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By Email

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: Response to August 23, 2017 – Notice of Gas Incident Violation for Pacific Gas and Electric Company – Deer Park (dated 08/10/2016)

Dear Mr. Bruno:

This letter is in response to the Safety and Enforcement Division's (SED) letter dated August 23, 2017 regarding a house fire incident that occurred on August 10, 2016 in the city of Deer Park.

In its letter, SED found PG&E in violation of the following sections of Title 49 of the Code of Federal Regulations (CFR) Part 192:

Title 49 CFR §49 CFR 192.605(a) states:

“General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.”

Title 49 CFR §49 CFR 192.805(f) states:

“Each operator shall have and follow a written qualification program. The program shall include provisions to...communicate changes that affect covered tasks to individuals performing those covered tasks”

Title 49 CFR §49 CFR 192.805(b) states:

“Each operator shall have and follow a written qualification program. The program shall include provisions to...ensure through evaluation that individuals performing covered tasks are qualified [from §192.803: Qualified means that an individual has been evaluated and can: (a) Perform assigned covered tasks; and (b) Recognize and react to abnormal operating conditions.]”

Title 49 CFR §49 CFR 192.801(b) states:

“For the purpose of this subpart, a covered task is an activity, identified by the operator, that: (1) Is performed on a pipeline facility; (2) Is an operations or maintenance task; (3) Is performed as a requirement of this part; and (4) Affects the operation or integrity of the pipeline.”

Title 49 CFR §49 CFR 192.481(a) states:

“Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows: If the pipeline is located onshore, then the frequency of inspection is at least once every 3 calendar years, but with intervals not exceeding 39 months.

Please find attached PG&E’s response and supporting documents to the CPUC NOPV letter.

This response contains information that should remain confidential and not be subject to public disclosure; see attached for PG&E’s declaration supporting confidential designation for additional detail (“Index 11290_Confidentiality Declaration.pdf”). Confidential information is highlighted yellow or outlined red within the referenced document(s).

Sincerely,

/s/ Mike Bradley
Senior Manager, Compliance

cc: Dennis Lee, CPUC
Aimee Cauguiran, CPUC
Terence Eng, CPUC
Susie Richmond, PG&E