



Mike Bradley  
Senior Manager  
Compliance  
Gas Operations

6121 Bollinger Canyon Rd.  
San Ramon, CA 94583  
Phone: 925.328.5724  
E-mail: M0BJ@pge.com

June 15, 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 East Bay Division

Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the CPUC conducted a General Order 112 audit of PG&E’s East Bay Division from February 6-8 & March 8-9, 2017. On May 19<sup>th</sup>, 2017, the SED submitted their audit report, identifying violations and findings. Attached is PG&E’s response to the CPUC audit report.

Please contact Stephen Ramos at (925) 413-7311 or s3rc@pge.com for any questions you may have regarding this response.

Sincerely,

/S/  
Mike Bradley

Attachments

cc: Mohammad Ali, CPUC  
Dennis Lee, CPUC  
Aimee Cauquiran, CPUC  
Terence Eng, CPUC  
Susie Richmond, PG&E

**2017 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		Prior to 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 audit related violations from PG&E's internal review.	There are no pending actions from the Internal review findings for the East Bay Division.	n/a
NOV	1	<p>1. Title 49 Code of Federal Regulation §192.707: Line markers for mains and transmission lines states:</p> <p>(a) Buried pipelines. Except as provided in paragraph (b) of this section, a line marker must be placed and maintained as close as practical over each buried main and transmission line:</p> <p>(1) At each crossing of a public road and railroad; and</p> <p>(2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference....</p> <p>a) During SED's field inspection of transmission line on route 0126-01 (1410 Kelsey Street, Richmond), no visible line markers or decals were observed within five blocks from the pipeline. The 22" Transmission line runs along Gertrude Ave. and was asphalt paved. Therefore, PG&amp;E is in violation of CFR §192.707(a).</p> <p>b) During SED's field inspection of transmission line on route 105A (920 Allston Way, Berkley), no visible line markers or decals were observed within five blocks from the pipeline. The line runs along 7th Street between Allston Way and Parker Street and was asphalt paved. Therefore, PG&amp;E is in violation of CFR §192.707(a).</p> <p>c) During SED's field inspection of transmission line on route 105A (515 Silver Ave, Richmond), no visible line markers or decals were observed within five blocks from the pipeline. The 24" transmission line runs along Market Street through the residential areas. Therefore, PG&amp;E is in violation of CFR §192.707(a).</p> <p>d) During SED's field inspection of transmission line on route identified as DREG 4275 (1528 Pomona Street, Crockett), no visible line markers or decals were observed within five blocks from the pipeline. The pipeline was roughly identified by a small temporary yellow flag on the ground. Therefore, PG&amp;E is in violation of CFR §192.707(a).</p> <p>PG&amp;E responded to the findings noted above [1(a) – 1(d)] that they will need to follow up the issues with a Subject Matter Expert (SME) for an explanation and response. PG&amp;E also indicated that exceptions stated in §192.707 may provide a part of the explanation. As of today, SED has not received any response from PG&amp;E. PG&amp;E is in violation of the aforementioned code sections.</p>	PG&E respectfully disagrees with this finding. The four locations identified were confirmed to be transmission lines in Class 3 locations and in an area where it is impractical to install line markers, therefore it meets the exception requirement of 192.707(b)(4).	n/a
AOC	1.1	1) During SED's leak survey field inspection on 3/8/17, PG&E could not locate the service addresses of 1207 16th Ave. and 1223 16th Ave. in Oakland, listed on PG&E's plat map 7F08-76, published on 10/01/2014. However, PG&E performed a leak survey on a nearby gas service located at 1223 16th Street, Oakland instead. Please explain the discrepancy of the addresses on the plat map.	<p>PG&amp;E determined that the discrepancy was an incorrect address on the plat map. The location was field verified and the map was updated accordingly. Please see attached "MapCorrection_16th Ave_CONF.pdf" for a copy of the map correction form and "Updated Plat Map_16th_Ave_CONF.pdf" for a copy of the updated plat map.</p> <p>Please note that 1223 16th ave was locatable, and a leak survey was performed during the field visit.</p>	MapCorrection_16th Ave_CONF.pdf Updated Plat Map_16th_Ave_CONF
AOC	1.2	2) During SED's leak survey field inspection on 3/8/17, a gas leak was encountered at 1622 E. 12th Street in Oakland. The Leak Surveyor identified the leak inside a curb meter box located within 5 feet of a building, and classified the leak as Grade 1 per PG&E Procedure TD-4110P-09, Section 4.1. PG&E leak surveyed this service on 2/3/2016 and the next leak survey is due by May of 2017. The Leak Surveyor reported the leak to General Construction (GC). GC personnel arrived at the site within an hour. PG&E, upon further investigation of the leak condition, determined that the measured gas was due to the venting of gas from the regulator. PG&E downgraded the leak to Grade Zero and no repairs were needed. SED requests a response on how PG&E plans to reduce accumulation of venting gas in the meter box.	PG&E respectfully disagrees with this concern. The measured gas was due to the venting of gas from the regulator as designed. In addition, the gas reading was determined to be aboveground and the facility is designed to be exposed to atmosphere. PG&E Design Standard "J-14.1 - Curb Meter Installations.pdf," Step 5 discusses the design requirements for the regulator vents terminus for curb meter installations. PG&E Design Standard "J-15 - Gas Meter Locations.pdf" discusses the meter set clearance requirements, including service regulator vents. Following the requirements in Design Standard J-14.1 and J-15 will reduce the accumulation of vented gas out of the meter box.	J-14.1 - Curb Meter Installations.pdf J-15 - Gas Meter Locations.pdf

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Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
AOC	1.3	3) During SED’s record review of Plat maps IB13, IC10, and IC12, SED observed that several gas services in the cities of Richmond and San Pablo were not leak surveyed in 2014 or 2016. PG&E responded indicating that these services were not leak surveyed due to a Business District and Public Assembly (BD/PA) revision. Please provide SED with the effective date of the BD/PA revision.	The first system-wide BD/PA update was completed on 12/31/2015. The enhanced update, which further identified BD/PA locations, was completed on 6/6/16.	n/a