designated job owner in Service Planning, if any, should be indicated on the form in the appropriate location.
- (5) Upon entry of the information provided on the Gas Distribution Corrective Work Form into SAP/WM, business rules within SAP developed by Gas Asset Lifecycle Management determine if a gas construction (GC) (for distribution) order should be created for action to be taken. The creation of an order implies that the work has been funded. Once an order is created and the operation to investigate the overbuild situation scheduled to a gas estimator, the gas estimator completes the proposed design and all other necessary design dependencies. In addition, the gas estimator activates any additional needed dependencies. All of these actions allow the order to be managed through construction.
- (6) After the information provided on the Gas Transmission Corrective Work Form is entered via a transmission notification (TR) to SAP/WM, gas asset strategists determine if an order should be created and manually release the work to be performed.

2. Action After Determining a Gas Overbuild Exists

- A. The designated job owner manages the completion of the order using the SAP/WM system.
- B. Within the timeframe specified in Attachment 1, "Gas Overbuild Correction Guideline," the job owner completes the following tasks:
 - 1) Sends a letter to the customer of record and requests that the customer remove the overbuild, according to the time limits specified in Attachment 1. The Company grants reasonable extensions based on reasonable progress.
 - 2) Records each letter sent and received as a "Customer Contact" on the Premises record in Customer Care and Billing (CC&B), as well as in the SAP Notification "Notes" field and attaches it to the order.
 - 3) If the customer does not remove the overbuild within the time period specified, the designated employee offers to have the gas line relocated at the customer's expense. The designated employee records this offer as a "Customer Contact" on the Premises record in CC&B, as well as in SAP.
- C. If the customer fails to respond to the letter or refuses to correct the situation or pay for the relocation within the time period specified, the job owner sends a letter to the customer indicating that gas service may be discontinued within 30 working days unless the customer agrees to correct the situation. Be sure to document letters sent and received as "Customer Contacts" on the Premises record in CC&B, and attach the letters to the order in SAP.

3. Action if Customer Agrees to Correct the Overbuild

- A. The job owner obtains written agreement to correct the overbuild from the property owner. **This document must include a negotiated deadline for the correction.**
- B. If the property owner fails to correct the overbuild by the negotiated deadline, the job owner sends a letter to the property owner and customer of record (if different from the property owner), as described in Section 2.C. above.
- C. The job owner documents all letters (sent and received) as a "Customer Contact" on the Premises record in CC&B.
- D. The job owner documents the completion of the overbuild correction in SAP.

4. Action if Customer Agrees to Pay Company to Relocate the Gas Line

- A. Rearrange gas facilities in accordance with Gas Rule 16, "Service Extensions." The job owner creates a Sold-to-Party (STP) in SAP (use the ZVAC transaction for this). The STP can then be added to the notification and order using the Partner screen.
- B. The job owner documents all letters (sent and received) as a "Customer Contact" on the Premises record in CC&B.
- C. The job owner documents completed work in SAP.

5. Action if the Customer Refuses to Correct the Overbuild or Pay for Gas Line Relocation

- A. Follow Gas Rule 11, "Discontinuance and Restoration of Service," Paragraph I, "Introduction," and UO Standard S7010, Attachment 1, "Gas Service Cut-Off Procedures," Paragraph 8, "Cut-Offs for Emergency (Such as Fire)," to discontinue gas service.
- B. Once the job estimate is authorized, the job owner contacts the customer one final time to give the customer the opportunity to remove the overbuild or relocate the gas line at the customer's expense. The job owner documents these contacts as "Customer Contacts" on the Premises record in CC&B.
- C. At the end of 10 working days from the date of the final customer contact, schedule construction to cut the gas line, as indicated in the job estimate. The job owner documents this work in SAP and as a "Customer Contact" on the Premises record in CC&B.
- D. If the Company receives a "Cease and Desist Order" from the customer's legal representative, the Company complies. The job owner forwards the project information to the Law department for response. The job owner conducts a monthly follow up and records the follow-up information in SAP until the overbuild condition is resolved.

6. Action After Determining that a Gas Overbuild Does Not Exist

The job owner closes the notification in SAP after determining that a gas overbuild does not exist.

7. Action if the Overbuild Clearance is Delayed

- A. Resolve overbuild situations in accordance with Attachment 1, "Gas Overbuild Correction Guideline." Do not cancel action due to any delay.
- B. The customer is responsible for correcting gas overbuilds or relocating the gas line, even if action is delayed.

- C. The customer is not responsible for correcting gas overbuilds if the gas facilities were installed in an incorrect location and/or the overbuild has been in place long enough for a qualified employee (see employees listed in Section 1.A.) to have visited the site without notifying the customer within 1 year. Generally speaking, performance of a scheduled routine leak survey at the site is considered indicative that a qualified employee has visited the site. For example, if a 5-year leak survey had taken place and the overbuild had not been reported to the customer within 1 year of the survey, the Company would correct these overbuilds at no expense to the customer.

8. Gas Engineering Monitoring Responsibilities

- A. To assure compliance, Gas Engineering monitors the completion of overbuild corrections on a quarterly basis.
- B. Gas Engineering provides forecasts to the Work Requested by Others (WRO) program manager, as requested.

9. Record Retention

Retain documentation of notification resolutions, including electronically scanned copies of letters sent and received for all potential gas overbuilds, in the SAP file for each notification.

Definition of Terms

CC&B: Customer Care and Billing, the Company customer information system.

Competent gas estimating person: A gas associate distribution engineer, senior gas estimator, gas estimator, and their supervisors.

Competent person: An employee who has the training and experience to determine if a field situation contains a gas overbuild. (See Section 1.A. for a list of qualified employees.)

Gas Distribution Corrective Work Form: The Systems Applications and Products/Work Management (SAP/WM) form used to report necessary corrective work on gas distribution facilities.

Gas engineering personnel: Local gas distribution engineers.

Gas overbuild: A situation in which third-party construction above or close to a gas meter set, service, distribution main, or transmission line reduces or limits access to Company gas facilities, preventing routine inspection and maintenance or creating a potential hazard. Such construction includes, but is not limited to buildings or portions of buildings, decks, patios, walls, driveways, or other structures. Potential hazards include, but are not limited to migrating gas and excessive outside force on gas facilities.

Gas Transmission Corrective Work Form: The SAP/WM form used to report necessary corrective work on gas transmission facilities.

Job owner: The local employee, generally a customer contact estimator, new senior business representative, or industrial power engineer, who performs local project management services.

Recision This work procedure cancels and supersedes UO Guideline G15001 "Gas Overbuilds," dated 08/05.

Reference Documents Gas Rule 11, "Discontinuance and Restoration of Service"
Gas Rule 15, "Gas Main Extensions"
Gas Rule 16, "Service Extensions"
UO Standard S4110 "Leak Survey and Repair of Gas Transmission and Distribution Facilities"

Attachments Attachment 1, "Gas Overbuild Correction Guideline"
Attachment 2, "Sample Letters to Customers"

Contact for More Information [Redacted]
 Senior Consulting Gas Engineer

Date Issued October 2008

Approved by [Redacted]
 Manager

Revision History

Chg No.	Date	Description	By (LAN ID)
00	October 2008	Converted UO Guideline G15001 into Work Procedure WP4100-04.	[Redacted]

Gas Overbuild Correction Guideline

Note: See Work Procedure WP4100-04, Section 7, "Action if Overbuild Clearance is Delayed," for applicability of cost responsibility.

SAP Work Type ¹	Overbuild Priority Level	SAP Priority	Potential Result of Overbuild	MWC/MAT Exp Cap	Initial Customer Contact Time Frame Target ²	Completion Target after Notification Creation
578	Immediate	A	Imminent danger to life and property and includes a leak.	FIH 50G	Immediate	
312	Immediate	A	Imminent danger to life and property. No leak.	EWM 51H	Immediate	
312	1	A	Allows accumulation of gas without proper venting and a source of ignition is present.	EWM 51H	2 months	4 months
	2	G	Prevents access to gas facilities to perform required maintenance and operation activities, such as: <ul style="list-style-type: none"> • Clear existing underground contacts • Perform leak survey. • Electrolysis test station (ETS) • Maintained distribution valve • District regulator station • Other compliance work 	EWM 51H	2 months	4 months
359	3	G or P	Prevents access to service, curb, or shut off valve.	EWM 51H	6 months	1 year
387	4	P	Overbuilds that limit access to the meter ³	US ³ service valve: EWM 51 DS ³ service valve: HYA n/a HYB n/a	6 months	2 years

Notes:

¹ The SAP Work Types in this table are for gas distribution facilities. For gas transmission facilities, use 650 for capital work and 651 for expense work.

² The "Initial Customer Contact Time Frame" is the maximum time between the date it is determined that a gas overbuild exists and the date the person assigned to handle the overbuild first contacts the customer. Specific conditions may require notification and completion of work sooner than the target.

³ US: Upstream of DS: Downstream of

- Charge to the expense MWC/MAT for partial service relocations, main relocations less than 100 feet, or relocation of valves less than 2 inches. Charge to the appropriate capital MWC/MAT for full service relocations, main relocations greater than 100 feet, or relocation of valves 2 inches or larger.
- Scheduled gas meter changes covered by CSS Procedure-Field Service Procedure, "SMC/TOU/Gas Regulator Replacement CGI Process."
- Refer new situations requiring meter protection to the Meter Protection Program database.
- Extensions based on documented extenuating circumstances may be granted by Gas Engineering – Integrity Management.
- Refer to UO standards, UO work procedures, and Numbered Document O-16 for Priority 2 related compliance requirements.

Sample Letters to Customers

Note: Attach or document electronic copies of all letters and other communications to the customer to the account file in Customer Care and Billing (CC&B), as well as in Systems Applications and Products (SAP).

Examples of the following sample letters to customers are provided, starting on Page 2 of this attachment:

- First Notification Letter to Customer
- Letter to Customer Who Failed to Respond to the First Notification Letter
- Letter to Customer Who Refused to Correct the Overbuild Condition
- Final Letter to Customer: Service to Be Discontinued

First Notification Letter to Customer*Sample*

<<Date>>
<< PG&E Customer>>
<<Address>>
<<City>>, <<State>> <<Zip>>

Re: Gas Safety

Dear << PG&E Customer>>:

Delivering safe and reliable energy is a top priority of Pacific Gas and Electric Company and the California Public Utilities Commission. To meet this requirement, PG&E must ensure that its gas facilities are in a safe location and are accessible at all times in order to perform inspections, routine maintenance, and emergency repair as required by the California Public Utilities Commission and the United States Department of Transportation regulations.

The safety of our system is impaired when a gas "overbuild" condition exists. This is a condition where ready access to PG&E gas facilities is prevented by objects that enclose, are installed directly over, or are in too close proximity to the PG&E gas facilities or when required clearances are not maintained. Such objects typically include, but are not limited to, buildings or portions of buildings, decks, patios, or walls.

We have identified a gas overbuild condition on your property that you are responsible for correcting, as soon as practicable, pursuant to Gas Rule 16.F.3 of PG&E's tariffs on file with, and approved by, the California Public Utilities Commission (copy attached). If you are not the property owner or otherwise not responsible for the property, please forward this to the appropriate party immediately.

Please contact <<Name>> at <<Phone Number>> to discuss your plans for resolving the situation. Your cooperation is greatly appreciated.

Sincerely,

<<Name>>
<<PG&E Title>>
<<Phone Number>>

Attachment
cc. CPUC Consumer Protection and Safety Division
bcc. CC&B
bcc. SAP

Work Procedure

October 2008

MATERIAL REDACTED

GTR0241944

**Letter to Customer Who
Failed to Respond to the First Notification Letter**

Sample

<<Date>>
<<PG&E Customer>>
<<Address>>
<<City>>, <<State>> <<Zip>>

Re: Gas Safety – Second Letter

Dear <<PG&E Customer>>:

Pacific Gas and Electric Company recently sent you a letter dated <<Date of First Letter>> identifying a safety concern as a result of a gas overbuild condition on your property.. We have not heard from you on this matter.

As we stated in our previous letter, delivering energy to our customers safely is a top priority of Pacific Gas and Electric Company and the California Public Utilities Commission. To meet this requirement, PG&E must ensure that its gas facilities are in a safe location and are accessible at all times in order to perform inspections, routine maintenance, and emergency repair as required by the California Public Utilities Commission and the United States Department of Transportation regulations.

CPUC Gas Rule 16.F.3.C requires that whenever an impaired access or clearance problem exists, the "Applicant or owner shall, at Applicant's or owner's expense, either correct the access or clearance infractions, or pay PG&E its total estimated cost to relocate its facilities to a new location which is acceptable to PG&E. Applicant or owner shall also be responsible for the expense to relocate any equipment which Applicant owns and maintains. Failure to comply with corrective measures within a reasonable time may result in discontinuance of service."

Pursuant to this rule we require that you contact us regarding corrective actions to resolve this matter. If we do not hear from you (or the property owner) within 30 days, we may need to discontinue service.

I look forward to working with you to resolve this issue. Again, please call <<Name>> at <<Phone Number>> to discuss your plans for removing the obstruction/overbuild or coordinate relocation of gas facilities. Your cooperation will be greatly appreciated.

Sincerely,

<<Name>>
<<PG&E Title>>
<<Phone Number>>

cc. CPUC Consumer Protection and Safety Division
bcc. CC&B
bcc. SAP

Work Procedure

October 2008

MATERIAL REDACTED

GTR0241945

**Letter to Customer Who Refused
to Correct the Overbuild Condition**

Sample

<<Date>>
<<PG&E Customer>>
<<Address>>
<<City>>, <<State>> <<Zip>>

Re: Gas Safety – Refusal to Correct

Dear <<PG&E Customer>>:

Pacific Gas and Electric Company recently sent you a letter dated <<Date of First Letter>> indicating that you are responsible for correcting a gas overbuild condition on your property. You have refused the offered alternatives of correcting the condition in a timely manner or paying PG&E to relocate our facilities to an acceptable location on your property.

As we mentioned in our previous letter and in our subsequent discussions on this matter, delivering energy to our customers safely is a top priority of Pacific Gas and Electric Company and the California Public Utilities Commission. To meet this requirement, PG&E must ensure that its gas facilities are in a safe location and are accessible at all times in order to perform inspections, routine maintenance, and emergency repair as required by the California Public Utilities Commission and the United States Department of Transportation regulations.

Since you have refused the available alternatives and the condition has not been resolved, PG&E will proceed to discontinue service pursuant to Gas Rule 11. In approximately 2 weeks you will be notified of the scheduled date to discontinue service. Once service has been disconnected, you must resolve the condition before service will be reconnected. You will be responsible for the cost to reconnect gas service if you desire to do so at a future time.

I look forward to working with you to resolve this issue. Again, please call me at <<Phone Number>> to discuss your plans for resolving the situation. Your cooperation will be greatly appreciated.

Sincerely,

<<Name>>
<<PG&E Title>>

cc. CPUC Consumer Protection and Safety Division
bcc. CC&B
bcc. SAP

Work Procedure

October 2008

MATERIAL REDACTED

GTR0241946

Final Letter to Customer: Service to Be Discontinued*Sample*

<<Date>>
<<Customer Name>>
<<Address>>
<<City>>, <<State>> <<Zip>>

Re: Gas Safety: Final Notice of Disconnect

Dear <<Customer Name>>:

On <<First Letter Date>>, I sent you a letter advising you of your responsibilities to take action to correct the gas overbuilt condition on your property in accordance with PG&E's filed tariffs. On <<Second Letter Date>> you were also advised that failure to comply with this requirement would result in gas service being discontinued to the property.

Unfortunately this situation has not been resolved and we must now advise you that your gas service will be discontinued. A utility crew is scheduled to cut-off the gas service that serves your property on <<Date>> unless the situation is resolved.

As stated above, you have been notified on two prior occasions of your options to avoid this action. This is the FINAL notice and no other notice will be provided. Once the service is disconnected, you will be responsible for all reconnection costs after the corrective action has been taken to PG&E's satisfaction.

You may contact <<Name>> at <<Phone Number>> to resolve this issue so that we may avoid this action.

Sincerely,

<<Name>>
<<PG&E Title>>
<<Phone Number>>

cc. CPUC Consumer Protection and Safety Division
bcc. CC&B
bcc. SAP

Work Procedure

October 2008

MATERIAL REDACTED

GTR0241947