

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 3, 2014

Mr. Kevin Knapp  
Vice President, Transmission and Distribution Operations  
Pacific Gas and Electric Company  
6111 Bollinger Canyon Road  
San Ramon, CA 94583

RE: Performing work in the City of Carmel-by-the-Sea

Dear Mr. Knapp:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) is in receipt of Pacific Gas and Electric's (PG&E) letter dated September 8, 2014, confirming the development and implementation of the following enhanced safety measures and work procedures to resume gas safety work in the City of Carmel-by-the-Sea (Carmel):

*1. Gas Carrier Pipe Checklist*

PG&E has trained all gas construction employees on the use of this checklist prior to beginning any work by PG&E's gas transmission and distribution construction crew, which requires:

- A review of maps and records,
- An inspection of the jobsite for signs of recent construction activity, and
- The physical verification of facilities

*2. Use of a new fitting to identify inserted plastic in steel pipes*

PG&E's TD-4150P-110 Continental Steel to PE Mechanical Bolt-on Saddle Punch (Publication Date: 03/21/2014) describes the use of the mechanical bolt-on saddle punch on steel pipe up to 2 inches in diameter to prevent possible damage to unknown inserted plastic pipe due to welding.

*3. Quality Control Field Verification*

PG&E's distribution Quality Control (QC) team will perform assessments of gas distribution construction work across the PG&E's system to ensure that field personnel are properly using the Gas Carrier Pipe Checklist, and that work is performed in accordance to PG&E standards and procedures. As of August 19, 2014, PG&E QC has detected 3 of the 23 instances examined in which the Gas Carrier Pipe Checklist was not used. PG&E must continue to monitor its implementation of this procedure to ensure full compliance.

*4. Train and Equip PG&E Crews to Address Emergencies*

In addition to its distribution crews, PG&E has trained general construction employees working on gas projects in the city of Carmel on proper use of pipe squeezers. Additionally, all crews working in the city of Carmel have been equipped with the necessary emergency tools. PG&E will be expanding its training on the use of pipe squeezers and will equip all general construction employees system-wide with the necessary emergency tools.

*5. Safety Briefings Prior to Conducting Work*

PG&E requires that safety briefings are conducted prior to commencing work at a job site to review potential safety issue including emergency protocols pertinent to the specific activities performed. The Job Site Safety Analysis (JSSA) form will be modified prior to performing work in Carmel to provide better guidance and ensure that the safety briefings are comprehensive.

*6. PG&E is treating all odor calls in the city of Carmel as immediate response.*

This requires PG&E to immediately dispatch personnel to respond to a gas odor call in the city of Carmel. PG&E's goal for 2014 Immediate Response time is 21 minutes.

*7. Coordinate with Carmel City Staff on Construction Projects*

PG&E will have a designated Project Manager who will coordinate with the City of Carmel on permitting requirements and ensure that all work is performed in accordance with city requirements. A PG&E field inspector will also be assigned during construction to work closely with the City's inspector. PG&E will continue to engage the City staff throughout the construction project including but not limited to pre-construction walk through inspection, pre-construction tailboard training with PG&E crews, and regular site visits.

SED fully expects PG&E to adopt the above-mentioned enhanced safety measures and procedures as part of its operations and maintenance. PG&E may proceed to work in the city of Carmel as it deem necessary for the safe operation of its gas system. SED may elect to confirm PG&E's compliance with the enhanced safety measures and procedures at any time. Failure to comply with the enhanced measures and procedures will be a violation of Title 49 Code of Federal Regulations Part 192.13(c).

Furthermore, SED understands that PG&E is exploring the following additional safety measures to improve the operational safety of the natural gas system:

1. Establish protocols in the City of Carmel similar to that of the city of San Francisco's Code Multiple-unit Resource Response Incident (MuRRI) program which provides triggers and notification protocol for PG&E personnel in a



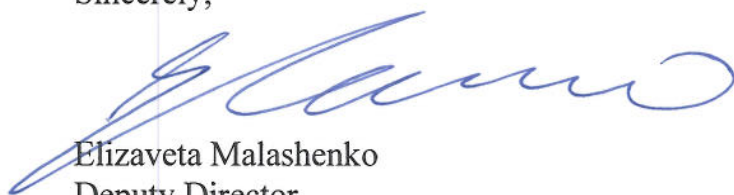
potentially hazardous situation, and actions for emergency responders arriving at the scene of a serious gas incident.

2. PG&E's participation in the Monterey County's efforts to update its Multi-Jurisdictional Hazard Mitigation Plan which intends to identify local policies and actions to reduce risk from natural hazards. PG&E agreed to participate in the planning effort to improve its coordination with local municipalities

When completed, please provide SED with an update on these additional measures. PG&E is required to keep the procedures current and any new findings for opportunities to improve procedures and processes should be incorporated as appropriate. SED will be monitoring to ensure that PG&E procedures stay current and reflect any newly identified best practices or additional corrective measures.

If you have any questions, please contact me at 415-703-2274 or [elizaveta.malashenko@cpuc.ca.gov](mailto:elizaveta.malashenko@cpuc.ca.gov).

Sincerely,



Elizaveta Malashenko  
Deputy Director  
Safety and Enforcement Division

Cc: Harvey Y. Morris