

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 20, 2014

Mr. Sumeet Singh, Vice President  
Pacific Gas and Electric Company  
Gas Asset and Risk Management  
6111 Bollinger Canyon Road, Office #4590-D  
San Ramon, CA 94583

GA2013-28

SUBJECT: General Order 112-E of PG&E's Public Awareness Program

Dear Mr. Singh:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Terence Eng, Fred Hanes, and Sikandar Khatri conducted a General Order 112-E audit of Pacific Gas and Electric Company's (PG&E) Public Awareness Program (PAP) on December 9 - 11, 2013.

During the audit, SED staff reviewed PG&E's PAP plan (RMP-12) and implementation records such as the stakeholder lists and messages. In addition, SED reviewed PG&E's most recent PAP annual reports. SED staff used the Pipeline and Hazardous Materials Safety Administration (PHMSA) Public Awareness Program Effectiveness Inspection Form (Form 21) as a reference guideline to conduct the audit.

Attached is a Summary of SED's audit findings, which contains the violations and areas of concerns identified by SED during the audit. Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the violation and recommendations noted in the Summary.

Pursuant to Commission Resolution ALJ-274, SED staff has the authority to issue citations for each violation found during the audit. SED will notify PG&E of the enforcement action it plans to take after it reviews PG&E's audit response.

If you have any questions, please contact Terence Eng at (415) 703-5326 or by email at [terence.eng@cpuc.ca.gov](mailto:terence.eng@cpuc.ca.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Robertson".

Michael Robertson  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: PG&E PAP Audit Summary

cc: Frances Yee, PG&E Gas Engineering and Operations  
Larry Berg, PG&E Gas Regulatory Support  
Larry Deniston, PG&E Gas Regulatory Support  
Dennis Lee, SED  
Aimee Cauguiran, SED  
Terence Eng, SED

**PG&E PAP Audit Summary**  
**December 9-11, 2013**

1. Audit Findings Identified in Protocol 1.04, Stakeholder Audience Identification Reference Title 49, Code of Federal Regulations (CFR) § 192.616 (d), (e), (f); American Petroleum Institute Recommended Practice (API RP) 1162 Section 2.2 and Section 3

*Does the operator's program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?*

A. In PG&E's Risk Management Procedure (RMP)-12, Appendix A Baseline: Stakeholder Definitions, Identification and Outreach table, PG&E explicitly states for each stakeholder audience how often the audience will be identified with the following exceptions:

- i. Affected Public – Residents, Business, or places of congregation located within 1000' feet of Transmission Pipeline
- ii. Affected public - Residents, Business, or places of congregation located within 1000' feet of a Gathering Pipeline
- iii. Excavators

SED recommends PG&E explicitly state how often PG&E will identify the individual stakeholders for the aforementioned stakeholder groups.

B. PG&E verbally indicated that it will perform an analysis whenever a stakeholder list from one year to the next differs by more than 10% to determine the underlying cause. To ensure thoroughness and consistency, SED recommends that PG&E consider documenting its procedure for performing the analysis and to include at a minimum the process, roles, and responsibilities. PG&E should maintain records of the analysis and its findings.

2. Audit Findings Identified in Protocol 1.06, Written Evaluation Plan Reference Title 49, CFR § 192.616 (c), (i)

*Does the operator's program include a written evaluation process that specifies how the operator will periodically evaluate program implementation and effectiveness? If not, did the operator provide justification in its program or procedural manual?*

PG&E's RMP-12 (Public Awareness Program Standard) states that the margin of error thresholds are in conjunction with advice from research firms and internal subject matter experts. SED recommends PG&E consider including in its standard, or as an appendix to the standard, the thought process behind each threshold, industry standards referenced (if applicable), and identification of the research firms and subject matter experts consulted.

3. Audit Findings Identified in Protocol 2.01, English and other Languages  
Reference Title 49, CFR § 192.616 (g); API RP 1162 Section 2.3.1

*Did the operator develop and deliver materials and messages in English and in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

PG&E's RMP-12 states that the PAP administrator will monitor changes in languages using United States Census data and will recommend any changes through the annual review or program effectiveness report, but does not explicitly state how often Census data will be polled. SED recommends PG&E explicitly state in its RMP how often it polls census data.

4. Audit Findings Identified in Protocol 2.02, Message Type and Content  
Reference Title 49, CFR § 192.616 (d)

*Did the messages the operator delivered specifically include provisions to educate the public, emergency officials, local public officials, and excavators on the:*

- *Use of a one-call notification system prior to excavation and other damage prevention activities;*
- *Possible hazards associated with unintended releases from a gas, hazardous liquid, or carbon dioxide pipeline facility;*
- *Physical indications of a possible release;*
- *Steps to be taken for public safety in the event of a gas, hazardous liquid, or carbon dioxide pipeline release; and*
- *Procedures to report such an event (to the operator)?*

A. SED recommends PG&E consider explicitly stating the requirement to hand dig around pipe on the Bill Insert for Affected Public.

B. On PG&E's School Transmission Line Safety Handout, the National Pipeline Mapping System link is labeled correctly as [www.npms.phmsa.gov/PublicViewer](http://www.npms.phmsa.gov/PublicViewer). Since the link does not work when lower-case letters are input, SED recommends PG&E consider adding a notation to indicate that the website address is case-sensitive.

C. Pipeline Emergency Response Guidelines, page 11, incorrectly states, "Ethane is an isomer." PG&E needs to revise or remove this statement because Ethane is not an isomer.

D. Pipeline Emergency Response Guidelines, page 3, ambiguously states, "Despite statistics, accidents can happen". SED recommends PG&E elaborate the term "statistics", e.g. statistics that show that pipelines are one of the safest modes of transportation.

E. "2013 Excavation Guide for Excavators" is missing Item 7 (Gathering Pipeline Location and Purpose) on the message map.

5. Audit Findings Identified in Protocol 2.05, Considerations for Supplemental Program Enhancements, Reference Title 49, CFR § 192.616 (c); API RP 1162 Section 6.2

*Did the operator consider, along all of its pipeline systems, relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stakeholder audience?*

SED recommends PG&E consider alternative means to remind excavators of the hand dig requirements. For example, after PG&E marks their facilities in response to an Underground Service Alert ticket, PG&E should consider, when submitting a positive response to the third party, including a reminder to hand dig where necessary.

6. Audit Findings Identified in Protocol 2.06, Maintaining Liaison with Emergency Response Officials, Reference Title 49, Code of Federal Regulations CFR § 192.616 (c); API RP 1162 Section 4.4

*Did the operator establish and maintain liaison with appropriate fire, police, and other public officials to: learn the responsibility and resources of each government organization that may respond, acquaint the officials with the operator's ability in responding to a pipeline emergency, identify the types of pipeline emergencies of which the operator notifies the officials, and plan how the operator and other officials can engage in mutual assistance to minimize hazards to life or property?*

PG&E currently reaches out to different agencies to provide emergency training, but with limited scheduling and tracking documentation, the process appears to be rudimentary. SED recommends PG&E consider creating a database of agencies intended for outreach, including when each agency had received emergency training, and when they are due for future training.

7. Audit Findings Identified in Protocol 4.02, Measure Program Outreach Reference Title 49, CFR § 192.616 (c); API RP 1162 Section 8.4.1

*In evaluating effectiveness, did the operator track actual program outreach for each stakeholder audience within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?*

Page 21 of PG&E's RMP-12 indicates that PG&E may use online surveys and online panels to assess message comprehension and understanding, yet PG&E verbally indicated that it has not exercised nor thoroughly examined these options. SED recommends PG&E consider examining the feasibility and applicability of online surveys and panels for different stakeholder audiences.

8. Audit Findings Identified in Protocol 4.06, Measure Bottom-Line Results  
Reference Title 49, CFR § 192.616 (c); API RP 1162 Section 8.4.4

*In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines? If not, did the operator provide justification in its program or procedural manual?*

- A. PG&E must explicitly provide a means to track reported pipeline damage occurrences that did not result in a release of gas. This is a violation of Title 49, CFR § 192.616 (c).
- B. SED recommends PG&E explicitly define “near miss” in its RMP.
- C. SED recommends PG&E consider tracking the number of incidents reported due to media coverage to correlate with the affected public’s perception of the safety of PG&E’s pipelines.