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July 26, 2017

Mr. Ken Bruno
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 Audit – PG&E’s Emergency Response Plan Program Audit

Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the CPUC conducted a General Order 112 audit of PG&E’s Emergency Response Plan Program Audit from August 1, 2016- August 5, 2016. On June 27, 2017, the SED submitted their audit report, identifying findings. Below is PG&E’s response to the CPUC audit report.

Please contact Enza Barbato at (925) 357-7889 or E1Bo@pge.com for any questions you may have regarding this response.

Sincerely,

/S/
Mike Bradley

cc: Durga Shrestha, CPUC
Aimee Cauguiran, CPUC
Dennis Lee, CPUC
Terence Eng, CPUC
Susie Richmond, PG&E

I. Areas of Concern and Recommendations (AOCs)-AOC 1

SED reviewed the Gas Emergency Response Plan (GERP) Version 5.0 dated December 31, 2015 including scenario specific training aids in Appendix B of the GERP and the Well Control Tactical Considerations Plan. During the inspection, SED and PG&E discussed the potential for a flood emergency at the McDonald Island storage facility located in the Sacramento-San Joaquin River Delta. SED recommends that PG&E incorporate a flooding scenario for gas storage into the GERP and also identify any additional common and potential emergency scenarios for gas storage facilities.

PG&E's Response:

PG&E's Gas Emergency Response Plan (GERP) Version 6.0 has been updated to include, as part of the Well Control Tactical Considerations ,additional site specific planning for a well blow out scenario, surface intervention considerations, and relief well planning. As part of the relief well planning a database of existing well locations and configurations was developed to aid in expediting the development of a relief well plan.

PG&E GERP Version 6.0 as modified, addresses the many potential emergency scenarios for the gas storage facilities. Storage well events, including severe weather management, have been included in classification of Emergency levels and Response Aids (Formerly Job Aids) modified for Gas Storage Facility Fire or Uncontrolled Release of Gas from Storage Well.

Definitions: NOV – Notice of Violation
 AOC – Area of Concern