

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 9, 2021

Christine Cowsert  
VP, Gas Asset Management and System Operations  
Pacific Gas and Electric Company  
Gas Transmission and Distribution Operations  
6121 Bollinger Canyon Road  
San Ramon, CA 94583

GI-2020-11-PGE-29-05

**Subject: General Order (G.O.) 112-F Compliance Inspection of Pacific Gas and Electric Company's Public Awareness Program**

Dear Ms. Cowsert:

The Safety Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F inspection of Pacific Gas and Electric Company's (PG&E) Public Awareness Program on November 2-6, 2020. The inspection included a review of PG&E's records from calendar years 2016 to 2019. SED used the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety's "Inspection Assistant Form" as a reference guide to conduct the inspection. SED reviewed records remotely during this inspection due to COVID-19 and California Governor Newsom's Executive Order N-33-20 ("Safer at Home, Stay at Home"), shelter in place, and social distancing guidelines.

SED staff noted one probable violation which is described in the enclosed "Summary of Inspection Findings". Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by PG&E to address the concern.

If you have any questions, please contact Michelle Wei, at (213) 620-2780 or by email: miw@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Terence Eng".

Terence Eng, P.E.  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

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

# Post-Inspection Written Findings

**Dates of Inspection:** 11/2-6/2020

**Operator:** PACIFIC GAS & ELECTRIC CO

**Operator ID:** 15007 (primary)

**Inspection Systems:** PG&E Public Awareness Program

**Assets (Unit IDs):** Main Office (Specialized Inspections) (86283)

**System Type:** GT

**Inspection Name:** PG&E PAP

**Lead Inspector:** Michelle Wei

**Operator Representative:** Sajjad Azhar

## Unsatisfactory Results

### A. Public Awareness and Damage Prevention : Public Awareness (PD.PA)

Question Text Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?

References 192.616(c) (API RP 1162 Section 6.2)

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary PG&E failed to meet all supplemental program enhancements as required by Reference Title 49 CFR, Part 192.616(c) which states that "The operator must follow the general program recommendations, including baseline **and supplemental** requirements of API RP 1162... (emphasis added)." API RP 1162, Table 2-1.3 - Local Public Officials states that operators should annually provide HCA information via personal contact with the public officials as part of the supplemental messaging. SED believes that the supplemental program enhancements listed in API RP 1162 are required if applicable to the operator as per §192.616(c). Or if the operator chooses not to include them in their program, they need to justify why it is "not practicable and not necessary for safety" per §192.616(c).

PG&E does list Face-to-Face meetings as a possible supplemental activity in Appendix 8: Supplemental Outreach Activities and Triggers, Table C-4 of their Public Awareness Plan (PPAP-10\_21\_2020). SED requested that PG&E provide a record of all meetings that would fall under that line item in Appendix 8, Table C-4 during our audit review period. Upon review of the response, SED noted that PG&E did not meet annually with each local public official with an HCA within their jurisdiction to discuss baseline and supplemental safety messages, either at the city or county level, as required by API RP 1162 Table 2-1.3. Therefore, SED found PG&E in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.616(c) for failing to meet or offer to meet with public officials in each county where they have an HCA.

# **Concerns**

**No Preliminary Concerns.**