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July 27, 2017

Mr. Ken Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 W. Fourth Street, Suite 500
Los Angeles, CA 90013

Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112 Inspection and CA Public Utilities Code Section 950, 955, 956, 956.5 of San Diego Gas and Electric (SDG&E) Emergency Management Program from October 10 - 13, 2016. The inspection included a review of emergency management procedures and 2015 records.

SED staff identified two areas of concern. Attached are SDG&E's written responses.

Please contact Troy A. Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,



Troy A. Bauer

CC:

ATTACHMENT

SUMMARY OF INSPECTION FINDINGS

I. Areas of Concern and Recommendations (AOCs)

AOC 1

SED visited SDG&E's Emergency Operation Center (EOC) and reviewed hard copy procedure binders located in the EOC. SED found some hard copy procedures dated to year 2001. SDG&E explained that staff has access to the most current emergency procedures electronically during EOC activation. SED recommends that SDG&E also update the hard copy procedures available to staff in the EOC to the most current version.

Response:

Effective 12/31/2016 a new process was implemented in the Emergency Operations Center (EOC) to mitigate the area of concern. It is now required that each Position Lead review their position specific electronic documents in WebEOC, as well as the documents in the hard copy procedure binders to ensure documents align, account for the review of all documents, and finally, account for any material changes made to process or procedures. Upon review the Position Lead will complete a 'Annual Review Attestation Form' confirming the procedures have been reviewed, and identify whether any material changes were necessary. If material changes were made to procedures or reference documents, those changes will be notated on the Attestation Form. The Attestation Form is found at the beginning of all EOC Position Binders and includes the following:

1. Reviewers Name
2. EOC Position Lead
3. Date of Review
4. Confirmation whether material changes were made
5. If material changes made, identify the document changed
6. Next review date
7. Reviewer/s Signature

Additionally, this process has been added to the SDG&E Corporate Emergency Response Plan as an annual compliance review required by EOC Position Leads no later than December 31st of the current review year. In the first quarter of 2017, all EOC Responders were trained to this new process as part of their annual EOC Responder Refresher training.

Finally, all hard copy EOC Position Reference Binders have been updated with a completed attestation form for 2017 review.

AOC2

SED reviewed the call center dispatch process used to receive, identify and classify notices of events. When customers call to report an event, SDG&E call center employees follow the “*Gas Leak Flow Chart*” to identify and classify the event, provide safety messaging and instructions to the customer and issue a service order to respond to the event. Notices of events are categorized as emergency events, hazardous events and non-hazardous events. For example, one type of emergency event is a broken pipe with escaping natural gas. Service Dispatch then dispatches employees to the field using the service order. The first qualified employee dispatched on scene is to conduct an on-site evaluation of the potential hazards to life and property. The “*Gas Leak Flow Chart*” did not include a step to notify first responders of emergencies. SED recognizes that each notice of an event is unique and can differ in the level of potential hazard to life and property or be classified as non-hazardous. However, for emergencies where a significant hazard has been reported, SED recommends that SDG&E notify the appropriate first responders of the emergency as soon as possible.

Response:

SDGE agrees with SED’s recommendation however, the responsibility lies with dispatch and not the call center. As part of our ongoing collaboration with local first responder agencies, we established an agreement, effective 5/15/2017, with the San Diego County Fire Chiefs Association for notification during incidents. This agreement outlines a process for Service Dispatch to contact the appropriate fire agency responsible for the area in which the emergency is reported when certain criteria are met. This will allow fire agencies to respond to those locations for events where the customer has called SDG&E instead of 911 or fire first. Please see attached process now being used by Service Dispatch.