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April 8, 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 Gas Inspection of PG&E Public Awareness Program

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to Post-Inspection Written Preliminary Findings (Summary), dated March 9, 2021. The actual inspection was held between November 2, 2020 and November 6, 2020.

**Unsatisfactory Result:**

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)

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.

**Response to Unsatisfactory Result:**

*Per API RP 1162, Table 2-1.3 Public Awareness Communication to Local Public Officials PG&E is required to send targeted printed materials as a baseline activity with a baseline frequency of 3 years. PG&E records indicate that each of the HCA counties are annual recipients of PG&E's official mailing that exceeds the baseline requirement. Please see attached spreadsheet for list of all counties that received PG&E public outreach letter in 2019 (the spreadsheet lists each organization and their point of contact).*

Please contact Sajjad Azhar at (415) 418-9046 or slat@pge.com for any questions you may have regarding this response.

Sincerely,

/s/ Vincent Tanguay

Director, Risk, Compliance, & Oper. Qual.

cc: Dennis Lee, SED  
Joel Tran, SED  
Michelle Wei, SED/GSRB  
Andrew Kwan, SED  
Vince Tanguay, PG&E  
Susie Richmond, PG&E