

## Developmental Workshop - Creating Useful and Efficient Gas System Operator Reporting Metrics

June 27, 2013

CPUC Proposed Metric		PG&E Comments
<b>A) Additional Metrics Beyond Those in the Current Annual Report (7100.1-1)</b>		
1	Add construction defects and material failures as a cause on the annual report;	This information is currently not available and would require modifications to existing forms and database to collect this information.
2	Report Metrics collected per 192.1007(e)(1)(v) for hazardous leaks and include the same information for non-hazardous leaks;	This information is currently not available and would require modifications to existing forms and database to collect this information.
3	Report Metrics for the number of compression type mechanical fitting failures that resulted in hazardous (192.1009 using Form 7100.1-2) as well as those for non-hazardous leaks;	PG&E is currently collecting this information for hazardous leaks only. The safety-related benefits of also collecting this information for non-hazardous leaks should be considered further, as well as the utility resources that would be required to compile this information. PG&E is aware of mechanical fittings limitations/performance issues and is currently working to improve that area. Additionally, PG&E's most recent annual Mechanical Fitting Failure Report (Form PHMSA F 7100.1-2) provides insight into all mechanical fitting failures.
4	For leaks repaired in the CY, show time between finding the leak and its repair in intervals of 0-3 months; 3-6 months; 6-9 months; 9-12 months; 12-15 months; and greater than 15 months;	This information should be easily available; however, it should be noted that it is important to understand how leaks are graded and re-graded over time.
5	Add a new Part G which requires number of overpressure events which exceed 50% allowance to be reported annually	This information is available. It is not clear where the new "Part G" would reside.
6	Annual Public Awareness Monitoring and/or calls received by the operator on each phone number provided in the public awareness message;	This information is currently not available and would be difficult to collect. We use the pipeline safety hotline number and our 800 number. As both are also promoted outside of Public Awareness, we have no way to determine if customers are responding due to Public Awareness outreach.
7	Annually Report the 32 metrics required to be tracked per 192.945(a) and ASME B31.8S, Chapter 9, Table 9;	This information is partially available. Each of the 32 metrics in Table 9 have a different degree of difficulty and progress. Some we are already reporting on and some we are developing.

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<b><i>B) Additional Excavation Related Metrics Beyond Those in the Current Annual Report (7100.1-1)</i></b>		
1	Number of excavation damage events involving homeowners;	This information is available.
2	Number of excavation damage events involving agencies (i.e., Caltrans, non-pressurized sewer) excluded per GC 4216;	This information is available.
3	Number of person-days, along with total costs, devoted to excavation field meetings (per GC 4216) and stand-by activities;	This information is available.
4	Number of person-days, along with total costs, devoted to mark and locate activities;	This information is available.
5	Confirm that Part D, the Number of Excavation tickets should include all original and renewals (overall, there exists a need to confirm state-wide uniformity in this reporting).	This information is available.
<b><i>C) Obtain new data that can assist in more effective audits of operators</i></b>		
1	Number of near-miss events by operating Division, District and/or Region;	This information is currently not available. A clear definition of a "near-miss" is necessary to make this a meaningful and reproducible metric.
2	A metric which tracks the amount of time it takes for changes, repairs or new facilities to get finalized to the operating maps;	This information is available. PG&E is currently deploying a new process to create a Request Work (RW) in SAP.
3	Number of employees, by operating Division, District and/or Region, evaluated and those disqualified after evaluations, performed per 192.805 (d) or (e);	This information is not readily available, but it can be collected. It should be noted that different operators will have different OQ tasks and it will be difficult to have comparable metrics between operators.

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<b>CPUC Proposed Metric</b>		<b>PG&amp;E Comments</b>
4	Provide lost and unaccounted for gas values by operating Division, District and/or Region	This information is not currently available, and does not appear to be a useful safety metric. It also would be very difficult and expensive to collect. The methodology for calculating LUAF on the PG&E system is Measured Volume into the system (e.g., interconnects and storage withdrawals) less Measured Volume out of the system (e.g., customer usage, storage injections, off system flows to interconnects), adjusted for change in pipeline inventory. To perform a LUAF calculation at a more granular level for the PG&E service area would necessitate having an isolatable environment such that one could accurately measure the flows into the area and be able to associate customers within that environment to calculate a measured out volume.
5	Obtain data to understand response times to leaks/damages reported to operators. Annually report response times, by Division, District, and/or Region, to reports of leaks or damages in periods of five minute intervals; The intervals would start with 0-5 minutes, all the way to 40-45 minutes, and with all responses greater than 45 minutes. The clock would start when the utility first receives the report and end when the first representative qualified to assess the situation and make it safe first arrives on scene at the reported location.	This information is partially available. We are currently tracking response times from dispatch to arrival on-site. "Make safe" is an undefined term and would need clarification before attempting to establish a metric for this activity.
<b><i>D) Increase transparency and public confidence related to operators' public liaison activities</i></b>		
1	Operators should report the total number of routine liaison activities planned and scheduled in the year and the number of the scheduled activities actually held;	This information is available.
2	Description of liaison activities and information on annual planned first responder liaison sessions would be provided on operators' respective websites:	This information is available.

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3	Agencies invited to sessions would be listed by county and name of agency	This information is available.
4	The number of agency representatives that attended the sessions would be listed	This information is currently available; however the operator's website may not be the appropriate place to post such information, as without the basis of why an agency was not represented the information could be misinterpreted (e.g., a fire department district could not attend a liaison session due to responding to a fire emergency that day).
5	A link to the operators' websites would reside on the CPUC website.	This information is available.
<b><i>E) Operators' Safety Culture - A very broad category</i></b>		
1	We are aware that operators are examining development of additional performance metrics to evaluate how their culture supports continuous safety improvements. Some of the items discussed earlier can support this effort.	The following are available or will be easily available: 1. Leadership Engagement - tracked to ensure visibility. Leaders can also remove barriers to ensure success. 2. Training completion - improves consistency and knowledge base. 3. Good Catch/near-hit reporting trends events that could've lead to an injury or incident. 4. Incident Investigation completion, corrective action development and close out. 5. Develop an actionable safety committee that addresses issues and tracks them to closure.