

# APPENDIX B

## Summary Table

PUC Code Section	SED Requirement	GSRB'S Initial Review of Compliance	GSRB'S Reviewer's Comments during Initial Review	Specific section in the REVISED Safety Plan that addresses revisions made to meet this PUC Section	Summary of the REVISED Safety Plan that addresses this PUC Code Section
Sec. 961 Subdivision (b)(3)	Each gas corporation shall implement its approved plan	N	The safety plan did not include a high level policy statement stating that PG&E will implement its approved Safety Plan.	III. Gas Safety Plan Implementation and Maintenance	Section III states that PG&E will implement its approved Safety Plan and goes further to explain how implementation and maintenance will occur through the creation of the Gas Safety Executive Committee and Gas Safety Team.
Sec. 961 Subdivision (b)(4)	The commission shall require each gas corporation to periodically review and update the plan	N	The safety plan did not specify a frequency on which the Safety plan will be reviewed.	Section III. Gas Safety Plan Implementation and Maintenance	Section III includes a process by which the Safety Plan will be renewed and updated on an annual basis (not to exceed 15 months).
Sec. 961 Subdivision (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.	N	The Safety Plan did not clearly describe if and how Publicly Available Specification (PAS 55) will include an evaluation of PG&E's operations, processes and procedures in comparison with best practices.	Section IV. Safety First Culture - B. Gas Safety Excellence, Section IX. Emerging Issues	Section IV provides an introduction on Gas Safety Excellence and PASS 55. Section IX describes how PG&E is obtaining PASS 55 Certification. This certification will include an evaluation of PG&E's operations, processes, and procedures via an independent audit targeted for 2014, which can then be used to compare to industry best practices.

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		N	Although PG&E indicated its plans for studying and adopting best practices, the safety plan did not describe how the company stays informed of industry best practices. The safety plan also did not state a frequency or criteria used to determine when a best-in-class comprehensive study and comparison is to be conducted.	Section VIII. State and Federal Regulations - H. Benchmarking and Best Practices Section	Section VIII describes how PG&E stays informed of industry best practices. The section also states that PG&E uses CGA's best practices study each year which PG&E would use for benchmarking and comparison. PG&E also added a new section 6 regarding Innovative Industry Leading Technologies.
Sec. 961 Subdivision (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.	N	PG&E is currently working on its PAS certification and the safety plan provides a general overview of the requirements to achieve certification. However, the safety plan did not detail on how PG&E intends to conduct the audits to achieve certification (i.e. PAS requires PG&E management team to review, at least annually, the results of communications, participation and consultation with employees and other stakeholders. Safety plan did not describe how the review will be conducted and by which PG&E management team it would be conducted.	Section IV. Safety First Culture - B. Gas Safety Excellence, Section IX. Emerging Issues	Section IV provides an introduction on Gas Safety Excellence and PASS 55. The Emerging Issues section states that PG&E must have annual independent audits performed of its asset management process and an independent recertification audit every 3rd year.
Sec. 961 Subdivision (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.	N	The Safety Plan did not detail processes used by the Gas Operations Risk and Compliance Committee to identify and manage risks. It was also unclear if and how the work done by the Gas Operations Risk and Compliance Committee is related to its existing Integrity Management programs.	V. Safety Systems - A. Risk Management, B - Risk Register, F and G - Integrity Management Programs	Section V details and cross references processes, standards, and procedures used by the Gas Operations Risk and Compliance Committee to identify and manage risks. In addition, TIMP and DIMP are specified within the Risk Management Procedures contained in this section.

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Sec. 961 Subdivision (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.	N	CPSD determined in its investigation involving I.11-11-009 that PG&E has deficiencies in its patrolling procedures for transmission pipelines.	VI. Continuing Operations - A. Damage Prevention - 4. Pipeline Patrol and Monitoring	Section VI describes how PG&E has either resolved or is in the process of resolving all deficiencies identified in its patrolling procedures by SED in 11-11-009. Recommendations were also included in PG&E's Patrol Work Procedure.
Sec. 961 Subdivision (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.	N	CPSD noted deficiencies in PG&E's SCADA system in its investigation of the San Bruno Incident.	V. Safety Systems - J. Transmission and Distribution System Controls - 3. Enhancements to Transmissions and Distribution Control Centers	Section V describes the steps PG&E has taken to resolved deficiencies in its SCADA system via additional SCADA monitoring points, visibility standards for distribution, detailed SCADA viewing tools, and many others. In addition, PG&E conducted a review of SCADA systems throughout the industry and hired an external consultant to review PGE's SCADA. Key takeaways PG&E is currently working on are described.
Sec. 961 Subdivision (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.	N	CPSD audited PG&E's Public Awareness Plan and noted deficiencies. CPSD also noted in its investigation of the San Bruno Incident deficiencies in PG&E's Emergency Response Program	VI. Continuing Operations - A. Damage Prevention - 1. Public Awareness and VII. Emergency Response	Section VI describes the various efforts PG&E has taken to remedy deficiencies identified by SED in its Public Awareness Plan. Section VII describes PG&E's Emergency Response Plan, improvements, and references the actual Plan in the appendix.

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		N	CPSD determined in its investigation involving I.11-11-009 that PG&E has deficiencies in its class location procedures.	VIII. State and Federal Regulations - G. Class Location	Section VIII describes PG&E's improved Class Location procedure which includes ongoing surveillance and an annual Class Location study.
		N	CPSD audited PG&E's Public Awareness Plan and noted deficiencies	VI. Continuing Operations - A. Damage Prevention - 1. Public Awareness	Section VI describes the various efforts PG&E has taken to remedy deficiencies identified by SED in its Public Awareness Plan.
Sec. 961 Subdivision (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.	N	CPSD audited PG&E's Operation and Maintenance Plan and noted deficiencies in PG&E's procedures	VIII. State and Federal Regulations - A - E	Section VIII has been further revised to define and outline PG&E's O&M Plan and Procedures.
Sec. 961 Subdivision (d)(10) & Sec.963 Subdivision (b)(3)	Ensure an adequately sized, qualified, and properly trained gas corporation workforce to carry out the plan.	N	The Safety Plan did not include a high level policy statement that the Operator ensures that determinations made by the Operator as to the adequacy of its workforce are based primarily on a demonstrable analysis that places safety as the highest priority and assigns it a weighting commensurate with this policy.	IV. Continuing Operations- J. Workforce Size	Section IV includes a high level policy statement that determinations of workforce adequacy are based on a procedure where proposed projects or programs are risk ranked and prioritized. A high level process flow is also provided.

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		N	The safety plan did not provide detail on how it conducts contractor evaluations (i.e. Who conducts the contractor evaluations? What is the process for doing the evaluation?)	VI. Continuing Operations - M. Contractor Safety and Oversight	Section VI provides detail on the Contractor Safety Program which was put in place in 2013 to evaluate safety performance results of contractors.
		N	The Safety Plan did not contain guidance or standard on how the audits will be conducted, selection of outsourced activities to audit, and how often.	VI. Continuing Operations - M. Contractor Safety and Oversight	Section VI references the contractor safety management program and contractor safety department.
		N	The Safety Plan did not contain description as to how class improvements are prioritized. It was also unclear if these are in addition from those required by 49 CFR Part 192, Subpart N.	VI. Continuing Operations	Section VI references how PG&E has conducted a comprehensive study in order to identify and prioritize gas training. In addition, this section describes how the priority of training program improvements is determined.
		N	The Safety Plan did not describe how PG&E identify its resource needs.	IV. Continuing Operations- J. Workforce Size	Section IV describes how resource needs are identified through a procedure where proposed projects or programs are risk ranked and prioritized. A high level process flow is also provided.

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Sec. 961 Subdivision (d)(11)	Any additional matter that the commission determines should be included in the plan.	N	Did not meet criterion	VII. Emerging Issues	Section VII describes how PG&E has worked closely with SED to address the deficiencies identified in the first revision of PG&E's Gas Safety Plan. PG&E will continue to work with the CPUC as part of PG&E's revision process to address any additional matters the CPUC might determine should be part of future revisions to the Gas Safety Plan. Likewise, PG&E will take appropriate steps to identify matters that should be included in future revisions of the Gas Safety Plan.
Sec. 961 Subdivision (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.	N	With the exception of the focus groups and Material Problem Reporting (MPR), PG&E's Safety Plan does not detail how comments or concerns brought up by the employees through supervisors, Gas Operations leader, or the Ethics Hotline are tracked, reviewed or validated.	X. Workforce Participation - A. Corrective Action Program, B. Compliance and Ethics Helpline, C. Material Problem Reporting, D. Other Reporting and Feedback Channels	Section X now includes details on the Compliance and Ethics Hotline and how complaints are tracked and prioritized. The Procedure is also attached in Attachment 19. In addition, other reporting and feedback channels are described openly and clearly.