

Compliance Risk Management Plan

Backbone Gas Transmission Maintenance

**Gas System Maintenance and Technical Support
California Gas Transmission
Pacific Gas and Electric Company**

Revised September 1, 2005

**Compliance Risk Management Plan
PG&E – Utility Operations – California Gas Transmission
Backbone Gas Transmission Maintenance**

1. Risk Assessment (Assessment of Compliance Requirements)

Pacific Gas and Electric Company (PG&E) delivers natural gas to customers through its gas system infrastructure. The gas system infrastructure is made up of high and low pressure pipelines. The portion of the gas system infrastructure operating at 60 pounds (psig) or greater, is defined as the backbone gas transmission system. This system is jurisdictionally maintained by PG&E's California Gas Transmission (CGT), Gas System Maintenance and Technical Support (GSM&TS) department. The backbone gas transmission system, which primarily delivers gas from the California borders, gas producers, and storage fields to the Bay Area distribution centers, as well as to off-system via other interconnecting pipelines, is maintained by the GSM&TS districts. By a memorandum of understanding, local transmission lines, operated at less than 60 psig (including distribution feeder mains), are maintained by the local divisions. These are supplied off of the backbone system and feed the distribution mains. PG&E performs preventative maintenance on the gas transmission system at regularly scheduled intervals, to ensure compliance with all applicable codes and regulations, and to ensure a safe and reliable gas transmission system.

The Compliance Risk Management Plan (CRMP) documents PG&E's gas backbone transmission preventative maintenance program and evaluates its state of compliance with regulatory and company requirements. This plan does not address local transmission since this is covered under the various Gas Distribution Preventative Maintenance Plans. This plan does not cover the portion of the gas distribution infrastructure that operates less than 60 psig (gas distribution facilities). This CRMP does not include service valves, service regulators, metering or customer owned gas facilities, which is being independently evaluated by Utility Operations' Gas Distribution Department.

IDENTIFICATION OF SPECIFIC LAWS, REGULATIONS, OR POLICIES THAT ARE OF CONCERN: The primary gas safety regulations that govern gas transmission maintenance include, but are not limited to, the following.

- Department of Transportation, Research and Special Programs Administration (DOT RSPA) – Title 49 of the Code of Federal Regulations (49 CFR) Part 192 – “Transportation of Natural and other Gas by Pipeline: Minimum Federal Safety Standards”. This Federal regulation covers the minimum requirements for the design, construction, testing, operations, and maintenance of gas transmission and distribution lines. Subpart M, Maintenance, prescribes the minimum maintenance requirements of pipeline facilities.
- Public Utilities Commission of the State of California: General Order 112E – “Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission and Distribution Piping Systems”. The General Order incorporates the requirements of 49 CFR Part 192 as well as additional reporting and maintenance requirements.

KEY REQUIREMENTS: The aforementioned regulations are enforced by the Department of Transportation (DOT) and the California Public Utilities Commission (CPUC). The key requirements are appended in “**Attachment A – CGT Transmission Maintenance Roadmap**.” The Roadmap provides a description of each of the requirements, and the documentation associated with the requirements. CGT's

GSM&TS department has responsibility for implementing the requirements on a daily basis.

2. Responsibility and Oversight

A. The Vice President of California Gas Transmission (CGT-VP) is responsible for ensuring that the overall management and performance of gas transmission maintenance and operations complies with all federal, state, and local regulations.

1. The CGT-VP will monitor implementation of the backbone gas transmission maintenance program in two ways:
 - a. Weekly Leadership Team meetings – The Director of GSM&TS reports on his area of responsibility, including gas transmission maintenance issues at the weekly CGT-VP Staff meeting.
 - b. Utility Operations Compliance Dashboard – The CGT-VP and CGT Leadership Team receives the monthly UO Dashboard Compliance Report which reflects the backbone gas transmission maintenance compliance, year-to-date metrics.
2. The CGT-VP delegates overall responsibility to coordinate gas transmission maintenance to the GSM&TS Director.

B. The GSM&TS Director, with his direct report Managers, administers controls to ensure gas transmission maintenance is performed, monitored and properly documented to fully comply with applicable laws, regulations, and company standards and policies.

3. Discretionary Authority

The CGT-VP has delegated responsibility for implementation of the Compliance Risk Management Plan – Backbone Gas Transmission Maintenance to the GSM&TS Director. The Director has demonstrated a commitment to consistently conduct company activities in a highly ethical manner and in full compliance with laws, regulations, and policies.

A. GSM&TS Director – The GSM&TS Director manages resources and holds respective managers, superintendents, and supervisors accountable to ensure gas transmission maintenance is properly performed, monitored and documented in order to meet all applicable regulatory and company requirements. This includes completing all requirements within the prescribed time requirements. Proactive detection, prevention and correction of non-compliance are incorporated in the respective managers, superintendents, and supervisors job duties.

B. GSM&TS Managers – The GSM&TS Managers set, communicate and document compliance requirements in job expectations. They ensure work is performed in compliance with all applicable laws and company standards. They ensure required training is conducted, as specified in various standard practices, apprenticeship programs, and as necessary for employees to gain the skills required to effectively perform their job functions.

C. GSM&TS Area Superintendents – The GSM&TS Area Superintendents are the principle asset managers in CGT. They are functionally and directly responsible for asset compliance with all applicable regulatory and company requirements. They hold the District Gas M&O Lead Supervisors or Gas Maintenance Supervisors accountable to ensure gas transmission maintenance is properly performed, monitored and documented in order to meet all applicable regulatory and company requirements, all within prescribed time requirements. Proactive detection, prevention and correction of non-compliance is incorporated in the District Gas M&O Lead Supervisors and Gas Maintenance Supervisors job duties.

- D. GSM&TS Manager of Systems Integrity – The GSM&TS Manager of Systems Integrity is directly responsible for developing, maintaining, and revising all company standards to ensure gas transmission maintenance is performed in full compliance with all regulations and company policies.
- E. All – All employees are expected to perform their duties in a manner that ensures compliance with established standards, work practices and procedures.

4.0 Standards, Procedures, and Policies

Please refer to Attachment A, *CGT Transmission Maintenance Roadmap*, which contains a comprehensive cross-reference of applicable code regulations with company policies, standards and procedures. The purpose of the Roadmap is to ensure that all applicable pipeline maintenance regulations are clearly understood, and to identify the company standards/policies required to ensure 100% compliance. The Roadmap is updated as the reference standards and/or the code requirements change.

- A. CGT Standards – Gas transmission maintenance requirements are specified in and directed by UO Standards and Guidelines contained in the CGT Standards Book. These standards are also contained on a website that is now linked to the Utility Operations Standards website. The Systems Integrity group within GSM&TS is directly responsible for developing, issuing, and revising these standards to ensure 100% compliance with all applicable codes and regulations. The individual standards are updated whenever changes occur in codes/regulations, or when additional clarifications/corrections are needed. The maximum interval for complete review of the UO Standards and Guidelines is 5 years from the issue date of the individual standards. Hardcopy updates to the CGT Standards Book are issued annually.
- B. PG&E Gas Standards and Specifications (GS&S) – Gas transmission maintenance requirements are also specified and directed in part by standards contained in the PG&E GS&S book. This book is maintained by the Technical Document Management group in the Gas Distribution & Technical Services section of the Utility Operations' Transmission and Distribution Engineering & Planning department. Engineers within both GSM&TS and E&P Gas Distribution are responsible for updates to specific standards contained within the GS&S book. The standards contained in the book are updated when changes occur in codes/regulations, or when additional clarifications/corrections are needed. There is no timeline when each gas standard is required for review. Hardcopy updates to the GS&S book is issued semi-annually.

5.0 Training and Communication Plan

Employees who perform gas transmission maintenance receive formal training through various sources, including PG&E gas department's apprenticeship and GSM&TS' skill block program training typically provided by the Technical Learning Services, and targeted training sponsored by GSM&TS. For example, in 2001 the technical training service group for DOT (TSI from Oklahoma City, Ok) provided a week long, in depth training course on 49 CFR code requirements to all GSM&TS District Gas M&O Lead and Maintenance Supervisors and other selected personnel. Additional on the job training is provided by first line supervisors, or engineering support personnel from various support groups such as the Systems Integrity or Work Management groups.

PG&E's Operator Qualification Program meets new federal code requirements to evaluate whether individuals are qualified to perform assigned covered tasks and can recognize and react to abnormal operation conditions. A Utility Operations Standard

S4450, *Operator Qualification Program*, governs this program, and the entire program has been reviewed with the CPUC. All employees responsible for performing required maintenance of 49 CFR Part 192 have been qualified in the Operator Qualification Program for the specific maintenance task. Furthermore, the employees are required to be subsequently re-evaluated to determine their competency to perform the covered task. A website documenting this program is currently active, and provides for more detail on this program (See: http://www/gsm/Library/learn_svc_s.htm).

As new regulatory or company requirements change, internal standards, policies and training curriculum are updated and communicated electronically and as well as at tailboards. If significant changes occur, local training sessions are conducted to ensure code requirements, policies, and guidelines are presented. Local management enforce adherence to current requirements. Managers, Area Superintendents, and District Gas M&O Lead and Maintenance Supervisors ensure that all required training is conducted as specified.

6.0 Auditing, Monitoring, and Internal Reporting

- A. District Gas M&O Lead and Maintenance Supervisors – Quality Assurance of gas transmission maintenance and its associated records is managed and enforced by District Supervisors. They are also responsible to address, prevent and correct any non-compliance in a timely manner.
- B. Work Management Group – The Work Management Group directly assists the Districts in planning, scheduling, and monitoring the performance of gas transmission maintenance. A set of performance indicators has been established by this group and is published monthly. The performance indicator tracks whether the code-mandated maintenance has been completed on time. This indicator report is sent to all District Supervisors, Area Superintendents, the GSM&TS Director and Managers, as well as the CGT-VP. See **Attachment B**, the “**Monthly Maintenance Indicator Report**,” for an example of this report.
- C. Systems Integrity Group Internal Auditing – The Systems Integrity group performs both general and specific audits of each District’s gas transmission maintenance work to assess the level of compliance being attained. The audit process is fully documented in the GSM&TS Maintenance and Operations Audit Manual. Each audit results in a “score” for each major area of compliance, and the score ranges in scale from an “unsatisfactory level” to an “excellent” level of performance. The audit also results in an action plan for the District for any deficiencies found during Internal Audit. It is the responsibility of the Area Superintendent and the local District Supervisors to fully address any areas of non-compliance or unsatisfactory performance, and subsequently complete the action plan. System Integrity Group Internal Audits are conducted annually. The findings of an internal audit may result in an update to a standards.
- D. External Auditing – The CPUC conducts regularly scheduled audits of office records and field activities of PG&E’s gas transmission maintenance program. The CPUC audits of each district/division are conducted on a two-year cycle. If the results of a CPUC audit are unfavorable for a particular district/division, then the CPUC has the option to conduct an annual audit for that particular district. The CPUC utilizes a protocol checklist and formally communicates non-compliance findings. The Area Superintendents, with assistance from the Systems Integrity Group, coordinates a review of these findings and, as needed, addresses, corrects, and prevents future non-compliance in the reported areas. The company formally responds to the CPUC with documentation of closure activities. The findings of an external audit may result in an update to a standards.

7.0 Accountability

Members of GSM&TS who are responsible for performing, monitoring, auditing, supporting, enforcing and managing gas transmission maintenance, have regulatory and company compliance goals embedded in individual job expectations and performance incentives, including PMPs and scorecards. Goals are reviewed and updated as needed to reflect current regulatory and company requirements. In cases of violations, disciplinary action is taken as appropriate.

The CGT-VP, GSM&TS Director, Managers, Gas M&O Lead and Maintenance Supervisors, and individual contributors are accountable to fully comply with all code and company requirements.

Employees have the freedom and responsibility to identify and communicate (anonymously or otherwise) any non-compliance to their supervisor or to the PG&E Compliance and Ethics Helpline, without fear of reprisal. Non-compliance items may also be reported to the designated expert for technical consultation. Material issues or failures are documented on Material Failure Reports.

Signed: _____ Date: _____
Daniel F. Thomas, Director
California Gas Transmission – Gas System Maintenance & Technical Support

Signed: _____ Date: _____
Robert T. Howard, Vice President
California Gas Transmission

ATTACHMENT A
CGT TRANSMISSION MAINTENANCE ROADMAP

ACTIVITY	49CFR REF	PLM CODE	REQUIREMENTS	HOW TO DO IT	APPLIES TO
TRANSMISSION & GATHERING LINES/PRESSURE LIMITING STATIONS/REGULATING AND METER STATIONS					
Patrolling	192.705 192.709	Y-A	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> • Patrolling Frequency: <ul style="list-style-type: none"> * All Classes Quarterly (by Aerial Patrol) • More frequent inspection - as local conditions warrant. • Monitor spans and exposed (above-ground) piping annually using ground-patrol. • Review the roster of lines and patrol methods for each section annually. • Patrol findings requiring immediate attention shall be handled as described in the CGT Standard 4111. <p>DOCUMENTATION (keep min. 5 years)</p> <ul style="list-style-type: none"> • Document patrol findings on form F4111a • Document spans on form F4111c. • Document slide areas on form F4111d. • Document aerial patrols on form F4111e. • Document physical inspection of buried pipeline on form 62-4060 (Form A). 	4111 4112 Gas Info Bulletin 138	Gathering lines and transmission lines, including spans, operating over 20% SMYS.
Leak Survey	192.706 192.709	Y-A	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> • Frequency of Gas Leak Surveys: <ul style="list-style-type: none"> * Transmission lines ($\geq 20\%$ SMYS), all gathering lines, station piping - Annually * Transmission lines ($< 20\%$ SMYS) in Class 1, 2, & 3 - 5 years * Transmission lines ($< 20\%$ SMYS) in Class 4 - Annually * Transmission lines ($> 20\%$ SMYS) in Class 3 & 4 not Integrity Management assessed - 2 times a year * After repairs are made. • Leaks found must be handled as described in CGT 	4110	Gathering and transmission lines, and buried and aboveground piping in meter and regulating stations, PLSs, and terminals.

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TRANSMISSION & GATHERING LINES/PRESSURE LIMITING STATIONS/REGULATING AND METER STATIONS					
			Standard 4110. DOCUMENTATION (keep min. 5 years) <ul style="list-style-type: none"> Document leak surveys on patrolling form F4111a Document casing vent leak checks in PLM Document all leak repairs on form 62-4060 (Form A) NOTES <ul style="list-style-type: none"> Vegetation leak survey not permitted in Class 3 locations. Lines carrying unodorized gas require more frequent leak surveys (see CGT Standard 4110) Check all casing vents annually with leak detection equipment. Casing vent checks to be conducted at the time of annual P/S readings. 		
Valves, Emergency (Valves used to isolate a pipeline facility or pipeline section in the event of an emergency.)	192.745	Y-A	REQUIREMENTS <ul style="list-style-type: none"> Annually inspect and partially operate all transmission line valves that might be required to be used in an emergency. Inspect, lubricate and partially operate power-actuated isolation and block valves semi-annually. DOCUMENTATION (keep min. 5 years) <ul style="list-style-type: none"> Document valve maintenance on form FF11 (or F4220). 	4220 Gas Info Bulletin 137	Valves in this category include, but are not limited to: Mainline valves (sectionalizing block valves), cross tie valves, blowdown valves, tap valves, line rupture control valves (LRCVs), station upstream and downstream block valves, and all valves controlled by a station ESD system (varies by station - includes ESD-controlled unit valves, and uphole safety valves.)
Valves, Maintenance (Valves used to	N/A	B	REQUIREMENTS <ul style="list-style-type: none"> Annually inspect and partially operate all transmission line valves that are to isolate equipment in order to facilitate maintenance or repairs. 	4220 Gas Info Bulletin 137	Valves in this category include, but are not limited to: Equipment isolation valves (e.g., separators, filters, coolers, etc.), block

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isolate equipment in order to facilitate maintenance or repairs.)			<u>DOCUMENTATION</u> <ul style="list-style-type: none"> Document valve maintenance on PLM. 		valves installed on either side of meter or individual regulator/monitor or load valve/trimmer runs, unit block valves (compressor stations), bypass valves (unless controlled by an ESD system), fuel gas valves (unless controlled by an ESD system), valves on gas well Christmas trees, and valves on power or instrument supply piping.
Valves, Operation (Valves used to facilitate system operations.)	N/A	B	<u>REQUIREMENTS</u> <ul style="list-style-type: none"> Annually inspect and partially operate all transmission line valves that are used to facilitate system operations. Inspect, lubricate and partially operate power actuated isolation and block valves semi-annually. <u>DOCUMENTATION</u> Document valve maintenance on PLM.	4220 Gas Info Bulletin 137	Valves in this category include, but are not limited to: BTU zone isolation valves, MAOP separation valves, and valves used to change routing through a station (primarily terminals and compressor stations). These valves are typically in open/dose service.
Valves, Power Actuated (¼-turn ball or plug valves) (See <i>Other Station Equipment and Instrumentation</i> for requirements on actuators, positioners and other ancillary instrumentation)	192.731, 192.739, 192.743	Y-A (Annual/Semi-Ann Req't) B (monthly/weekly Req't) Valves described in last column	<u>REQUIREMENTS</u> <ul style="list-style-type: none"> Inspect and partially operate all controller-operated standby regulators and monitors once a month. Service and lubricate semi-annually. Inspect, lubricate and partially operate power actuated isolation and block valves semi-annually. Inspect and lubricate frequently used controller-operated ball or plug valve-type regulators every other week. <u>DOCUMENTATION (keep min. 5 years)</u> <ul style="list-style-type: none"> Document valve maintenance on form FF11 (or F4220). <u>NOTES</u> <ul style="list-style-type: none"> Maintenance frequencies given in UO S4220 for power- 	4220 Gas Meas. & Control Manual	Power-actuated, ¼-turn, ball or plug valves used in either throttling or non-throttling service (regulators, monitors, relief, and on/off valves). Generally, power-actuated, ¼-turn valves used in 1) throttling service are controller-operated, and 2) non-throttling service are remotely operated.

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ACTIVITY	49CFR REF	PLM CODE	REQUIREMENTS	HOW TO DO IT	APPLIES TO
TRANSMISSION & GATHERING LINES/PRESSURE LIMITING STATIONS/REGULATING AND METER STATIONS					
			<p>actuated valves are guidelines and may be modified to reduce maintenance when operating conditions allow.</p> <ul style="list-style-type: none"> A District must gain concurrence from the facility engineer and/or a System Integrity Specialist prior to changing valve maintenance frequencies. Once approved, the PLM Job and valve card are to be changed including comments regarding the change. 		

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ACTIVITY	49CFR REF	PLM CODE	REQUIREMENTS	HOW TO DO IT	APPLIES TO
TRANSMISSION & GATHERING LINES/PRESSURE LIMITING STATIONS/REGULATING AND METER STATIONS					
Relief Devices (Natural Gas)	192.739 192.743	Y-A	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> Inspect and test relief devices annually. Verify that the relief valve has sufficient <u>capacity</u> to limit the pressure to required levels annually. Repair or replace defective or undersized relief devices. <p>DOCUMENTATION (keep min. 5 years)</p> <ul style="list-style-type: none"> Document relief capacity verification on forms found in GS&S H-70. (Separate forms are provided for pressure limiting and regulating station, compressor station, and gas gathering reliefs.) <p>Note: Relief valves that were purchased as an integral part of a piece of equipment do not require calculations, but still must be inspected and tested annually.</p> <ul style="list-style-type: none"> Document inspection and testing of: <ul style="list-style-type: none"> ◇ Main gas relief valve at stations with controller operated valves - Form F4432B (page1) ◇ Main gas relief valve at station with only pilot-operated diaphragm valves - Form 62-6321 ◇ Gas supply or fuel gas relief valves - Form F4432B (page2) ◇ Compressor Station Reliefs - Form CSR relief ◇ Package System Relief - Form Package Relief 	GS&S H-70 4432 4433	<ul style="list-style-type: none"> All relief devices (except rupture discs) which <u>relieve natural gas</u> that are installed in compressor and regulator stations, and on transmission and gathering lines. Relief valves in this category include, but are not limited to: Main gas reliefs, compressor station and unit reliefs, fuel gas reliefs, instrument/power gas reliefs, condensate tank reliefs, reliefs on tanks where natural gas is used for blanket gas, etc.
Relief Devices (Air Systems)	(Cal Title 8 OSHA)	A	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> Annually inspect and test. Test relief valve by using relief valve disc lifting device. On <u>portable air tanks</u>, every three years replace relief valve with a certified ASME relief, or overhaul and recalibrate relief by a qualified person. 	No published CGT standard.	All relief devices (except rupture discs) which <u>relieve air</u> that are installed in compressor and other stations.

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ACTIVITY	49CFR REF	PLM C CODE	REQUIREMENTS	HOW TO DO IT	APPLIES TO
TRANSMISSION & GATHERING LINES/PRESSURE LIMITING STATIONS/REGULATING AND METER STATIONS					
			<ul style="list-style-type: none"> On <u>stationary air tanks</u>, every five years replace relief valve with a certified ASME relief, or overhaul and recalibrate relief by a qualified person. <p>Note: A copy of the tank permit shall be posted near the air tanks. The three/five year replacement or overhaul should be performed at the time the air tanks are re-permitting.</p> <p>DOCUMENTATION</p> <ul style="list-style-type: none"> Document in PLM. 		
Relief Devices (Non-natural Gas or Air)	N/A	B	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> Annually inspect and test. <p>DOCUMENTATION</p> <ul style="list-style-type: none"> Document in PLM. 	No published CGT standard.	Relief valves on non-natural gas or air systems (e.g., lube oil, water, etc.) are currently exempt from capacity calculations and annual inspection and test.
Vaults	192.749	Y-A	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> Inspect vaults housing pressure-regulating and/or pressure limiting equipment annually. Repair any leaks found. Report deficiencies the same day found to the supervisor for corrective action. <p>DOCUMENTATION (keep min. 5 years)</p> <ul style="list-style-type: none"> Document inspections on form 75-300. Document leak repairs on form 62-4060 (Form A) 	4292	Vaults, regulator pits, valve pits or other enclosed underground gas facility with an internal volume of 200 cubic feet or more and housing pressure regulating and pressure limiting equipment.
Main Gas Pressure Regulating Equipment	192.739	Y-A	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> Annually conduct a complete station inspection and: <ul style="list-style-type: none"> * perform operating test of regulator and overpressure protection device pressure settings, regulator controllability; cause monitor valve to take over pressure control, 		<u>This section applies to pressure regulating or limiting equipment which limits the gas pressure into a pipeline or main.</u> For pressure regulation of other auxiliary systems, such as, compressor fuel gas, boilers, instrumentation & controls, etc.,

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ACTIVITY	49CFR REF	PLM CODE	REQUIREMENTS	HOW TO DO IT	APPLIES TO
TRANSMISSION & GATHERING LINES/PRESSURE LIMITING STATIONS/REGULATING AND METER STATIONS					
		B (for B inspect'ns)	<ul style="list-style-type: none"> * check and operate all station valves required to isolate the station in an emergency, * inspect for general station housekeeping. • Report deficiencies the same day found to the supervisor for corrective action. • Pilot-operated, boot/diaphragm regulators require Class B (internal) inspection at least once every 4 years. (See UO S5351 & 4432 (supplement 2) for further information). <p>DOCUMENTATION</p> <ul style="list-style-type: none"> • Document maintenance on forms 62-6271 and 62-6321 for facilities with pilot-operated, boot/diaphragm regulating valves. • Document maintenance on form F4432B for facilities (including compressor stations) with controller-operated valves. • Retain continuous maintenance records for 5 years. 	<p>S5351</p> <p>4432</p>	<p>see "Other Station Equipment and Instrumentation" below.</p> <ul style="list-style-type: none"> • Facilities with pilot-operated, boot/diaphragm regulating valves. • Facilities (including compressor stations) with controller-operated valves.
Other Station Equipment and Instrumentation	192.739	<p>Y-A Equip't associated w/main gas regs and relief valves</p> <p>B All other equip't.</p>	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> • Annually, or as otherwise specified by CGT Standard 4432, inspect, service and calibrate (if appropriate) station equipment and instrumentation. • Report deficiencies the same day found to the supervisor for corrective action. <p>DOCUMENTATION</p> <ul style="list-style-type: none"> • Document maintenance on form F4432B. <p>Retain continuous maintenance records for 5 years.</p>	4432	<p>CPUC-code required (Y-A) for those valve actuators, positioners, gas saver circuits, filters, transducers, controllers, and other instrumentation <u>associated with the main gas regulators or relief valves.</u></p> <p>Non-main gas regulators (e.g., reboilers, aux. generators, fuel systems, control racks, domestic supply, etc.) and other controls/ instrumentation shall be coded for Reliability (B).</p>
Corrosion	192	Y-A	REQUIREMENTS	4133	Gathering and transmission lines and

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ACTIVITY	49CFR REF	PLM CODE	REQUIREMENTS	HOW TO DO IT	APPLIES TO
TRANSMISSION & GATHERING LINES/PRESSURE LIMITING STATIONS/REGULATING AND METER STATIONS					
Control Cathodic Protection	Subpart I		<ul style="list-style-type: none"> All buried metallic pipelines must be installed with an approved coating and cathodically protected within one year of installation. Take: <ul style="list-style-type: none"> * Pipe-to-soil readings annually * Rectifier readings bi-monthly Annually take pipe to soil and soil to casing potentials. Readings requiring investigation shall be handled as described in CGT Standard 4126. Restore CPAs or develop action plan within 60 calendar days from the date readings are found inadequate. For internal corrosion, consult internal corrosion section in UO S4133. (Internal corrosion is generally associated to those districts with gas production liquids.) <p>DOCUMENTATION</p> <ul style="list-style-type: none"> Record work in PLM. Retain records for the life of the facility. 	4126 Corrosion Manual	<p>cased pipe crossings.</p> <p>Example of inadequate readings are:</p> <p>Pipe-Soil: < 850 mv > 1600 mv < 100 mv polarization</p> <p>Casing-Soil: > 800 mv < 100 mv of P/S</p> <p>Note: All readings are negative referenced to a CuCuSO₄ half cell.</p>
Odorizers	192.625	Y-A	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> Check equipment odorizing 200Mcf/day or more, weekly. Check and fill small odorizers, including farm tap types, annually. Complete odorization reports (form 62-4650) for all stations monthly. Conduct odorometer tests downstream of the odorizer monthly (or in certain cases weekly) for odorization stations odorizing over 200Mcf/d. <p>DOCUMENTATION</p> <p>Document odorometer tests on form 62-4650 (monthly) or</p>	4350	All odorizers, regardless of frequency of operation.

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TRANSMISSION & GATHERING LINES/PRESSURE LIMITING STATIONS/REGULATING AND METER STATIONS					
			form 62-3480 (weekly).		
System Odorant Levels	192.625	Y-A	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> Conduct odorometer tests for locations designated as system sampling points according to the frequency specified in S4350, Supplement 1. <p>DOCUMENTATION</p> <p>Document on form UO S4350, Exhibit 3.</p>	4350	Locations listed in Supplement 1 of UO S4350, <i>Odorization of Natural Gas</i> .
Class Location Survey	192.609 192.613	N/A	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> In conjunction with scheduled patrols, look for new construction taking place within 220 yards on either side of the pipeline (or 100 yards for small well defined outdoor areas). Scheduled annual density surveys are not required. Review and give concurrence on class location related projects within 5 working days. Track schedule of projects and notify Mapping when complete. <p>DOCUMENTATION</p> <ul style="list-style-type: none"> Report new construction on form F4127; and send to Mapping within 10 working days. <p>NOTES</p> <ul style="list-style-type: none"> Update PLM as necessary for any changes in patrolling or leak survey frequencies due to class location change. 	4127	Pipelines operating over 20% SMYS.
Pipeline Markers	192.707	N/A	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> In conjunction with scheduled patrols, check that pipeline markers are upright and that signs on the marker are legible and reference correct telephone numbers. Replace damaged markers or illegible signs. Remove markers when a line is abandoned. 	4122	All active lines transmission and gathering lines.

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TRANSMISSION & GATHERING LINES/PRESSURE LIMITING STATIONS/REGULATING AND METER STATIONS					
			<u>DOCUMENTATION</u> Document location and condition of markers needing attention on appropriate patrolling form.		
USA Notification and Response	192.614 See also CA Gov't Code 4216	A	<u>REQUIREMENTS</u> <ul style="list-style-type: none"> • Except in an emergency, prior to commencing any excavation, verify the location of underground facilities owned and operated by other companies or agencies. • For USA request of PG&E gas facilities - furnish information within 2 working days of USA request. <u>DOCUMENTATION</u> <ul style="list-style-type: none"> • Retain records documenting USA requests and company actions for at least 5 years after completion of the project. 	4412 4412.1	Excavations (performed by PG&E personnel or third parties) in the vicinity of CGT facilities.

TRANSMISSION MAINTENANCE ROADMAP

ACTIVITY	49CFR REF	PLM CODE	REQUIREMENTS	HOW TO DO IT	APPLIES TO
COMPRESSOR STATIONS					
Leak Survey	192.706 192.709	Y-A	<u>REQUIREMENTS</u> <ul style="list-style-type: none"> Survey station piping for leaks annually. <u>DOCUMENTATION</u> <ul style="list-style-type: none"> Document leak survey on patrolling form F4111a Document leak repairs on form 62-4060 (Form A). 	4110	Buried and aboveground piping in compressor stations.
Valves			See <i>Valves (Emergency, Maintenance, Operation, & Power Actuated)</i> sections, pages 3&4, in the "Pipeline" table for requirements.		
Relief Devices (Natural Gas & other fluids)			See <i>Relief Devices (Natural Gas & Non-Natural Gas)</i> sections, pages 4 & 5, in the "Pipeline" table for requirements.		
ESD Systems	192.167	Y-A	<u>REQUIREMENTS</u> <ul style="list-style-type: none"> Test annually. Deficiencies found must be corrected immediately. <u>DOCUMENTATION</u> <ul style="list-style-type: none"> Document on the ESD test form for the station. 	No published CGT standard.	Unit and station ESD systems.
Gas Detection System	192.736	Y-A Compr. Bldg A Aux. Bldg	<u>REQUIREMENTS</u> <ul style="list-style-type: none"> Test annually in conjunction with test of ESD system. <u>DOCUMENTATION (keep min. 5 years)</u> <ul style="list-style-type: none"> Document on ESD test form for the station. 	4291	Systems installed in main compressor buildings and in auxiliary buildings.
Fire Detection System (tied to the ESD System)	192.171	Y-A	<u>REQUIREMENTS</u> <ul style="list-style-type: none"> Test annually in conjunction with test of ESD system. 	No published CGT standard	Fire detection systems (e.g., pneumatic shutdown systems), including smoke detectors, installed in compressor buildings and are tied into and initiates

TRANSMISSION MAINTENANCE ROADMAP

ACTIVITY	49CFR REF	PLM CODE	REQUIREMENTS	HOW TO DO IT	APPLIES TO
COMPRESSOR STATIONS					
			DOCUMENTATION (keep min. 5 years) <ul style="list-style-type: none"> Document on ESD test form for the station. 		the ESD system. (Includes Fire Suppression system tied to and initiates the ESD system.)
Fire Suppression System	N/A	A	REQUIREMENTS <ul style="list-style-type: none"> State or local fire codes such as CCR Titles 19 and 24 establish frequencies (e.g., 6 month frequency for smoke detectors and CO₂, Halon and dry chemical systems). Note: PG&E normally does not install automatic fire suppression equipment. Specific maintenance requirements will be based on the manufacturer's and/or Insurance Department recommendations. Further information will be forthcoming. 	No published CGT standard	Fire suppression and detection systems and smoke detectors installed in compressor and auxiliary buildings.
Overspeed Shutdown (K-units)	192.171	B	REQUIREMENTS <ul style="list-style-type: none"> Annually test mechanical and electrical overspeed shutdown devices. (If the unit has both mechanical and electrical devices that are operational and if either device can shut the unit down on high overspeed, both need to be tested.) DOCUMENTATION (keep min. 5 years) <ul style="list-style-type: none"> Document on Overspeed Trip form. 	Manufacturer Instructions	Prime movers other than electrical induction or synchronous motors.
Overspeed Shutdown (P-units)	N/A	B	REQUIREMENTS <ul style="list-style-type: none"> Annually test overspeed shutdown devices. DOCUMENTATION <ul style="list-style-type: none"> Document in PLM. 	Manufacturer Instructions	Auxiliary power generating sets.
Crankcase Relief Doors	N/A	B	REQUIREMENTS <ul style="list-style-type: none"> Annually inspect. DOCUMENTATION <ul style="list-style-type: none"> Document in PLM. 	Manufacturer Instructions	Reciprocating compressors.
Fuel Gas System (K&P - Units)	192.739	Y-A Reliefs	REQUIREMENTS <ul style="list-style-type: none"> See <i>Other Station Equipment and Instrumentation</i> in the 	No published CGT standard.	Fuel gas systems for prime movers and auxiliary power generating units.

TRANSMISSION MAINTENANCE ROADMAP

ACTIVITY	49CFR REF	PLM CODE	REQUIREMENTS	HOW TO DO IT	APPLIES TO
COMPRESSOR STATIONS					
		Only B All other Equipm't	<p>“Pipeline” table for requirements for fuel gas regulators.</p> <ul style="list-style-type: none"> • See <i>Valves</i> in this table for requirements for fuel gas valves. • See <i>Relief Devices (Natural Gas)</i> in this table for requirements and exceptions for fuel gas reliefs. <p><u>DOCUMENTATION</u></p> <ul style="list-style-type: none"> • See referenced sections of the “Pipeline” table and this table for documentation requirements. 		
Auxiliary Air Systems	N/A	A CalOSHA	<p><u>REQUIREMENTS</u></p> <ul style="list-style-type: none"> • Test system annually. (Test in conjunction with test of ESD system if it supplies air for ESD.) • See <i>Relief Devices (Air Systems)</i> in this table for requirements for reliefs. • Check regulators for pressure settings and controllability annually. <p><u>DOCUMENTATION</u></p> <p>Document tests and checks in PLM.</p>	No published CGT standard	Station air supply system.

TRANSMISSION MAINTENANCE ROADMAP

ACTIVITY	49CFR REF	PLM CODE	REQUIREMENTS	HOW TO DO IT	APPLIES TO
OTHER EQUIPMENT, DOCUMENTATION AND REPORTS					
AGN flash suits	N/A	A CalOSHA	<u>REQUIREMENTS</u> <ul style="list-style-type: none"> Maintain according to manufacturer's recommendations.. 	Manufacturer Instructions	
Combustible Gas Indicator (CGI)	N/A	A	<u>REQUIREMENTS</u> <ul style="list-style-type: none"> Calibration of the CGI shall be checked monthly when in service. <u>DOCUMENTATION</u> <ul style="list-style-type: none"> Document monthly calibration on the form in Attachment A of GS&S M-53.3 Maintain current calibration sticker (62-1394) on instrument. 	GS&S M-53 GS&S M-53.1 GS&S M-53.3	All CGIs used for leak survey, to evaluate and monitor for hazardous atmospheres or for confined space entry.
Hydrogen Flame Ionization Unit (HFI)	N/A	A	<u>REQUIREMENTS</u> <ul style="list-style-type: none"> Calibration of the HFI shall be checked weekly when in service. <u>DOCUMENTATION</u> <ul style="list-style-type: none"> Document weekly calibration on the form in Attachment B of GS&S M-53.3 Maintain current calibration sticker (62-1394) on instrument. 	GS&S M-53.2 GS&S M-53.3	All HFIs used for leak survey.
Pipe/Cable Locating Instrument	N/A	A	<u>REQUIREMENTS</u> <ul style="list-style-type: none"> Verifying the calibration of the Pipe/Cable Mark-and-Locate Instruments used for locating and marking company underground infrastructure as part of USA shall be checked monthly. Verifying the calibration of the Pipe/Cable Mark-and-Locate Instruments used for crew and engineering purposes and not for locating and marking company underground infrastructure for USA shall be checked twice a year. NOTE: If damage to an underground structure has 	GS&S M-60.2 GS&S M-61.2	

TRANSMISSION MAINTENANCE ROADMAP

ACTIVITY	49CFR REF	PLM CODE	REQUIREMENTS	HOW TO DO IT	APPLIES TO
OTHER EQUIPMENT, DOCUMENTATION AND REPORTS					
			<p>occurred and it is suspected that the instrument used for locating the facility is not operating properly, the instrument must be checked within 3 working day of the damage of the facility.</p> <p>DOCUMENTATION</p> <ul style="list-style-type: none"> Document verification of the calibration on the "Verifying the Calibration of Pipe and Cable-Locating Instruments" form, Attachment 1 of GS&S M-60.2 or 61.2. 		
Chromatographs	No 49CFR ref. See GO 58B	A	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> Perform weekly, monthly, - and semi-annual inspections and calibration tests. <p>DOCUMENTATION</p> <p>Document inspections and calibration tests as on form F4310.1(Daniel models) or F4310.2 (Applied Automation models).</p>	4310 4310.1 4310.3 Gas Info Bulletin 150	All chromatographs used to generate customer billing data.
Sulfur analyzers	N/A	Y-A	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> Inspect and test as recommended by manufacturer. <p>DOCUMENTATION</p> <ul style="list-style-type: none"> Document in PLM. 	Manufacturer Instructions	All sulfur analyzers.
Operating Diagrams	192.605	N/A	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> Review annually and submit any updates to Mapping. <p>NOTES</p> <p>Annual update requirement is based on requirement to maintain current procedural manuals (O&MIs). The operating maps and diagrams are an integral part of the O&MIs.</p>	4460	
Operating & Maintenance Instructions	192.605	Y-A	<p>REQUIREMENTS</p> <ul style="list-style-type: none"> All major stations shall have O&MIs. Update O&MIs whenever changes are made. 	4431 4431.1	All O&MIs written for major control facilities.

TRANSMISSION MAINTENANCE ROADMAP

ACTIVITY	49CFR REF	PLM CODE	REQUIREMENTS	HOW TO DO IT	APPLIES TO
OTHER EQUIPMENT, DOCUMENTATION AND REPORTS					
			<ul style="list-style-type: none"> Review annually for accuracy. <p><u>DOCUMENTATION</u></p> <ul style="list-style-type: none"> Document updates and annual reviews in the O&M's log sheet. 		
Quarterly Summary Report CPUC Reportable & Non-Reportable Gas Leaks	No 49CFR ref. See GO 112E 122.2(e)	Y-A	<p><u>REQUIREMENTS</u></p> <ul style="list-style-type: none"> Submit to Walnut Creek [REDACTED] not later than the 15th of the month following the quarter, a summary of CPUC reportable and non-reportable gas leak related incidents which occurred in the preceding quarter. 	4413	<p>All incidents occurring on CGT facilities which were not already reported by DCS and which meet any of the following criteria:</p> <ul style="list-style-type: none"> CPUC/DOT reportable Involve escaping gas and property damage including gas loss >\$1000 Include property damage >\$0 and <\$1000 and involved fire or explosion All dig-ins.
Operator Qualification (OQ) Program	49CFR Part 192 Subpart N	Y-A	<p><u>REQUIREMENTS</u></p> <ul style="list-style-type: none"> Employees conducting M&O work on pipeline facilities that are defined OQ Tasks, shall be qualified under the OQ Program. An Annual review of the OQ Program shall be conducted with all employees. The OQ annual review is included in the Districts safety training program. <p><u>DOCUMENTATION</u></p> <ul style="list-style-type: none"> Employee OQ Forms are kept by System Integrity Tailboards or Training that addresses specific OQ items shall have a sign up sheet. The sign up sheet shall be filed in the Districts tailboard file. 	4450	Employees conducting M&O work on pipeline facilities that are defined OQ Tasks.

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Scheduling Performance Indicators		Bunney	Hinkley	Kettleman	Los Medanos	L-300 North	L-300 South	McDonal Island	Meridian	Milpitas/Hollister	Rio Vista	Topock	Tracy	Willows
Created this Month¹														
PLM Regulatory		85	1	55	165	48	149	92	120	251	271	47	134	49
PLM 'A' Jobs		24	38	27	13	14	32	176	18	47	43	8	73	48
PLM 'B' Jobs		236	179	149	247	113	149	911	799	128	508	99	253	199
Priority 1 Work Requests		18	39	16	11	7	16	34	29	14	36	10	30	55
Priority 2 Work Requests		6	48	671	91			2	142			213		22
Priority 3 Work Requests		49	80	18	50	9	74	64	28	15	40	69	65	18
Total		418	380	271	493	192	429	1289	1008	457	899	254	558	391

Scheduled to be Completed this Month ²		Bunney	Hinkley	Kettleman	Los Medanos	L-300 North	L-300 South	McDonal Island	Meridian	Milpitas/Hollister	Rio Vista	Topock	Tracy	Willows
Scheduled to be Completed this Month²														
PLM Regulatory		85	1	55	159	48	149	89	120	247	271	47	134	49
PLM 'A' Jobs		24	37	25	13	14	33	170	18	46	43	8	73	48
PLM 'B' Jobs		236	181	148	236	107	149	949	799	125	508	105	261	195
Priority 1 Work Requests		1825	10					4	80		2494		6	0
Priority 2 Work Requests		8	54	9725				21	10		22	538		23
Priority 3 Work Requests		89	141	47	105	33	58	198	32	89	18	196	233	61
Total		443	422	286	525	205	394	1412	988	507	886	418	755	376

Actual Completed this Month ³		Bunney	Hinkley	Kettleman	Los Medanos	L-300 North	L-300 South	McDonal Island	Meridian	Milpitas/Hollister	Rio Vista	Topock	Tracy	Willows
Actual Completed this Month³														
PLM Regulatory		85	1	55	159	48	149	78	120	247	271	47	128	49
PLM 'A' Jobs		24	37	25	13	14	33	170	18	46	43	8	73	48
PLM 'B' Jobs		236	181	148	236	107	149	919	799	125	508	105	260	195
Priority 1 Work Requests		19	14	10	14	4	18	37	32	13	42	8	14	44
Priority 2 Work Requests		24	93	3	14	5	26	3	16	0	18	17	3	17
Priority 3 Work Requests		35	62	7	36	14	36	90	26	18	28	58	59	20
Non Scheduled Completed Work Requests		12	85	30	34	13	42	93	51	14	37	69	56	55
Canceled Created Work Requests		1418	12					6	453			111		4
Canceled Prior Months Work Requests		4905	201					331	6				0	0
Total		435	473	278	506	205	453	1390	1062	463	947	312	593	428

Measurables from Above Tables		Bunney	Hinkley	Kettleman	Los Medanos	L-300 North	L-300 South	McDonal Island	Meridian	Milpitas/Hollister	Rio Vista	Topock	Tracy	Willows
Measurables from Above Tables														
Percentage of Tasks Completed		100%	76%	85%	90%	88%	100%	88%	95%	91%	100%	100%	96%	86%
Percentage of Hours Accounted For		100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Percent of Regulatory Work Completed		100%	100%	100%	100%	100%	100%	88%	100%	100%	100%	100%	96%	100%
PLM 'A' Jobs Completed		100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
PLM 'B' Jobs Completed		100%	100%	100%	100%	100%	100%	97%	100%	100%	100%	100%	99.6%	100%
Work Request Backlog Increase/Decrease		-11%	2%	28%	18%	13%	-13%	-2%	-10%	-7%	-11%	-14%	6%	-24%

Jobs Delinquent by District		Bunney	Hinkley	Kettleman	Los Medanos	L-300 North	L-300 South	McDonal Island	Meridian	Milpitas/Hollister	Rio Vista	Topock	Tracy	Willows
Jobs Delinquent by District														
PLM Regulatory		0	0	0	0	0	0	0	000				0	0
PLM 'A'		000000						0	000				0	0
PLM 'B'		000000						0	000				0	0
Priority 1 Work Requests >10 Days old in the Scheduled or Approved status		020000						0	8013				3	0
Priority 2 Work Requests >30 Days old in the Scheduled or Approved status		0	1141	10				0	900			360		1
Priority 3 Work Requests >90 Days old in the Scheduled or Approved status		71	51	15		72	51	02	36		08	33	1	1
Total		7	28	15	6	8	25	10	40	6	1	122	34	2

Paradigm CP Uncompleted Action Listings		Bunney	Hinkley	Kettleman	Los Medanos	L-300 North	L-300 South	McDonal Island	Meridian	Milpitas/Hollister	Rio Vista	Topock	Tracy	Willows
Paradigm CP Uncompleted Action Listings														
Criterion Violation ^{7,8}		0	0	0	0	1	2	0	302				6	0
Misd Reading ¹⁰		0	0	0	0	0	0	0	000				0	0
Misd Reading - Delinq ¹¹		0	0	0	0	0	0	0	000				0	0
Casings Shorted ⁹		0	0	0	0	1	0	0	122				6	2

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Action Plans Developed ^{12, 13}	0	0	0	0	1	0	0	122				6	2
Casings Planned for Remediation in 2005 ¹³	0	0	0	0	0	0	0	012				3	0
Casings Remediated in 2005	000000							0	000			0	0
Total	000032							0	508	2		1	4

Planning Performance Indicators	Burney	Hinkley	Kettleman	Los Medanos	L-300 North	L-300 South	Mr Donald Island	Meridian	Mojave	Ro Vista	Topock	Tule	Willows
Meter System Maintenance													
Created Meter System Jobs	9	5	37	39	33	39	69	497	10	267	0	47	12
Completed Meter System Jobs	9	5	37	39	33	39	69	497	10	267	0	47	12
Incomplete System Meter Jobs	000000						0	000				0	0
Backlog Meter System Jobs	000000						0	000				0	0

Work Request Scheduling													
New Percent of Priority 1 WR's Completed within 10 days of Origination	100%	87%	95%	85%	100%	90%	100%	100%	100%	95%	89%	66%	100%
New Percent of Priority 2 WR's Completed within 30 Days of Approved Date	85%	74%	100%	94%	70%	87%	87%	100%	0%	89%	54%	83%	87%
New Percent of Priority 3 WR's Completed within 90 Days of Approved Date	82%	90%	100%	71%	85%	91%	80%	100%	81%	97%	70%	85%	96%

Work Request Planning													
Percent of Priority 2 WR Outside of 20% of Planned Hours	17%	43%	0%	77%	60%	58%	100%	54%	0%	44%	36%	33%	47%
Percent of Priority 3 WR Outside of 20% of Planned Hours	14%	41%	57%	39%	79%	62%	88%	31%	83%	29%	63%	68%	25%
Percent Priority 2 WR's (Actual-Estimated)/Estimated	-6%	-3%	-5%	-3%	-21%	-4%	40%	29%	0%	7%	-15%	25%	-15%
New Priority 3 WR's (Actual-Estimated)/Estimated	5%	-1%	-31%	4%	-3%	17%	-8%	6%	5%	5%	117%	-28%	-3%

Work Management Utilization Performance Indicators													
Total Hours Recorded on Assets in PLM	1089	1314	1309	977	1046	905	1403	863	1431	1061	987	1169	1091

Wrench Time Indicators													
Hours	811	1292	1131	905	900	665	1377	596	1278	867	975	956	924

Travel Time Indicators													
Hours	278	23	178	72	146	241	27	268	153	195	12	213	168

Corrective/Preventative Indicators													
Corrective Maintenance	131	250	66	118	44	129	180	58	36	79	240	133	77
Non Failure Work	549	854	971	526	965	356	553	310	971	483	574	517	656
Preventive Total Hours	409	225	273	360	167	473	704	462	424	541	174	520	360
Y-A CPUC Required Total Hours	42	0	47	138	25	151	51	85	212	208	12	140	67
"A" Other Agency Required	107	73	63	6	30	71	247	8	65	18	12	109	160
"B" Reliability	258	152	162	215	113	251	405	370	143	315	150	271	133

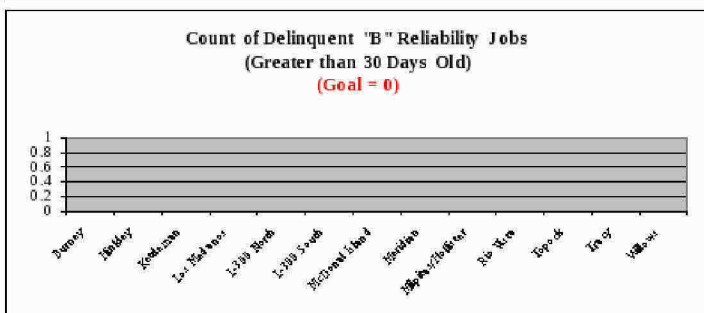
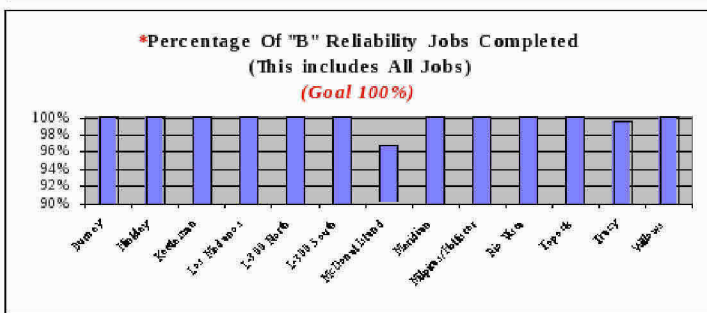
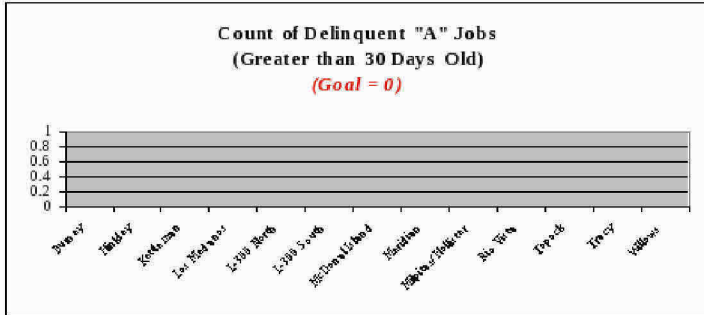
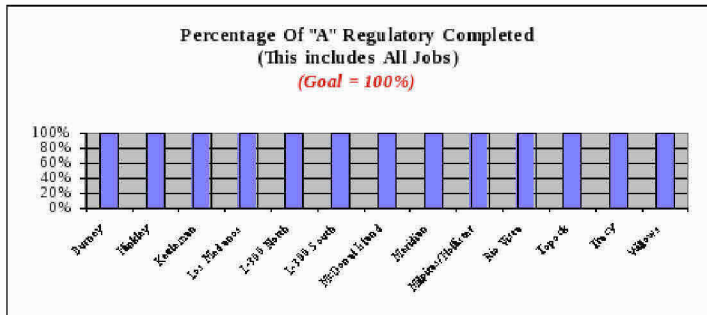
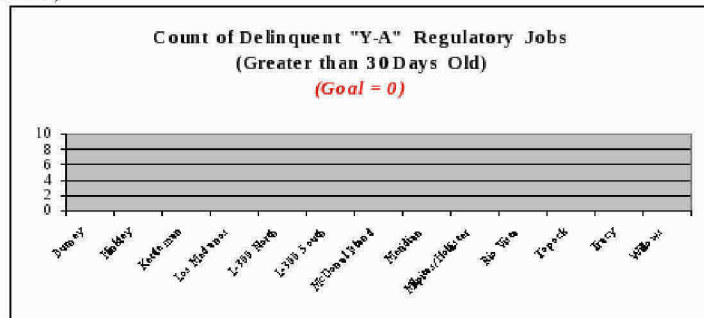
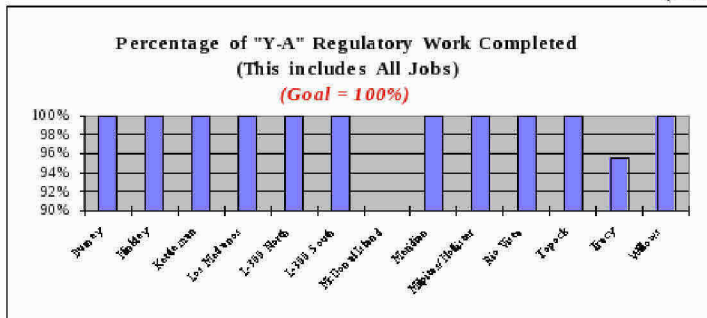
- Legend**
- 1-number of jobs requested or generated by PLM program
 - 2-number of jobs with an expected to be completed date within this month
 - 3-number of jobs completed this month
 - 4-non-completed, in service, CPUC required jobs due in the previous month or earlier (may still be in compliance)
 - 5-non-completed, in service, non-CPUC required jobs due in the previous month or earlier
 - 6-non-completed, corrective jobs that have an expected completion date in the previous month or earlier
 - 7-potential readings do not meet the criterion for cathodic protection
 - 8-readings are outside the limits set to flag a potential problem - requires investigation

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<p>9—casing is shorted - risk management program checks and mitigates all casings systemwide by priority</p> <p>10—reading is past the scheduled time, but is not yet delinquent</p> <p>11—reading is delinquent and does not comply with CPUC monitoring requirements</p> <p>12—the corrosion dept is responsible for issuing action/remediation plans for all shorted casings</p> <p>13—all action/remediation plans must be approved by the responsible District Superintendent</p>			
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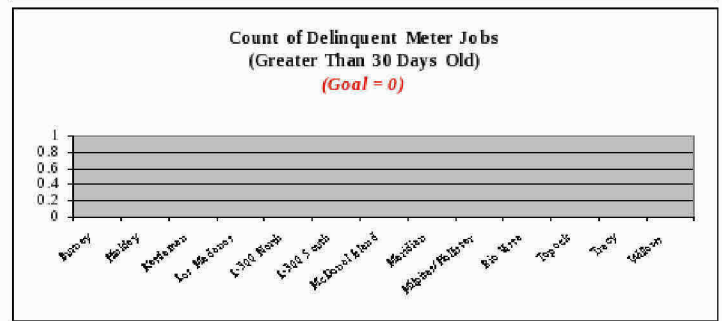
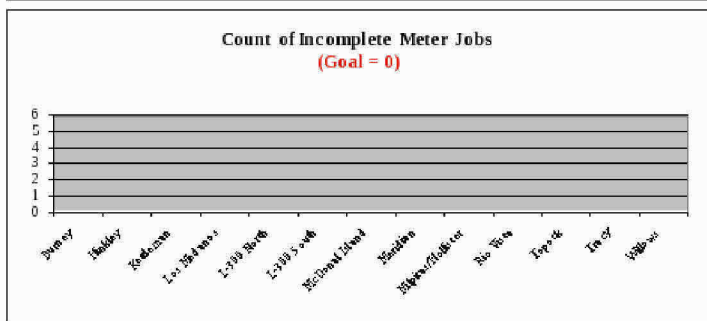
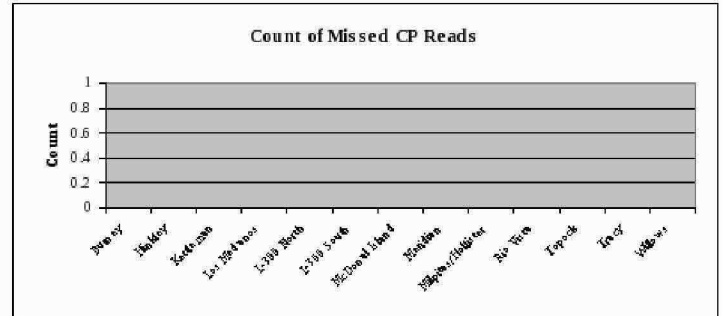
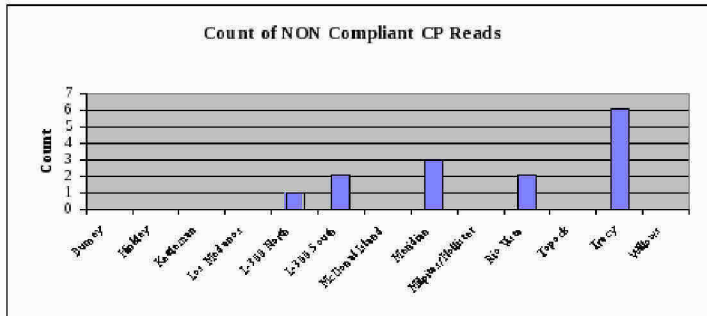
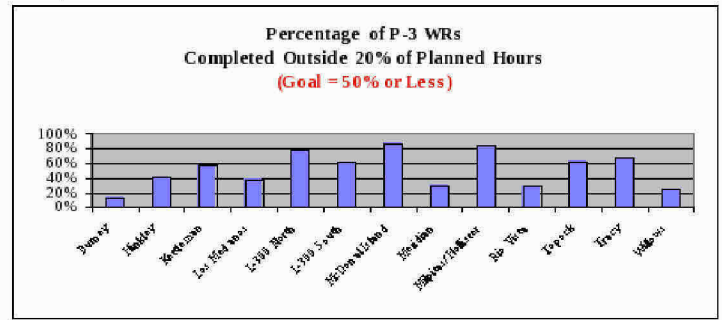
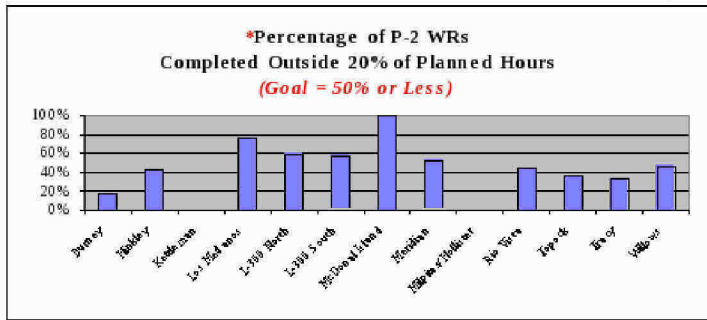
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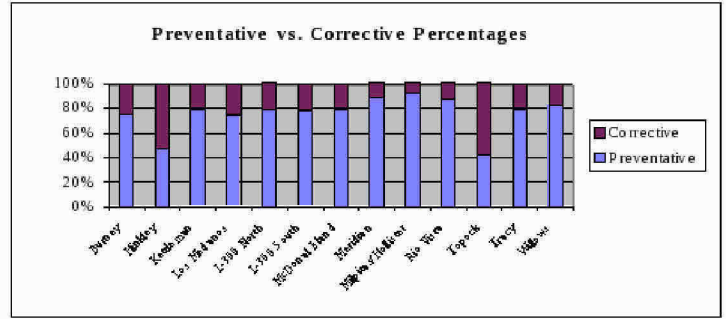
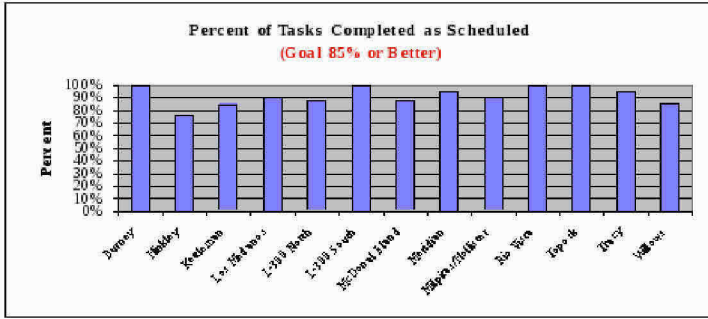


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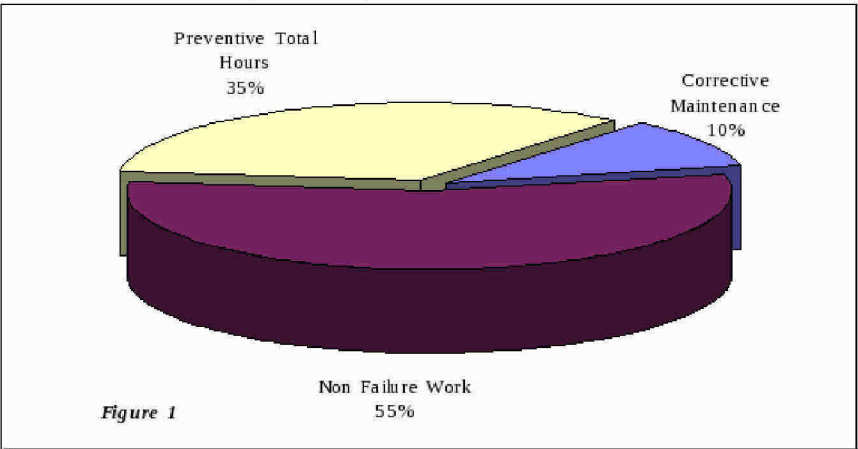


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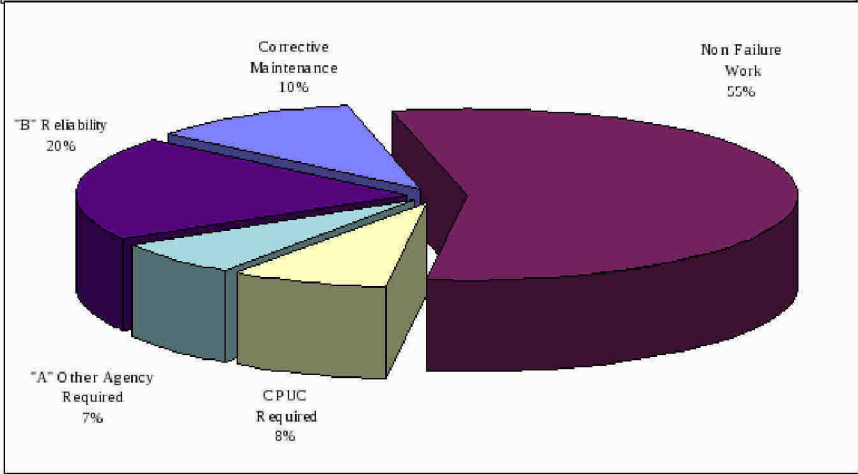


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 (June 2005)

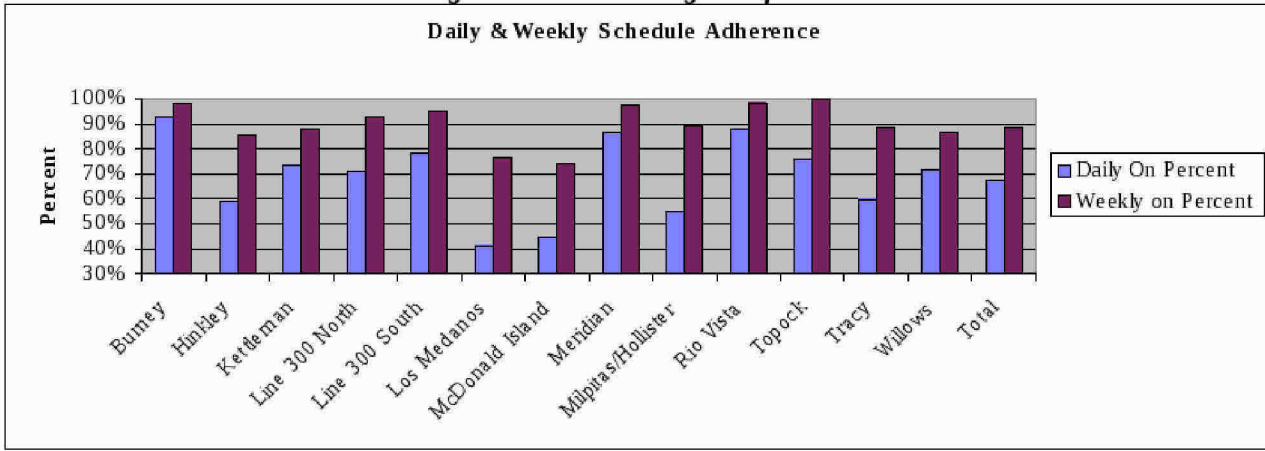
Presently 35% of the maintenance work performed within GSM&TS is preventive (*Figure 1*).



More detailed resolution of preventive work is shown in *Figure 2*. Currently **Work Execution Performance Indicators** are available for CPUC Required work or 8% of the maintenance work that GSM&TS performs.

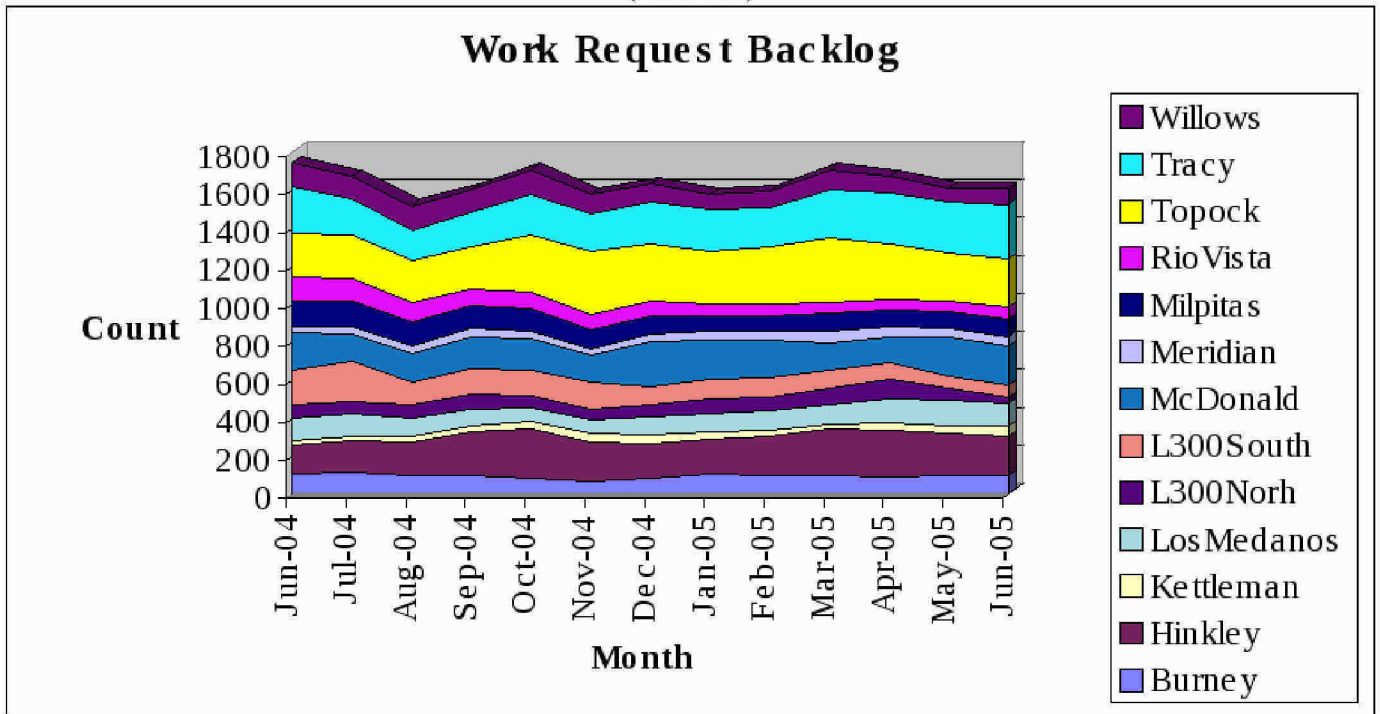


GSMandTS
Planning and Scheduling Performance Indicators



DATA	On Schedule Day	Daily On Percent	Off Scheduled Day	Off Percent	On Scheduled Week	Weekly on Percent	Not Done	Not Done Percent	Scheduled Count	Never Scheduled Count	Never Scheduled Percent
Burney	436	92%	27	6%	463	98%	9	2%	472	44	9%
Hinkley	319	59%	139	26%	458	85%	80	15%	538	151	25%
Kettleman	306	74%	59	14%	365	88%	50	12%	415	95	21%
Line 300 North	196	71%	58	21%	254	92%	21	8%	275	82	24%
Line 300 South	455	78%	102	17%	557	95%	28	5%	585	67	11%
Los Medanos	296	42%	251	35%	547	77%	166	23%	713	83	13%
McDonald Island	545	44%	370	30%	915	74%	317	26%	1232	227	20%
Meridian	903	87%	109	11%	1012	98%	26	3%	1038	70	7%
Milpitas/Hollister	382	55%	241	35%	623	90%	72	10%	695	50	7%
Rio Vista	826	88%	100	11%	926	99%	13	1%	939	88	9%
Topock	214	75%	69	24%	283	100%	1	0%	284	55	16%
Tracy	424	60%	201	28%	625	88%	83	12%	708	90	13%
Willows	335	72%	71	15%	406	87%	61	13%	467	118	23%
Total	5637	67%	1797	22%	7434	89%	927	11%	8361	1220	14%

GSMandTS
Planning and Scheduling Performance Indicators
 (June 2005)



Performance Tracker (2005)

	Jan	Feb	March	1st Quarter	April	May	June	2nd Quarter	July	Aug	Sept	3rd Quarter	Oct	Nov	Dec	4th Quarter	Year Ave
All Districts Overall Average																	
% of Regulatory Jobs Complete	99.6%	99.6%	100.0%	99.7%	99.5%	99.2%	98.7%	99.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	49.73%
% of PLM A Jobs Complete	99.8%	100.0%	100.0%	99.9%	99.7%	98.7%	100.0%	99.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	49.85%
% of PLM B Jobs Complete	99.4%	99.8%	99.5%	99.6%	99.9%	99.0%	99.7%	99.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	49.77%
# of Delinquent Regulatory Jobs	00		0	0	000			0	000			0	000			0	0
# of Delinquent PLM A Jobs	00		0	0	000			0	000			0	000			0	0
# of Delinquent PLM B Jobs	00		0	0	000			0	000			0	000			0	0
% of Priority 2 WR Outside of 20% of Planned Hours	34.1%	49.2%	54.0%	45.7%	34.1%	54.5%	43.9%	44.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	22.48%
% of Priority 3 WR Outside of 20% of Planned Hours	44.8%	43.7%	48.8%	45.7%	50.2%	47.6%	52.3%	50.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	23.95%
Daily Scheduled Tasks Completed	57.6%	65.8%	65.8%	63.1%	63.9%	62.7%	69.0%	65.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	32.08%
Weekly Scheduled Tasks Completed	86.2%	87.2%	87.7%	87.0%	88.0%	87.4%	90.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		42.87%
Percent of Hours Accounted for	99.5%	99.7%	99.5%	99.6%	100.0%	100.0%	100.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	49.89%
Work Request Backlog	121	123	131	125	129	124	124	125	000			0	000			0	63
Burney																	
% of Regulatory Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM A Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM B Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
# of Delinquent Regulatory Jobs	0	00		0	000			0									0
# of Delinquent PLM A Jobs	0	00		0	000			0									0
# of Delinquent PLM B Jobs	0	00		0	000			0									0
% of Priority 2 WR Outside of 20% of Planned Hours	33%	27%	5%	21.8%	25.0%	65%	17.4%	16.3%				0.0%				0%	9.52%
% of Priority 3 WR Outside of 20% of Planned Hours	14%	15%	46%	25.1%	19.4%	30.0%	14.3%	21.2%				0.0%				0%	11.59%
Daily Scheduled Tasks Completed	63%	81%	81.0%	74.8%	78.9%	78.3%	92.4%	83.2%				0.0%				0%	29.51%
Weekly Scheduled Tasks Completed	89%	92%	94.0%	82.0%	100.0%	95.4%	86.1%										47.46%
Percent of Hours Accounted for	100%	100%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%				0.0%				0%	50.00%
Work Request Backlog	103	98	96	99	86	101	98	95				00					4
Hinkley																	
% of Regulatory Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM A Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM B Jobs Complete	100%	100%	99.9%	100.0%	100%	100%	100%	100.0%									49.99%
# of Delinquent Regulatory Jobs	0	00		0	000			0									0
# of Delinquent PLM A Jobs	0	00		0	000			0									0
# of Delinquent PLM B Jobs	0	00		0	000			0									0
% of Priority 2 WR Outside of 20% of Planned Hours	54%	68%	52%	58.0%	46.3%	56.7%	42.9%	48.6%				0.0%				0%	26.66%
% of Priority 3 WR Outside of 20% of Planned Hours	54%	42%	54%	49.9%	49.0%	64.1%	41.1%	51.4%				0.0%				0%	25.32%
Daily Scheduled Tasks Completed	51%	73%	56.0%	60.1%	47.0%	66.3%	59.3%	58.2%				0.0%				0%	29.58%
Weekly Scheduled Tasks Completed	75%	89%	78.0%	80.7%	72.0%	82.2%	86.1%										40.11%
Percent of Hours Accounted for	100%	100%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%				0.0%				0%	50.00%
Work Request Backlog	184	207	243	211	248	219	203	223				00					1

Performance Tracker (2005)

	Jan	Feb	March	1st Quarter	April	May	June	2nd Quarter	July	Aug	Sept	3rd Quarter	Oct	Nov	Dec	4th Quarter	Year Ave
Kettleman																	
% of Regulatory Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM A Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM B Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
# of Delinquent Regulatory Jobs	0	00		0	000			0									0
# of Delinquent PLM A Jobs	0	00		0	000			0									0
# of Delinquent PLM B Jobs	0	00		0	000			0									0
% of Priority 2 WR Outside of 20% of Planned Hours	27%	100%	100%	75.6%	0 0%	100 0%	0 0%	33.3%				0.0%				0%	27.23%
% of Priority 3 WR Outside of 20% of Planned Hours	67%	67%	79%	70.7%	88 7%	62 5%	57 1%	68.4%				0.0%				0%	34.78%
Daily Scheduled Tasks Completed	46%	65%	66 0%	58.8%	54 3%	23 5%	73 7%	53.8%				0.0%				0%	26.17%
Weekly Scheduled Tasks Completed	92%	87%	80 0%	86.3%	69 5%	82 7%	88 0%										41.60%
Percent of Hours Accounted for	100%	100%	100 0%	100.0%	100 0%	100 0%	100 0%	100.0%				0.0%				0%	50.00%
Work Request Backlg	43	31	28	34	39	41	58	46				00					2
Los Medanos																	
% of Regulatory Jobs Complete	95%	95%	99.9%	96.6%	100%	100%	100%	100.0%									49.16%
% of PLM A Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM B Jobs Complete	88%	100%	94%	97.3%	100%	100%	100%	100.0%									49.33%
# of Delinquent Regulatory Jobs	0	00		0	000			0									0
# of Delinquent PLM A Jobs	0	00		0	000			0									0
# of Delinquent PLM B Jobs	0	00		0	000			0									0
% of Priority 2 WR Outside of 20% of Planned Hours	22%	17%	39%	25.8%	62 6%	60 0%	76 5%	66.7%				0.0%				0%	23.13%
% of Priority 3 WR Outside of 20% of Planned Hours	32%	41%	41%	37.8%	46 7%	40 0%	38 9%	41.9%				0.0%				0%	19.91%
Daily Scheduled Tasks Completed	44%	38%	41 0%	40.9%	41 3%	68 6%	41 5%	50.5%				0.0%				0%	22.84%
Weekly Scheduled Tasks Completed	71%	79%	81 0%	77.0%	84 7%	87 4%	76 7%										39.98%
Percent of Hours Accounted for	94%	100%	100 0%	98.0%	100 0%	100 0%	100 0%	100.0%				0.0%				0%	49.50%
Work Request Backlg	89	101	106	99	130	121	117	126				00					5
L-300 North																	
% of Regulatory Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	99.9%									49.97%
% of PLM A Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM B Jobs Complete	100%	100%	100%	100.0%	100%	99%	100%	99.5%									49.94%
# of Delinquent Regulatory Jobs	0	00		0	000			0									0
# of Delinquent PLM A Jobs	0	00		0	000			0									0
# of Delinquent PLM B Jobs	0	00		0	000			0									0
% of Priority 2 WR Outside of 20% of Planned Hours	39%	60%	71%	56.8%	25 0%	100 0%	60 0%	61.7%				0.0%				0%	29.61%
% of Priority 3 WR Outside of 20% of Planned Hours	47%	54%	66%	55.6%	57 1%	28 5%	78 6%	58.1%				0.0%				0%	28.42%
Daily Scheduled Tasks Completed	59%	66%	65 0%	63.2%	76 6%	27 4%	71 3%	58.4%				0.0%				0%	30.40%
Weekly Scheduled Tasks Completed	77%	82%	81 0%	80.3%	85 7%	74 7%	82 4%										41.15%
Percent of Hours Accounted for	100%	100%	100 0%	100.0%	100 0%	100 0%	100 0%	100.0%				0.0%				0%	50.00%
Work Request Backlg	79	75	87	80	101	65	36	68				00					3

Performance Tracker (2005)

	Jan	Feb	March	1st Quarter	April	May	June	2nd Quarter	July	Aug	Sept	3rd Quarter	Oct	Nov	Dec	4th Quarter	Year Ave
L-300 South																	
% of Regulatory Jobs Complete	100%	100%	100%	100.0%	100%	99%	100%	99.7%									49.92%
% of PLM A Jobs Complete	100%	100%	100%	100.0%	100%	84%	100%	94.7%									48.67%
% of PLM B Jobs Complete	100%	100%	100%	100.0%	100%	98%	100%	99.3%									49.81%
# of Delinquent Regulatory Jobs	0	00		0	000			0									0
# of Delinquent PLM A Jobs	0	00		0	000			0									0
# of Delinquent PLM B Jobs	0	00		0	000			0									0
% of Priority 2 WR Outside of 20% of Planned Hours	42%	50%	66%	52.6%	0 0%	47 1%	58 2%	35.1%				0.0%				0%	22.19%
% of Priority 3 WR Outside of 20% of Planned Hours	69%	79%	40%	61.2%	30 0%	59 6%	81 3%	50.5%				0.0%				0%	27.91%
Daily Scheduled Tasks Completed	66%	46%	57 0%	56.2%	74 2%	82 6%	77 8%	78.2%				0.0%				0%	33.63%
Weekly Scheduled Tasks Completed	98%	82%	98 0%	92.0%	96 6%	96 1%	96 2%										46.99%
Percent of Hours Accounted for	100%	100%	100 0%	100.0%	100 0%	100 0%	100 0%	100.0%				0.0%				0%	50.00%
Work Request Backlg	102	99	95	99	84	57	63	68				00					4
McDonald Island																	
% of Regulatory Jobs Complete	100%	100%	100%	100.0%	98%	92%	88%	92.8%									48.19%
% of PLM A Jobs Complete	100%	100%	100%	100.0%	95%	100%	100%	98.2%									49.70%
% of PLM B Jobs Complete	97%	100%	100%	99.0%	99%	95%	97%	96.9%									48.97%
# of Delinquent Regulatory Jobs	0	00		0	000			0									0
# of Delinquent PLM A Jobs	0	00		0	000			0									0
# of Delinquent PLM B Jobs	0	00		0	000			0									0
% of Priority 2 WR Outside of 20% of Planned Hours	0%	67%	100%	55.6%	40 0%	80 0%	100 0%	73.3%				0.0%				0%	32.23%
% of Priority 3 WR Outside of 20% of Planned Hours	72%	74%	72%	72.5%	72 7%	78 2%	88 2%	79.7%				0.0%				0%	38.05%
Daily Scheduled Tasks Completed	31%	38%	48 0%	39.0%	39 0%	41 8%	44 2%	41.7%				0.0%				0%	20.16%
Weekly Scheduled Tasks Completed	59%	58%	65 0%	60.7%	74 3%	71 5%	74 3%										33.51%
Percent of Hours Accounted for	100%	98%	100 0%	99.3%	100 0%	100 0%	100 0%	100.0%				0.0%				0%	49.83%
Work Request Backlg	214	203	144	187	140	206	204	183				00					9
Meridian																	
% of Regulatory Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM A Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM B Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
# of Delinquent Regulatory Jobs	0	00		0	000			0									0
# of Delinquent PLM A Jobs	0	00		0	000			0									0
# of Delinquent PLM B Jobs	0	00		0	000			0									0
% of Priority 2 WR Outside of 20% of Planned Hours	40%	36%	60%	45.2%	66 7%	66 7%	52 8%	62.4%				0.0%				0%	26.91%
% of Priority 3 WR Outside of 20% of Planned Hours	42%	33%	52%	42.5%	44 4%	31 3%	30 8%	35.5%				0.0%				0%	19.51%
Daily Scheduled Tasks Completed	79%	79%	80 0%	79.4%	82 7%	85 7%	87 0%	85.1%				0.0%				0%	41.13%
Weekly Scheduled Tasks Completed	95%	92%	96 0%	94.7%	93 2%	93 3%	97 5%										47.33%
Percent of Hours Accounted for	100%	100%	100 0%	100.0%	100 0%	100 0%	100 0%	100.0%				0.0%				0%	50.00%
Work Request Backlg	45	44	61	50	55	50	51	52				00					2

Performance Tracker (2005)

	Jan	Feb	March	1st Quarter	April	May	June	2nd Quarter	July	Aug	Sept	3rd Quarter	Oct	Nov	Dec	4th Quarter	Year Ave
Milpitas/Hollister																	
% of Regulatory Jobs Complete	100%	100%	100%	100.0%	95%	100%	100%	98.5%									49.62%
% of PLM A Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM B Jobs Complete	97%	100%	100%	99.0%	99%	100%	100%	99.5%									49.70%
# of Delinquent Regulatory Jobs	0	00		0	000			0									0
# of Delinquent PLM A Jobs	0	00		0	000			0									0
# of Delinquent PLM B Jobs	0	00		0	000			0									0
% of Priority 2 WR Outside of 20% of Planned Hours	0%	0%	0%	0.0%	0 0%	0 0%	0 0%	0.0%				0.0%				0%	0.00%
% of Priority 3 WR Outside of 20% of Planned Hours	26%	35%	53%	38.1%	55 0%	47 1%	83 3%	61.8%				0.0%				0%	24.97%
Daily Scheduled Tasks Completed	62%	66%	62 0%	62.3%	52 5%	61 1%	55 0%	56.2%				0.0%				0%	29.55%
Weekly Scheduled Tasks Completed	97%	90%	92 0%	93.0%	90 0%	84 6%	89 6%										45.27%
Percent of Hours Accounted for	100%	98%	93 0%	97.0%	100 0%	100 0%	100 0%	100.0%				0.0%				0%	49.25%
Work Request Backlg	82	83	91	86	85	91	89	88				00					4
Rio Vista																	
% of Regulatory Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM A Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM B Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
# of Delinquent Regulatory Jobs	0	00		0	000			0									0
# of Delinquent PLM A Jobs	0	00		0	000			0									0
# of Delinquent PLM B Jobs	0	00		0	000			0									0
% of Priority 2 WR Outside of 20% of Planned Hours	31%	45%	14%	29.8%	0 0%	0 0%	44 4%	14.8%				0.0%				0%	11.15%
% of Priority 3 WR Outside of 20% of Planned Hours	8%	0%	9%	5.6%	15 2%	23 5%	29 4%	22.7%				0.0%				0%	7.05%
Daily Scheduled Tasks Completed	78%	82%	88 0%	82.1%	88 2%	91 0%	88 0%	89.1%				0.0%				0%	42.78%
Weekly Scheduled Tasks Completed	99%	96%	98 0%	97.7%	99 6%	96 9%	96 6%										49.18%
Percent of Hours Accounted for	100%	100%	100 0%	100.0%	100 0%	100 0%	100 0%	100.0%				0.0%				0%	50.00%
Work Request Backlg	58	56	59	58	53	56	64	58				00					2
Tapoek																	
% of Regulatory Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM A Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM B Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
# of Delinquent Regulatory Jobs	0	00		0	000			0									0
# of Delinquent PLM A Jobs	0	00		0	000			0									0
# of Delinquent PLM B Jobs	0	00		0	000			0									0
% of Priority 2 WR Outside of 20% of Planned Hours	60%	57%	78%	65.0%	80 0%	69 2%	36 4%	61.9%				0.0%				0%	31.71%
% of Priority 3 WR Outside of 20% of Planned Hours	64%	60%	52%	58.4%	66 7%	51 9%	82 3%	60.6%				0.0%				0%	29.76%
Daily Scheduled Tasks Completed	62%	71%	69 0%	67.4%	63 5%	56 0%	75 4%	65.1%				0.0%				0%	33.13%
Weekly Scheduled Tasks Completed	100%	100%	100 0%	100.0%	100 0%	100 0%	99 6%										49.97%
Percent of Hours Accounted for	100%	100%	100 0%	100.0%	100 0%	100 0%	100 0%	100.0%				0.0%				0%	50.00%
Work Request Backlg	282	306	336	308	292	249	258	267				00					1

Performance Tracker (2005)

	Jan	Feb	March	1st Quarter	April	May	June	2nd Quarter	July	Aug	Sept	3rd Quarter	Oct	Nov	Dec	4th Quarter	Year Ave
Tracy																	
% of Regulatory Jobs Complete	100%	100%	99.9%	100.0%	100%	100%	96%	98.5%									49.62%
% of PLM A Jobs Complete	98%	100%	100%	99.3%	100%	99%	100%	99.5%									49.71%
% of PLM B Jobs Complete	100%	97%	100%	99.0%	100%	95%	100%	98.2%									49.30%
# of Delinquent Regulatory Jobs	0	00		0	000			0									0
# of Delinquent PLM A Jobs	0	00		0	000			0									0
# of Delinquent PLM B Jobs	0	00		0	000			0									0
% of Priority 2 WR Outside of 20% of Planned Hours	43%	75%	73%	63.7%	57.1%	80.0%	33.3%	56.8%				0.0%					0%
% of Priority 3 WR Outside of 20% of Planned Hours	51%	43%	34%	42.4%	60.3%	53.7%	67.8%	60.6%				0.0%					0%
Daily Scheduled Tasks Completed	59%	76%	63.0%	65.9%	70.0%	62.1%	59.9%	64.0%				0.0%					0%
Weekly Scheduled Tasks Completed	87%	89%	85.0%	87.0%	92.3%	89.5%	88.3%										44.26%
Percent of Hours Accounted for	100%	100%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%				0.0%					0%
Work Request Backlg	219	208	256	228	275	270	287	277				00					1
Willows																	
% of Regulatory Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM A Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
% of PLM B Jobs Complete	100%	100%	100%	100.0%	100%	100%	100%	100.0%									50.00%
# of Delinquent Regulatory Jobs	0	00		0	000			0									0
# of Delinquent PLM A Jobs	0	00		0	000			0									0
# of Delinquent PLM B Jobs	0	00		0	000			0									0
% of Priority 2 WR Outside of 20% of Planned Hours	52%	39%	41%	43.9%	39.0%	42.9%	47.1%	43.0%				0.0%					0%
% of Priority 3 WR Outside of 20% of Planned Hours	41%	27%	36%	34.8%	51.5%	38.5%	25.0%	38.3%				0.0%					0%
Daily Scheduled Tasks Completed	51%	74%	83.0%	69.2%	62.1%	58.7%	71.7%	64.2%				0.0%					0%
Weekly Scheduled Tasks Completed	81%	93%	95.0%	89.7%	86.2%	79.3%	86.9%										42.45%
Percent of Hours Accounted for	100%	100%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%				0.0%					0%
Work Request Backlg	78	87	107	91	86	68	84	79				00					4