



Michael Falk
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October 9, 2015

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: California Public Utilities Commission
Response to September 9, 2015 Cross Bore Inspection Potential Violation Letter (GW-2015-01)

Dear Mr. Bruno:

This letter is in response to the Safety and Enforcement Division's (SED) letter dated September 9, 2015 regarding PG&E's cross bore inspection program.

In its letter, the SED found PG&E in violation of:

Title of 49 Code of Federal Regulations (49 CFR) §192.805(b) which states:
"Ensure through evaluation that individuals performing covered tasks are qualified;"

SED's Findings: SED's investigation found that contract personnel performing "proximity clearances" as part of PG&E's cross bore inspection program were not qualified to perform the inspections under the Operator Qualification (OQ) rule. SED staff believes these "proximity clearances" are a covered task as defined in Title 49, Code of Federal Regulations (CFR), §192.801(b)."

PG&E's Response: PG&E developed and maintains two qualifications for locate and mark activities. OQ task 05-01 is used for production locate and mark activities where the location information obtained will be used to guide excavation activities in accordance with the Underground Service Alert requirements. PG&E also developed and maintains a non-USA production locate and mark OQ task 05-04, which is used for locating for purposes other than completing a USA request. This non-production task is used for occasions such as a gas crew foreman locating gas facilities for decisions about excavating for tie-in points.

The PG&E cross bore program performs proximity clearances to identify the approximate location of PG&E's distribution gas lines in relation to sewer lines as part of the assessments being performed for the program rather than in preparation for excavation as is the case with a non-production task. In the interest of continuous improvement of the Cross Bore Program, PG&E will use locate and mark Operator Qualified employees to perform proximity clearances on a going forward basis. Additionally, PG&E will revisit the locations that were previously determined not to have a cross bore through a proximity clearance and perform the proximity clearance with locate and mark Operator Qualified personnel.

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We would welcome the opportunity to meet with you and your team to further discuss our corrective actions. In the interim, should you have any questions, please do not hesitate to contact Cheryl Dizon at (925) 328-5721 or at C1DZ@pge.com or Raymond Thierry at (925) [925-328-5936](tel:925-328-5936) or at RXT5@pge.com.

Sincerely,

/S/
Michael Falk
Director, Compliance

cc: Aimee Cauguiran, CPUC
Paul Penney, CPUC

Cheryl Dizon, PG&E
Larry Deniston, PG&E
Raymond Thierry, PG&E