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Gas Event Reporting Requirements

Summary

This utility standard is the governing document for reporting gas events occurring within Pacific Gas and Electric Company (Company) gas systems. It establishes criteria, requirements, and procedures for reporting and documenting gas events. It includes the following subjects. (For detailed instructions related to these topics, see the referenced utility procedures.)

- Criteria for gas incidents reportable to the Department of Transportation (DOT) and the California Public Utilities Commission (CPUC). See <u>Utility Procedure TD-4413P-01, "Procedure for Reportable Gas Incidents."</u>
- Criteria for reporting safety-related conditions and low-pressure system problems. See <u>Utility Procedure TD-4413P-02</u>, "<u>Procedure for Reporting Safety-Related Conditions and Low-Pressure System Problems</u>."
- Preparing quarterly and annual incident reports. See <u>Utility Procedure</u> <u>TD-4413P-03</u>, "Annual and Quarterly Reporting Requirements for Gas Incidents, Events, and Activities."
- The process for notifying select Company leaders about major gas events.

Also, this standard establishes the requirements for reporting gas incidents to the DOT and/or the CPUC, in accordance with the <u>Code of Federal Regulations</u> (CFR) 49 CFR Part 191 and <u>General Order (GO) 112-E, "State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and <u>Distribution Piping Systems"</u> (Section 101.4), respectively.</u>

Target Audience

All personnel involved with gas transmission and distribution (T&D) operations, engineering, customer field services, and gas maintenance and construction (M&C).

Safety

Perform all work in compliance with the <u>Code of Safe Practices</u> and <u>Utility</u> <u>Standard Practice (USP) 22, "Safety and Health Program."</u>

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Requirements

1 Gas Incidents

A "gas event" is an occurrence that impacts the safety or reliability of Company gas facilities.

When a gas event meets the criteria outlined below, it is considered a "gas incident." Such events may require reports to the DOT and/or the CPUC within the time frame allotted. Refer to Utility Procedure TD-4413P-01 for the reporting procedure.

A gas incident is defined as an event that involves or is suspected to involve a release of natural gas from a Company facility and meets certain other regulatory criteria. Usually, Grade 1 leaks are not considered incidents unless protecting the safety of persons and/or property requires actions beyond routine responses.

1.1 CPUC Reportable Criteria

All events that meet any of the following criteria are considered reportable gas incidents and must be reported to the CPUC within 2 hours (during working hours) or 4 hours (during non-working hours) after Company gas employees are aware of the incident and have arrived on the scene. (If the only criterion met is the presence of major media and the media arrives at the site after the gas employee arrives, then the clock starts at the time the media arrives.)

- Events that involve a release of gas from a transmission or distribution pipeline (up to and including the meter set) or a liquid natural gas (LNG) or compressed natural gas (CNG) facility and that result in one or more of the following:
 - Fatality or personal injury requiring admission to and an overnight stay in a hospital.
 - Property damage (including labor costs) to the Company or others estimated at \$50,000 or more, including the cost of gas lost.

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- Other consequences or events deemed significant (see Page 8 for a definition of "significant event").
- 2. Events that have attracted either public attention or coverage by major news media ("major news media" are defined as San Francisco, Sacramento, and/or national network TV news stations), are known or suspected to involve natural gas, and occur in the vicinity of Company facilities, regardless of whether or not Company facilities are involved.
- 3. All explosions, with the exception of those in areas where there is no gas service or where it is immediately clear that natural gas did not contribute to the explosion.
- 4. Fires involving Company facilities (up to and including the meter set) and the release of gas, if they meet any of the other criteria in Subsections 1.1.1, and 1.1.2, above, regardless of the cause or origin of the fire.

Note: If the only criterion met is the presence of major media, the incident is reportable to the CPUC, but not to the DOT.

1.2 DOT Reportable Criteria

- 1. All events that meet one or more of the criteria listed in the paragraph below are considered reportable gas incidents and must be reported to the DOT within 3 hours (during working hours) or 5 hours (during non-working hours) after Company gas employees are aware of the incident and have arrived on the scene:
- 2. Events are reportable if they involve a release of gas from a transmission or distribution pipeline (up to and including the meter set) or an LNG or CNG facility and that result in one or more of the following:
 - Fatality or personal injury requiring admission to and an overnight stay in a hospital.
 - Property damage (including labor costs) to the Company or others estimated at \$50,000 or more, including the cost of gas lost.
 - Other consequences or events deemed significant (see Page 8 for a definition of "significant event").

Note: If the only criterion met is the presence of major media, the incident is reportable to the CPUC, but not to the DOT.

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- 1.3 Criteria for Internal Notification of Major Gas Events
 - Certain Company officers must be notified of major gas events meeting the criteria described in Table 1 below.
 - Within 30 minutes of receiving a report of a gas event, the gas control senior transmission coordinator must determine if the event meets the criteria for reporting to Company officers. If so, the senior transmission coordinator must send a brief description of the event to the <u>Epage list GSO Gas Event Notification</u>.
 - Designated gas control employees "E-page" the notifications to the appropriate distribution list. The list includes officers responsible for energy delivery, operations, and customer care, and is maintained by gas control employees.

Table 1. Major Event Types

Type of Major Event	Criteria
CPUC Reportable Incidents	Bay Area and Sacramento TV media presence, damages > \$50.000, injury requiring overnight hospitalization or fatality.
CPUC Possibly Reportable Incidents	Unsure if Bay Area and/or Sacramento TV media presence, extent of damages has yet to be determined, status of injury requiring overnight hospitalization or fatality is unknown.
Fires and Explosions	All fires and explosions that have or may have natural gas involved, regardless of the cause.
Critical Customer Outages	Hospitals, schools, large businesses, tourist attractions, high-profile communities, transit agencies, utilities, power plants, refineries, prisons, and government offices.
CO Poisoning	Carbon monoxide (CO) poisoning related to natural gas facilities and resulting in a fatality or overnight hospitalization.
Evacuations	Any evacuation related or suspected to be related to natural gas that has been ordered by emergency response professionals (fire or police) or Company personnel.
Potential Gas Transmission System Impacts	Compressor and/or other equipment outages resulting in a reduction in supply of 50 million cubic feet (Mmcf) or impacts to the gas transmission system caused by forces such as flooding, earthquakes, or fire.
Gas Quality Upset	Any incident of British thermal units (Btus), odorant, or hydrogen sulfide (H ₂ S) outside established limits.
SCADA Outages	Supervisory Control and Data Acquisition (SCADA) failures exceeding 6 hours and affecting multiple mountain-top installations, front-end processors, and/or control room operator data network (ODN) consoles.
Security Breaches	Any act or suspected act of terrorism or vandalism that impacts the operation of the Company gas system.

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2 Safety-Related Conditions

Safety-related conditions meeting the criteria below must be reported to a Company regulatory support and analysis (RS&A) representative within 2 hours after a gas employee determines that the condition exists. A "safety-related condition" gas event is any event that compromises the safe operation of the Company's pipeline system. Refer to Utility Procedure TD-4413P-02 for the reporting procedure.

2.1 Criteria for Reporting Safety-Related Conditions

- General corrosion on a line operating over 20% of its specified minimum yield strength (SMYS), if it has reduced the wall thickness to less than that required for the established maximum allowable operating pressure (MAOP) of the line.
- · Localized corrosion pitting to a degree where leakage might result.
- Any material defect, crack, or physical damage that impairs the serviceability of the line. ("Impaired serviceability" means that the safe operation of the line is adversely affected.)
- Unintended movement or abnormal loading by environmental causes, such as earthquakes, landslides, or floods that impairs the serviceability of a Companyowned line.
- A leak in a Company facility that constitutes an emergency. ("Emergency" is defined as a situation that requires immediate corrective action to protect personnel, the public, or property.)
- A known safety—related condition involving Company facilities that could lead to an imminent hazard and that causes (either directly or through remedial Company action in response to the condition) a 20% or more reduction in operating pressure or the shutdown of a line.
- An operating error or equipment malfunction that causes pressure in a Companyowned facility to rise above the MAOP permitted by 49 <u>CFR</u> 192, Section 192.201.

3 Low-Pressure System Problems

Low-pressure system problems meeting the criteria below must be reported to an RS&A representative within 2 hours after field personnel determine that the condition exists or within 2 hours of the start of the next business day, if the event occurs during non-business hours. Refer to Utility Procedure TD-4413P-02 for the reporting procedure.

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- 3.1 Criteria for Reporting Low-Pressure System Problems
 - System pressure above 10.5 inches of water column (WC).
 - System pressure below 4 inches WC.
 - Unplanned system outages.
 - Security valve trips.
 - Elevation of regulation set points caused by system pressure or false trips.
 - Water intrusion in the system.

4 Quarterly and Annual Reports

Quarterly, annual, and other required reports to the DOT and CPUC must be made in accordance with 49 CFR Part 191 and CPUC GO 112-E. Refer to Utility Procedure TD-4413P-03 for the reporting process.

4.1 Quarterly Reports

File quarterly reports listing all gas incidents that met one or more of the following criteria:

- A report was submitted.
- Property damage exceeding \$1,000 was involved, including the cost of lost gas.
- Property damage involving fire or explosion occurred, regardless of monetary value or loss.
- A dig-in to an underground gas facility occurred.

4.2 Annual Reports

File annual reports compiled from the information contained in all gas T&D reports submitted on DOT Forms PHMSA F- 7100.1-1, "Incident Report - Gas Distribution," and PHMSA F- 7100.2-1, "Incident Report - Gas Transmission and Gathering Systems."

5 Record Retention Requirements

All correspondence and other written materials relating to gas incidents shall be retained in accordance with USP 4, "Record Retention and Disposal."

END of Requirements

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Definitions

Annual DOT report: Submitted to the DOT Office of Pipeline Safety, this report identifies pipe by number of miles, sizes, types of installation, coating, cathodic protection, class location, and the number of leaks repaired or eliminated during the year. The report is prepared using information compiled from gas T&D reports submitted on DOT Forms PHMSA F-7100.1 and PHMSA F-7100.1 and PHMSA F-7100.2.

CPUC form: Refers to a "California Public Utilities Commission Report of Gas Leak or Interruption - CPUC File No. 420."

CPUC Gas Quarterly Incident (GQI) Reporting Criteria: 1. Incidents that were reported via the CPUC's "Reporting Emergencies" website, 2. Incidents for which either a DOT Form PHMSA F-7100.1 or PHMSA F-7100.2 was submitted, 3. Incidents involving escaping gas from the operator's facilities and property damage including loss of gas in excess of \$1,000, or 4. Incidents including property damage between \$0 and \$1,000, and involving fire, explosion, or underground dig-ins.

DOT form: Refers to DOT Form PHMSA F-7100.1 for distribution systems and DOT Form PHMSA F-7100.2 for transmission and gathering systems.

*Electronic report: A report filed on the CPUC and/or DOT website notifying them of a gas incident and providing basic information about the incident.

*Email report: A CPUC Form 420 report that is sent to the CPUC via email.

Gas Event: An unplanned occurrence, such as major equipment failure, operator/work procedure error, insufficient design, natural disaster or planned outage that resulted in an outage to customers, damage to major equipment, or impacts system reliability.

Gas Quarterly Incident (GQI) Report: The summary listing of reportable and nonreportable incidents submitted to the CPUC within 30 days following the end of each calendar quarter.

Leak report: (For distribution systems only) A report submitted on DOT Form PHMSA F-7100.1 for gas incidents that occur on distribution systems operating at less than 20% of their specified minimum yield strength (SMYS).

*Leak or test failure report: (For transmission or gathering systems only)
A report submitted on DOT Form PHMSA F-7100.2 for gas incidents or test failures that occur on transmission or gathering facilities.

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Definitions, continued

Significant event: For reporting purposes, a "significant event" is left to the judgment of the Company personnel involved with and knowledgeable of the details of the event. "Significant" events must involve Company facilities and the release of natural gas, and may include the following:

- · Rupture or explosion
- Fire
- · Loss of service
- Evacuation of people in the area
- Involvement of local emergency response personnel (such as fire, police, ambulance)
- Major television coverage (see Subsection 1.1.2. on Page 3)

*Telephonic report: A telephone call to the CPUC and/or the DOT notifying them of a gas incident and providing basic information about the incident.

*Written report: A letter of explanation sent to the CPUC which gives a more detailed account of an incident and includes, when required, the appropriate DOT Form.

*If complete information is unavailable by the time the report is required, make an initial incomplete report and then a subsequent report when complete information becomes available.

Implementation Responsibilities

The senior director responsible for gas engineering is accountable for implementing this standard.

Governing Document

NA

Compliance Requirement/ Regulatory Commitment

Code of Federal Regulations 49 CFR Parts 191 and 192

General Order (GO) 112-E, "State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems"

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Reference Documents

Developmental References:

Code of Federal Regulations 49 CFR Parts 191 and 192

Code of Safe Practices

General Order 112-E, "Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems"

Utility Procedure WP1465-02, "Gas Event and Near Hit Reporting"

<u>Utility Procedure WP6436-12, "Handling Emergency Conditions Reported by Outside Agencies and Other Entities"</u>

<u>Utility Standard S0353/S4112, "Physical Inspection of Pipelines, Mains and Services"</u>

<u>Utility Standard S4110, "Leak Survey and Repair of Gas Transmission and Distribution Facilities"</u>

<u>Utility Standard S6436, "Gas and Electric Field Services and Dispatch and Scheduling Operating Practices"</u>

Utility Standard Practice (USP) 22, "Safety and Health Program"

Supplemental References:

Utility Procedure TD-4413P-01, "Procedure for Reportable Gas Incidents"

<u>Utility Procedure TD-4413P-02, "Procedure for Reporting Safety-Related</u> Conditions and Low-Pressure System Problems"

<u>Utility Procedure TD-4413P-03, "Annual and Quarterly Reporting Requirements for Gas Incidents, Events, and Activities"</u>

USP 4, "Record Retention and Disposal"

Appendices

NA

Attachments

TD-4413S, Attachment 1, "Event Notification Matrix"

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Document Recision Utility Standard D-S0355/GTS Standard S4413, "CPUC and DOT Reportable Incidents, Curtailments and Conditions and Low Pressure System Problem

Reporting"

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Revision Notes

Where?	What Changed?
NA	New document.