

Enclosure 3



**Public Utilities Commission**  
STATE OF CALIFORNIA

**Citation Date:** December 5, 2013

**Citation #:** 13-005

**Operator ID#:** 15007



**Frances Yee**  
Acting Director  
Regulatory Compliance & Support  
Gas Operations

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October 12, 2012

Mr. Michael Robertson  
Gas Safety and Reliability Branch  
Consumer Protection and Safety Division  
California Public Utilities Commission  
320 West 4th Street, Suite 500  
Los Angeles, CA 90013

Re: General Order 112-E Audit of PG&E's Operations, Maintenance, and Emergency Plan

Dear Mr. Robertson:

The Consumer Protection and Safety Division (CPSD), Gas Safety and Reliability Branch (GSRB) of the CPUC conducted a General Order 112-E audit of PG&E's Operations, Maintenance, and Emergency Plan (OM&E) from February 14 - 17, 2012. The attachment to this letter provides PG&E's detailed responses to the inspection findings listed in your audit letter, dated August 29, 2012.

Please contact Larry Berg at (925) 974-4084 or [LMB5@pge.com](mailto:LMB5@pge.com) for any additional questions you may have regarding this notification.

Sincerely,

/s/  
Frances Yee  
Acting Director, Regulatory Compliance and Support

Attachment

cc: Aimee Cauquiran, CPUC  
Julie Halligan, CPUC  
Larry Berg, PG&E  
Larry Deniston, PG&E  
Karen Roth, PG&E  
Jane Yura, PG&E

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### General Order 112-E Findings CPUC Inspection Report, dated August 29, 2012 Operations, Maintenance, & Emergency Plan

#### INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
February 14-17, 2012	NOV – 4	Aimee Cauguiran	(415) 703-2055

#### INSPECTION FINDING

CPUC Finding	<p>49 CFR §192.605(e) and §192.613 Continuing Surveillance</p> <p><i>“(a) Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.”</i></p> <p>PG&amp;E currently does not have a specific written procedure addressing Continuing Surveillance. PG&amp;E has certain standards and work procedures such as patrolling, class location study, leak survey, cathodic protection monitoring, and cathodic protection area resurvey. These specific procedures describe PG&amp;E’s performance of the various operations and maintenance tasks, but it remains unclear how or whether the various tasks relate to PG&amp;E’s continuing surveillance efforts.</p> <p>PG&amp;E must clearly describe how it uses and coordinates the various operations and maintenance tasks in its continuing surveillance. PG&amp;E’s written procedure should describe how findings from failure investigations, leak surveys, cathodic protection monitoring, and other operating and maintenance tasks are gathered and analyzed as a part of its continuing surveillance. The written procedure must also describe the actions to take if changes are found as a result of its data gathering and analysis.</p>
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#### PG&E RESPONSE

PG&E agrees with this finding and will publish a specific work procedure to address the Company’s continuing surveillance of its gas facilities as required by §192.613.

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**General Order 112-E Findings**  
**CPUC Inspection Report, dated August 29, 2012**  
**Operations, Maintenance, & Emergency Plan**

**ATTACHMENTS**

<b>Attachment #</b>	<b>Title or Subject</b>
None	

**ACTION REQUIRED**

<b>Action To Be Taken</b>	<b>Due Date</b>	<b>Completion Date</b>	<b>Responsible Dept.</b>
Publish a new Continuing Surveillance Procedure	July 31, 2013		Integrity Management