



**Pacific Gas and  
Electric Company**

**Gas Transmission & Distribution Information  
Bulletin**

Title: **Regulatory Advisory Bulletin and Proposed Rulemaking Tracking Process**

Check all appropriate boxes

- |   |   |  |   |
|---|---|--|---|
| <input type="checkbox"/> SAFETY ALERT                           | <input checked="" type="checkbox"/> GAS | <input checked="" type="checkbox"/> DISTRIBUTION | <input type="checkbox"/> SUBSTATION ENGR.     |
| <input type="checkbox"/> MANDATORY COMPLIANCE                   | <input type="checkbox"/> ELECTRIC       | <input checked="" type="checkbox"/> TRANSMISSION | <input type="checkbox"/> TRANS./SUB. M&C      |
| <input type="checkbox"/> RECOMMENDED ACTIONS                    | <input type="checkbox"/> ESTIMATING     | <input checked="" type="checkbox"/> OPERATIONS   | <input type="checkbox"/> APPLICANT DESIGNER / |
| <input checked="" type="checkbox"/> INFORMATIONAL/CLARIFICATION | <input type="checkbox"/> MAPPING        | <input checked="" type="checkbox"/> SERVICE      | CONSTRUCTION                                  |

## Purpose

The purpose of this bulletin is to establish a formalized process to track, assign, and review advisory bulletins and proposed rule making from regulatory agencies in a timely manner, and to also ensure that any actions or changes are implemented in a timely manner. This bulletin specifies the process, roles and responsibilities to be followed, and defines terminology used.

Information contained in this bulletin will be incorporated into a separate work procedure under Utility Standard S4000, *Gas Standards Documentation*.

The Regulatory Support & Analysis Department within Gas Engineering maintains overall responsibility to implement the process described herein. Gas Engineering Managers and Directors are responsible for ensuring employees in their departments understand and follow the process, and take the appropriate actions based on potential regulatory decisions.

## Definitions

Advisory Bulletin – PHMSA uses advisory bulletins to inform affected pipeline operators and Federal and State pipeline safety personnel of matters that have the potential of becoming safety or environmental risks.

AGA – American Gas Association; a non-governmental association, which is an advocate for energy companies that transport natural gas in the United States. It represents the interests of its members and the gas industry to agencies and legislative bodies.

DOT – U.S. Department of Transportation; the regulatory body responsible for the oversight and implementation of the minimum safety standards for the transportation of natural gas, CNG and LNG through pipelines.

INGAA - Interstate Natural Gas Association of America (INGAA); a trade organization that advocates regulatory and legislative positions of importance to the natural gas pipeline industry in North America.

PHMSA – Pipeline and Hazardous Materials Safety Administration; one of the agencies within the U.S. Department of Transportation (DOT), with oversight to ensure the safe and secure movement of hazardous materials to industry and consumers by all transportation modes, including the nation's pipelines.

PHMSA Final Rule – The Pipeline and Hazardous Materials Safety Administration, through the Federal Registry and its website, issues Final Rules. These are the federal regulation code revisions or additions for pipeline safety.

NAPSR - The National Association of Pipeline Safety Representatives; a non-profit organization of state pipeline safety personnel who serve to promote pipeline safety in the United States and its territories.

NPRM -Notice of Proposed Rule Making (and ANPRM; Advanced Notice of Proposed Rule Making) – PHMSA provides these notices of proposed regulation. These documents propose changes to the safety regulations for the purpose of obtaining public comment.

NTSB – National Transportation Safety Board; an independent federal agency charged by Congress with investigating significant hazardous materials accidents/incidents. The NTSB issues Safety Recommendations as a result of incident investigations. PHMSA is required by law to respond to these Safety Recommendations and will communicate these via an Advisory Bulletin.

Reviewer – This is the subject matter expert (SME), document steward or responsible engineer working within the Gas Engineering organization who is responsible for applying the rules and regulation to PG&E's design, operation and maintenance practices.

Stakeholder – Person or persons whose work is directly affected by pipeline transportation regulations including 49CFR Parts 190, 191, 192, 193, 195, 199 and CPUC General Order 112E.

WinDOT – An electronic catalogue of Federal Pipeline Safety Regulations and interpretations of the regulations. A source of notifications of proposed changes to Federal Pipeline Safety Regulations.

## General

Various Federal and State agencies and advocacy groups use advisory bulletins and notifications to inform affected pipeline operators and pipeline safety personnel of matters that have the potential of becoming safety or environmental risks, or could potentially impact operations. PG&E's policy is to review these pipeline advisory bulletins and notifications and take the appropriate measures to ensure PG&E's pipelines continue to be designed, operated, and maintained in a safe manner and in compliance with all applicable state and federal regulations.

## Process

1. When the Regulatory Support & Analysis group (RS&A) receives a Pipeline Advisory Bulletin (Bulletin), a Notice of Proposed Rule Making (NPRM), or Advanced Notice of Proposed Rule Making (ANPRM) thru the PHMSA's website: (<http://www.phmsa.dot.gov/pipeline/regs/advisory-bulletin>) or WinDOT update, RS&A will log the Bulletin, NPRM, or ANPRM into the RS&A tracking system.  
**Note:** RS&A personnel are signed-up to automatically receive these Bulletins, NPRM's and ANPRM's that are generated from the PHMSA and WinDOT websites.
2. When other personnel within Gas Transmission and Distribution (GT&D) receive a Bulletin, NPRM, or ANPRM from the various other sources, a copy of the Bulletin, NPRM, or ANPRM shall be forwarded to the RS&A group.
3. RS&A will review the Bulletin, NPRM, or ANPRM and determine if it pertains to any aspect of PG&E's transportation of natural gas. If RS&A determines that the Bulletin, NPRM, or ANPRM does not pertain to any aspect of PG&E's transportation of natural gas, the Bulletin, NPRM, or ANPRM will be documented and logged by RS&A personnel as not applicable to PG&E, and no review will be required.
4. If RS&A determines that the Bulletin, NPRM, or ANPRM does involve, or has the potential to involve, some aspect of PG&E's transportation of natural gas, RS&A will assign (within 5 calendar days) the Bulletin, NPRM, or ANPRM to the appropriate reviewer within the Gas Engineering Department for review and action.
5. For NPRM and ANPRM, the assigned reviewer and his/her manager will be asked to make a critical review of the NPRM and ANPRM and provide PG&E's comments within 15 calendar days to the reviewer's director for

approval. Upon the director’s approval, the reviewer will forward PG&E’s comments to RS&A for external communication to the appropriate regulatory or industry agency. (Proceed to item 7 below)

- 6. For Bulletins, the assigned reviewer and his/her manager will be asked to make a preliminary review of the Bulletin to determine the appropriate course of action that will need to be taken, and to provide RS&A (within 15 calendar days of receiving the Bulletin) with a proposed action plan that will address the Bulletin, the name of the person who will be responsible for completing the action plan, and the expected completion dates of the action items.

Thirty (30) calendar days prior to the completion date of the action item(s), the reviewer will issue his/her written interpretation of the Bulletin to the affected stakeholder(s) for review. The interpretation shall include any proposed changes that are necessary to comply with the Bulletin. The changes may include revisions to PG&E’s design standards, operation, and maintenance work procedures. The proposed changes will need to be approved by the appropriate Standards and Work Procedures steering committee and senior leadership.

After the proposed changes are approved, RS&A will then assign to the affected responsible department and stakeholder, the action item and PG&E document(s) that will need to be revised, along with an expected due date for the affected PG&E document(s) to be issued.

- 7. RS&A will track these action items and completion dates, including any agreed upon revisions and additional assignments, using the tracking log below. RS&A will continue to track the resolution of the Bulletin, NPRM, or ANPRM until all action items are completed. The reviewer’s interpretation will be retained for future reference.

**Tracking Log**

<i><b>WINDot Updates</b></i>									
<b>2009</b>									
Date	Agency	Type	Description	Parts of Code Affected	Action Required?	Action Taken/ Comments	Reviewer	Due Date	Completion Date

**Roles and Responsibilities**

Description of Process Tasks	Department(s) Responsible to Complete Task	Department (s) Receiving Completed Task Information	Tasks Completion Timeframe
<b>PHMSA Advisory Bulletin and Notification Process</b>			
• Distribute Bulletins and Notifications	Various governmental and non-governmental organizations	RS&A and Stakeholders in the GT&D organization	Notices and Bulletins are distributed as they are developed.
• Receive, log, and review Bulletins and Notifications	RS&A	RS&A	Within 5 calendar days of receipt of Notice or Bulletin
• For Bulletins and Notifications that are not relevant to PG&E log in tracking system as not applicable.	RS&A	RS&A	Within 10 calendar days of receipt of Notice or Bulletin
• For Bulletins and Notifications that are relevant to PG&E, identify and distribute to Reviewer(s) for review and development of an action plan.	RS&A	Reviewer	Within 5 calendar days of receipt of Notice or Bulletin
• For Notifications, prepare PG&E comments and upon director's approval, submit for external distribution.	Reviewer	RS&A	Within 15 calendar days of assignment from RS&A
• For Bulletins, prepare proposed action plan, identifying affected stakeholders and expected completion dates	Reviewer	RS&A	Within 15 calendar days of assignment from RS&A
• For Bulletins, issue interpretation describing actions that will be taken to adequately address the bulletin or notification	Reviewer	RS&A, Affected Shareholder(s)	30 calendar days prior to taking action
• Log action plan deliverables into tracking system and monitor progress of completion of milestones.	RS&A	Reviewer	Ongoing during action plan
• Log final actions completed	RS&A	RS&A	Within 2 days of receipt of final report.

**Approved by:**

Glen Carter

**Date:** December 14, 2009

**Author:** [Redacted]

**If you have any questions about this bulletin, please call the employee(s) listed below:**

Contact(s):

LAN ID(s):

Phone(s):

