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Senior Manager
Regulatory & Field Compliance
Gas Operations

Redacted

April 25, 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
Prolonged Exposure of Aboveground Plastic Service in the City of Mill Valley

Dear Ms. Tyrrell:

Pursuant to Resolution ALJ-274, PG&E is providing notification of a self-identified non-compliance issue regarding prolonged exposure to atmosphere for an aboveground plastic service serving a customer in the City of Mill Valley, Marin County.

On April 22, 2013, a PG&E crew responded to a leak reported on a buried plastic service serving a residential customer. The crew was unable to locate the leak due to the depth of the service, so the service was cut off and capped at the main. A temporary aboveground polyethylene (PE) plastic service was installed to continue service to the customer, while PG&E pursued an easement to construct a permanent buried service to the customer. However, the customer's property is surrounded on all sides by neighbors' private properties ("land-locked"), and PG&E has not been able to obtain the easements needed to construct the permanent service. PG&E recently determined that the manufacture date of the temporary aboveground PE pipe was March 27, 2012. This results in non-compliance with 49 CFR §192.321(g)(1) and PG&E's Design Standard A-93, which stipulate that aboveground exposure of temporarily installed plastic pipe may not exceed two years beyond the date of manufacture. (PG&E's approved PE pipe manufacturers certify that supplied pipe is suitable for at least three years of aboveground exposure, in accordance with ASTM D2513.)

As a corrective action, PG&E is working with the customer to deactivate the aboveground plastic service by May 2, 2014, and serve the customer with portable compressed natural gas (CNG) equipment. The CNG equipment will be remotely monitored and secured within steel cabinets and security fencing. Furthermore, PG&E is continuing to pursue an easement to construct a permanent, buried service and is also evaluating other permanent alternatives.

PG&E will evaluate this issue to identify and address the pertinent safety and compliance risks on a longer term or system-wide basis, as warranted.

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Furthermore, PG&E will notify the appropriate local authorities for the City of Mill Valley and the County of Marin of this issue and will provide confirmation of notification as a supplement to this letter.

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

Sincerely,

/S/

[Redacted]

Senior Manager, Regulatory & Field Compliance

cc: Ken Bruno, CPUC
Dennis Lee, CPUC
Liza Malashenko, CPUC
Sunil Shori, CPUC

[Redacted], PG&E
[Redacted], PG&E
Shilpa Ramaiya, PG&E