1.0 Introduction

1.1 Purpose and Objectives

This plan outlines the responsibilities and procedures to safeguard life and property and maintain or restore service during a natural gas emergency. A gas emergency is defined as an actual or potential hazardous escape of gas, an extreme overpressure or underpressure situation, an interruption of gas supply, or a combination of these events. This plan also may be used as an instructional aid or a resource for post-emergency investigations.

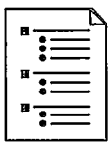
1.2 Plan Requirement

The California Public Utilities Commission's General Order 112-E requires all scheduled and emergency operations to proceed safely and in accordance with established procedures and programs. GO 112-E establishes minimum requirements of what must be contained within these procedures and programs. This plan specifies the requirements for orderly procedures and programs in accordance with GO 112-E requirements.

- ☐ Plans for routine and emergency work may consist of standard procedures
- ☐ Complex situations may require plans that are tailored to specific needs and conditions

Detailed procedures for specific emergencies or conditions will be referenced in the plan or added to the appendix by local operating departments.

1.3 Plan Format



The plan defines the required procedures that all local gas operating departments must have in place to respond to gas emergencies. These procedures are either detailed in this document, referenced, or must be added to the appendices by local operating departments. All information to be added by local departments appears in **bold type** to let the reader quickly acknowledge the requirement.

1.4 Scope of Plan

The plan applies to all Energy Deliver (ED), Gas Transmission & Distribution Maintenance and Construction departments, areas, and headquarters, and to all types and levels of gas emergencies. The policies and procedures contained in the plan will be implemented whenever response to a gas emergency is required.

1.5 Compliance with Company Emergency Plan (CEP)

TRAINING DOCUMENTATION

All employees must be trained to the appropriate level of awareness to the departments response role. Everyone should be aware of their own roles in emergencies.

The director will ensure the department emergency plan is reviewed with **all** employees at least annually and document the completion of the training in Human Resource's Learning Services Database using the code: CORP-0135.

Employee Responsibilities

Employees will ensure that their supervisors have their current telephone number to facilitate contact with them. Employees are also encouraged to maintain some personal emergency supplies at the workplace to include a change of clothing, extra socks, sturdy shoes, and some simple toilet articles such as toothpaste, toothbrush, and any medications they might need. Employees should also have a plan for contacting their immediate family and relatives in the event that they are unable to return home promptly. It is recommended that they designate an out-of-state relative that they and their family can contact to coordinate messages. As a backup plan, the Sacramento Human Resources office will staff the Employee Message Center (EMC) after a major Bay Area earthquake to serve as a connection point for employees and families. The phone numbers for the EMC are: Toll Free 1-877-MSG2PGE (1-877-674-2743); Pac Bell 1-916-923-7000 or PG&E 8-720-7000

General Emergency:

A general emergency is defined as a specific short-term emergency such as a bomb threat, fire alarm, or some other localized emergency that does not render the facility unsafe, unusable, or inaccessible. During such emergencies, employees will follow the directions of the Emergency Team Members.

The Emergency Team Members will coordinate their activities with the building maintenance group. In most cases, employees will receive instructions over a public address system (if appropriate) as to whether or not to evacuate and where to proceed. The evacuation assembly point for each facility should be in a plan.

For emergencies in the GO Complex, contact **Security Control 3-3622 (973-3622).**

Corporate Security is available to consult and/or respond to security issues in an emergency. To contact Corporate Security:

- Call your assigned Corporate Security Representative in your areas (see Corporate Security website
- Call the Corporate Security office during business hours 223-6926 or after hours (415) 973-7000 and ask for the on duty Corporate Security Representative.

During Working Hours:

As outlined in the General Emergency section, employees will be expected to follow the directions of the Emergency Team Members. In most serious emergencies, the company will relocate employees to a safe location within the facility or outside the complex altogether.

In major emergencies, the company will direct employees to go home as soon as it is reasonably safe for them to do so. The Human Resources Department, along with the Corporate Security Department, will provide information on available transportation routes such as BART, ferries, bus service, as well as general freeway information. This information will be broadcast over the public address system (if appropriate) or communicated through the Emergency Team.

Although permitted to return home to check on their families, employees who are essential to the restoration of service are encouraged to remain on the job until the emergency has stabilized. If they are at home, they are encouraged to report to work as soon as practical. It is recommended that employees pre-plan child care whenever possible, to make it less traumatic for them during the emergency.

During Non-Working Hours:

If a major emergency occurs during non-working hours which renders the facility either unusable or inaccessible, department employees should remain at their homes unless otherwise assigned, and await contact from their supervisor and/or director. Those employees with emergency responsibilities are encouraged to report to work as soon as practical.

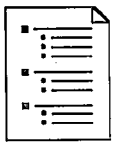
2.0 Preparedness Policy

2.1 Plan Distribution

Holders of the PG&E Company Gas Emergency Plan include: SVP- Energy Delivery, VP-Gas Transmission and Distribution, VP- Gas Engineering, Directors- Customer Service, Gas Asset Strategy, Electric Control Center Operations, Area M&C, Call Center, Gas Transmission Maintenance & Construction, Gas System Operations, Managers/Superintendents- Emergency & Technical Services, Gas Engineering & Technical Document Management, Gas Field Support, Customer Field 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 – Energy Delivery (ED) Gas Transmission & Distribution (GT&D) Maintenance and Construction (M&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 – Gas Transmission & Distribution (GT&D) is charged with overall authority and responsibility for gas emergency preparedness planning and training of gas emergency response personnel.

The Manager of Gas Engineering and 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 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 Gas Transmission 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 Engineering & Planning Director, Transmission, Substation, Maintenace & Construction 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 Don Anderson 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:

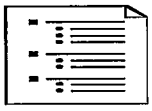
- ☐ Equipment description
- ☐ Location
- ☐ Method to obtain the equipment—such as PG&E's Fleet Pool Management System or the location of keys for tool room lock up

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. 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-0006."

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 he 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.

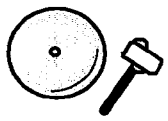
Operating departments and crews may distribute public safety information by mail or at public speaking engagements to interested organizations. In addition, information may be distributed through letters to individuals or organizations.

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*, 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.

Gas Transmission 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 Gas Transmission Districts. Each HQ or Gas Transmission District must perform a scenario once every two years. The scenario tests the interaction between HQ and/or Gas Transmission 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 Gas Transmission District to interact with a neighboring HQ or Gas Transmission District.
- ☐ An exercise requiring the HQ or Gas Transmission District to interact with the Operations Coordination Center
- ☐ An exercise requiring the HQ or Gas Transmission 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 Gas Transmission 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 Gas Transmission 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

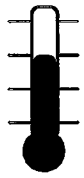
Documentation must be retained for 5 years.

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

3.0 Concept of Gas Emergency Operations



3.1 Levels Of Emergency

PG&E has adopted four levels of emergency response to ensure a consistent and well coordinated response to emergencies by all departments and business units. The levels are based primarily on the resource requirements to respond to the emergency and impacts on customer service. Classification of emergency levels are not function specific. A storm and ensuing flooding that results in multi-area electric outages and one small gas system shutdown would constitute a Level 3 or higher emergency, even though the impact on the gas facilities are minimal.

3.1.1 Level 1 - Local Emergency

A local emergency involving a small number of customers which is generally handled within the geographic area with minimal impact on Call Center operations and limited, if any, media or governmental interest. The duration of the event is usually fairly short, i.e., less than 12 hours. Responsibility for managing this emergency will generally be at the first line supervisor level.

Examples: routine dig-ins; response to customer smell of gas calls; small, localized gas outage requiring local Gas Service Representative(s) to restore service, Stage I non-core customer gas curtailment.

3.1.2 Level 2 - Area-Wide Emergency

An area-wide or high profile emergency involving a large number of customers and/or requiring construction or other resources from outside the impacted organization but still within the affected area boundaries. The Call Centers may augment staffing and/or extend hours of coverage, utilize technology such as IVRU, 21st Century, etc., and may activate the Credit and Records Center as a Call Center. This level of emergency will generally result in increased media and/or governmental interest and may impact multiple major customers. Distribution reported emergencies will result in the activation local Operations Emergency Center (OEC). A gas transmission emergency will require the activation of the Pipeline Restoration center (PRC). The duration of this event is usually expected to be in excess of 12 hours. Responsibility for managing this level of emergency will vary based on the emergency. Emergencies which are distribution related will be managed by the Area M&C Director with the support of Customer Service. If an emergency is caused by the failure of a gas transmission facility managed by UO (gas distribution), the affected HQ-M&C organization will assume responsibility for managing the emergency as described in the existing Memorandum of Understanding (MOU) with Gas Transmission.

Examples: gas outage where out of HQ personnel assist local HQ personnel with service restoration; gas transmission main rupture repair requiring out of HQ certified welders (available from Title 300 HQ's, other HQ or districts), Stage II non-core customer gas curtailment.

3.1.3 Level 3 - Multi-Area Emergency

A multi-area emergency involving large numbers of customers and requiring the movement of construction and other business unit resources across area boundaries, as well as resulting in customer inquiries to the extent that Call Center Operations may be required to activate the Call Center Emergency Coordination Center (CCECC), and utilize additional Call Center support options. This emergency is expected to result in extensive inquiries from major media organizations, including some at the national level, as well as county and state agencies. This event is expected to last for two or more days, but can be of shorter duration particularly in widespread outage situations. At this level of emergency, the Operations Coordination Center (OCC) is activated and assumes responsibility for managing the emergency. The only exception is where there are only system-wide gas curtailments due to conditions outside the PG&E service territory, which are managed by System Gas Control. The Senior Director-M&C and the Director of Electric Control Center Operations are responsible for the operation of the OCC.

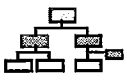
Examples: System-wide gas curtailment due to conditions outside the PG&E service territory, major gas transmission outages, Stage III non-core customer gas curtailment.

3.1.4 Level 4 - Company-Wide Emergency

An emergency which impacts the Company's and/or our customers' ability to conduct normal business functions and requires the full mobilization of Company resources to respond. Other factors could include an emergency requiring extensive cross-business unit prioritization of resources, or one which causes extensive inquiries from customers, the media or governmental agencies. The Sr. VP/GM-ED is responsible for managing Level 4 Emergencies with the support of the Corporate Emergency operations Center (EOC).

Example: An urban earthquake.

3.2 Company Emergency Management Organizations



This section provides a general description of the organizations responsible for managing Level 3 and 4 emergency response activities. The UO Electric Emergency Operations Plan provides a more detailed and comprehensive description of the Company Emergency Management Organization.

The vast majority of gas emergencies are handled at the local level. In many cases, HQ and operating departments coordinate among themselves or with General Office departments to resolve emergencies in the most effective manner. The OCC is activated for Level 3 and 4 Emergencies, and the EOC is activated for Level 4 Emergencies. The OCC manages Level 3 and the EOC manages Level 4 Emergencies.

The OM&C Area Manager, through the OEC, is responsible for managing distribution emergencies within their assigned area. As appropriate, the OEC coordinates with General Office departments and, in particular, Gas Engineering, Public Relations, and the Call Centers.

When the OCC is activated, the HQ, through the OEC (PRC for Gas Transmission), is responsible for reporting system status information to the OCC on a periodic basis. This information generally includes the number of customers out of service and the number of customers that have been restored (both gas and electric), major facilities impacted, personnel and equipment requirements, and estimated restoration time.

The VP-Gas Transmission and Distribution and the affected area manager are responsible for responding to emergencies that affect the gas transmission system. In response to these emergencies, they coordinate with the Gas Control Centers or, if activated, the PRC, as well as other affected organizations. When the gas emergency requires OCC activation, the OCC coordinates personnel and equipment requests, and other technical support.

3.2.1 Operations Emergency Center (OEC) (Levels 2-4)

During Levels 2-4 Emergencies, affected HQ activate a OEC comprised of multiply departments and other business units, when indicated, to manage and coordinate emergency response and service restoration efforts within its service boundary. In fulfilling this role, the OEC deploys, monitors, directs, and coordinates the personnel necessary to assess damage, secure hazardous situations, restore service, and communicate up-to-date distribution system status information to the CTCC, OCC, and other activated coordination centers. For a more detailed description of the roles and responsibilities of the OEC, see the OEC Operating Procedures in the Area Headquarters Electric Emergency Plan.

An OEC is activated for Level 2 emergencies, and for other emergencies deemed necessary by the Emergency Response Coordinator (ERC). During a Level 3, the OCC is activated and all OECs are activated (although some may be a partial activation). Activation levels can range from an emergency supervisor's call for advice to all department representatives responding to the OEC.

Local operating departments' gas emergency plans should establish the following:

- ☐ Departments that should be involved
- ☐ Department roles
- ☐ Notification procedures

The OEC establishes local gas emergency response priorities and implements gas system priorities as directed by the OCC. The OEC gathers the data needed to coordinate gas system response and gas restoration priorities. Some of the information required by the OCC includes:

- ☐ Number of customers without service
- ☐ Major customers without service
- ☐ Number of customers restored
- ☐ Facilities affected
- ☐ Damage assessment
- ☐ Personnel allocations
- ☐ Additional personnel needed
- ☐ Estimated time of restoration

The location and custodian of the OEC activation and operation procedures are to be in Appendix E-5.

3.2.2 Pipeline Restoration Center (PRC) (Levels 2-4)

The PRC, located in Walnut Creek, serves as a central point for coordinating and supporting response to Level 2-4 gas transmission emergencies. In this capacity, the PRC coordinates with System Gas Control, OECs, the OCC, and other emergency management organizations. During Level 3 and 4 emergencies the PRC will request out-of-area crews and/or mutual aid leak surveyors from the OCC. During Level 2-4 local gas transmission emergencies, as described in the CGT MOU, the local OM&C Area operating groups will make the situation safe. The CGT MOU (Section 2.6.1 and Appendix B-2 in the local Area OM&C gas emergency plans) describes the process for managing local gas transmission emergencies. The local Area OM&C operating groups will coordinate gas service restoration. During Level 3 and 4 Emergencies, the PRC provides regular gas transmission system status reports to the OCC.

The role of the CGT Emergency Response Coordinator (ERC) is to manage emergency response efforts through the PRC.

Local gas emergency plans (CGT only) must include the following:

- **Activation criteria**
- **Departments that should be involved**
- **Department roles**
- **Notification procedures**

3.2.3 Operations Coordination Center (OCC) (Levels 2-4)

The OCC is located in San Francisco (alternate in San Ramon) and consists of multiple departments and business units working together to gather, consolidate, analyze and disseminate system-wide status information, and to allocate resources, as necessary, or as directed by the EOC to ensure an effective gas emergency response throughout the Company's service territory. The OCC manages Level 3 Emergencies and is opened (possibly only partially) for support for Level 2 Emergencies.

The OCC acquires and coordinates all resources for deployment between HQ and areas as necessary to provide for the safest and most efficient restoration effort. The OCC also communicates, on a consistent basis, the status of the gas emergency response, including personnel and equipment deployment, customer restoration status, call volumes, and facility impacts to senior management, the Corporate EOC when activated, and to OECs, other coordination centers and restoration centers involved in the gas emergency response.

The VP-OM&C has overall responsibility for the OCC.

3.2.4 Company Emergency Operations Center (EOC) (Level 4)

The Company EOC, located in San Francisco (alternate in San Ramon) is activated for and manages all Level 4 emergencies and is responsible for assessing the overall extent and impact of the gas emergency; developing an overall response strategy; providing the OCC and other coordination centers with policy direction; and coordinating, on a Company-wide basis, resources and information needed to support the impacted HQ and areas. The OCC reports system status and information to the Operations Group of the Corporate EOC.

The Sr. VP/GM-UO has overall responsibility for managing the EOC.

3.2.5 System Gas Control (SGC)(24 hour activation)

System Gas Control located in San Francisco, provides central monitoring of the gas transmission system. SGC directs the actions to be taken by the Gas Control Centers. An alternate SGC is located in Antioch.

3.2.6 Gas Control Centers (GCC)(24 hour activation)

There are two Gas Control Centers (Brentwood and San Jose) which operate on a 24-hour basis. Each GCC is responsible for monitoring and controlling a portion of the gas transmission system under the direction of SGC. Brentwood GCC covers the following Divisions: Diablo, Fresno, North Bay, North Coast, North Valley, Sacramento, Sierra, Stockton, and Yosemite. San Jose GCC covers the following Divisions: Central Coast, DeAnza, East bay, Kern, Los Padres, Mission Peninsula, San Francisco, and San Jose.

3.2.7 Other Emergency Management Organizations

The following emergency management organizations may also be involved in gas emergency response:

- ☐ Human Resources Coordination Center (HRCC), only during level 4
- ☐ Computer & Telecommunications Restoration Center (CTRC)
- ☐ Facilities Coordination Center (FCC), only during level 4
- ☐ External Communications Coordination Center (EXCCC)
- ☐ Call Center Emergency Coordination Center (CCECC)
- ☐ Materials and Fleet Coordination Center (MFCC)

3.3 Personnel Roles and Responsibilities

In a gas emergency, all employees have the responsibility and authority to take all necessary steps to safeguard the public from imminent danger including, but not limited to, shutting customers and systems down.

While most emergencies allow enough time to assess and develop an action plan specific to the incident, respondents must recognize whether shutdown should occur before an action plan is activated.

The specific duties of classifications that assess, develop, and implement response plans are defined below. These are the most common classifications involved in gas emergencies. This list does not preclude other classifications from the requirements of this Plan.

3.3.1 Customer Service Representative

The customer services representative is generally the first company representative to be notified of gas emergencies. The CSR has four distinct responsibilities in handling these calls:

- ☐ Recognize calls that need immediate response (*See section 2.3.1*)
- ☐ Correctly advise the customer how to safeguard against potential hazards as outlined in the DCS policy statement on Excellent Service

- ☐ Ask the customer for information that could help assess the situation and develop an appropriate response—use skilled questioning, call handling process maps, call guides, and the bullet help list
- ☐ Transmit a tag to service dispatch—then call to be sure the tag is received and recognized as an "immediate response" tag

See the Call Center Operations Gas Emergency Plan for more detailed information.

3.3.2 Service Operator (SO) or Distribution Operator (DO)

The service operator (SO) or distribution operator (DO) dispatches the appropriate first responder. The SO/DO is the primary communications link between field forces, Gas Control Centers, outside agencies and emergency supervision. He/She helps gather the necessary information to assess the gas emergency. The SO/DO is the information hub and coordinates the communication of all required information. When the OEC is activated, communication to other coordination centers is from the OEC, not the SO/DO. The SO/DO must:

- ☐ Recognize an "immediate response" tag and review it to ensure that the required information is available on the tag
- ☐ Dispatch an appropriate qualified company representative to the scene—usually a gas service representative
- ☐ Identify and notify other individuals or departments as needed, including local management, outside emergency agencies (such as fire and police departments), or Safety Health and Claims, when the SO/DO is the communication coordinator
- ☐ Collect and relay information to the appropriate gas emergency response participants
- ☐ Evaluate all information for possible cause and recommend corrective action to the supervisor in charge
- ☐ Recognize incidents that may affect the operation of the gas transmission and gas distribution systems and notify appropriate personnel
- ☐ Provide information to the Call Center
- ☐ Provide CPUC/DOT reportable incident information when appropriate. See Section 4.6.

See the UO Electric Emergency Operations Plan for additional information.

3.3.3 Gas Service Representative (GSR)

The gas service representative is generally the first company representative on the scene. Their first responsibility is to protect life and property. If unable to do so, the representative must immediately call for assistance. After the area is secure, the representative assesses the situation and determines the necessary response. The GSR must:

- ☐ Respond to the gas emergency and make field assessments
- ☐ Make safe. Protect people first, then property
- ☐ Relay assessment to the SO/DO
- ☐ Correctly advise the customer how to safeguard against potential hazards as outlined in the UO policy statement on Excellent Service
- ☐ Assist and advise emergency response agencies on how to handle natural gas emergencies
- ☐ Assist other company personnel
- ☐ Perform minor repairs within the service representative position description
- ☐ Determine if the incident is reportable and help the SO/DO gather data for the report
- ☐ Relay outage information to the SO/DO for communication to the Call Center
- ☐ Prepare an Accident Report when required

3.3.4 Transmission Coordinator

The Transmission Coordinator is responsible for the continuous monitoring and operation of the gas transmission system and continuous monitoring of some distribution systems. To do this, the operator uses SCADA equipment and information relayed to the operators from representatives in the field and the service operators.

In emergencies, the operator directs all operations that affect the supply, pressure and quality of the gas on the transmission system. Any changes that affect the above, must be cleared by the Transmission Coordinator. The Gas Control Centers also act as the company relay for all information regarding curtailment of non-core gas customers. The operator must:

- ☐ Monitor alarm settings and respond with standard operating procedures
- ☐ Notify the appropriate SO/DO and emergency supervisor of obvious or potential problems
- ☐ Relay reportable incident information to the Gas Distribution & Technical Services Department. See Section 4.6 for more detailed information.
- ☐ Maintain a log of operations to record company response to emergencies
- ☐ Provide information to the Call Center

3.3.5 Transmission and Regulation Personnel

ED M&C departments and Gas System Maintenance & Technical Support districts are responsible for the maintenance of facilities that affect the flow, pressure, quality and measurement of natural gas.

During emergencies, Transmission and Regulation (T&R) personnel may operate valves, regulators and control equipment to bring the gas emergency under control and/or maintain the system at a safe working level while emergency repairs are being made. T&R employees have the authority and responsibility to take any necessary actions, including shutting down a system, to safeguard the public from imminent danger.

T&R employees:

- ☐ Respond and make field assessments
- ☐ Make safe. Protect people, then property
- ☐ Relay assessment to SO/DO or Transmission Coordinator and/or supervisory personnel as appropriate
- ☐ Correctly advise the customer how to safeguard against potential hazards as outlined in the UO policy statement on Excellent Service
- ☐ Assist and advise emergency response agencies in dealing with natural gas
- ☐ Assist other company personnel
- ☐ Relay outage information to the SO/DO for communication to the Call Center

3.3.6 Gas Construction Crew

A gas construction crew repairs damaged facilities and provides labor for emergencies such as closing riser valves during curtailments. Generally, the work that construction crews do in a gas emergency is not substantially different from their normal assignments.

In responding to a gas emergency, crew members must:

- ☐ Respond and make field assessments
- ☐ Make safe. Protect people, then property
- ☐ Relay assessment to appropriate personnel
- ☐ Correctly advise the customer how to safeguard against potential hazards as outlined in the UO policy statement on Excellent Service
- ☐ Assist and advise emergency response agencies in dealing with natural gas
- ☐ Assist other company personnel
- ☐ Determine if the incident may be reportable and gather data for the report
- ☐ Suggest method of repair to emergency supervisor or proceed on own as necessary
- ☐ Report customer outage information and anticipated time of restoration to the SO and emergency supervisor

3.3.7 Emergency Supervisor (On-Call Advisor)

The emergency supervisor (ED distribution supervisor, Customer Field Services supervisor, CGT district superintendent, etc.) coordinates all gas emergency response activities. The supervisor must be sufficiently familiar with the work processes of each department to either direct the response, or recognize the need for additional expertise. The supervisor must ensure compliance with corporate and local gas emergency response policies and priorities and ensure that all appropriate communication, both internal and external, is accomplished.

The emergency supervisor must:

- ☐ Be available during non-standard work hours
- ☐ Gather facts using informed questioning
- ☐ Assess situation and information
- ☐ Develop a response plan—who and what is required
- ☐ Implement the response plan—make safe, protect people, then property
- ☐ Communicate with all appropriate internal organizations
- ☐ Communicate with other emergency response agencies and media
- ☐ Establish a command site if necessary
- ☐ Ensure notifications are made
- ☐ Ensure information is logged—including time notified, description of incident, time employees called out, time notifications made, time customers out and restored, time employees respond, time situation is made safe, others (*See section 5.11*)
- ☐ Determine when the gas emergency is over
- ☐ Participate in post-incident critiques (*See section 5.12*)
- ☐ Complete or assist in preparing the after-action report (*See section 5.13*)
- ☐ Relinquish command to another department supervisor, if appropriate

3.3.8 Customer Field Services Supervisor

The Customer Field Services Supervisor (CFS) directs the gas service representatives. They take an active role in major service restorations.

The supervisor must:

- ☐ Maintain the department in a state of readiness through a combination of skills assessment, training, system familiarity, periodic inspections, audits and drills
- ☐ Ensure the department has access to the necessary tools and equipment to respond adequately to emergencies
- ☐ Provide expertise and participate in the OEC
- ☐ Participate in carbon monoxide poisoning investigations

- ☐ Take over all or part of gas emergency response responsibility specific to his/her department
- ☐ Participate in post-incident critiques (*See section 5.12*)
- ☐ Complete or assist in preparing the after-action report (*See section 5.13*)

3.3.9 Distribution Supervisor (T&R)

The Gas Operations Supervisor directs the maintenance and operation of facilities that affect the flow, pressure, quality and measurement of natural gas.

The supervisor must:

- ☐ Maintain the department in a state of readiness through a combination of skills assessment, training, system familiarity, periodic inspections, audits and drills
- ☐ Ensure the department has access to the necessary tools and equipment to respond adequately to emergencies
- ☐ Provide expertise and participate in the OEC
- ☐ Take over all or part of gas emergency response responsibility specific to his/her department
- ☐ Participate in post-incident critiques (*See section 5.12*)
- ☐ Complete or assist in preparing the after-action report (*See section 5.13*)

3.3.10 Distribution Supervisor (Construction Crews)

The Construction Supervisor directs the work of the gas construction crews.

The Construction Supervisor must:

- ☐ Maintain the department in a state of readiness through a combination of skills assessment, training, system familiarity, periodic inspections, audits and drills
- ☐ Ensure the department has access to the necessary tools and equipment to respond adequately to emergencies
- ☐ Provide expertise and participate in the OEC
- ☐ Take over all or part of gas emergency response responsibility specific to his/her department
- ☐ Participate in post-incident critiques (*See section 5.12*)
- ☐ Complete or assist in preparing the after-action report (*See section 5.13*)

3.3.11 Title 300 Area Foreman

The Title 300 Area Foreman directs the work of Title 300 crews.

The foreman must:

- ☐ Maintain the department in a state of readiness through a combination of skills assessment, training, system familiarity, periodic inspections, audits and drills
- ☐ Ensure the department has access to the necessary t33ols and equipment to respond adequately to emergencies
- ☐ Provide expertise and participate in the OEC
- ☐ Take over all or part of gas emergency response responsibility specific to his/her department
- ☐ Participate in post-incident critiques (*See section 5.12*)
- ☐ Complete or assist in preparing the after-action report (*See section 5.13*)
- ☐ Provide additional resources as required, including tapping and plugging equipment, specialized personnel, boring equipment and liaison with contractors.
- ☐ Provide expertise in T&R practices that are not routinely part of the operating department, such as transmission repair, welding, shoring, and tapping and plugging.

3.3.12 Gas System Maintenance and Technical Support (GSM&TS) District Superintendent

The Gas System Maintenance and Technical Support District Superintendent is the emergency supervisor for the operating areas within CGT.

The superintendent must:

- ☐ Maintain the department in a state of readiness through a combination of skills assessment, training, system familiarity, periodic inspections, audits and drills
- ☐ Ensure the department has access to the necessary tools and equipment to respond adequately to emergencies
- ☐ Take over all or part of gas emergency response responsibility specific to his/her department
- ☐ Participate in post-incident critiques (*See section 5.12*)
- ☐ Complete or assist in preparing the after-action report (*See section 5.13*)
- ☐ Provide expertise on gas transmission and collection

3.3.13 Headquarters Gas Engineer

The Headquarters Gas Engineer ensures that all maps, records, shut down plans and other associated records are accurate, up to date and available for all employees. The engineer may be required to perform engineering functions, such as load balance and blow down calculations for different repair options. The engineer also may train employees about maps and records, code compliance, Gas Standards and Specifications, CPUC and local notification procedures, and local operating procedures.

3.3.14 Maintenance and Construction Superintendent - Title 300

The Title 300 M&C Superintendent is responsible for gas emergency preparedness planning and training of company gas emergency response personnel within that organization. See section 3.3.20 for information concerning the Superintendent's role as the ACRC.

The Superintendent will:

- ☐ Coordinate movement of construction crews between HQ's within the Area
- ☐ Notify the OCC when moving crews across area boundaries
- ☐ Assess damage and notify the Title 200 M&C superintendent

3.3.15 Maintenance and Construction Superintendent - Title 200

The Title 200 M&C Superintendent is charged with the responsibility of gas emergency preparedness planning, training and response in the HQ and acts as the HQ contact for the OCC. The Superintendent is the primary ERC. See Section 3.3.19.

The superintendent will:

- ☐ Assess damage and notify the OCC
- ☐ Sets local repair priorities
- ☐ Guide and direct the emergency supervisor

3.3.16 Customer Service - Field Service and Dispatch Manager

The Customer Service - Field Service and Dispatch Manager is responsible for gas emergency preparedness planning and training of Company gas emergency response personnel within his/her organization. The manager also may be required to provide expertise specific to the department and participate in the OEC. He/she also manages major service restoration work in his/her HQ's.

3.3.17 Call Center Managers

The Call Center Managers are responsible for gas emergency preparedness planning and training of Company gas emergency response personnel within their organization.

3.3.18 Area M&C Director, GT&D Director, GSO Director, Call Center Operations Director

Area M&C Directors, GT&D Director, GSO Director, and Call Center Operations Director are responsible for gas emergency preparedness planning and training of company gas emergency response personnel in their respective organizations. They are responsible for the actions and results of employees in their organizations.

In response to emergencies, Area M&C Directors and GT&D Directors should ensure that they coordinate their efforts with the Call Centers as well as representatives from Public Relations, Governmental Relations, and Community Relations Departments. Managers are also responsible for ensuring that Senior Management (through the OCC) is informed in a timely manner of major emergencies including:

- ☐ Major seismic event
- ☐ Widespread fires
- ☐ Terrorist incidents or civil disruption
- ☐ Significant environmental problems
- ☐ Other significant problems

An event is deemed significant if it affects large numbers of customers, has a potential for state and/or national publicity, or poses adverse regulatory impacts.

During working hours, senior management should be notified through the OEC or the OCC. If those officers are not available after normal business hours, the Corporate Security Department is available to contact senior management. Corporate Security can be reached through the General Office Telephone Operator at 223-7000, or 415-973-7000.

3.3.19 Area OM&C Emergency Response Coordinator (ERC)

The ERC manages gas emergency response within the assigned HQ, coordinates the activities of all OEC staff, and reports to the Area M&C Director. The ERC is responsible for determining the level of response required to address a specific gas emergency; ensuring that appropriate gas emergency response personnel are activated and deployed; coordinating resource acquisition and deployment; providing information to the OCC; implementing restoration priorities established by the OCC or Company EOC; and sending resources to other HQ as requested by the ACRC/ASRC, or when directed by the OCC.

3.3.20 Area Construction Resource Coordinator (ACRC)

During Levels 2-4 Emergencies, the Title 300 &C Superintendent assumes the role of ACRC and is responsible for coordinating movement of construction crews and leak surveyors between the HQ in the assigned area (Level 2), and between areas, in accordance with priorities established by the OCC (Levels 3 and 4).

3.3.21 Area Service Resource Coordinator (ASRC)

In Level 2-4 Emergencies, the on-call Customer Services Planning and Support representative assumes the role of ASRC and is responsible for coordinating and tracking the movement of gas service personnel between HQ in an area (Level 2), and between areas, in accordance with priorities established by the OCC (Levels 3 and 4).

3.3.22 Emergency Process Coordinator (EPC)

The EPC reports to the Electric Control Center Operations Department and is responsible for the following items within their geographic territory:

- ☐ Providing emergency response training, including WLA/OMT/OIS/FAS
- ☐ Developing exercises/drills
- ☐ Establishing verbal agreements with community services (e.g. OES, Fire, Police, etc.)
- ☐ Responding when any OEC in the Area is activated to provide support as needed to the Area OM&C Manager and the ERC
- ☐ Coordinating OEC audits
- ☐ After every OEC opening and/or exercise, a critique with an Action Plan is developed and submitted to Emergency Response and placed on the EPC's shared drive
- ☐ Ensuring that all process are documented and communicated in the UO Area Headquarters manual
- ☐ Continuously updating key Emergency Response personnel and contact phone numbers

Refer to the UO Electric Emergency Operations Plan for additional information.

4.0 Gas Emergency Response Policies

4.1 Gas Emergency Response Policy

Gas emergency response activities must protect people first. After people are safe, threatened property may be safeguarded. All available help is used in these efforts: police, firefighters, and gas company personnel summoned to the scene. The use of building occupants and bystanders should be considered if necessary, but extreme caution should be used. Those not trained in emergency procedures may not help the situation.

The steps to safeguard life are:

- ☐ SHUT OFF the gas if possible
- ☐ EVACUATE all persons from the danger area
- ☐ PREVENT IGNITION by extinguishing open flames, prohibiting smoking and the operation of electric switches and apparatus
- ☐ BARRICADE or rope off the area and warn people
- ☐ VENTILATE enclosed spaces and covered areas
- ☐ STOP the escape of gas by controls or repairs

Communication, both internal and external, is critical to effectively managing emergencies.

4.2 Immediate Response Requirements

DCS Policy regarding Excellent Service defines PG&E's requirements for responding to a customer's request for assistance immediately (*See section 2.3.1*).

4.3 Internal Notification Requirements

Most gas emergencies require notification of internal departments. This section provides a brief description of the notification requirements for each department with references to corresponding documents. See the "Internal Notification Requirements" section in Part III.

Local operating plans must include the notification requirements including a list of phone numbers and parties responsible for notifications in Appendix B-3.

4.3.1 Operations Coordination Center

The OCC must be notified and the OCC may be activated when the necessary response exceeds the capabilities of the HQ and local Title 300 personnel (all Level 3 and 4 Emergencies), such as:

- ☐ Major service restorations requiring additional gas service representatives
- ☐ Major damage requiring additional crews

The OCC hotline phone number is (415) 973-9999.

4.3.2 Pipeline Restoration Center

The PRC must be notified and may be activated for Levels 2-4 gas transmission emergencies. The PRC can be reached through the OCC. When activated, the PRC can be reached at Ext. 583-4363 (1-925-974-4363).

4.3.3 Safety, Health, and Claims

SH&C Procedure 202 delineates incidents that require immediate notification of the Safety Health and Claims department, including:

- ☐ All third-party injuries or deaths
- ☐ Major damage ($20,000 or more) to third parties
- ☐ Major damage ($20,000 or more) to company property

See the "Safety, Health, and Claims" section in Part III.

Local plans must provide the weekend and after-hours duty roster for their representatives in Appendix B-3.

4.3.4 Law

The Law Department must be notified when any of the following occur:

- ☐ Any environmental release that must be reported to a federal state or local agency
- ☐ Any environmental release that attracts media attention
- ☐ Any discovery of historic contamination at a PG&E site

Notifications are to be marked "Privileged and Confidential". Written follow-up reports should be sent (preferably by e-mail) to:

Judi Mosley	415-973-1455	JKM8@PGE.COM
Susan Bragagnolo	415-973-4594	NSD1@PGE.COM

See the "Law" section in Part III.

Local Plans must include procedures for notifying the Law Department in Appendix B-3.

4.3.5 News Department

Local plans must provide procedures for when and how to notify News Department representatives.

The procedures for notifying the News Department and their weekend and after-hours duty roster are to be included in Appendix B-3.

4.3.6 Corporate Security

The Corporate Security Department should be notified in the following instances:

- ☐ Serious injuries to employees
- ☐ Bombings or bomb threats at company facilities (also complete "Report of Bomb Threat," Form 87-52)
- ☐ Sabotage or serious vandalism incidents
- ☐ Any situations where, in the judgment of the Emergency Supervisor, they should be notified

See the "Corporate Security" section in Part III.

Local plans must include the weekend and after-hours duty roster for their representatives in Appendix B-3. Also include a copy of "Report of Bomb Threat," Form 87-52.

4.3.7 Local Management

Local operating departments must include notification requirements for managers and department heads in Appendix B-3.

4.3.8 Call Center

The Call Center must be notified whenever a gas emergency occurs which could directly impact more than 500 customers, which could require that special instructions be given to the customers, or which could generate a large number of calls to the Call Center.

Notifications are made by telephone to the Call Center's Customer Traffic Control Center (CTCC) in Sacramento at 8-777-7278 or 916-923-7278.

See the "Call Center Traffic Control Center (CTCC)" section in Part III.

4.3.9 Gas Control Centers

Any changes that affect the supply, pressure, and quality of gas on the transmission system must be cleared by the Transmission Coordinator. The Gas Control Centers also act as the company relay for all information regarding curtailment of non-core gas customers.

See the "Gas Control Centers" section in Part III.

4.3.10 Service Dispatch (SO or DO)

Since the SO or DO in many cases dispatch the first responder (see Section 3.3.2), they will be a primary communications link. During incidents where Service Dispatch did not dispatch the first responder, the person responsible for managing the emergency must , if appropriate, ensure that coordination is initiated and maintained with Service Dispatch.

4.4 External Notification Requirements

Many gas emergencies require notification of external agencies. This section provides a brief description of the requirements.

Local operating plans must include a list of phone numbers and parties responsible for notifications in Appendix F-3.

4.4.1 Fire

Local fire departments must be contacted whenever a gas emergency poses the threat of fire or explosion. Fire departments can assist in fire suppression, evacuations, and traffic control. PG&E's Public Safety Information Program requires local operating departments to contact local fire departments annually to establish notifications agreements and contact methods (*See section 2.8*).

Local plans must include these agreements and contacts in Appendix F-3.

4.4.2 Law Enforcement

Police departments may be contacted if PG&E requires assistance in evacuations, traffic control, or crowd control. PG&E's Public Safety Information Program requires local operating departments to contact local police departments annually to establish notifications agreements and contact methods (*See section 2.8*).

Local plans must include these agreements and contacts in Appendix F-3.

Police departments should be contacted for any confirmed or suspected civil or criminal offense, including:

- ☐ Theft
- ☐ Riot or civil disturbance
- ☐ Sabotage
- ☐ Bomb threat
- ☐ Bombing
- ☐ Hostage situation
- ☐ Any situations in which the emergency supervisor believes law enforcement should be notified

4.4.3 Local Department of Public Works

Local public works departments must be contacted any time a PG&E response affects the city or county infrastructure or permit requirements.

Local plans must include the requirements and contact arrangements in Appendix F-3.

4.4.4 Notification Requirements for Large Customers

Refer to the Gas Curtailment procedures in Section 5.8.6.

Local operating departments must include the notification requirements for large customers in Appendix F-3.

4.5 Environmental Release Notification

All gas incidents that actually—or potentially—adversely effect the environment require notification.

PG&E's Hazardous Waste Manual, Appendix F, outlines which emergencies must be reported to which agencies. These manuals provide up-to-date phone numbers for the reporting agencies. Hazardous waste manuals must be readily available to all company personnel involved in the response.

PG&E's "Environmental Emergency Hotline: telephone number is 1-800-874-4043.

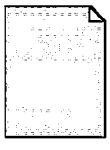
Local plans must either include or reference the location and custodian of Appendix F of PG&E's Hazardous Waste Manual in Appendix F-9.

Agencies that may require notification include:

- ☐ Office of Emergency Services - Utilities Coordinator
- ☐ California Highway Patrol
- ☐ California Department of Forestry
- ☐ State Department of Fish and Game
- ☐ California Regional Water Quality Control Board
- ☐ U.S. Coast Guard
- ☐ U.S. Environmental Protection Agency
- ☐ California Department of Toxic Substance Control
- ☐ Local Hazardous Materials Emergency Response Agency

Note: *Any unplanned release of natural gas, where there is a reasonable belief of significant or potential hazard to human health and safety, property or the environment, must be immediately reported to the Office of Emergency Services: 1-800-852-7550 and the local Hazardous Materials Emergency Response Agency. Reference* PG&E Hazardous Waste Manual, *Appendix F, paragraph 12.*

4.6 Reportable Incidents: California Public Utilities Commission (CPUC) / Department of Transportation (DOT)



UO Standard D-S0355/CGT Standard S-4413 (CPUC and DOT Reportable Incidents, Curtailments and Conditions and Low Pressure System Problem Reporting) describes incidents that require the CPUC and DOT to be notified.

The required information is to be gathered by employees in the field and the emergency supervisor, and relayed via the Gas Control Centers to the General Office Gas Distribution & Technical Services Department representative.

The phone number for reporting incidents is 1-415-973-7200 (ext. 223-7200). When a message is left at this number, the Gas Distribution & Technical Services Department representative who is on call will be automatically paged.

The Gas Distribution & Technical Services Department Fax number is 1-415-973-7707 (ext. 223-7707).

For convenience, some of the reporting criteria is included in the Reportable Incident Emergency Response Checklist in this plan.

UO Standard D-S0355/CGT Standard S-4413 and the local procedures for notifying Reportable Incidents to the Gas Distribution & Technical Services Department must be included in Appendix E-3.

The Procedure for Handling CPUC Field Contacts – Requesting Incident Information should be included in Appendix E-3

5.0 Gas Emergency Response Procedures

5.1 How the Company is Notified

This section describes the ways in which the company may be notified of a possible gas emergency.

5.1.1 Calls from Customers

Customers may call the Call Centers via the 1-800-743-5000 phone number. The centers operate 365 days each year, 24 hours per day. Calls are automatically routed between the four Call Center headquarters to ensure that all calls are answered in the least amount of time. Design criteria and backup capabilities are outlined in Customer Traffic Control Center and Computer Network Operations manuals available at every center.

Customer calls are dispatched to the appropriate headquarters by electronic tag transfer. Calls that require immediate response are transferred electronically and followed up by a phone call to ensure the tag is received and noted as requiring immediate response (*See section 2.3.1*). The call center disaster recovery plan outlines the preparedness policy and contingency plans for the call centers.

5.1.2 Calls from Outside Agencies

Emergency response agencies may directly access local operating departments.

In Appendix B-1, identify who receives notifications and any internal or external notifications that are triggered. Address on- and off-hours occurrences.

5.1.3 Field Operating Personnel

Field operating personnel may report by radio, mobile data terminal (MDT), cellular phone or public telephone. During normal work hours, they inform the SO, gas T&D dispatch, their immediate supervisor or alternate. After hours, employees inform the emergency supervisor or OEC, if activated.

In Appendix B and D, provide a list of radio call numbers including system and groups, phone numbers, pagers and cellular phone numbers and assigned vehicles for employees and supervisor involved in gas emergency response.

5.1.4 Operations, Planning and Control (OP&C)

OP&C may notify the emergency supervisor, or OEC if activated, of gas emergencies. These messages typically involve:

- ☐ Changes in pressure
- ☐ Quantity of gas coming into the system
- ☐ Quality of gas coming into the system

OP&C has jurisdiction over any transmission operations that effect the above, such as operating valves or changing regulation and control set points. This information is communicated between OP&C, M&C mechanics and operating supervisors. OP&C also informs the OCC of major damage assessments to the transmission system.

5.2 Initial Information Needed

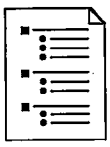
Initial information is necessary to assist in determining the nature of the incident. Determine:

- ☐ **Where** incident occurred
- ☐ **What** caused customer call or SCADA alarm
- ☐ **Why** immediate response is required
- ☐ **When** incident occurred

5.3 Assessment

Gather the information necessary to determine the scope of the gas emergency. When assessing the situation:

- ☐ Assemble the facts
- ☐ Review records of facilities
- ☐ Consider eyewitness reports
- ☐ Determine physical and operational limits
- ☐ If gas is escaping underground, continue testing until consistent negative readings are obtained
- ☐ Remember that each incident requires different information to make an accurate assessment
- ☐ Use the lists provided in the Emergency Checklist section.



5.4 Developing an Action Plan

The first person at the scene determines if additional assistance is needed. If help is not needed, the responder develops and implements a gas emergency plan. If help is required, the emergency supervisor is notified. The emergency supervisor determines if additional expertise or resources are required to develop and/or implement a plan. If not, he/she develops the plan and gathers the resources to implement it.

5.5 Activating the Operations Emergency Center (OEC)

If additional expertise is needed beyond the emergency supervisor, he/she may activate the OEC. The OEC then develops and implements the plan. When the need for additional expertise is obvious and response time is critical, the Emergency Response Coordinator or alternate may activate the OEC.

In Appendix E-5, include the procedure for activating the OEC and criteria for full and partial activation.

5.6 Activating the Pipeline Restoration Center (PRC)

If additional materials or supplies are needed beyond what is available at the local district or HQ, the PRC may need to be activated. The PRC will coordinate and track acquisition and transportation of these resources.

In Appendix E-11, include the criteria and procedures for activating the PRC.

5.7 Mobilizing Personnel

Major emergencies may require resource support from several local operating departments. In Appendix C-4 include procedures for mobilizing personnel. At a minimum, include the following information:

- ☐ List of the personnel available to the emergency supervisor or OEC
- ☐ Number of personnel by job classification and the way they are mobilized
- ☐ Positions to be dispatched—by whom and how
- ☐ Discussion of how to handle on-hours versus off-hours mobilizations
- ☐ Minimum personnel needed at each headquarters when supporting major emergencies in other areas

Do not include individual contact numbers unless the emergency supervisor or OEC is to call employees out directly. Otherwise, provide the contact number for the individual or department responsible for mobilizing the work force.

5.8 Standard Gas Emergency Actions

This section describes the standard actions that should be taken for gas emergency situations. Additional information is provided in the Emergency Checklists.

5.8.1 Gas Detected In or Near a Building

Send a competent representative to the scene. Investigate the leak per UO Standard C-S0434 (Gas Leak and Odor Response). If necessary, perform a leak survey per UO Standard C-T&CS-S0350. Repair leakage as prescribed in this standard.

5.8.2 Fire Involving or Near a Gas Pipeline Facility

Call the local fire department at the same time a company representative is dispatched. Depending on circumstances at the scene, initiate a previously developed joint action (*See section 2.6*) to control the gas emergency.

5.8.3 Explosion Involving or Near a Gas Pipeline Facility

Call the local fire department at the same time a company representative is dispatched. Depending on circumstances at the scene, initiate a previously developed joint action (*See section 2.6*) to control the gas emergency. In addition, determine:

- ☐ Whether gas or some other agent caused the explosion
- ☐ Whether gas facilities and/or third party property are damaged
- ☐ To what extent gas facilities and/or third party property are damaged

5.8.4 Shutdown Plans for Specific Sections of Principal Gas Lines

Local operating departments must identify facilities that are vulnerable to disruption, critical to local operation, or where disruption would cause significant hazard to the public.

The department must prepare written action plans to reduce anticipated emergencies. Procedures should include canned shutdown procedures and detail all specialized equipment and materials required (such as control fittings or sleeving material). The sources and availability of equipment and material must be identified in the procedures. Procedures are to reviewed annually.

In Appendix E-9, include a list of these facilities and identify where written procedures are located.

5.8.5 Gas Distribution System Shutdown Zones

Each operating department that serves Core gas customers must maintain pre-determined procedures for the emergency shutdown of geographic zones of residential gas customers as established by UO Standard S5000 (Gas Distribution Emergency Shutdown Zones). Also see GS Interim Standard 459.1-1 (Emergency Curtailment of Rule 21 Priority 1 Gas Customers) and GS Interim Standard 459.32-1 (Curtailment of Priority P-2A through Priority P-5 Natural Gas Customers). These Interim Standards are in the process of being revised. Zones must be "shut in" when public safety is at risk and other methods to curtail the flow of gas are not immediate enough. Other reasons for shutdown include load shedding, pressure control, or catastrophic events, such as flood, fire or earthquake.

Zones are customarily established by pipeline valves installed strategically in the system. However, the use of line stoppers and pipe squeezers can be an acceptable method for some situations. Emergency zones using this method must include the location of gas emergency equipment and specific personnel requirements to effect zone shutdown. See section 5.9 for service shutdown and restoration procedures.

In Appendix E-1, include a copy of UO Standard S5000, a copy of GS Interim Standard 459.1-1, and a copy of GS Interim Standard 459.32-1, and identify where the written procedures are kept.

5.8.6 Load Curtailment of Interruptible Gas Customers

GS Interim Standards 459.1-1 and 459.32-1 (See 5.8.5) outline the procedures used to curtail service to interruptible (non-core) gas customers. Customarily, the Gas Control Centers notify Customer Account Services of the need to curtail. A Customer Account Services representative then contacts the customer. The Gas Control Centers also notify the local operating department of the situation, and the department monitors the customer for compliance.

For more detailed information regarding gas service interruptions, see the Company's "Getting Ready for Winter" document. Go to the following web-site and click on "Getting Ready for Winter" in the first paragraph.

http://www.pge.com/pipeline/news/20011026_r4winter.html

Each Headquarters must develop a gas curtailment plan and a gas curtailment monitoring plan. The following documents have been developed to support this process:

- o Curtailment Communication Process
- o Developing a Customer Monitoring Plan for Gas Curtailment
- o Diversion Communication Process
- o Gas Curtailment Noncompliance Action Request

Include the local curtailment plan in Appendix E-9 (see 5.8.5 requirements).

5.8.7 Low Pressure Gas Systems

In the event that a low pressure system (standard operating pressure is 7.0 inches W.C., +/- 50% which results in a range from 3.5 inches W.C. to 10.5 inches W.C.) is subjected to pressures greater than 21 inches W.C. and no information is readily available to assess the condition of customer appliances, the system must be shut in and reduced to atmospheric pressure. Similarly, if a low pressure system drops below 2 inches W.C., the system must be shut in. All customer riser valves must be closed and the system repressurized to allow systematic inspection and relighting of customers appliances. Shutting in the system is necessary because appliance regulators may have been damaged and pilot lights may have been extinguished during the period of high pressure. *(See service restoration Section 5.9)*

Incidents involving low pressure systems are to be reported as required by UO Standard D-S03555/CGT Standard S4413 (CPUC and DOT Reportable Incidents, Curtailments and Conditions and Low Pressure System Problem Reporting).

A copy of UO Standard D-S0355/CGT Standard S4413 is located in Appendix E-3.

5.9 Gas Service Restoration

When customers lose service for any reason, the area affected by the outage must be shut in. Then, all customer riser valves must be closed and the system repressurized. At the customer site, the Gas Service Representative (GSR) checks that all appliances are off, turns on the gas, and relights the appliances.

The first step in service restoration is determining the necessary personnel. To do this, first determine how many customers are without service. Next, determine a target time when restoration will be complete. See the Customer Service Support Emergency Restoration Plan for a detailed shut in and turn on procedure and general gas service restoration information.

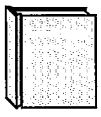
Local operating departments are responsible for service restorations. When the relight effort requires more personnel than are available within a HQ, the HQ will request additional Gas Service Representative assistance from OCC. The OCC will contact the Area Service Restoration Coordinator who will coordinate the response to this type of resource request by acquiring resources from other HQ, and dispatching them to the affected HQ.

A copy of the Customer Service Planning and Support Emergency Restoration Plan is located in Appendix H.

5.10 Communications

A communications flow chart describing who communicates with whom, when, and how is to be included in Appendix B-1. Include PG&E personnel and external agencies (both on- and off-scene), such as dispatch to field crews, dispatch to public safety agencies, dispatch to Public Relations, dispatch to Call Center, field crews to public safety agencies, field crews to emergency supervisor, emergency supervisor to media, Public Relations to media, etc.

5.11 Incident Log



All employees involved in gas emergencies must document their activities. The documentation should provide enough information to be able to recreate the gas emergency response at a later date. Information that is critical to the response should be included such as times, locations, actions taken, and communications. Field personnel may use log books, field tags, clearances and/or other company forms to document individual responses. The emergency supervisor or OEC uses these documents to complete the Incident Log Form located in the appendix.

An Incident Log Form needs to be completed for each incident that requires a telephone report to the CPUC *(See section 4.6)*.

Appendix E-9 must list where the Incident Log Forms are kept.

5.12 Post-Incident Critique

The local operating department reviews the incident log forms as they occur to determine if incidents require post-incident critiques. Post-incident critiques are performed and documented for incidents that demonstrate inadequacies in gas emergency plans and procedures or where company response could be improved.

The local operating department determines the scope of the critique, ranging from contacting a single responder to scheduling a meeting with all relevant departments. The local operating department documents all areas for improvement identified during the critique *(See section 2.9.5)*

Appendix E-9 must list were the documented critiques are kept.

5.13 After-Action Report

Post-incident critiques that identify areas for improvement beyond refresher training of individuals require after-action reports. The after-action report lists areas needing improvement, responsible parties and a schedule for correction. The after-action report is to be distributed to the appropriate local managers and directors. The area manager, Call Center manager, G&ET area superintendent, or a designee follows up to ensure that improvements are incorporated on schedule.

Appendix E-9 must list where the documented after-action reports are kept.

5.14 DOT Drug and Alcohol Testing - Post-Accident

If drug or alcohol usage may have contributed to an accident or cannot be discounted as a contributing factor, the first line supervisor must:

- ☐ Make a list of employees to be tested
- ☐ Review the list and the reasons for testing with a supervisor of equal or higher authority, if possible, to confirm validity
- ☐ Conduct drug test within 32 hours of the incident (8 hours for alcohol)
- ☐ Notify/consult with HR

See the "DOT Drug and Alcohol Testing - Post-Accident" section in Part IV.

Include a copy of the "DOT Post Accident Testing Quick Reference Criteria" in Appendix E-6.