

Procedure for Reportable Gas Incidents

Summary

This utility procedure establishes a uniform system for reporting gas incidents. It covers:

- Incidents requiring a report to the United States Department of Transportation (DOT).
- Incidents requiring a report to the California Public Utilities Commission (CPUC) Safety and Reliability Branch.
- Internal notification of reportable gas incidents to Pacific Gas and Electric Company (the Company) designated personnel.

Level of Use: Information Use

Target Audience

All personnel involved with gas transmission and distribution (T&D) operations, 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>

Before You Start

NA

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Submit all reports within the timeframe allotted and in accordance with the applicable procedures outlined below.

1 Natural Gas Incident Reporting

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.

2 Incidents Requiring a Report to the CPUC Safety and Reliability Branch

Report incidents, as follows:

2.1 Gas Employees

On observing or becoming aware of a gas event or a potentially reportable incident, gas employees must:

- 1. Gather the information needed to fill out the Gas Incident Checklist (included in the "California Public Utilities Commission Report of Gas Leak or Interruption CPUC File No. 420" [CPUC Form 420]).
- 2. Communicate the above information to Gas Control within 1 hour (during working hours) or 2-1/2 hours (during non-working hours) after Company gas employees are aware of the incident and have arrived on the scene.
- 3. If complete information is unavailable by the time the report is required, make a preliminary report and then a subsequent report when the information is complete.

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2.2 Gas Control

Gas control employees must:

- Obtain as much information relating to the gas incident as possible from the gas employee reporting the event. For a list of questions to ask and/or information to gather, see Attachment 1, "Gas Control - Gas Incident Procedure."
- 2. Contact and forward the necessary information to the Company's CPUC on-call employee within 1/2 hour of being notified of the incident.
- Provide updated information to the Company's on-call employee as more information is obtained.
- 4. If complete information is unavailable by the time the report is required, make a preliminary report and then a subsequent report when the information is complete.

2.3 Company CPUC On-Call Employee

The Company CPUC on-call employee must:

- Determine if the incident meets the criteria for reporting to the CPUC Safety and Reliability Branch.
 - If the incident meets the criteria, the on-call employee must notify 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.)
 - Preferably, the notification is made online on the CPUC <u>"Reporting Emergencies"</u> website. Select #1 in the "Utility and GAO Online Reporting" box. If the website is unavailable the report may be made by telephone: 800 235-1076.
 - Fill out the online report form, including the time, location, and a detailed description of the incident, and the name and telephone number(s) of the Company CPUC on-call employee making the report. The CPUC on-call employee must provide telephone numbers that allow the CPUC to reach the employee immediately at any time.
 - If complete information is unavailable by the time the report is required, make a preliminary report and then a subsequent report when the information is complete.
- 2. Send a brief description of the reportable incident via email to the <u>UO EP Gas Incident Notify</u> list within 30 minutes of submitting the notification to the CPUC.
- 3. Email a completed <u>"CPUC Form 420"</u> documenting the incident to the CPUC by the end of the next working day. A Company regulatory support/analysis (RS&A) representative may assist with this task.

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3 Incidents Requiring a Report to the DOT

3.1 Gas Employees

On observing or becoming aware of a gas event or a potentially reportable incident, gas employees must:

- 1. Gather the information needed to fill out the "Gas Incident Checklist" (included in the "CPUC Form 420").
- 2. Communicate this information to the Gas Control within 1 hour (during working hours) or 2-1/2 hours (during non-working hours) after Company gas employees are aware of the incident and have arrived on the scene.
- 3. If complete information is unavailable by the time the report is required, make a preliminary report and then a subsequent report when the information is complete.

3.2 Gas Control

Gas Control employees must:

- Obtain as much information relating to the gas incident as possible from the gas employee reporting the event. For a list of questions to ask and/or information to gather, see <u>Attachment 1</u>.
- 2. Contact and forward the necessary information to the Company's CPUC on-call employee within 1/2 hour of being notified of the incident.
- 3. Provide updated information to the Company's on-call employee as more information is obtained.

3.3 Company CPUC On-Call Employee

The Company CPUC on-call employee must:

- 1. Determine if the incident meets the criteria for reporting to the DOT.
- 2. If the incident meets the criteria, notify the National Response Center (NRC) within 3 hours (during working hours) or within 5 hours (during non-working hours) after Company gas employees are aware of the incident and have arrived on the scene. The notification must be made either online (<u>NRC Incident Reporting</u>) or by telephone: 800 424-8802. (**Note:** The NRC forwards the incident information to the DOT.)
- 3. If complete information is unavailable by the time a report is required, make a preliminary report and then a subsequent report when the information is complete.

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3.4 Regulatory Support and Analysis (RS&A) Representative

The RS&A Representative must:

- Within 30 days of the incident, fill out the appropriate DOT Form (either PHMSA F-7100.1, "Incident Report Gas Distribution," or PHMSA F-7100.2, "Incident Report Gas Transmission and Gathering Systems") on the DOT Office of Pipeline Safety website. (Note: If necessary, such forms may be filled out off-line and emailed or faxed to the DOT.) Send a copy to the CPUC along with the letter and form described in Subsection 4, below.
- 2. If complete information is unavailable by the time the report is required, make a preliminary report and then a subsequent report when the information is complete.
- 3. Coordinate with the director responsible for gas engineering (or delegate) to review and approve written gas incident reports before they are submitted to the DOT.

4 Conducting an Incident Critique

- 4.1 All CPUC-reportable incidents must have a critique conducted in accordance with Utility Procedure WP1465-02, "Gas Event and Near Hit Reporting."
- 4.2 Whenever the gas T&D organization holds a full investigation or critique for a gas incident that involves work-procedure error, the system reliability and support organization must be included for determining the root cause and developing the corrective or preventative action plan.
- 5 Preparing Written Reports for the CPUC Safety and Reliability Branch

A written report is a letter of explanation sent to the CPUC that gives a more detailed account of an incident and must be emailed to the CPUC within 30 days of the incident. The written report must include the final "CPUC Form 420" and, when required, the appropriate DOT form. If complete information is unavailable by the time the report is required, make a preliminary report and then a subsequent report when information is complete.

5.1 Report Submission

- 1. An **RS&A representative** must submit written reports and, when required, the applicable DOT forms, if requested by the CPUC Safety and Reliability Branch.
- 2. A **director** responsible for gas engineering (or delegate) must verify that such reports are needed and must review and approve written reports before they are submitted to the CPUC.

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5.2 Report Recision

If additional information and analysis show that a given incident did not need to be reported to the CPUC, an RS&A representative must telephone the CPUC Safety and Reliability Branch to request that the report be rescinded. If the CPUC accepts the rescission, no further report is required.

6 Record Retention Requirements

Retain all correspondence and other written materials relating to gas incidents in accordance with <u>Utility Standard Practice (USP) 4, "Record Retention and Disposal."</u>

END of Instructions

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Definitions

Applicable Company facilities: All gas distribution and transmission facilities owned by the Company, except gathering lines that are not within the limits of a city, town, or village (incorporated or unincorporated) or within a residential or commercial area such as a subdivision, business or shopping center, or community development.

CPUC on-call employee: Any Company employee who has CPUC on-call duties.

CPUC Safety and Reliability Branch: That part of the CPUC specifically responsible for utility safety and reliability.

Gas incident: 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.

Line organization: A division or district of an operating area.

Nonreportable incident: An incident that does not need to be reported to the DOT or CPUC by telephone, email, or online form, but still must be listed on the GQI report.

Regulatory support and analysis (RS&A) representative: Any gas engineering employee assigned to serve as a point of contact for gas incidents.

Reportable incident: A gas incident that must be reported to either the DOT and/or CPUC by telephone or online form in accordance with this procedure.

Pipeline and Hazardous Materials Safety Administration (PHSMA): A branch of the DOT.

Safety-related condition: A condition, as specified by the DOT, that affects the serviceability or structural integrity of the pipeline or other gas facilities and that could lead to an imminent hazard.

Supervisory Control and Data Acquisition (SCADA): The system used by the Company to transmit system status information from remote sensing locations to central monitoring locations.

Working days: Days other than Saturday, Sunday, or Company holidays.

Working hours: Hours between 8:00 a.m. and 5:00 p.m. on working days.

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Implementation Responsibilities

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

Governing Document

Utility Standard TD-4413S, "Gas Event Reporting Requirements"

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"

Reference Documents

Developmental References:

Code of Federal Regulations 49 CFR Parts 191 and 192

Code of Safe Practices

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

Gas Engineering On-Call Procedure Manual

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>

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

Supplemental References:

USP 4, "Record Retention and Disposal"

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Appendices

Attachments Attachment 1, "Gas Control - Gas Incident Procedure"

Document Recision

NA

Note: <u>Utility Standard TD-4413S</u>, "<u>Gas Event Reporting Requirements</u>," along with this procedure and other new procedures governed by the standard, replace Utility Standard D-S0355/S4413, "CPUC and DOT Reportable Incidents, Curtailments and Conditions and Low Pressure System Problem

Report."

Approved By Todd Hogenson, Director

Document Owners Senior Program Manager

Document Contact



Revision Notes

Where?	What Changed?
NA	This is a new document.

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