



Sumeet Singh
Vice President
Asset and Risk Management
Gas Operations

6111 Bollinger Canyon Road
San Ramon, CA 94583
Phone: 925.244.3189
E-mail: Sumeet.Singh@pge.com

April 4, 2014

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

Re: Response to March 6, 2014 Gas Incident Violation Letter
Mountain View, California

Dear Mr. Robertson:

This letter summarizes PG&E's response to the Safety and Enforcement Division's (SED) letter dated March 6, 2014, regarding the gas incident that occurred on July 30, 2013 in Mountain View, California, affecting a one-inch plastic service line insert.

In its letter, the SED found PG&E in violation of Title 49 of the Code of Federal Regulations Part 192.605(b). PG&E agrees with this violation. We have taken corrective actions and are developing preventative actions to address and minimize recurrence of the issue.

Actions taken immediately following the incident:

- Replaced the damaged pipe, conducted a leak survey of the area (no additional leaks were detected), and restored gas service.
- Updated the distribution plat map to reflect the completed replacement work.
- Conducted an extensive search into existing records and construction drawings in an effort to determine why the inserted plastic gas service was not shown on the distribution plat map or the job installation drawing. PG&E was not able to locate the records for the plastic insert job, which PG&E believes occurred prior to 1980.

Ongoing preventive actions include:

- Reduced the average amount of time that it takes to update our mapping systems with the details of post construction as-built jobs from 75 days to 34 days in 2013.
- Implemented a Corrective Action Program across Gas Operations so that every employee has the ability and is continuously encouraged to submit any issues from a personal safety related observation to any differences they identify between the information on our maps and records to what is in the ground. Each item is assigned an owner, prioritized, and tracked through completion.

As you are aware, on March 3, 2014 we had an explosion related to distribution work in Carmel. While the specific circumstances of the Mountain View and Carmel incidents do not precisely match, we believe the following additional steps instituted following the Carmel incident will also address the Mountain View incident:

- Distribution and training of a "5 Minute Meeting" on March 24, 2014 to field personnel throughout PG&E's system that enhances tapping procedures incorporating process safety principles. This introduces new measures to be taken to identify whether or not steel pipe has been inserted. This guidance, which

includes a checklist to be followed for each job, walks employees through three successive steps, each adding another level of confidence regarding possible insertions before work begins. These steps are: 1) review associated documentation, looking specifically for indications that documents match; 2) look at the job site to “read the street,” checking that facilities match documentation; and 3) perform a physical verification for plastic or to utilize existing fittings to determine if a previous insertion exists.

- Developing and implementing a field QA/QC plan to verify that the steps outlined in the March 24 5 Minute Meeting are being uniformly applied by field personnel. These quality verification activities are also expected to identify further safety enhancements.
- Approval of the use of a bolt-on steel tap fitting. Work Procedure TD-4150P-110 -*Continental Steel to PE Mechanical Bolt-On Saddle Punch Tee*, published on March 24, 2014, provides field personnel detailed procedures about how to use a bolt-on saddle punch tee as a further validation step that steel pipe has not been previously inserted, as required. This is a technique that can be used to fulfill the physical verification noted in the 5 Minute Meeting if other fittings are not available.
- Continuing implementation of the Pathfinder Project to convert critical distribution asset data from an existing Computer Aided Design (CAD)-based system and paper to an integrated SAP and Global Information System (GIS). Deployment of the Pathfinder Project is continuing throughout PG&E’s operating divisions, with complete system-wide deployment planned in 2015.

Upcoming preventive actions include:

- Instituting an R&D project with other industry operators to develop non-destructive testing methods that can be used to confirm inserted pipe prior to commencing work.

We would welcome the opportunity to meet with you and your team to further discuss our preventive action plans. In the interim, should you have any questions please do not hesitate to contact [Redacted] at [Redacted] or [Redacted].

Sincerely,

/S/

Sumeet Singh
Vice President, Asset and Risk Management

cc: Aimee Cauguiran, CPUC
Dennis Lee, CPUC
Liza Malashenko, CPUC
Nathan Sarina, CPUC

[Redacted]
Bill Gibson, PG&E
[Redacted], PG&E