



**Pacific Gas and  
Electric Company®**

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June 13, 2013

Brigadier General Jack Hagan, Director  
Safety and Enforcement 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 Leak Surveys and Atmospheric Corrosion Inspections in Sonoma Division

Dear Brigadier General Hagan:

Pursuant to Resolution ALJ-274, PG&E is providing notification of self-identified non-compliance issues regarding missed leak surveys and atmospheric corrosion (AC) inspections for gas distribution service lines and meters in the Cities of Sonoma and Petaluma, County of Sonoma, California.

In April 2013, a PG&E leak surveyor in Sonoma Division discovered nine service lines that had not been posted on plat maps and consequently had no record of leak surveys or AC inspections. The services and meter sets had been installed in 1993 or later.

The missed leak surveys result in non-compliance with 49 CFR §192.723(b)(2), which requires leak surveys on distribution facilities at least once every 5 calendar years at intervals not exceeding 63 months. The missed AC inspections result in non-compliance with 49 CFR §192.481(a), which requires AC inspections on portions of the pipeline exposed to the atmosphere at least once every 3 calendar years, but with intervals not exceeding 39 months.

Upon discovery, PG&E took immediate action by conducting leak surveys and atmospheric corrosion inspections of the services and meter sets on April 16, 2013, with no leaks or corrosion issues found. PG&E also added the services to appropriate plat maps, ensuring that they will be scheduled for future leak surveys and AC inspections.

Furthermore, PG&E has initiated a Gas and Electric Mapping System/Customer Care and Billing (GEMS/CC&B) Validation effort to investigate the potential for assets to not be accurately reflected on Gas Plat Maps. In coordination with PG&E's Pathfinder Program, this effort will continue to identify any unmapped services and significantly improve the management of PG&E's gas distribution assets.

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PG&E will notify the local authorities for the Cities of Sonoma and Petaluma and the County of Sonoma of this event and will provide confirmation of notification as a supplement to this letter. Please contact Redacted for any additional questions you may have regarding this notification.

Sincerely,



Frances Yee  
Acting Director, Regulatory Compliance and Support

cc: Dennis Lee, CPUC  
Liza Malashenko, CPUC  
Mike Robertson, CPUC  
Sunil Shori, CPUC

Redacted &E  
PG&E  
Shilpa Ramaiya, PG&E