2016 East Bay Division CPUC Audit Responses

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Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
NOV - PG&E's Internal Review Findings		At the start of the inspection, PG&E provided SED its findings from the internal review it conducted of the Division. Some of PG&E's internal review findings are violations of PG&E's standards, and are therefore violations of Title 49 Code of Federal Regulations (CFR), §192.605(a). SED is aware that PG&E corrected all of its findings prior to SED's inspection. Table 1 lists all of the violations from PG&E's internal review.	Per the attached summary of PG&E's East Bay Internal Review, there were 6 findings that was awaiting resolution. Please see below for a status of the finding. FV-18 replacement completed on 3/30/16, Order #31222093 FV-45 project is scheduled to be completed by 4Q 2016, Order#74004847 FV-70 replacement completed on 9/14/16,Order#7404848 For valves, D-90, FV-90, and A-13, engineering is in the process of scheduling the projects for 2017.	n/a
NOV	1.1	Title 49 Code of Federal Regulations §192.745 Valve maintenance: Transmission lines states: (a) Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year. (b) Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve. Title 49 Code of Federal Regulations §192.747 Valve maintenance: Distribution systems states: (a) Each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year. (b) Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve. SED during the inspection found following valves missed annual inspection and exceeded the 15-months maximum timeframe allowed by the code. In addition, where required, no Alternate Valves were designated. (i) Valve, J-01: 62nd Avenue and Foothill Blvd., Oakland: Last maintenance was done on 11/21/14, and the 2015 calendar year inspection was missed. The notes also indicate that the valve is paved over, and a corrective was turned in after 12/29/15 inspection. Please provide an update. (ii) Valve H-07: N/S Russel E/S Claremont, Berkeley: It was not operated during the year 2014. The notes from 2014 show, "Unable to operate" and there is no record of Alternate Means of Control (AMC) designation. Please provide an update. (iii) Valve B-18, currently inoperable since 2015. There was an incorrect entry for operation in 2016 and another inoperable entry. Currently there is a request for designation of AMC but no valve has been assigned. (iv) Valve E-07, Oakport Office (June binder) – last maintenance was performed in 2014; the notes say stem broke and valve frozen. It is more than 15 months and no AMC has been designated. Please provide an update.	PG&E recognizes these observations and has taken the following corrective actions: (i) Valve J-01: The gas valve box was uncovered and raised on 9/19/2016 under notification 111927633. Please see attached "NOV1.1(i) - J-01 SAP Record_CONF.pdf". The valve maintenance is scheduled for 4Q 2016. (ii) Valve H-07:The valve was repaired on 9/2/15 by Campbell Bros. Please see attached "NOV1.1(ii) - H-07 Valve_Card_CONF.pdf" (iii) Valve B-18: Please see attachment "NOV1.1(iii) - B-18 AMC_CONF.pdf". The AMC was completed 11/15/16. In addition, PM 42778667 was created to repair the hard to turn valve. The repair is scheduled for December 2016. To prevent recurrence, PG&E's Quality Control Group assists with record reviews of completed maintenance to ensure compliance, which includes supervisor review and approval being completed in a timely manner. The goal is to identify any errors and have them corrected real time in order to drive quality and provide timely feedback/instruction. In East Bay, these reviews of the prior month's work were first started in September 2016. Please note that the Quality Control Group did not go back to review maintenance performed greater than 30 days prior to this start date or the previous year's maintenance. (iv) Valve E-07: After further review, PG&E has determined that valve E-07 is no longer needed and is tentatively scheduled for replacement with straight pipe in August 2017. Please note the valve E-07 was discovered to be inoperable on 8/4/15, and the AMC was created 8/5/15. Please see attached "NOV1.1(iv) - E-07 AMC_CONF.pdf."	NOV1.1(i) - J-01 SAP Record_CONF.pdf NOV1.1(ii) - H-07 Valve_Card_CONF.pdf NOV1.1(iii) - B-18 AMC_CONF.pdf NOV1.1(iv) - E-07 AMC_CONF.pdf
NOV	1.2	1.2. Late Supervisor Review (valves) PG&E procedure TD-4430P-04, Rev 1, section 3.3 states: "Maintenance supervisor, upon completion of valve maintenance, will accomplish the following: 1. Review, within 30-working days, each Gas Utility Form TD-4430P-04-F02, "Gas Valve Maintenance Record Form—Service History" for accuracy and completeness. Return Service History Form to personnel that performed maintenance to correct errors and omissions." SED observed that maintenance records for the following valves were not reviewed and signed during the required timeframe: A-15, A-19, A-28, B-77 and FV-41	PG&E recognizes these observations and has taken the following corrective actions: As noted above in the response to NOV 1.1, PG&E's Quality Control Group assists with record reviews of completed maintenance to ensure compliance, which includes supervisor review and approval being completed in a timely manner.	n/a

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NOV	1.3	1.3. Late Supervisor Review (Regulator Station) PG&E procedure TD-4540P-01, Rev 0, section 7.1 (4) states: "Review AND approve all records for work performed at each regulator station within 30 days of completion of maintenance" SED observed that maintenance records for the stations RB-02 and RC-01 for the year 2015 were not signed in the required timeframe.	Please refer to NOV 1.2 response.	n/a
NOV	1.4	1.4. Meterset Assemblies and Large Volume Customers PG&E procedure D-4540S, Rev 0, Table 2 Maintenance Schedule outlines the frequency intervals for regulating stations. According to this table Class A Inspection of customer meterset assemblies should be performed at least once every 5-calendar years and large volume customer regulator set at least once each calendar year, at intervals not to exceed 15 months. SED found that maintenance for following assets was not performed as per the required timeframe: - M-12 - City of Oakland CNG, 7101 Edgewater Dr., Oakland - M-09 - Metro Furniture/One Work Place, 7220 Edgewater, Oakland - M-14 - Peets Coffee – 2001 Harbor Bay Parkway, Alameda - M-16, Gallager & Burke, 344 High Street, Oakland - Emery Station, 5858 Horton Street, Emeryville - Federal Building, 1301 Clay Street Oakland - Alameda CO-GEN, 2900 Main Street Alameda - D-11: 850 Marina Bay parkway, Richmond - C-18: 2101 Franklin Canyon Rd., (Phillips 66 Company) - P-16: 1145 Harbour Way S, Richmond - Heating Plant (1), UC Berkeley - Heating Plant (2), UC Berkeley: maintained on 7/12/08 & 6/5/10 but lapsed the 5 year interval	PG&E recognizes these observations and has taken the following corrective actions: Please see below for an update to the meterset assembly (MSA) and large volume customer (LVC) maintenance. - M-12 - City of Oakland CNG, 7101 Edgewater Dr., Oakland - COMPLETE - M-09 - Metro Furniture/One Work Place, 7220 Edgewater, Oakland - COMPLETE - M-14 - Peets Coffee – 2001 Harbor Bay Parkway, Alameda - COMPLETE - M-16, Gallager & Burke, 344 High Street, Oakland - COMPLETE - Emery Station, 5858 Horton Street, Emeryville - COMPLETE - Federal Building, 1301 Clay Street Oakland - COMPLETE - Alameda CO-GEN, 2900 Main Street Alameda - COMPLETE - C-18: 2101 Franklin Canyon Rd., (Phillips 66 Company) - COMPLETE The locations below to be completed by 12/31/16. - D-11: 850 Marina Bay parkway, Richmond - P-16: 1145 Harbour Way S, Richmond - Heating Plant (1), UC Berkeley - Heating Plant (2), UC Berkeley: maintained on 7/12/08 & 6/5/10 but lapsed the 5 year interval To prevent recurrence, the MSA & LVC assets were inputted into the asset registry system (SAP), to provide visibility and ensure that maintenance is completed per PG&E's standard TD-4540S.	n/a
NOV	1.5	1.5. Capacity of Pressure Relieving Devices Title 49 Code of Federal Regulations §192.201, Required capacity of pressure relieving and limiting stations, states: (a) Each pressure relief station or pressure limiting station or group of those stations installed to protect a pipeline must have enough capacity, and must be set to operate, to insure the following: (1) In a low pressure distribution system, the pressure may not cause the unsafe operation of any connected and properly adjusted gas utilization equipment. (2) In pipelines other than a low pressure distribution system: (i) If the maximum allowable operating pressure is 60 p.s.i. (414 kPa) gage or more, the pressure may not exceed the maximum allowable operating pressure plus 10 percent, or the pressure that produces a hoop stress of 75 percent of SMYS, whichever is lower; (ii) If the maximum allowable operating pressure is 12 p.s.i. (83 kPa) gage or more, but less than 60 p.s.i. (414 kPa) gage, the pressure may not exceed the maximum allowable operating pressure plus 6 p.s.i. (41 kPa) gage; or SED observed that for station, R-E03 Jackson & Buchanan St., Albany, the downstream maximum allowable operating pressure (MAOP) is 50 psig, and the set pressures for regulator and monitors are 40 psig and 45 psig respectively. However, automatic shut-off valve (ASV) is set at 57 psig, which is above the allowable limit of 56 psig as per 49 CFR 192.201 (a)(2)(ii). –	PG&E respectfully disagrees with this finding. The overpressure protection for the station is the monitor, which is set at 45 psig, which is below the MAOP. In addition, the automatic shut-off valve was changed from 57 psig to 56 psig on 10/12/16 to match MAOP plus allowable. Please see attached "NOV1.5 - R-E03 Maintenance_Record_CONF.pdf"	NOV1.5 - R-E03 Maintenance_Record_CONF.pdf

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NOV	1.6	1.6. Response not received PG&E has not provided response for the following data request: (1) 192.517(b) requires keeping record of pressure test failures (under 192.513) for at least five years. It appears from discussions with PG&E staff that the records have not been kept. Please confirm. (2) PG&E in its self-identified violation via letter July 7, 2014 reported that failure records for plastic joiners have not been kept to determine whether they need requalification (using both visual and destructive examination). Hence, under special exercise performed, PG&E requalified joiners using both visual and destructive examination. After that special exercise, has PG&E kept records to implement 192.285(c) as required at that time prior to Amdt. 192-120, 80 FR 12779, Mar. 11, 2015, effective October 1, 2015? (3) 192.285(c) was amended through Amdt. 192-120, 80 FR 12779, Mar. 11, 2015, effective October 1, 2015. Did PG&E amend procedures to take account of it? Please provide the revised procedure. (4) As per our understanding from discussions with PG&E staff procedure was revised in August 2016. How the period from October 1, 2015 to the new PG&E procedure is covered? Is it correct to say that PG&E has not implemented the revised code language until August 2016 for joiner qualification? (5) Has PG&E kept record of plastic joints failed under pressure (192.513) to implement the revised code language after new code language of 192.285(c) became effective? If yes, please provide the same.	Please refer to "Index 10080.07-.11_Response.pdf" and "Index 10080_07-11_Attachments.zip."	Index 10080.07-.11_Response.pdf Index 10080_07-11_Attachments.zip
AOC	0	Areas of Concern/ Observations/ Recommendations SED made following observations during the audit. We understand that PG&E is taking steps to remediate the situations, please provide the information and update.	Please see below for responses to the AOCs.	n/a
AOC	1	1. A large number of valve maintenance records (valve cards) did not have valve pressure ratings. For example, the records at Oakport office (October, November, & December anniversary months binders), all of them except valve K-99 (a total of 128 valves), there was no pressure rating. A similar observation was made for 45 valves in June binder at the Oakport office. Please provide detailed explanations of any efforts that PG&E made to find this critical information ("Type", "Pressure Rating", "Make/Model", "Size") for those filled as "Unknown" on valve cards.	PG&E feels the valve card contains sufficient information to perform the valve maintenance. "Critical" information is validated through the MAOP Validation process and stored in GT-GIS. PG&E's asset knowledge group has reviewed the GIS database for transmission assets and provided the attached table with valve ratings. The pressure ratings of valves on distribution system are historically greater than 100 psig , which is more than the operating pressure of a distribution system of 60 psig or less. Please see attachment "AOC1 - TD-4430P-04-JA01 Valve Maintenance Record.pdf" that was provided during the audit. Unknown valve ratings on the valve maintenance cards are acceptable.	n/a
AOC	2	2. It was observed that numbering of certain fire valves on regulator station diagram, station datasheets and valve cards did not match. The examples are fire valves at the regulator stations, RJ-12, RJ-11, RRA-03 and RL-03. PG&E explained that the fire valves have been renumbered; however, the records are not updated. Please provide information on efforts that are being made to update and synchronize the records, and expected deadline for the same.	PG&E recognizes these observations and has taken the following corrective actions: Please see attached updated data sheets and ops diagrams for RJ-12, RJ-11, RA-03 and RL-03 (actually R-L08). For the short-term corrective action, both Transmission and Distribution Valve numbers are indicated on the data sheets and operating diagrams for these four stations. For the long-term corrective action, CAP 7035720 was created to determine a consistent valve numbering system to use in the data sheets and ops diagrams system-wide.	AOC2 - R-A03 Data Sheet & Ops Diagram_CONF.pdf AOC2 - R-J11 & R-J12 Data Sheet & Ops Diagram_CONF.pdf AOC2 - R-L08 Data Sheet & Ops Diagram_CONF.pdf

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AOC	3	3. A number of valves had notes such as hard to turn, stem is broken and need to be replaced. In some case there were no correctives and in other cases there were correctives in place, but no action has been taken. Examples are valves G-34, G-35, T-27, P54, C-29, R-81, F-97 and T-37. Please provide update on actions being taken to resolve the situation, and expected deadlines.	PG&E recognizes these observations and has taken the following corrective actions: Please see below for a status update of the valves. G-34: Valve replacement is scheduled under PM 31256022 for December 2016. G-35: The valve is scheduled to be repaired by the end of 2016. F-97: PM 31277724 was created to replace the valve, the valve is scheduled to be replaced by June 2017. T-37: PM42780949 was created to uncover the valve. The project to uncover valve and perform maintenance is scheduled by 4th Quarter 2016. Below are the valves with no further actions deemed necessary. T-27: PG&E feels no additional action is necessary at this time; please see attachment "AOC3 - T-27 Valve_Card_CONF.pdf." On 12/5/14, the mechanic noted that the valve was hard to turn. The mechanic then opearated the valve 2 times and the valve became easy to turn. The valve was last operated on 12/12/15 with no issues identified. P-54: Valve was replaced under PM 31029805 on 6/2/15. Please see attachment "AOC 3 - P-54 GasOpChngForm.pdf" C-29: The valve was field verified on 9/1/16 and confirmed the grease fitting was repaired and there is no leak. Please see attachment "AOC 3 - C-29 Valve_Card_CONF.pdf" R-81: After further review, PG&E has determined that valve R-81 is no longer needed and tentatively scheduled to cut and cap the valve by July 2017. As noted above in the response to NOV 1.1, PG&E's Quality Control Group assists with record reviews of completed maintenance to ensure compliance, which includes supervisor review and approval being completed in a timely manner.	AOC3 - T-27 Valve_Card_CONF.pdf AOC 3 - P-54 GasOpChngForm_CONF.pdf AOC 3 - C-29 Valve_Card_CONF.pdf
AOC	4	4. SED observed that a number of regulator stations have issues with fresh air vent system, corrosion/painting/coating, vault lids and lock up. There are either no correctives or for some of these corrective orders in place, some dating back to 2010 /2012 but no action has been taken. It is expected that these should be remediated as soon as possible. Please provide an update on completion or expected completion dates. The examples are RA-01, RB-02, RB-05, RA-03, RA-05, RA-08, RA-18, RC-02, RC-04 and RC-05.	Please see attachment "AOC4- Reg Station Corrective Updates.xlsx" for an update on the completion and expected completion dates for the reg station correctives. As noted above in the response to NOV 1.1, PG&E's Quality Control Group assists with record reviews of completed maintenance to ensure compliance, which includes supervisor review and approval being completed in a timely manner.	AOC4- Reg Station Corrective Updates.xlsx AOC4 - RA-05 Maintenance_Record_CONF.pdf
AOC	5	5. Regulator Station, RA-01: Beaudry & Powell, Emeryville: The maintenance notes have requests for valve replacement since 2014, but still no corrective action has been taken.	The regulator station RA-01 was installed in 1964, and the date of last major alteration for the station was 2001. The valve of concern (FV-108) is an outlet fire valve and at the time of construction, the valve was not required. Please see attachment "AOC5 - H-14 Reg Sta 1986 Version_CONF.pdf." If the station were to be replaced, then the valve will meet the current standard. The initial notification for valve replacement was requested because of the valve spacing, as the pit was in close proximity of the valve. The outlet fire valve spacing requirement of 20 feet became effective in 2013 under PG&E Design Standard H-14 (step 6). The notification was cancelled because the design standard is not retroactive and does not require PG&E to bring the spacing to the current standard. The fire valve is fully operational as noted in the maintenance sheet for RA-01. Please see attachment "AOC5 - RA-01Maintenance_Record_CONF.pdf"	AOC5 - RA-01Maintenance_Record_CONF.pdf

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AOC	6	6. Regulator station, RA-03: Broadway Terrace & Pinewood, Oakland: Didn't lock up in both 2014 and 2015 inspections. The work orders have been created; please provide an update on corrective action.	I&R couldn't achieve lock-up on the monitor because of low inlet pressure. There isn't enough inlet pressure coming into this station to compress the boot on the regulator over 48 pounds. I&R can't achieve any additional pressure on inlet. PG&E is working with Regulator Experts and are trying new regulators to see if this will create enough differential to achieve lock up. As noted in AOC 4, the regulator replacement is scheduled under PM 31242323. The regulation will be installed by 4th quarter 2016.	n/a
AOC	7	7. Regulator station, R-E06: 7th St. & Gilman St., Berkeley: The folder contains notes on "missing ventilation stack" (with notification # 109198852) since the 9/6/14 inspection and an email note stating "the station will be rebuilt in 2015", however, there is no record of corrective action(s). PG&E provided information that the station will be rebuilt under work order, PM 30882899. Please provide an update.	As noted in the finding, PM 30882899 was created to rebuild the station. The station rebuild is on track to be complete by the 1st quarter of 2017.	n/a
AOC	8	8. C-86: Hillmont Drive and Altamont, Oakland: The notes show a request since 2013, "valve frame and cover needs to be re-centered". It appears that a corrective has been submitted, but there is no record of corrective action. Please provide an update.	PM 42780948 was created to re-center the valve frame and cover. The repair is scheduled to be complete by September 2017. The valve is accessible and operational. Valve is scheduled for annual maintenance 4th quarter 2016.	n/a
AOC	9	9. P-54: Congress and Foothill Blvd., Oakland: There are notes form PG&E staff, "valve stem is not fitting key correctly, corrective to replace valve" both during 2012 and 2013 inspections. There was no record of corrective action. Please provide an update.	Please refer to AOC 3 for an update on the replacement for P-54.	n/a
AOC	10	10. There were number of valves, that have notes such as "valve not taking grease" or other greasing issues, but no corrective action has been taken. Examples are: C-29, G-34, G-35, B-92, R-75.	C-29: Please refer to AOC 3 for an update on the repair. G-34: Please refer to AOC 3 for an update on the valve replacement for G-34. G-35 : Please refer to AOC 3 for an update on the valve replacement for G-35. B-92: PM31148805 was created to replace the valve, the valve is scheduled to be replaced February 2017. R-75: After further review, the valve was deactivated under PM 31148806. A new valve was installed across the street. on 1/24/16. Please see attachment "AOC10 - R-75_31148806AsBuiltDWG_CONF.pdf". A new valve card was created, please see attachment "AOC 10 - R-75 - New Valve Card_CONF.pdf" As noted above in the response to NOV 1.1, PG&E's Quality Control Group assists with record reviews of completed maintenance to ensure compliance, which includes supervisor review and approval being completed in a timely manner.	AOC10 - R-75_31148806AsBuiltDWG_CONF.pdf AOC 10 - R-75 - New Valve Card_CONF.pdf
AOC	11	11. SED observed that set points of Automatic Shutoff Valve (ASV) were not recorded on the maintenance data sheets for the following regulator stations: RA-15, RA-16, RA-17, RA-18, R-Z02, R-Z03, R-G06, A06, RA-01, RA-04and RA-08 PG&E responded that brass label tag on each equipment in the field has set point recorded on it. SED recommends that it will be helpful to have the same recorded on maintenance data sheets for the sake of the verification of records.	Currently, PG&E does not have a field within the data sheet for ASV set points. As noted in the prior response, the brass label tag indicates the set point. The recommended set points are established per Table 3, Maximum Recommended Set Points of Regulator and OPP Device. Please see attached TD-4125P-07. PG&E will add a field to the datasheet to capture the slam shut set points in the next procedure revision. An ECTS record was created to track the document change.	n/a

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AOC	12	12. SED inspected the alarm history provided for the Division. Following observations were made: (a) PG&E's standard "Alarm Definition and Rationalization Process", Section 2 lists, "2.1. Alarm Priorities" and "2.2. Response Codes", however, SED did not find a correlation between the two; it was not clear that what kind of response code will be assigned for each alarm priorities. For example, "Immediate Response" for alarms categorized as "Emergency" etc. Please provide PG&E plan to address this issue. (b) SED identified 719 alarm events categorized as 'Emergency' from the list provided. After discussions with PG&E, it was found that 64 of them didn't have any record of the cause and the actions taken to resolve. PG&E in its post-audit response has provided a list with comments. Please provide the cause of these discrete alarms and actions taken, if required.	(a) The Alarm Definition and Rationalization (ADR) Process is specifically executed to determine how the control room will respond and take action to alarm activations. The ADR Process is performed prior to allowing any new alarms being introduced into the SCADA system, ensuring Gas Control personnel can safely monitor and operate the gas system. The Alarm Prioritization (Emergency, High, Medium, Low) classifications are not directly correlated to the Alarm Response Code. Alarm Prioritizations are specific to the control center, directing control room personnel on how to manage alarms in a specific order. Alarm priority is used to guide the Operator's order of attention to alarm activations. For example, Emergency Prioritized alarms are to be worked before High Priority Alarms. Medium Priority alarms are to be worked before to Low Priority Alarms. This is in alignment with API 1167. Alarm Response Codes are an agreement between field personnel, gas control and engineering to provide recommended responses that the control room may execute in response to an alarm activation. (b) The information provided during the audit included a data extraction from the system and not necessarily alarms associated with system problems or issues. Please see attachment "AOC12 - EastBay_Alarm Update_CONF.xlsx." An additional column was added with additional comments. The discrete alarms are associated with clearances, SCADA deployment, testing indication and/or false alarms.	AOC12 - East Bay Alarms Update_CONF.xlsx

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AOC	13	13. During field inspections, following observations were made: (a) A leak was noticed on valve E-41, Alameda. The valve was also hard to turn. PG&E staff has reported a leak on this valve during maintenance inspections on 8/27/13, 9/12/14, 8/22/15. We understand that there is a corrective in place for replacement but no action has been taken. Please provide an update. (b) Regulator station DR-11 Alameda. A leak was found, and PG&E Staff mentioned that the filter is leaking and work order is in place to replace the filter and also make changes to vault for the ease of station maintenance. The station is located next to a parking lot and a busy road and hence need an urgent action. Please provide an update. (c) Valve F-97- It was found to be very hard to turn by two people even after the application of grease. The notes in the folder show that it has been very hard to turn since 2014. There is no corrective action in place. Please provide details of PG&E planned remedial action and expected completion date. (d) Regulator station R-L08 The lock-up was not achieved on both monitor and regulator. The cartridge was changed at the monitor and a diaphragm at the regulator which was due to Sulphur build-up. There has been an issue of lock-up at this station in every maintenance cycle since 2013. Therefore, special attention is needed to look at the underlying problem and take a remedial action. Please provide information on PG&E's plan to address this. In addition, the lock-up issues due to Sulphur build-up have been observed in recent and the previous years' Division audits. PG&E should make a comprehensive plan to address it at regulator station level and system-wide. Please provide information on PG&E's plan to address Sulphur build-up issue. (e) Valves H-07, H-05 and H-06 Pipe corrosion was observed at this location. PG&E mechanics stated that they have noticed corrosion but were not sure how to record this information. Therefore, mechanics need system-wide tailboards to provide instructions that all observations must be recorded, and where to record this information. In addition, these valves were found hard to turn in previous years; a contractor fixed these recently, but no records were kept which indicates a communication gap and short-coming in the record keeping.	PG&E recognizes these observations and has taken the following corrective actions: (a) Valve E-41 was determined to be a grade 2 leak. The valve is scheduled to be replaced by the end of 2017. (b) Reg Station RC-11, Webster & Atlantic Ave, Alameda. PM 31118214 was created to replace the filter. The filter was replaced in October 2016. Please see attachment "AOC13 - RC-11_Filter_As-built.pdf_CONF." Accessibility to the station has not been an issue historically. (c) Valve F-97: Please refer to AOC 3 for an update to F-97. (d) Regulator station R-L08: 3rd St and Parr Blvd, Richmond: A sulfur-gon filter will be installed at this station during the maintenance clearance. The anticipated installation date is the end of the year. DIMP has reviewed reports of sulfur build up at regulator stations from field reviews or CAP notifications and identified this as a potential threat. Review of this potential threat includes working with the Overpressure Elimination Team to develop mitigations beyond installing sulfur filters on pilots. (e) Valves H-07, H-05, H-06, Russell & Claremont, Berkeley A tailboard was provided to ensure proper documentation for issues relating to atmosphic corrosion or other issues, noted during maintenance. Please see attached Tailboard record for the Richmond office. Please see attachment "AOC13 - H-07 Valve Card_CONF.pdf." The"action taken" column indicates that repairs were completed. Contractors work with the local PG&E supervisor and/or PG&E representative for project coordination and repairs. The local PG&E supervisor is aware of the construction and ensures the repairs are documented on the valve card.	AOC13 - RC-11_Filter_As-built_CONF.pdf AOC13 - Richmond_Tailboard_Redacted.pdf AOC13 - H-07 Valve Card_CONF.pdf