



Vincent Tanguay
Director
Compliance
Gas Operations

6111 Bollinger Canyon Road
San Ramon, CA 94583
Phone: 925.244.3466
E-mail: VXTH@pge.com

July 20, 2021

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

Re: State of California – Public Utilities Commission
General Order 112-F Gas Inspection of PG&E’s Division Damage Prevention Program

Dear Mr. Eng:

The Safety and Enforcement Division (SED) of the CPUC conducted a General Order 112F inspection of PG&E’s Division Damage Prevention Program Inspection from April 20 through April 22, 2021. On June 23, 2021, the SED submitted its inspection report, identifying no violations and two concerns. Attached is PG&E’s response to the CPUC inspection report.

Please contact Alberta Ekukinam at (925) 328-7528 or u.alberta.ekukinam@pge.com for any questions you may have regarding this response.

Sincerely,

/s/ Vincent Tanguay
Director of Risk, Compliance & Operator Qualifications

Attachments

cc: Desmond Lew, CPUC
Dennis Lee, CPUC
Mahmoud Intably, CPUC
Kan-Wai Tong, CPUC
Claudia Almengor, CPUC
Susie Richmond, PG&E

2021 Damage Prevention Program SED Inspection Responses

#	Finding Type	Topic	Code Reference	SED Finding	PG&E Response
1	Concerns	Public Awareness and Damage Prevention: Damage Prevention (PD.DP)	192.614(c)(3)	<p><i>Does the process specify how reports of TPD are checked against One-Call tickets?</i></p> <p>During records review on April 20, 2021, Pacific Gas and Electric Company indicated that it does not specify a process or procedure of how reports of Third-Party Damage are checked against One-Call tickets.</p> <p>SED recommends Pacific Gas and Electric Company modify the Damage Prevention Program to specify how reports of Third-Party Damage are checked against One-Call tickets. The process or procedure should include:</p> <ol style="list-style-type: none"> 1) Damage identified as Third-Party Damage is linked back to One-Call events in the vicinity; and 2) Ensuring Third-Party Damage was not original construction damage if there is no evidence of excavation in the vicinity. 	<p>PG&E recognizes this concern and is taking the following actions:</p> <ul style="list-style-type: none"> ▪ Utility Procedure, <i>TD-5811P-501: Dig-In Investigation</i> has been canceled. ▪ Standards Engineering is working on updating Utility Procedure documents for Dig-In Response and Investigation that will detail Dig-In Reduction Team (DiRT) investigations of dig-ins and confirming the status or existence of USA tickets. While this is current practice, it will be formalized in the Utility Procedure documents by Q4 2021.
2	Concerns	Public Awareness and Damage Prevention: Damage Prevention (PD.DP)	192.614(c)	<p><i>Does the damage prevention program meet minimum requirements specified in 192.614(c)?</i></p> <p>During records review on April 21, 2021, Pacific Gas and Electric Company provided a list of approximately 5,000 “Late Tickets” for 2018, 2019, and 2020. SED recommends Pacific Gas and Electric Company review the reasons for “Late Tickets” and make process improvements to reduce the number.</p>	<p>PG&E recognizes this concern:</p> <ul style="list-style-type: none"> ▪ Late tickets are reviewed, and the reasons are identified in a report completed by the Quality Control team. Additionally, third party monitors are required as a result of the Locate and Mark OII III.B.1 – Timely Ticket Review.