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Manager  
Regulatory Compliance  
Gas Operations

Redacted

June 9, 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 for Not Following the PG&E Leak Survey Procedure

Dear Ms. Tyrrell:

Pursuant to Resolution ALJ-274, PG&E is providing notification of a self-identified non-compliance issue regarding not following the PG&E leak survey procedure for inside meter sets within the San Francisco Division.

During a recent review of leak surveys within the San Francisco Division, PG&E discovered that from January 1 – May 12, 2014, approximately 7,200 inside residential meter sets may not have been leak surveyed in accordance with PG&E's recently implemented Utility Procedure: TD-4110P-03, "Performing and Documenting Leak Survey" (Procedure).<sup>1</sup> Specifically, leak surveyors may have failed to comply with Section 3.11, sampling residential meters, and Section 4 – Can't Get In process. In at least some of those meter locations, it appears the Procedure was not followed.

Section 3.11 of the Procedure requires leak surveyors to survey residential gas meter sets within 12-inches of the meter, which requires leak surveyors to have access to the gas meters that are located within a residential structure, such as a garage.

When leak surveyors are unable to access an inside meter and conduct a survey within 12-inches of the meter set, this is noted in our system as "Can't Get In" (CGI). Section 4 in the Procedure addresses CGIs by providing instructions on how leak surveyors attempt to gain access to a CGI and the required documentation necessary to track these CGIs until leak surveys are completed.

Prior to the implementation of the Procedure, PG&E's practice was to complete a leak survey of an inside meter from the exterior of the building if: (1) a riser was present and a vent from the

<sup>1</sup> Published on May 22, 2013 and became effective on January 1, 2014.

regulator was piped to the exterior and/or; (2) in the judgment of the leak surveyor, the survey could be completed by surveying the area up to and around the exterior of the building via other vents/cracks along the outside of the structure, windows near the meter, or other ways to sample for gas from the exterior. To ensure compliance with the Procedure, PG&E will review the appropriate records to understand whether the new processes were followed. For those locations in San Francisco or otherwise that leak surveyors did not follow the new work processes, a plan will be developed to leak survey those locations correctly.

The San Francisco Division currently has over 100,000 inside residential meter sets and the CGI process can be burdensome to customers and inefficient. PG&E is undergoing a major effort to review and improve not only the existing CGI process to make it as effective and efficient as possible, but will also evaluate the use of advanced leak detection technology such as the Picarro Surveyor™ to investigate inside meter set locations without disturbing the customers to gain access.

PG&E has identified CGIs as an issue impacting other routine monitoring and maintenance programs, including scheduled meter changes, atmospheric corrosion inspections, and the isolated steel services program. PG&E will evaluate bundling leak surveys of inside meters with programs that have similar access needs in order to increase efficiencies and minimize customer impact. In the meantime, PG&E will follow the CGI process set forth in the new leak survey Procedure by making multiple attempts to reach the customer in order to gain access to meter sets inside customer property or buildings, utilize a system that tracks these efforts, and perform the necessary leak surveys to completion.

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.

Furthermore, PG&E will notify all the appropriate local authorities. A confirmation of notification as a supplement to this letter will be provided. Please contact [Redacted] at [Redacted] or [Redacted] for any additional questions you may have regarding this notification.

Sincerely,

/S/

[Redacted]

Manager, Regulatory Compliance

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

[Redacted]

Shilpa Ramaiya, PG&E  
Bill Gibson, PG&E