

Enclosure 3



Public Utilities Commission
STATE OF CALIFORNIA

Citation Date: December 5, 2013
Citation #: 13-005
Operator ID#: 15007



Frances Yee
Acting Director
Regulatory Compliance & Support
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October 12, 2012

Mr. Michael Robertson
Gas Safety and Reliability Branch
Consumer Protection and Safety Division
California Public Utilities Commission
320 West 4th Street, Suite 500
Los Angeles, CA 90013

Re: General Order 112-E Audit of PG&E's Operations, Maintenance, and Emergency Plan

Dear Mr. Robertson:

The Consumer Protection and Safety Division (CPSD), Gas Safety and Reliability Branch (GSRB) of the CPUC conducted a General Order 112-E audit of PG&E's Operations, Maintenance, and Emergency Plan (OM&E) from February 14 - 17, 2012. The attachment to this letter provides PG&E's detailed responses to the inspection findings listed in your audit letter, dated August 29, 2012.

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

Sincerely,

/s/
Frances Yee
Acting Director, Regulatory Compliance and Support

Attachment:

cc: Aimee Cauguiran, CPUC
Julie Halligan, CPUC

Redacted

Karen Roth, PG&E
Jané Yura, PG&E

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General Order 112-E Findings
CPUC Inspection Report, dated August 29, 2012
Operations, Maintenance, & Emergency Plan

INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
February 14-17, 2012	NOV – 4	Aimee Cauquiran	(415) 703-2055

INSPECTION FINDING

CPUC Finding	<p>49 CFR §192.605(e) and §192.613 Continuing Surveillance</p> <p><i>“(a) Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.”</i></p> <p>PG&E currently does not have a specific written procedure addressing Continuing Surveillance. PG&E has certain standards and work procedures such as patrolling, class location study, leak survey, cathodic protection monitoring, and cathodic protection area resurvey. These specific procedures describe PG&E’s performance of the various operations and maintenance tasks, but it remains unclear how or whether the various tasks relate to PG&E’s continuing surveillance efforts.</p> <p>PG&E must clearly describe how it uses and coordinates the various operations and maintenance tasks in its continuing surveillance. PG&E’s written procedure should describe how findings from failure investigations, leak surveys, cathodic protection monitoring, and other operating and maintenance tasks are gathered and analyzed as a part of its continuing surveillance. The written procedure must also describe the actions to take if changes are found as a result of its data gathering and analysis.</p>
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PG&E RESPONSE

PG&E agrees with this finding and will publish a specific work procedure to address the Company’s continuing surveillance of its gas facilities as required by §192.613.
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ATTACHMENTS

Attachment #	Title or Subject
None	

ACTION REQUIRED

Action To Be Taken	Due Date	Completion Date	Responsible Dept.
Publish a new Continuing Surveillance Procedure	July 31, 2013		Integrity Management