

From: Doll, Laura
Sent: 3/31/2014 3:18:22 PM
To: Singh, Sumeet
(/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=S1ST56905772);
Malashenko, Elizaveta I. (elizaveta.malashenko@cpuc.ca.gov); Allen, Meredith
(/O=PG&E/OU=Corporate/cn=Recipients/cn=MEAe)
Cc: Cherry, Brian K (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=BKC7)
Bcc:
Subject: Comments on SED Utility Safety 2014 Annual Plan

Liza

Here are our belated comments on the Plan draft you provided.

Our overwhelming reaction is congratulatory. It is extremely refreshing and unprecedented to see a document like this from the Commission. It's very both comprehensive and thorough. We found it helpful to see not only what the major issues are from your perspective, but also where they fall within the SED organization. Your "vision of high performance for the Office of Utility Safety and Reliability," and the focus on public trust and clear goals and measurements for success deeply resonates and highlights the challenging parallels between our organizations.

We (Sumeet, Meredith and I) are grateful that you allowed us the opportunity to review and comment; we saw no gaps in key issues or proceedings.

We have a few questions and also noticed some typos which you may already have caught.

Questions

1. Page 7: What is the process of your "Safety Alert" for day-of notification of incidents?
2. Pages 8 and 24: Given the requirement that all reportable incidents be investigated, we are supportive of updating the reporting requirements to focus on incidents that warrant this attention. We are particularly concerned with the current media reportable requirement given the many new small web outlets.

3. Page 9: Is there anything PG&E can do to support the Safety Council’s work in preparing for emergencies? And who is on the Safety Council?
4. Page 10: Re the HAMR reports, we are naturally interested in how those reports will be used in or link to the various regulatory processes already underway. What are the selection and prioritization criteria associated with the 2014 categories you outlined?
5. Page 24: Re the GO 166 rulemaking, PG&E held meetings as required by AB 1650 in 2013 and will start the planning process soon for the 2015 meeting. It would be very helpful to know staff direction on approach so we can incorporate that in our planning for early 2015 meetings even before the OIR is finalized. Also, additional changes may be needed to GO 166 on the plans that are submitted to the CPUC.
6. General:
 - Obviously some of the dates in the risk management program section and elsewhere are already off, including the citation enforcement reference. The target dates for closing out audit reports and incident and violations investigations are helpful.
 - It would be helpful to know the process by which SED will identify and prioritize respective areas of focus for the Annual Plan, and how risk assessments by utilities might affect those priorities. You mentioned this as a living document. Would you anticipate progress updates and/or reports?

Typos

- p. 9 “annul plan” should be annual
- p. 10: “technical finings” should be findings
- p. 12: The October 2014 event description should be in bold like the previous references.
- p. 15: 2nd paragraph should be “PG&E’s” implementation
- p. 16: In the master meter OIR section, “staff with work” should be staff will work; and comply rather than complies
- p. 23: First sentence of NexG section needs revision. Delete the “of” and add “and” before will?
- p. 24: Second sentence needs work for clarity, and 3rd sentence should be “seen” rather than “seem”

GO 166 section: “Utilities” and delete “to submit”

p. 25: 3rd line from bottom should be “and” information rather than “an”

Thanks again for sharing this, and good luck as you go forward.

Laura

Meredith

Sumeet

From: Malashenko, Elizaveta I. [mailto:elizaveta.malashenko@cpuc.ca.gov]
Sent: Thursday, March 13, 2014 5:10 PM
To: Cherry, Brian K; Doll, Laura; Allen, Meredith; Singh, Sumeet
Subject: SED Utility Safety 2014 Annual Plan

Hi,

Please find attached the 2014 Annual Plan for SED Utility Safety and Reliability. Please have a look and let me know if you have any questions or if you see anything missing. I'm intending for this to be a living document and will keep it updated with new information as things come up.

The plan is intended primarily as a CPUC internal management tool – I'm sending it to you to make sure that it's complete and to answer any questions that you might have. If you would like to share it with someone outside of your organization, I would appreciate it you check-in with me first.

Kind Regards,

Liza

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