

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 8, 2014

Mr. Bill Gibson, Director, Compliance  
Pacific Gas and Electric Company  
6111 Bollinger Canyon Road, Office #4440F  
San Ramon, CA 94583

SUBJECT: PG&E's 7/7/14 Self-Identified Non-Compliance Notification for Not Adhering to PG&E's Plastic Fusion Requalification Procedures, Pursuant to CPUC Resolution ALJ-274

Dear Mr. Gibson:

The Safety and Enforcement Division of the CPUC has received your July 7, 2014 letter of Non-Compliance regarding PG&E's Plastic Fusion Requalification Procedures and are concerned with both the stated corrective action as well as the underlying issue, including PG&E's procedure and its compliance with 49 CFR § 192.285.

As a result, and in addition to your stated corrective actions, we direct PG&E to undertake the following actions immediately and respond to this letter within 3 days.

1. It was observed by an SED investigator during the Fremont training qualification session on 7/3/14 that PG&E employees were not actually preparing the specimen fusion joint for the saddle electro-fusion technique, rather they were just completing the steps leading up to the fusion consistent with PG&E's procedure. In accordance with 49 CFR §192.285 we direct PG&E to qualify / requalify all identified employees by having each individual perform the specimen fusion joint, including but not limited to the saddle fusion and make this change in PG&E's procedure consistent with 49 CFR § 192.285.
2. In addition to PG&E's stated "next steps" in your 7/7/2014 notification letter, PG&E should identify any and all employees whose performance on the requalification training was substandard and determine the number and locations of plastic fusions performed by that person in the service territory as well as PG&E's complete plan for assessing and mitigating the risk posed by the previous work being done by those employees as applicable.

Please let me know if you have any questions.

Sincerely,

Kenneth Bruno  
Acting Program Manager  
Gas Safety & Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
Office: (415) 703-5265  
Cell: (415) 852-2936

A handwritten signature in black ink that reads "Kenneth Bruno".