

## Procedures for Reviewing, Updating, and Tracking Gas Documentation

**Summary** This procedure provides steps that Pacific Gas and Electric Company (the Company) must follow in order to review, update, and track gas maintenance, operations, and emergency response documentation to ensure compliance with Code of Federal Regulations (CFR) Title 49, Part 192, §§ 603, "General provisions," and 605, "Procedural manual for operations, maintenance, and emergencies."

These regulations require that documents covering gas maintenance, normal operations, emergency response, and abnormal operations (for transmission lines) be reviewed and updated as necessary at intervals of at least once each calendar year, not exceeding 15-months, to the date.

This procedure also contains steps to conduct gas document reviews and update plans using the Company's compliance document tracking system known currently as the Enterprise Compliance Tracking System (ECTS). The ECTS fulfills a 2008 Company commitment to the California Public Utilities Commission (CPUC) to track document reviews and updates.

Level of Use: Information Use

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**Target Audience** Personnel who review and update gas documents or manuals. ECTS refers to these individuals as document coordinators and document stewards.

A secondary target audience includes these individual's supervisors, superintendents, managers, and directors.

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**Safety** Use this procedure in accordance with Utility Standard Practice (USP) 22, "Safety and Health Program."

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**Before You Start** PPE: None required.

**Training:** Personnel using this process must receive training on the steps in this procedure. Untrained personnel must work with the assistance of a trained person.

**Tools:** Standard Company word processing, spreadsheet, and flowcharting software. For document reviews, use the Company's compliance document tracking system, which is currently the ECTS application.

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### Procedure Steps

#### 1 General Information

- 1.1 The following Company manuals are subject to the requirements of CFR Title 49, Part 192, § 605:
- Gas Emergency Plan.
  - Gas Distribution Maintenance Manual.
  - Gas Distribution Operations Manual.
  - Gas Transmission Standards.
  - Other manuals that contain qualifying documents.
- 1.2 The document coordinator assigned to manage the updates to the manuals listed above must ensure that the Company conducts an acceptable review and, if needed, provides updates of applicable manual sections.
- 1.3 The document coordinator must ensure that each document, subject to the requirements of CFR Title 49, Part 192, §§ 603 and 605, is included in the list of manuals and reviewed by the document steward.
- 1.4 The document coordinator maintains a list of the document stewards assigned to each document and notes when the SME reviews the document for changes.
- 1.5 If changes are needed, the document coordinators facilitate and track the progress of the updates. The supervisor of the gas standards section provides two times per year a report on the review and update status for each document within the manuals to senior management.
- 1.6 This report contains, at a minimum, the following items:
- The list of requirements of CFR Title 49, Part 192, §§ 603 and 605.

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### 1.6 (continued)

- The list of Company documents subject to review and update linked to each external requirement.
- The document steward assigned to each Company document.
- The date each Company document must be reviewed for compliance.
- The actual date each document is reviewed.
- The date each document is planned to be updated for compliance.
- The actual date each document is updated.

1.7 Updates to the manuals are published once each calendar year, not to exceed 15-months, to the date. The letter that accompanies each manual update includes the Company's certification that the documents were reviewed in the previous year, and any changes ready for publication are included in the update.

1.8 The supervisor for gas standards retains the annual report provided to senior management and the certification letters that accompany the manual updates for 3-years.

## 2 Document Review

2.1 The document review process is essential to maintaining regulatory compliance for Company documents. During the review, specific tasks must be performed to ensure review consistency across the Company. To conduct a review on a gas document, follow the steps below in order.

2.2 The gas technical team sponsor is responsible for reviewing the progress of document reviews and updates to ensure that document stewards complete reviews and updates timely.

2.3 Personnel assigned to monitor regulatory code changes maintain a database that cross references gas documents with regulatory code sections.

2.4 As shown in Attachment 2, "Gas Standards Management High-level Process Flow," the ECTS system automatically initiates document reviews based on the rules for reviewing documents. The document coordinator can also initiate document reviews on an *ad hoc* basis.

2.5 Upon receiving a document review request, the document steward must confirm the assignment.

If the document steward is not the appropriate person to review the document,

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THEN the document steward does not accept the assignment AND notifies the document coordinator, who arranges for the appropriate document steward to conduct the review.

2.6 Once a document review is initiated, the document steward prepares the document review plan, assigns subtasks as needed, and completes the document review within the allotted timeframe by performing the steps below beginning in Paragraph 2.7 through to the end of Section 2 based on either an annual or 5-year review.

2.7 Steps to review a procedure due on an annual review schedule:

1. Read the document. ....
2. Check for any changes to any applicable federal or state code sections by reviewing the Gap Analysis – Code vs. PG&E Standard database (Consulting WINDOT or the most recent copy of the code can also be done.) ....
3. Review the Regulatory Support & Analysis spreadsheet (WINDot Update xxx.xls) for PHMSA advisory bulletins or notices applicable to any parts of the document. ....
4. Review the Regulatory Support & Analysis spreadsheet (xxxxxxx CommitmentLog.xls) for any new external and internal commitments that apply to the document. ....
5. Review any recent applicable MPRs for changes that may need to be included for the next draft. ....
6. Contact, as needed, appropriate personnel who may have knowledge of systems and processes that affect the subject matter area (for example the IGIS programmer for the leaks area, or the purchaser of the material in the sourcing department.) ....
7. Input all required fields on the document review form, as shown in Attachment 1, "Gas T&D Document Management User Guide." ....

2.8 Steps to review a procedure due on a 5-year review schedule (checkmark the placeholder to the right of the step upon completion):

1. Read the document. ....

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### 2.8 (continued)

2. Check for any changes to any applicable federal or state code sections by reviewing the Gap Analysis – Code vs. PG&E Standard database <http://ws.suo/gtdregsupport/analysis/Gap%20Analysis%20%20Code%20vs%20PG&E%20Std/Forms/AllItems.aspx> (Consulting WINDOT or the most recent copy of the code can also be done.) -----
3. Review the Regulatory Support & Analysis spreadsheet for PHMSA advisory bulletins or notices applicable to any applications to the document. -----
4. Review the Regulatory Support & Analysis spreadsheet for any new external and/or internal commitments that apply to the document. -----
5. Review any recent applicable MPRs for changes that may need to be included for the next draft. -----
6. Consider and document in ECTS database the following additional reasons to change the document:
  - Changes to business imperatives, goals, or metrics. -----
  - The introduction of new products, tools, or technology. -----
  - Changes in other Company standards or requirements. -----
  - Changes in integrity management program procedures. -----
  - Changes in suppliers or existing products (e.g., obsolescence). -----
  - Changes in manufacturers' maintenance and operations (M&O) instructions or product advisories. -----
  - Changes in cost drivers (e.g., repair versus replacement, life extensions, asset utilization). -----
  - Address audit results. -----
  - Information gained from incidents. -----
  - Requests by third parties. -----
  - Identification of best practices. -----
  - Personnel suggestions. -----
  - Clarify or correct text or illustrations. -----

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2.8 (continued)

- Improve readability.
  - Administrative changes. -----
7. Contact, as needed, appropriate personnel who may have knowledge of systems and processes that affect the subject matter area (for example the GIS programmer for the leaks area, or the purchaser of the material in the sourcing department.) -----
  8. Input all required fields on the document review form, as shown in Attachment 1, "Gas T&D Document Management User Guide." -----

### 3 Document Update Plan

- 3.1 Document stewards create document update plans when they complete a document review plan. The ECTS system tracks update plan target dates and sends reminders to the document steward beginning 90-days prior to the target date.

#### NOTE

Document update plans may exceed a 1-year timeframe if extensive revisions are required, or if there is the intent to incorporate updates into the next manual and priority allows it.

- 3.2 To initiate a document update plan (checkmark the placeholder to the right of the step upon completion):
  1. Read the review plan. -----
  2. Consult with the gas standards facilitator and the gas technical team to determine realistic dates to incorporate any changes. -----
  3. Input all required fields on the document update plan form as shown in Attachment 1, "Gas T&D Document Management User Guide." -----
  4. Assign subtasks as necessary to ensure document can be updated as required. -----
- 3.3 Update a Document:
  1. Review the update plan to ensure proposed changes are appropriate.
  2. Obtain editable version of the document and processes changes, using the process outlined in Utility Procedure TD-4001P-01, "Gas Document Development and Update Process."

#### END of Instructions

## Procedures for Reviewing, Updating, and Tracking Gas Documentation

### Definitions

**Document coordinator:** The gas standards person assigned to a document to ensure that Company gas standards procedures are followed, including assisting in document reviews and updates.

**Document review:** Steps taken to check a document for any needed updates or corrections.

**Document steward:** The gas personnel (for example, a subject matter expert) assigned to a document to ensure that document reviews and updates are conducted as necessary.

**Document update plan:** A series of tasks developed to incorporate necessary changes to a document.

**Enterprise Compliance Tracking System (ECTS):** The system created by AssurX that the Company uses to track compliance commitments.

**Gas document:** A formal document that provides instructions to Company personnel for designing, building, maintaining, and/or operating gas facilities or tools. Examples of such documents include the following:

- Gas numbered documents (design and construction standards).
- Gas utility standards (for M&O activities).
- Gas work procedures.
- Engineering material specifications.
- Bulletins.
- Manuals.
- Job aids.

**Gas technical team:** A cross-functional team representing stakeholders for a specific subject matter. At a minimum, each team must be composed of subject matter experts and field stakeholders. The team is sponsored by a manager or superintendent appropriate for the subject matter.

**Subject matter expert (SME):** Gas personnel who have demonstrated sufficient knowledge and sound judgment on a topic.

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### Implementation Responsibilities

Individuals using this utility procedure are expected to carry out the steps in this procedure.

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Supervisors, managers, and directors are to ensure all required document reviews are completed by the compliance due dates.

The gas standards section will ensure that new or untrained personnel get trained on this procedure and in using the ECTS system. The gas standards section controls the users that are added to the ECTS system.

### Governing Document

Utility Standard TD-4001S, "Gas Standards Documentation Requirements." governs this procedure.

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### Compliance Requirement/Regulatory Commitment

CFR Title 49, § 192.603, "General provisions."

CFR Title 49, § 192.605, "Procedural manual for operations, maintenance, and emergencies."

September 29, 2008 PG&E Response to 2008 CPUC Gas M&O Plan Audit.

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### Reference Documents

#### Developmental References :

Gas Distribution Maintenance Manual.

Gas Distribution Operations Manual.

Gas Emergency Plan.

Gas Transmission Standards.

Utility Procedure TD-4001P-01, "Gas Document Development and Update Process."

USP 22, "Safety and Health Program."

#### Supplemental References :

NA

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### Appendices

NA

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**Attachments**      Attachment 1, "Gas T&D Document Management User Guide."  
Attachment 2, "Gas Standards Management High-Level Process Flow."  
Attachment 3, "Gas T&D Gas Standards Document Review and Update Program Business Requirements."


**Document Revision**      This document cancels and supersedes Utility Procedure TD-4001P-02, "Procedures for Reviewing and Updating Gas Manuals," issued January, 2010.

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**Approved By**        
Engineer

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**Document Owners**        
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## Procedures for Reviewing, Updating, and Tracking Gas Documentation

### Revision Notes

Where?	What Changed?
Summary and Procedure Steps	Added introductory statement for tracking documents. Revised procedural steps to be more specific for reviews and updates. Wrote new procedure for tracking documents.
Procedure Steps	Organized the steps into these major parts: 1) General information, mostly focused on manual updates. 2) Document review procedure 3) Document update plan procedure 4) Document update process  Section 2 and 3 are new and implement, for the first time, the ECTS steps to recording document reviews and updates.
Attachments	All three attachments are new and assist in implementing the ECTS system.