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January 30, 2014

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
Plastic Connections Made by Unqualified Employee in Contra Costa County

Dear Brigadier General Hagan:

Pursuant to Resolution ALJ-274, Pacific Gas & Electric Company (PG&E) is providing notification of a self-identified non-compliance issue regarding plastic connections performed by an unqualified employee on gas distribution facilities in the cities of Pleasant Hill and Lafayette in Contra Costa County.

The employee was qualified to perform plastic connections but missed his annual plastic connection verification test in May 2013 and continued to make plastic connections in 2013 after his qualification period had lapsed. This does not comply with PG&E's Gas Standard D-34 Qualifications for Joining Plastic Pipe, which requires employees performing plastic connections to receive annual verification testing.

Upon discovery, PG&E took the following actions:

- Removed all assignments of plastic joining from the employee on December 19, 2013.
- Identified the plastic joining projects the employee worked on since May 2013. This consisted of two plastic main installation projects, one in Lafayette and the other Pleasant Hill.
- Performed leak surveys of the gas distribution facilities installed as part of the identified projects. The leak surveys were completed on January 17, 2014 and no gas leaks were found.
- Administered the annual plastic connection verification test to the employee on January 13, 2014. The plastic connections he performed for the test passed and he is now re-qualified in accordance with PG&E's Gas Standard D-34. This employee was first qualified to make plastic connections in May 2007, and had successfully completed all plastic connection verification tests prior to May of 2013.
- Cut out and destructively tested a sample of each type of plastic connection the employee made during the period that his qualification had lapsed. One butt

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fusion connection and one electrofusion connection were removed from service and destructively tested on January 29, 2014. Both connections passed the destructive test as specified in PG&E's Gas Standard D-34 Qualifications for Joining Plastic Pipe. This is equivalent to what the annual verification test requires, and it demonstrates the ability of the employee to make successful plastic connections.

PG&E is investigating this issue and will develop additional mitigation measures to prevent recurrence on a longer-term or system-wide basis, as warranted.

PG&E will notify the local authorities for the cities of Pleasant Hill and Lafayette, and County of Contra Costa of this event and will provide confirmation of notification as a supplement to this letter.

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

Sincerely,

/S/
Bill Gibson
Director, Codes and Standards

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

Redacted

Laura Doll, PG&E
Shilpa Ramaiya, PG&E
Frances Yee, PG&E