



2.0 Preparedness Policy

*2.1 Plan Distribution

Holders of the Pacific Gas & Electric Company Gas Emergency Plan include: VP-Distribution Operations, Maintenance & Construction, VP-Distribution Engineering & Planning, VP-Customer Service, VP-Gas & Electric Transmission; Managers-Gas Distribution & Technical Services, Distribution Operations, Area OM&C, Area Customer Services (CS), Call Center, Gas System Maintenance, Gas System Operations, Directors/Superintendents-Emergency Response, Gas Engineering & Planning, Gas Training & Technical Support, Corporate Security, Area OM&C, Area CS, Local Gas Emergency Plan Coordinators (LGPC), Area Emergency Process Coordinators (EPC), and HQ Emergency Response Coordinators (ERC). The LGPC's will distribute the local plans within their organization

.Local Gas Emergency Plan holders are to be listed in Appendix A.

*2.2 Plan Development and Updates

This section defines the departments and individuals responsible for gas emergency preparedness, training, and updating this plan.

*2.2.1 General Office Responsibility

The Vice President - Distribution Operations, Maintenance, and Construction (OM&C) is charged with overall authority and responsibility for gas emergency preparedness planning and training of gas emergency response personnel in Distribution and Customer Services (DCS).

The Vice President - Gas and Electric Transmission (G&ET) is charged with overall authority and responsibility for gas emergency preparedness planning and training of gas emergency response personnel in California Gas Transmission.

The Vice President - Distribution Engineering and Planning is charged with overall authority and responsibility of developing the Pacific Gas & Electric Company Gas Emergency Plan. The Director of Gas Engineering & Planning appoints a Company Gas Emergency Plan Coordinator (CGPC) who is responsible for maintaining the Pacific Gas & Electric Company Gas Emergency Plan and its policies on a company level. The CGPC is to review the plan, and update as needed. Updates are to be submitted to Corporate Security by August 31 each calendar year. The CGPC distributes updates to the plan holders listed in paragraph 2.1.



*** 2.2.2 Headquarters Responsibility**

Each G&ET district, DCS Headquarters (HQ), Call Center, Gas Control Center, Centralized Gas Dispatch, etc. must have a local Gas Emergency Plan.

The DCS Area OM&C Managers, Customer Service Managers, Gas Distribution & Technical Services Manager, Gas System Maintenance Manager, Gas System Operations Manager, and the Call Center Manager are responsible for gas emergency preparedness planning and training of gas emergency response personnel in their organizations. This includes the annual procedural training, employee skill assessment, and drills and exercises. They also must appoint a Local Gas Emergency Plan Coordinator(s) (LGPC) to administer the plan in their local operating department(s) (the Area OM&C Manager will appoint an LGPC for each Headquarters).

The LGPC is responsible for maintaining the local aspects of the plan and its appendices, including adding local phone numbers, tool and equipment lists, and personnel schedules. The LGPC is responsible for continually reviewing and updating the local plan as changes dictate.

Appointment of the LGPC(s) is to be documented in Appendix A.

*** 2.2.3 Audit Schedule and Responsibility**

The LGPC maintains a list of all Local Gas Emergency Plan holders and surveys them annually, or more often if needed, to verify all copies of the plan are up to date and initiate changes if not up to date. Each sheet must be dated to allow verification that the information is up to date.

The annual review shall be documented.

The LGPC must notify the manager responsible for the plan when the annual review is completed.

***2.3 Standard Operating Procedures**

This section defines the general standard operating procedures in response to gas emergencies. Each area, HQ, and department is required to develop, maintain, and regularly update standard operating procedures for specific emergency situations, as appropriate (e.g., activation, notification, facility shut-down, evacuation, etc.).

*** 2.3.1 Customer Service Requests Requiring Immediate Response**

DCS Policy 3.6 on Excellent Service defines PG&E's criteria for immediate response to a customer request for assistance:

“When safety requires, we will immediately respond to customer requests for assistance to investigate, repair and/or make safe the use of gas and electricity in the areas listed below. In addition, there may be other situations not listed where an immediate response service would be initiated.

- * Asphyxiation, carbon monoxide poisoning, carbon monoxide alarm, or electric shock*
- * Fire, explosion (that may involve gas and/or electric with house, appliances, etc.)*
- * Gas leaks or odor of gas*
- * Arcing wires in fire area or in trees*
- * Wire down*
- * Extreme high/low voltage (customer suspects damage to equipment)*
- * Customer cannot shut off appliance*
- * Report of high gas pressure (appliance gas flame unusually high)*
- * Incidents involving or suspected of involving hazardous materials*
- * Damage or suspected damage to company property, such as: car power pole accident, dig-in of gas or electric underground facilities*
- * Gas pressure complaints”*



2.3.2 Investigating Gas Leaks on Customer Premises

The procedures used to investigate gas leaks on customer premises are defined in Company Standard Practice 460.21-3.

***2.3.3 Response to SCADA Alarms**

Gas quality and system pressures are monitored via SCADA at the Gas Control Centers. Each SCADA point has a high, high-high, low, and low-low alarm. Each Gas Control Center has prescribed directions for response to SCADA alarms.

Local operating departments who are responsible for maintenance and operation of facilities monitored by SCADA must include a list of the points monitored, their alarm setpoints, and prescribed course of action in case of alarm in Appendix E.

Each Gas Control Center must include in Appendix E the location of directions for response to SCADA alarms.

***2.3.4 Station and Terminal Operating Instructions**

Certain gas installations have prescribed directions for gas emergency responses.

Local operating departments must include a list of these documents and their locations in Appendix E.

2.3.5 Injury and Illness Prevention Program

In compliance with Cal OSHA regulations, Standard Practice 726-8 defines PG&E's "Injury and Illness Prevention Program".

2.4 Facility Maps And Records

This section details the responsibilities for maintaining maps and records that may be needed during gas emergencies.



* 2.4.1 Pressure Regulating Stations

Local operating departments maintain regulator station data sheets and maintenance records, which may be needed to operate or troubleshoot system operations during a gas emergency.

Include the location and custodian of these records in Appendix E.

* 2.4.2 Valve Books

Local operating departments maintain valve maintenance records for all gas emergency valves in their systems.

Include the location and custodian of these records in Appendix E.

2.4.3 Other Maps and Records

In the course of normal operation, local operating departments maintain maps and records, many of which can be used to assess gas emergencies and plan responses.

Include in the appendix the location and custodian of the following or other records that are pertinent to local operations:

- * Operating maps and diagrams
- * Wall map and plat sheets
- * Pipeline survey sheets
- * Work Order/GM/Specific Order files
- * Gas Standards & Specifications
- * Standard Practices/ DCS Standards and Guidelines/CGT Standards
- * Gas Service Records (Orders)
- * Leak Survey, Inspection and Repair Reports ("A" Forms)
- * System Operating Instructions (Example, winter/summer operating instructions)

* 2.5 Gas Emergency Supplies

This section defines the requirements and responsibilities for stocking and maintaining materials, tools, and equipment that may be needed to respond to a gas emergency.

* 2.5.1 Gas Emergency Material

Local operating departments must have sufficient materials readily available to respond to gas distribution emergencies.

LGPC's and Departments must annually plan and conduct a review of gas emergency stock needs and ensure that the necessary materials are on-hand. The gas emergency stock must also be inspected to ensure its usability and integrity. At the same time, all materials needed to shutdown specific principal lines must be reviewed (See section 5.8.4).

At the conclusion of the review, **the LGPC and local operating department will document the names of individuals involved in the gas emergency stock review and provide an up-to-date list of required gas emergency materials in Appendix D, including:**

- * Description of the material
- * Size
- * Pressure rating
- * Code number
- * Location
- * Minimum stock level
- * Stock on hand
- * Reference to associated Gas Standard
- * Location of material
- * Method to obtain the material—such as, call Materials Department, coordinate through other Headquarters, or location of keys.

All gas emergency response materials should be marked "emergency stock" and should not be used for routine construction work. If routine stock is also used to meet gas emergency stock requirements, minimum stock levels must be clearly identified and responsibility specified for insuring minimum stock levels are maintained. Depending upon the local system, these materials may include:

- * Pre-tested pipe (per G.S.S. A-34)
- * Repair clamps
- * Sleeving materials
- * Leak repair cans
- * Fittings
- * Dresser style couplings
- * Line stopper fittings
- * Pressure control fittings
- * Electrofusion couplings

Gas emergency materials can be shared between operating departments if they can be delivered in sufficient time to respond to emergencies. Operating departments that plan to share materials should establish mutual assistance agreements in advance.

A copy of the agreement and/or list of materials and location is to be included in Appendix D.

Gas transmission emergency stock pipe is the responsibility of CGT. Engineering Guideline 4124 "Emergency Pre-Tested Transmission Pipe" explains the process for maintaining this stock and obtaining it in an emergency.

A copy of Engineering Guideline 4124 is to be included in Appendix D.

***2.5.2 Gas Emergency Equipment and Tools**

The Fleet Services - Davis Service Center Tool Catalog provides a partial list of hand, power, welding, plastic fusion and miscellaneous tools that should be readily available. Crew foremen maintain the day-to-day inventory of these tools. Supervisors will periodically inspect the inventory on each vehicle.

In addition to these prescribed tools, other tools and equipment may be required for emergencies. As in section 2.5.1, local operating departments must annually review the equipment and tools needed to respond to emergencies involving the facilities in their systems.

At the conclusion of the review, **the local operating department will provide an up-to-date list of required specialty tools and equipment in Appendix D, including:**

- * Equipment description
- * Location
- * Method to obtain the equipment—such as PG&E's Fleet Pool Management System or the location of keys for tool room lock up

Items listed will depend upon the requirements of each local system but may include:

- * Tapping and plugging equipment
- * Leak detection equipment
- * Carbon monoxide testers
- * Flash suits and portable air supply
- * Pipe squeezers
- * Engine driven construction equipment
- * Low pressure bagging equipment

2.6 Mutual Assistance Agreements/Memorandums of Understanding

This section details the responsibilities regarding mutual assistance arrangements.

* 2.6.1 PG&E Internal

Local operating departments that share resources, or have arrangements with others for maintaining and operating their facilities, generally establish memorandum of understanding agreements. An example of such an agreement is the DCS/CGT MOU.

Local agreements that address gas emergency responses must be included in Appendix B, and should be part of the local training plan.

* 2.6.2 External Utilities

PG&E has established mutual assistance agreements with other utility companies. These agreements are maintained by the Distribution Operations Department and implemented through the Operations Control Center (*See section 3.2.3*).

Local operating departments may have local agreements with utilities in their area. Include agreements in Appendix F.



* 2.6.3 Local Government and Emergency Response Agencies

**2.6.3.1 Liaison

The program is intended to develop an understanding about the roles and responsibilities of PG&E and individual agencies during gas emergencies. Understandings must be documented and shared with the respective agency to ensure clear lines of responsibility under gas emergency conditions.

Regular, annual liaison meetings must be scheduled with Emergency Response Agencies. Topics to be covered include: jurisdictional boundaries, capabilities, and the responsibilities and functions of each organization. These meetings will enable the exchange of policy statements, notification requirements, communication channels, and phone numbers between organizations. In addition, the agenda will include joint training exercises and demonstrations. The LGPC ensures these meetings are scheduled and maintains all records necessary to verify accomplishment of this responsibility.

The location and custodian of the records documenting these meetings are to be included in Appendix G.

**2.6.3.2 Mutual Assistance

Local operating departments that have arrangements with local government and emergency response agencies for mutual aid during gas emergencies should document those agreements.

Include any agreements in Appendix F.

*2.7 Competency And Training Requirements

Any employee whose job may require being involved in gas emergency response activities must participate in gas emergency response training and maintain competency in areas specific to his/her role in gas emergency response activities (*See Part II*).

***2.7.1 Skill Assessment and Development**

Skill levels for employees involved in gas emergency response activity must be assessed annually using the Gas Emergency Assessment and Development Guide (ERAD) in Part II.

The purpose of the assessment is to help employees and their supervisor identify and plan for individual knowledge and skill development needs in the area of gas emergency response readiness. If the emergency supervisor (advisor on-call) does not meet the minimum skill requirements, then a fully qualified backup person must be available to assist in the response.

***2.7.1.1 Bargaining Unit Employees**

Skill levels for bargaining unit employees responsible for gas emergency response activities are to be assessed annually by the unit supervisor or other technically qualified individual as described in Part II.

*** 2.7.1.2 Management Employees**

Skill levels of management employees responsible for gas emergency response activity are to be assessed annually by the employees' supervisor or other technically qualified individual as described in Part II.

Include the name(s) of the gas expert(s) in Appendix G.

Department management must develop any skill deficiencies demonstrated by gas emergency response personnel.

Include the location and custodian of individual skill assessment and development evaluations in Appendix G.

All department managers/superintendents share the responsibility to ensure that employees skill assessments have been completed for employees in their organizations and documented and that all employees with gas emergency responsibilities receive the required annual training and the required documentation is completed.

PATH can be used to assist in the documentation of skill assessment for DCS.

***2.7.2 Annual Procedural Training**

Any employee whose job may require being involved in gas emergency response activities must receive a minimum of four hours of gas emergency plan training each year to ensure familiarity with gas emergency response procedures. This training may be completed in a single session or in multiple sessions. The training must be conducted by qualified instructors, such as first line supervisors. Gas emergency plan training should provide instruction appropriate to the employee's job function. The training at a minimum defines:

- * Individuals and departments responsible for gas emergency responses
- * When different emergency response organizations are activated
- * Emergency categorizations (levels)
- * Reportable incident procedures
- * Liaison with emergency response agencies
- * Claims investigation and evidence retention
- * Familiarity with local systems/plans
- * Dealing with the media
- * Radio communication procedures
- * Familiarity with local maps/records
- * After hours facility assessment procedures
- * Post accident testing requirements

Training must be documented and, at a minimum, include:

- * Subject matter
- * Dates
- * Duration
- * List of attendees and their signatures

PATH can be used to assist in this documentation of annual training.

Include the location and custodian of these records in Appendix G.



* 2.7.3 Verification

CPUC General Order 112-E requires local operating departments to verify the effectiveness of training. The Area OM&C Manager is responsible for ensuring that all requirements are met. Acceptable verification methods include:

- * Testing
- * Subjecting trainees to hypothetical emergencies and a post-event critique
- * Participation in the drill and exercise programs (*See section 2.9*) and completion of post drill/exercise critiques

*2.7.4 External Agencies

PG&E provides a proactive public safety information program to educate the public about how to handle potential gas emergencies (Standard Practice 726-3). The program offers the public—such as homeowners groups, public agencies, private individuals and governmental agencies such as the Office of Emergency Services, fire and police departments—the opportunity to participate in gas emergency training. All outreach must be documented, including the names of those contacted (and titles, if appropriate), the material covered, and the response to the training offer.

Include the location and custodian of these records in Appendix G.

*2.8 Public Safety Information Program (PSIP)

PG&E has a public safety information program (PSIP) to educate the public on how to handle potential gas emergencies. See Standard Practice 726-3 for more detailed information about the program.

The program targets the following audiences:

- * Consumers
- * General public other than consumers
- * Government agencies
- * Utility employees and others involved in excavation-related activities

Program subjects may include:

- * What gas is and how it is used
- * How gas is transmitted and distributed
- * The kinds of gas emergencies that occur
- * How to recognize the signs of a gas emergency
- * Those to notify in gas emergency and how to notify them



- * How to avoid accidents in a gas emergency
- * Guidelines for locating and marking excavation areas to avoid dig-ins
- * Gas appliance safety
- * Consequences of misuse of gas

The Safety, Health and Claims (SH&C) Department is responsible for the production of mass communication materials including print-media advertising, radio and television messages, inserts in billing statements, *PG&E Spotlight*, the monthly newsletter, and other Public Safety Information Program items to support the local PSIP's. The Area OM&C Manager is responsible for ensuring that the PSIP is completed as required.

Operating departments and crews may distribute public safety information by mail or at public speaking engagements to interested organizations. In addition, information may be distributed through letters to individuals or organizations.

Local supervisors responsible for gas emergency planning will assist the Public Safety Information activity as directed by local management. Activities are reported quarterly to the Safety, Health and Claims Department as required by SP 726-3.

***2.9 Drill and Exercise Requirements**

This document establishes the following system of drills and exercises to ensure that gas emergency plans, procedures, and training effectively minimize the hazards resulting from a gas emergency. They are supervised instruction periods that develop, test, and maintain gas emergency response skills.

Records documenting the nature of the drills and exercises, date and duration, participating departments and personnel, recommendations and actions taken as a result of the recommendations must be retained for a period of at least five years.

The Area OM&C Manager is responsible for ensuring that all requirements are met.

Include the location and custodian of these records in Appendix G.

*** 2.9.1 Drills**

A drill is a supervised instruction period that develops, tests, and maintains gas emergency response skills within a particular front line supervisor's group. Specifically, the drill tests the group's ability to respond and perform its gas emergency response function.

Each front line supervisor's group with gas emergency responsibilities must conduct and review one drill per year. Results must be documented and shared with others in the group that did not participate in the actual drill. Actual emergencies that meet the drill development criteria in section 2.9.5 can be substituted for drills if the response is properly reviewed and documented.

*** 2.9.2 Exercises**

An exercise is a supervised instruction period that combines three or more drills. Each front line supervisor's group with gas emergency responsibilities must conduct and review one gas emergency exercise per year. Participation in an exercise may also satisfy the annual drill requirement. For example, combining a Call Center, HQ Customer Service and Construction, Maintenance and Operations drills, satisfies each of their annual exercise requirements.

Results must be documented, submitted to the Corporate Security Department, and shared with others in the department that did not participate in the actual exercise. Actual emergencies that meet the exercise development criteria in section 2.9.5 may be substituted if the response is properly reviewed and documented.

*** 2.9.3 Extensive Damage Exercise**

Extensive Damage Gas Emergency Exercises are supervised instruction periods that require the interaction of two or more HQ. Each HQ must perform a scenario once every two years. The scenario tests the interaction between HQ. Some examples of extensive gas emergency tests are:

- * An extensive damage exercise requiring a HQ to interact with a Gas System Maintenance district or neighboring HQ
- * An exercise requiring the HQ to interact with the Operations Coordination Center
- * An exercise requiring the HQ to interact with a local emergency response agency such as fire or police departments

Results must be documented, submitted to the Corporate Security Department, and shared with others in the department that did not participate in the actual exercise. Actual emergencies that meet the exercise development criteria in section 2.9.5 may be substituted if the response is properly reviewed and documented.

*** 2.9.4 EOC Emergency Exercise**

Each year, the Company conducts an exercise that tests the ability of the Corporate Emergency Operations Center (EOC), the Operations Coordination Center (OCC) and other parts of the EOC organization to carry out their roles in response to major emergencies. Selected HQ, emergency management organizations from all business units, and General Office departments represented in the Corporate Emergency Operations Center, also participate in this exercise to become familiar with the issues and problems created by a major emergency as well as their interaction with the EOC. The Corporate Security Department is responsible for developing and conducting the exercise.

*** 2.9.5 Design Criteria and Documentation**

Scenarios for drills, exercises, and extensive damage emergencies must test operating procedures. Scenarios must require participants to locate emergency response equipment and tools and demonstrate familiarity with the local system.

Emergency testing, as outlined in this section, must be reviewed and documented. The reviews must document:

- * Response time(s)
- * Individual performances
- * Group/HQ performance
- * Communications links
- * Availability of materials
- * Compliance with Emergency Response Policy and Procedures
- * Plans to address any noted deficiencies
- * Follow-Up schedule to document the correction of deficiencies
- * Action taken to correct the deficiencies

Documentation must be retained for 5 years.

****2.10 Other PG&E Emergency Planning Documents**

The following PG&E emergency planning documents should also be available for use in gas emergency planning:

- * Corporate Emergency Plan
- * PG&E Company Emergency Planning and Response Policy
- * DCS Emergency Operations Plan
- * Customer Services Support Emergency Plan
- ****Call Center Operations Gas Emergency Plan