



Redacted
Manager
Regulatory Compliance
Gas Operations

Redacted

July 24, 2014

Denise Tyrrell, Acting 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
Clearance Procedures Not Followed in the County of Solano

Dear Ms. Tyrrell:

Pacific Gas & Electric Company (PG&E) is providing a revision to its notification of a self-identified non-compliance issue, Re: Clearance Supervisor Missed Annual Refresher Training in the County of Solano, submitted to the CPUC on July 24, 2014. This revision clarifies the primary non-compliance as not following clearance procedures.

From December 13 to 15, 2013, PG&E implemented Gas Clearance SA-13-63 to install new pipe on natural gas transmission pipeline Line 220. During the clearance, a section of DFM 0600-01 was isolated from Line 220 by closing DFM 0600-01 Valves 31 and 34, which are normally open. Both valves were to be reopened prior to closure of the clearance on December 15. After the clearance had been closed, PG&E maintenance personnel discovered the valves still in the closed position while performing annual valve maintenance. Upon discovery, PG&E reopened both valves on April 7, 2014 and verified that downstream pressure regulation was working properly. PG&E also determined that service to one downstream commercial customer had been interrupted while the valves were closed; however, the customer's facilities had been shut down and did not require gas service.

PG&E investigated the issue and determined that steps for Gas Clearance SA-13-63 were not adequately followed: Valves 31 and 34 were not reopened, and downstream regulating station R-59 was not checked to verify pressure and regulation. This does not comply with PG&E's Utility Procedure TD-4100P-10, "Gas Clearance Procedures for Facilities Operating Over 60 psig," which requires clearance steps to be followed and equipment to be restored to normal operation. PG&E determined a contributing cause to be that the clearance was supervised by a clearance supervisor who, upon investigation, was found to have last completed the Refresher Gas Clearance Process Training in 2010. This does not comply with TD-4100P-10, which requires annual clearance process training for personnel supervising transmission clearances. Additionally, when changes were made to the clearance steps after they were initially approved, the clearance

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supervisor did not obtain formal approval as required by TD-4100P-10 before proceeding with the clearance.

As a corrective action, the clearance supervisor completed Refresher Gas Clearance Process Training on April 16, 2014. Additionally, PG&E provided a refresher briefing to all transmission pipeline clearance personnel to review the requirements for properly completing clearances in accordance with TD-4100P-10.

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. PG&E will notify the local authorities for the County of Solano of this event and will provide confirmation of notification as a supplement to this letter.

Please contact [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]

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