



ChristiAne Mason, Senior Manager
Regulatory & Field Compliance
Gas Operations

6111 Bollinger Canyon Road
4th Floor
San Ramon, CA 94583
Phone: 925.328.5795
Email: c6mw@pge.com

March 31, 2014

Denise Tyrrell, Interim 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 Missed Maintenance of Isolated Steel Riser Inspections in the Cities of Alameda, Oakland, and Piedmont

Dear Ms. Tyrrell:

Pursuant to Resolution ALJ-274, PG&E is providing notification of a self-identified non-compliance issue regarding missing documentation for the inspection of isolated steel risers in the Cities of Alameda, Oakland, and Piedmont, in Alameda County. Per Title 49 of the Code of Federal Regulations, section 192.465(a), separately protected short sections of steel gas facilities, such as isolated steel risers, are required to be monitored for adequate levels of cathodic protection on a sampling basis, with 10 percent of the population monitored each year so that the entire population is monitored each 10-year period.

In October 2013, as part of a project (the SAP Stabilization Plan) to convert and validate the inspections of isolated steel risers from PG&E's legacy "Gas FM" maintenance scheduling tool to the SAP Maintenance Plan, East Bay Division personnel identified 109 isolated steel riser locations that had no cathodic protection inspection data entered in the legacy Gas FM. PG&E was unable to locate any documentation from the prior inspections for these risers, and therefore is unable to confirm that the work was performed as required by section 192.465(a), which states: " At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period."

Upon discovery, PG&E began conducting inspections of the 109 steel riser locations identified through the SAP Stabilization Plan. All sites identified as having inadequate cathodic protection have been remediated.

PG&E will notify the local authorities for the affected cities and counties of this self-identified non-compliance issue and will provide confirmation of notification as a supplement to this letter.

Please contact Sonal Patni at (925) 328-5778 or S1PW@pge.com for any additional questions you may have regarding this notification.

Sincerely,
/S/

ChristiAne Mason
Senior Manager, Regulatory & Field Compliance

cc: Dennis Lee, CPUC
Liza Malashenko, CPUC
Mike Robertson, CPUC
Sunil Shori, CPUC
Larry Berg, PG&E
Larry Deniston, PG&E
Shilpa Ramaiya, PG&E
Bill Gibson, PG&E