

September 8, 2014

Ms. Elizaveta Malashenko  
Deputy Director  
Safety & Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**RE: Performing work in the City of Carmel-by-the-Sea**

Dear Ms. Malashenko:

In response to your August 27, 2014, letter, I write to provide the following information as confirmation of the enhanced safety measures and work procedures in place as PG&E resumes routine gas safety work in the City of Carmel-by-the-Sea. In addition, PG&E is prepared to coordinate a field visit should SED so desire.

**Enhanced Safety Measures and Work Procedures**

After the March 3, 2014, natural gas leak that led to an explosion in Carmel-by-the-Sea, PG&E immediately ceased all non-urgent tapping operations. PG&E then developed and implemented enhanced work procedures that include:

- Requirements to review maps and records to validate assets in the ground
- Requirements to inspect the jobsite for signs of recent construction activity on gas facilities
- Requirements to conduct physical verification of facilities prior to performing work

Central to the enhanced work procedures is a new Gas Carrier Pipe Checklist on which all gas construction employees (system-wide) have been trained. This checklist must be completed prior to the start of any work for PG&E's gas transmission & distribution construction crews.

The attached documents entitled "*PGE Carmel Supplemental Information Response.pdf*" (question 13 on pages 5-6) and "*City of Carmel-by-the-Sea Enhanced Work Procedures.pdf*" include the checklist form and a list of protocols developed to ensure Gas Carrier Pipe Verification takes place prior to any welding or tapping operations on PG&E's Gas Distribution system.

**Procedures that Leverage Advanced Technologies**

PG&E has approved a new fitting to identify inserted plastic in steel pipes. In addition, PG&E also has initiated, in collaboration with eight other Gas Distribution Utilities, a project with the Gas Technology Institute (GTI), a major gas industry research and development laboratory, to identify or develop advanced technologies to detect inserted plastic in steel mains. After a broad review of NDE (Non Destructive Evaluation) techniques, it was decided on August 5, 2014, to focus the project on the most promising solutions: acoustic detection and thermal dynamic response. The project is expected to

involve research and testing over the next six months. Please refer to attachment “*PGE Carmel Supplemental Information Response.pdf*” (question 13 on pages 5-6).

PG&E also continues to use its advanced mobile leak survey detection technology (Picarro Technology) in appropriate circumstances to conduct gas leak inspections, which is substantially more sensitive than earlier technology.

### **Quality Control Processes to Verify Adherence to Safety Procedures**

PG&E has implemented a Quality Control (QC) field verification step within PG&E’s ongoing Quality Assurance process that confirms field personnel are properly using the Gas Carrier Pipe Checklist to document the required records review, jobsite review, and physical verification steps prior to any personnel performing welding and/or tapping on steel gas distribution facilities. The Distribution QC team performs assessments of a sampling of gas distribution construction work across the PG&E system on an ongoing basis to assure that the work is performed according to PG&E standards and procedures.

### **Procedures to Train and Equip Crews to Address Emergencies**

PG&E trains and qualifies employees for the necessary tasks required to operate a natural gas system through the use of classroom, web-based, and hands-on training. PG&E oversees contractors to ensure they are also trained and monitors their performance. PG&E has trained those general construction employees who will be working on the gas projects in Carmel-by-the-Sea on the proper use of pipe squeezers to ensure they would be able to respond to an Abnormal Operating Condition (AOC) or gas emergency in addition to PG&E’s distribution gas crews that have already been trained in the proper use of these tools. PG&E will also be expanding this training to all general construction employees in PG&E’s service territory. All crews, in addition to those responsible for emergency response, are in the process of being equipped with necessary emergency tools; all crews in the City of Carmel have been equipped with these tools.

PG&E employees are also equipped with Gas Control Wallet Cards (see attachment “*Gas Control Wallet Card.pdf*”) that list actions to take in an emergency, including immediately calling 911. This procedure allows field employees to focus on the situation, manage public and employee safety, stop the gas flow, and plan repairs. The actions listed on the card enable PG&E’s Gas Operations to respond in the safest, fastest manner possible and provide required notifications to 911 Emergency Response Center, Gas Operations leadership, the California Public Utilities Commission (CPUC) and the Department of Transportation (DOT).

In addition to the Gas Control Wallet Cards, safety briefings are being conducted prior to commencing work at a job site to review potential safety issues, emergency protocols, and other pertinent information for specific activities to be performed. PG&E is also in the process of further modifying its Job Site Safety Analysis (JSSA) form.

PG&E is also treating all gas leak odor calls in the City of Carmel-by-the-Sea as “Immediate Response.” PG&E recently published an ad (see attachment “*Carmel*

*Pinecone Safety.pdf*) in the local *Carmel Pine Cone* newspaper asking residents to call 911 and PG&E if they smell natural gas.

### **Procedures to Coordinate with Carmel City Staff to Ensure Adherence to City Requirements**

PG&E employees have been directed to engage and coordinate with the City of Carmel-by-the-Sea staff to ensure all work is performed in accordance with city requirements, including a pre-construction walk through and regular status check-ins.

PG&E will assign a dedicated Project Manager to work with the City of Carmel-by-the-Sea to review permitting requirements. The Project Manager will apply for necessary permits and review the City's requirements and permit conditions with City staff. During construction, a field inspector will be assigned to the job and will be available to coordinate closely with the City's inspector. In addition, PG&E will invite City staff to engage in pre-construction tailboard training with each crew in the City to review City requirements and permit conditions. PG&E will invite the City to regularly visit the site (announced or unannounced) at any time, and participate in our regularly scheduled crew tailboard trainings.

### **Engagement with First Responders**

PG&E is currently working with the City and County First Responder organizations to establish protocols in Carmel-by-the-Sea similar to the San Francisco Code MuRRI program. Code MuRRI is the Multiple-unit Resource Response Incident (MuRRI) procedure that provides triggers and notification protocols for PG&E personnel faced with a potentially hazardous situation and tactical actions for emergency responders arriving at the scene of a serious gas incident (please see attachment "*PGE Carmel Supplemental Information Response.pdf*," question 11 on page 4). Developing and operationalizing the program in the Carmel-by-the-Sea area would involve a series of working meetings to tailor the program for the City of Carmel-by-the-Sea, as well as training for local emergency response personnel. Since the Monterey Fire Department provides fire service to multiple cities on the Peninsula, PG&E proposes to develop the program regionally, which would benefit not only Carmel-by-the-Sea, but also the response system throughout Monterey County's regional dispatch and automatic aid system. PG&E's Public Safety Specialist has met with Chief Panholzer of Monterey Fire and has also reached out to the City of Carmel-by-the-Sea's leadership.

In addition, PG&E has also agreed to participate in the Monterey County Hazard Mitigation Plan. Monterey County, in coordination with all of its incorporated municipalities, is preparing a comprehensive update to its Multi-Jurisdictional Hazard Mitigation Plan. The plan, which was initially developed and adopted in 2007, is intended to identify local policies and actions to reduce the risk and future losses from natural hazards such as flooding, severe storms, earthquakes, and wildland fires. PG&E has agreed to be part of this planning effort to foster improved coordination with local municipalities. Please visit the following link for more information on the Monterey County Hazard Mitigation Plan: <http://www.co.monterey.ca.us/oes/hazard-mitigation.asp>.

Please feel free to contact me if you have any additional questions or concerns following your review of this information.

Sincerely,  
Kevin Knapp  
Vice President, Transmission and Distribution Operations