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January 19, 2021

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

Re: General Order (GO) 112-F Compliance Inspection of Pacific Gas and Electric Company’s Emergency Response Program

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to the Post-Inspection Written Preliminary Findings (Summary), dated December 28, 2020, stemming from the one week Emergency Response Program inspection which took place on October 19 to October 23, 2020. For clarity, each Summary item identified will be repeated, followed by PG&E's response. Pursuant to I.19-06-015: 2017 NORTH BAY FIRES / 2018 CAMP FIRE OII (System Enhancement Initiative No. 15), attached is the leadership assertion verification (*Att-1*), along with other supporting documents.

Unsatisfactory Result:

None.

Response to Unsatisfactory Result:

None.

Concern #1:

Question Text	Does the process include procedures for beginning action under 192.617, if applicable, as soon after the end of the emergency as possible?
References	192.615(a) (192.615(a)(10))
Issue Summary	During record review, SED noted that PG&E's Gas Emergency Response Plan (GERP) Response aids A and B mention “Preserve Gas Facilities for potential investigation and maintain chain of custody” and “Preserve and maintain any photos or documents from scene.” In an email response to a data request PG&E elaborated that the evidence gathering process would be conducted per the chain of custody procedure TD-4100P-14. PG&E also explained that once pipe is preserved, assuming there was no legal or regulatory hold, they would conduct a technical investigation/analysis using the processes addressed in TD-4810P-26. Although those documents serve as the procedure for chain of custody and root cause analysis, PG&E's GERP does not have any reference to those documents with respect to the process of incident investigation after the end of the emergency. Therefore, SED suggests that PG&E add references to both of those procedures to the GERP to demonstrate compliance of 192.615(a)(10) and 192.617.

Response to Concern #1:

PG&E recognizes this concern and has taken steps to demonstrate compliance with 192.615(a)(10) and 192.617 by updating the Gas Emergency Response Plan (GERP). Version 10 GERP now features Section 1.8, "Incident Investigation," which details the background of the regulatory requirement and PG&E's process to meet the requirement. Additionally, PG&E Utility Procedures TD-4100P-14 "Removing, Documenting, and Preserving Gas Transmission Pipe and Components," and TD-4810P-26 "Direct-Cause and Root-Cause Analysis," along with other relevant procedures have been added as references. Please see "Att 2 - GERP V10 Final_Incident Investigation" for the updated GERP cover page with its new effective date, table of contents listing Section 1.8, and Section 1.8's Incident Investigation content.

Please contact Alberta Ekukinam at (415) 961-8923 or u.alberta.ekukinam@pge.com for any questions you may have regarding this response.

Sincerely,

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

CC: Susie Richmond, PG&E
Michelle Wei, SED/GSRB
Kan Wai Tong, SED/GSRB
Kelly Dolcini, SED/GSRB
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