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By Email

Mr. Terence Eng
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Response to May 1, 2020 – Revised Notice of Gas Incident Violations by Pacific Gas and Electric Company (PG&E) - PGE NOPV G20180310-2506 – (DOT #1206479)

Dear Mr. Eng:

This letter is in response to the Safety and Enforcement Division's (SED) letter dated May 1, 2020 regarding a DOT reportable incident (#1206479) that occurred on March 10, 2018 at [REDACTED] San Jose.

In its letter, SED found PG&E in violation of the following:

U.S. Department of Transportation Title 49 CFR §192.605(b)(3) states in part:

"The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations... (3) Making construction records, maps, and operating history available to appropriate operating personnel."

SED's Revised Finding: Instead of using information from PG&E's Gas Service Order #6798 LW as required by §192.605(b)(3), PG&E relied solely on paper maps to develop its CSRP. However, PG&E's paper maps did not indicate the service line at [REDACTED] as being partially copper. Therefore, PG&E failed to make all construction records, particularly the Gas Service Order #6798 LW, available to the appropriate personnel when identifying copper service lines for the CSRP.

PG&E failed to identify the partial copper service line at [REDACTED] for inclusion in its CSRP. The partial copper service line remained in service where it developed internal corrosion, a known threat to copper service lines. As internal corrosion over time led to a leak at the transition fitting, natural gas migrated into [REDACTED] and subsequently ignited causing approximately \$638,472 in property damage, and one injury requiring in-patient hospitalization.

Therefore, SED found that PG&E failed to make construction records available to the appropriate operating personnel and thus violated Title 49 CFR, Part 192, Section 192.605(b)(3).

PG&E's Response: PG&E agrees with SED's revised finding. Since the incident, PG&E has implemented many improvements to make the most accurate records available to its employees, including:

1. Identified remaining and potential copper services based on the Gas Service Record (GSR) data table in GD GIS, repaired leak database, CSRP database, and other available databases. For services that were determined to be potential copper services, PG&E reviewed the GSRs to validate whether the services contain copper. For services that were confirmed to be copper, annotations were added in GD GIS to accurately reflect the service material.
2. Audited the CSRP inventory against the GSR table in GD GIS to identify if there is any indication that a copper service has been left in the field and updated GD GIS to reflect the replacement status.
3. Updated the Mapping Handbook to include details on how to map partial material services.

In addition to these improvements, PG&E continues to improve our methodologies for managing knowledge of assets by deploying GIS for both transmission and distribution assets, scanning and attributing of gas service records, digitizing as-built job packages and creating a mapping correction program. Furthermore, PG&E continues to invest in technology such as mobile as-building and material traceability to make the best information available to its personnel in a timely manner.

This response contains information that should remain confidential and not be subject to public disclosure; see attached for PG&E's declaration supporting confidential designation for additional detail ("*Index 14017_Confidentiality Declaration.pdf*"). Confidential information is highlighted yellow within the referenced document(s).

Sincerely,

/s/Vincent Tanguay

Director, Regulatory Compliance

cc: Dennis Lee, CPUC
Joel Tran, CPUC
Susie Richmond, PG&E