



**Pacific Gas and  
Electric Company®**

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February 6, 2013

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  
Failure to Repair, Re-check and Document Leaks – Mission Division

Dear General Hagan:

Pursuant to Resolution ALJ-274, PG&E is providing notification of a self-identified non-compliance issue regarding failure to repair, re-check and document leaks in the Mission Division.

During a recent leak records review for 2012 by a local engineer, the Mission Division discovered leaks that had been identified in the field between January and July 2012 but had not been entered into PG&E's Integrated Gas Information System (IGIS). By failing to document leaks in IGIS, PG&E also failed to repair and re-check leaks per PG&E Procedure TD-4410P-09 "*Leak Grading and Response*," which is a violation of 49 CFR 192.13(c).

Per PG&E's Utility Procedure TD-4110P-09, leak grades are defined as follows:

**Grade 2+** - A leak that is non-hazardous to persons or property at the time of detection but requires a scheduled priority repair completed within 90 days.

**Grade 2** – A leak that is non-hazardous to person or property at the time of detection but requires periodic surveillance and a scheduled repair because it presents a probable future hazard.

**Grade 3** – A leak that is non-hazardous at the time of detection and can reasonably be expected to remain non-hazardous.

Grade 2 leaks must be rechecked before repair at intervals of 6 months, not to exceed the last day of the 7<sup>th</sup> month, to the date. Grade 3 leaks must be rechecked at 15 months to the date or during the next scheduled survey, whichever comes first. PG&E must enter all leaks into IGIS within 14 days of discovering the leak.

One Grade 2+ leak, nine Grade 2 leaks and 24 Grade 3 leaks were determined to have missed timely IGIS entry after the leaks were identified. On January 3, 2013, upon discovering the leaks had not been entered into IGIS and had missed corrective actions, PG&E immediately entered the leaks into IGIS and performed the required repairs and re-checks. Of these leaks, one Grade 2+ leak was repaired late and two Grade 2 leaks were re-checked late. The remaining seven Grade 2 leaks were also re-checked, but were not late. One Grade 2 leak was upgraded to a Grade 1 leak and was repaired in the field on January 3, 2013. None of the Grade 3 leaks missed their re-check dates.

PG&E's Mission Division conducted a review of all 2011 leaks to determine if the problem extended into the previous year. All leaks identified in 2011 were verified to have been appropriately entered into IGIS.

All leaks that were not timely entered into IGIS had been logged in the field on a manual leak log but had been noted on the back side of the log, thereby being overlooked for IGIS entry. The introduction of tablet computers has eliminated the practice of using a handwritten form to transmit leak information to Mapping for IGIS entry. The new form that is printed from tablet data does not print to the backside of the form, thus preventing the chance of Mapping failing to notice leaks that require entry into IGIS.

PG&E plans to perform a system-wide review to identify the existence of similar issues in other divisions. PG&E will also conduct a causal evaluation regarding the missed leak entries, and based on the results of the evaluation, will develop additional appropriate corrective actions to address this event on a longer term or system-wide basis, if warranted.

PG&E will notify the appropriate local authorities for the Cities and Counties of PG&E's Mission Division of this issue and will provide confirmation of notification as a supplement to this letter.

Please contact [Redacted] at [Redacted] or [Redacted] for any additional questions you may have regarding this notification.

Sincerely,



Frances Yee  
Acting Director, Regulatory Compliance and Support

cc: Julie Halligan, CPUC  
Dennis Lee, CPUC  
Mike Robertson, CPUC  
Sunil Shori, CPUC

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