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September 25, 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 Unqualified Employee Performing Service Repairs in Sonoma County

Dear Brigadier General Hagan:

Pursuant to Resolution ALJ-274, PG&E is providing notification of a self-identified non-compliance issue regarding an employee who used a valve changer while performing service valve repair work without being qualified to operate riser valve change equipment.

Personnel performing maintenance or operations activities on gas facilities without proper qualifications is not in compliance with 49 CFR 192.805(b), which states, "Each operator shall have and follow a written qualification program. The program shall include provisions to...Ensure through evaluation that individuals performing covered tasks are qualified."

All gas department personnel are given annual refresher OQ training, which includes notification of what OQ sub-tasks the personnel are, and are not, qualified to perform. On July 27, 2013, during the GAS-0134 Annual Review of Operator Qualifications, a PG&E employee discovered that she was not qualified to operate riser valve change equipment while performing service valve repair work.

Upon discovery, PG&E re-tested and re-qualified the employee on August 14, 2013. PG&E also reviewed all daily field reports between August 23, 2012 and July 27, 2013, where the employee performed valve change work without being properly qualified or supervised. The review identified four work reports located in the Cities of Santa Rosa, Petaluma and Sonoma. These locations were rechecked by qualified personnel and were confirmed to be installed and sealed properly.

PG&E will notify the local authorities for the City of Santa Rosa, Petaluma, Sonoma, and the Sonoma County where the affected services are located and will provide confirmation of notification as a supplement to this letter.

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

Sincerely,

Frances Yee

Manager, Regulatory Compliance

CC:

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