



2.0 Preparedness Policy

2.1 Plan Distribution

Holders of the PG&E Company Gas Emergency Plan include: VP-Operations, Maintenance & Construction, VP-Engineering & Planning, VP-Customer Service, VP-California Gas Transmission; Directors-Gas Distribution & Technical Services, Electric Control Center Operations, Area OM&C, Call Center, Gas System Maintenance & Technical Support, Gas System Operations, Managers/Superintendents-Emergency & Technical Services, Gas Engineering & Planning & Technical Document Management, Gas Technical & Field Support, Customer Service Planning & Support, Corporate Security, Area Headquarters OM&C, Emergency Process Coordinators (EPC), and HQ Emergency Response Coordinators (ERC).

Local Gas Emergency Plan holders are to be listed in Appendix A-2.

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 - Operations, Maintenance, and Construction (OM&C) is charged with the overall authority and responsibility for gas emergency preparedness planning and training of gas distribution emergency response personnel in the Utility Operations (UO) Areas, including those in Customer Field Service.

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

The Vice President - Engineering and Planning is charged with the overall authority and responsibility of developing the Pacific Gas & Electric Company Gas Emergency Plan. The Manager of Gas Engineering & Planning & Technical Document Management 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 it as needed. Updates are to be submitted to Corporate Security by August 31st each calendar year. The CGPC distributes updates to the plan holders listed in paragraph 2.1.

2.2.2 Local Operating Department Responsibility

Each CGT district, UO Area Headquarters (HQ), Call Center, Gas Control Center, Service Dispatch, etc. must have a Local Gas Emergency Plan.



The UO OM&C Area Directors, Customer Service Director, Gas Distribution & Technical Services Director, Gas System Maintenance & Technical Support Director, Gas System Operations Director, and the Call Center Operations Director 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 & exercise requirements. They also must ensure that the local aspects of the plan and its appendices, including adding local phone numbers, tool and equipment lists, and personnel schedules are maintained. Those local aspects of the plan should be continually reviewed and updated as changes dictate. Also, they are responsible for ensuring that “Gas Experts” are designated within the particular local operating department.

On August 22, 2000, a letter with attachments was issued by [REDACTED] and Bill Blastic describing proposed gas emergency planning roles and responsibilities. This letter does not change the overall responsibilities for gas emergency planning and response as described in the paragraph above.

A copy of the August 22, 2000, letter (with attachments) described above is to be located in Appendix A-4.

A list of the “Gas Experts” is to be located in Appendix C-1.

2.2.3 Audit Schedule and Responsibility

A list of all Local Gas Emergency Plan holders shall be maintained. The plan shall be reviewed and updated at intervals not exceeding 15 months, but at least once each calendar year. Each sheet of the plan must be dated to allow verification that the information is up to date, however sheets that are not revised do not need to have the date changed. Signing off on the annual review is sufficient to document that the plan has been reviewed and revised.

The annual review shall be documented in Appendix A-1.

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.

- * *Low pressure system alarms (“low-low” and “high-high”)*
- * *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 UO Standard C-S0434 “Gas Leak and Odor Response.”

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-9.



2.3.5 Code of Safe Practices

In compliance with Cal OSHA regulations, Utility Standard 22 defines PG&E's "Code of Safe Practices".

The location of a copy of the "Code of Safe practices" is to be listed in Appendix E-9.

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-9.

2.4.2 Valve Books

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

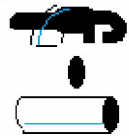
Include the location and custodian of these records in Appendix E-9.

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 location and custodian of the following or other records that are pertinent to local operations in Appendix E-9:

- * Operating maps and diagrams
- * Wall map and plat sheets
- * Pipeline survey sheets
- * Work Order/GM/Specific Order files
- * Gas Standards & Specifications
- * Standard Practices/ UO 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 emergencies.

Local Operating 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 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-2, D-3, and D-4, 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-2.

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 CGT Engineering Guideline 4124 is to be included in Appendix D-1.

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 D5 and D-9, 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 gas distribution/CGT MOU.

Local agreements that address gas emergency responses must be included in Appendix B-2, 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 Electric Control Center Operations Department and implemented through the Operations Control Center (*See section 3.2.3*).

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 local operating department 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 F-1.

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.

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 in Part II.

This is a two-part assessment process:

- o One-on-one (Initial / 5 Year) Assessment
- o Job Performance Assessment

The One-on-one Initial and 5 year Assessment process, through dialogue, requires the supervisor and his/her employee to complete this assessment initially when an employee reports from outside of his/her normal lines of progression and each 5th year thereafter.

The Job Performance Assessment process requires the supervisor to complete a job assessment on each of his/her employees annually (except when either the Initial or 5th year assessment is being performed).

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 C-1.

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-1.

Keep records for 5 years.

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.

Training Server is to be used to assist in the documentation of skill assessment. The Training Server code is "TECH-0006."

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 (one hour for Call Center and Gas Dispatch employees) 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. This time based training requirement does not apply when utilizing the web-based training product that is nearing completion. The web-based training is content based rather than time based. As is the case with the time based training product, supervisors will be required to provide local content to their employees to supplement the web-based training product. 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 levels (1 through 4))
 - * 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
- *****Local content (provided by the supervisor), as appropriate. A job aid will be provided by HR Learning Services to assist the supervisor in developing local content.

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

- * Subject matter
- * Dates
- * Duration
- * List of attendees and their signatures
- * Trainer(s)

The Annual Procedural Training Aid (Part V) was developed to be the basis for this training. Local procedural information must be used to supplement this aid.

Training Server is to be used to assist in the documentation of annual procedural training. The Training Server code for the time based training product is "TECH-0008."

The web-based training product links directly to Training Server, avoiding the need to manually enter training completion information. Since the web-based training product has customized for the various departments (and in most cases, separate versions for management and other employees), there are Training Server codes for each version.

The new Training Server codes for the web-based training product are as follows:

GAS-0500	Gas Dispatch – Employee
GAS-0501	Gas Dispatch – Management
GAS-0502	Call Center – Employee
GAS-0503	Call Center – Management
GAS-0504	Gas Customer Field Service – Employee
GAS-0505	Gas Customer Field Service – Management
GAS-0506	Operations, Maintenance & Construction – Employee



GAS-0507 Operations, Maintenance & Construction – Management
 GAS-0508 Gas Engineering & Planning – All

Include the location and custodian of these records in Appendix G-1.

Keep records for 5 years.

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 (Safety, Health, & Claims Department Procedure #103). 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.

2.7.5 Emergency management Overview Program (EMOP)

Key emergency management personnel are required to complete this annual training which provides an overview of the plans for the emergency management organizations in PG&E.

Include the location and custodian of the EMOP records, including a list of the attendees (name and signature) and the date of training in Appendix G-1. Corporate Security also maintains records for EMOP.

2.8 Public Safety Information Program (PSIP)

PG&E provides a proactive public safety information program to educate the public about how to handle potential gas emergencies. See Safety, Health, & Claims Department (SH&C) Procedure #103 for more detailed information about the program. 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.

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 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 appropriate Director 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.

SH&C is responsible for developing measures to be used to evaluate this program.



Local supervisors responsible for gas emergency planning will assist the Public Safety Information activity as directed by local management. Activities are reported monthly to SH&C as required by SH&C Procedure #103, "Public Safety Information Program."

Include a copy of SH&C Procedure #103 and the PSIP records in Appendix G-2. PSIP records are also kept by SH&C.

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 appropriate Director (see Section 2.2.2) is responsible for ensuring that all requirements are met.

Include the location and custodian of these records in Appendix G-1.

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. Participation in an exercise may satisfy the drill requirement. 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 may 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 departments. Each front line supervisor's group with gas emergency responsibilities must conduct and review one gas emergency exercise per year. For example, combining a Call Center, HQ Customer Service and Operations, Maintenance, and Construction 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.

CGT District exercise requirements are covered under Drills.

2.9.3 Extensive Damage Exercise

Extensive Damage Gas Emergency Exercises are supervised instruction periods that require the interaction of two or more HQ or CGT Districts. Each HQ or CGT District must perform a scenario once every two years. The scenario tests the interaction between HQ and/or CGT Districts. Actual emergencies that meet the exercise development criteria in section 2.9.5 may be substituted if the response is properly reviewed and documented. Some examples of extensive damage gas emergency exercises are:

- * An extensive damage exercise requiring a HQ or CGT District to interact with a neighboring HQ or CGT District.
- * An exercise requiring the HQ or CGT District to interact with the Operations Coordination Center
- * An exercise requiring the HQ or CGT District to interact with a local emergency response agency such as fire or police departments

Participation in an Extensive Damage Exercise satisfies the Annual Exercise requirement for that year.

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 or CGT District, 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. Those HQ and CGT Districts that participate in the EOC exercise may satisfy their annual exercise requirement or their extensive damage exercise requirement. 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 or CGT District 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:

- * Company Emergency Plan
- * Company Emergency Planning and Response Policy
- * UO Electric Emergency Operations Plan
- * Customer Service Planning and Support Emergency Restoration Plan
- * Call Center Operations Gas Emergency Plan

- * Area Headquarters Gas & Electric Emergency Response Planning Guide
- * Pipeline Restoration Center (PRC) Manual
- * Operations Coordination Center (OCC) Manual
- o CGT Emergency Plan Manual