



**Pacific Gas and  
Electric Company®**

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August 15, 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: Final Update to May 25, 2012 Resolution ALJ-274 Self-Identified Non-Compliance Notification Regarding Distribution Feeder Main 401-01 Missed Leak Surveys, Marin County

Dear Brigadier General Hagan:

PG&E is providing a final update to the action items stated in its May 25, 2012 notification and August 16, 2012 update letter for a self-identified non-compliance issue regarding missed annual leak surveys on gas distribution feeder main (DFM) 401-01 located in Mill Valley, Marin County.

In its first update, dated August 16, 2012, PG&E stated that an outside consultant would perform a secondary review to ensure that PG&E is appropriately using Standard Industrial Classification (SIC) codes for its Public Assembly list. The consultant, Cyera Strategies, verified that the SIC codes used by PG&E included all schools, hospitals, and places of worship. This year, PG&E's Gas Distribution Mapping has begun using the Public Assembly list to update the leak survey maps and schedules for all distribution facilities system-wide. PG&E plans to update and implement this list on an ongoing basis.

PG&E also stated that it would evaluate the standard and procedures in the Leak Survey Program as part of a Lean Six Sigma (LSS) quality assessment. The LSS assessment resulted in several improvements, including simplification of leak survey frequencies and clarified definition of "public assembly" areas. The standard and procedures pertaining to leak survey frequency and scheduling were revised and published in May 2013, and communication and training on the new procedures is underway, with a target completion date of December 31, 2013. The revised documents include Utility Standard TD-4110S, "Gas Leak Survey and Detection Program," and Utility Procedures TD-4110P-01, "Leak Survey Process" and TD-4110P-03, "Performing and Documenting Leak Survey." Clarifying language has been included in TD-4110P-03 to specify, "A public building survey must include, at a minimum, all Company facilities within a 150 foot perimeter around the building..."

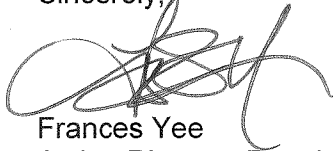
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Please contact [Redacted] at [Redacted] or [Redacted] or any questions you may have regarding this update.

Sincerely,



Frances Yee

Acting Director, Regulatory Compliance and Support

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

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Shilpa Ramaiya, PG&E