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February 28, 2014

Mr. Mike Robertson
Gas Safety and Reliability Branch
Consumers Protection and Safety Division
California Public Utilities Commission
320 West 4th Street, Suite 500
Los Angeles, CA. 90013

Re: State of California – Public Utilities Commission
General Order 112-E Audit – PG&E’s Mission Division

Dear Mr. Robertson:

The Safety and Enforcement Division (SED), Gas Safety and Reliability Branch (GSRB) of the CPUC conducted a General Order 112-E audit of PG&E’s Mission Division, from July 15- 19, 2013. On January 28, 2014, the SED submitted their audit report, identifying violations and findings. Attached is PG&E’s response to the CPUC audit report.

Please contact Charles Chang at (925) 328-5727 or CYC8@pge.com for any questions you may have regarding this response.

Sincerely,

A handwritten signature in cursive script that reads 'Larry Deniston for'.

ChristiAne Mason
Senior Manager, Regulatory & Field Compliance

Attachments

cc: Aimee Cauguiran, CPUC
Dennis Lee, CPUC
Liza Malashenko, CPUC

Larry Berg, PG&E
Larry Deniston, PG&E
Bill Gibson, PG&E
Sumeet Singh, PG&E

**General Order 112-E Findings
CPUC Inspection Report, dated January 28, 2014
Mission Division**

INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
July 15- 19, 2013	Internal Review	Aimee Cauguiran	(415) 703-2055

INSPECTION FINDING

CPUC Finding	<p>A. <u>PG&E Internal Audit Findings</u></p> <p>Prior to start of the audit, PG&E provided the results of their internal audit of the Mission Division’s (Division) records. Many of PG&E’s internal audit findings are violations of PG&E’s own standards, and therefore a violation of Title 49 Code of Federal Regulations (CFR) §192.13(c) or §192.605(a). Other issues found are violations of Title 49 CFR 192 as shown in the following Table.</p> <p>SED notes that the Division corrected several of PG&E’s internal audit findings and addressed others during their subsequent scheduled maintenance. Please provide updates on items that were still pending corrective actions as of the last day of the audit.</p> <p style="text-align: center;">PG&E’s Internal Audit Findings</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">GO-112E Section or 49 CFR Part 192</th> <th style="text-align: center;">Topic</th> <th style="text-align: center;"># of Violations</th> <th style="text-align: center;"># of Violations Corrected</th> <th style="text-align: center;"># of Pending Corrections (as of 7/19/2013)</th> </tr> </thead> <tbody> <tr> <td>192.723(b)(1) and 192.723(b)(2)</td> <td>Distribution Leak Survey (2010-2011) – Missed or Late Surveyed</td> <td style="text-align: center;">58</td> <td style="text-align: center;">58</td> <td style="text-align: center;">0</td> </tr> <tr> <td>192.605(a)</td> <td>Distribution Leak Survey and Repairs (2010-2012) – Daily Leak Logs missing information, missing USA info</td> <td style="text-align: center;">61</td> <td style="text-align: center;">61</td> <td style="text-align: center;">0</td> </tr> <tr> <td>192.703(c)</td> <td>Distribution Leak Repairs (2010-2012) – Late Repair</td> <td style="text-align: center;">160</td> <td style="text-align: center;">160</td> <td style="text-align: center;">0</td> </tr> <tr> <td>192.481</td> <td>Atmospheric Corrosion Monitoring (2010) – Not inspected, corrective action not completed</td> <td style="text-align: center;">9</td> <td style="text-align: center;">9</td> <td style="text-align: center;">0</td> </tr> <tr> <td>192.605(a) and 192.467</td> <td><u>Casings not monitored annually</u></td> <td style="text-align: center;">147</td> <td style="text-align: center;">147</td> <td style="text-align: center;">0</td> </tr> <tr> <td>192.465(a)</td> <td><u>10%ers (2010) – less than 10% of total population monitored in 2010</u></td> <td style="text-align: center;">9</td> <td style="text-align: center;">9</td> <td style="text-align: center;">0</td> </tr> <tr> <td>192.605(a)</td> <td><u>Missing pre/post rectifier reads, no actions, CPA resurvey conducted beyond 6-years, missing calibration records for P/S electrode</u></td> <td style="text-align: center;">36</td> <td style="text-align: center;">36</td> <td style="text-align: center;">0</td> </tr> <tr> <td>192.605(a)</td> <td><u>Regulator station</u></td> <td style="text-align: center;">1</td> <td style="text-align: center;">1</td> <td style="text-align: center;">0</td> </tr> </tbody> </table>					GO-112E Section or 49 CFR Part 192	Topic	# of Violations	# of Violations Corrected	# of Pending Corrections (as of 7/19/2013)	192.723(b)(1) and 192.723(b)(2)	Distribution Leak Survey (2010-2011) – Missed or Late Surveyed	58	58	0	192.605(a)	Distribution Leak Survey and Repairs (2010-2012) – Daily Leak Logs missing information, missing USA info	61	61	0	192.703(c)	Distribution Leak Repairs (2010-2012) – Late Repair	160	160	0	192.481	Atmospheric Corrosion Monitoring (2010) – Not inspected, corrective action not completed	9	9	0	192.605(a) and 192.467	<u>Casings not monitored annually</u>	147	147	0	192.465(a)	<u>10%ers (2010) – less than 10% of total population monitored in 2010</u>	9	9	0	192.605(a)	<u>Missing pre/post rectifier reads, no actions, CPA resurvey conducted beyond 6-years, missing calibration records for P/S electrode</u>	36	36	0	192.605(a)	<u>Regulator station</u>	1	1	0
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	and 192.739(a)	<u>maintenance – working and standby runs not swapped during maintenance</u>			
	192.605(a) and 192.747(b)	<u>Valve Maintenance – inoperable valve not repaired or no alternate valve designated, valves requiring lubrication not lubricated, improper documentation of maintenance</u>	4	4	0
	192.727 and 192.605(a)	<u>Review of idle gas stubs not conducted to determine need</u>	272	0	272
	192.605(a)	<u>Instrument Calibration (2010-2012) – missing records</u>	464	464	0
	192.615(e) and 192.605(a)	<u>2010 Emergency Exercise – no record of attendees</u>	1	1	0

PG&E RESPONSE

As noted above, PG&E has corrected many of the internal audit findings. An update to the pending item is described below:

Idle Stubs Review not completed by Engineering within Required Timeframe

PG&E is in the process of reviewing all idle stubs in Mission Division in accordance with Utility Procedure TD-9500P-16, “Deactivation and/or Retirement of Underground Gas Facilities.” Of the 272 idle stubs reported as overdue in the internal review summary, 124 have been reviewed as of February 12, 2014. By July 31, 2014, PG&E will complete the reviews for all Mission Division idle stubs.

A long-term preventative measure to ensure gas service stubs are identified and reviewed per TD-9500P-16 will be the implementation of the Pathfinder Program. Pathfinder will use a Geographical Information System (GIS) to store gas assets data, and will interface with SAP for scheduling of certain maintenance activities such as the review of service stubs. The Pathfinder Program is expected to be fully functional by the end of 2015.

ATTACHMENTS

Attachment #	Title or Subject
None	

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ACTION REQUIRED

Action To Be Taken	Due Date	Responsible Dept.
Complete all open stub reviews.	July 31, 2014	Mission Division Gas Distribution Engineering & Design
Implement Pathfinder Program including tracking and review of idle gas service stubs.	December 31, 2015	Gas Operations – Technology and R&D

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INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
July 15- 19, 2013	NOV – 1	Aimee Cauguiran	(415) 703-2055

INSPECTION FINDING

CPUC Finding	<p>1. Title 49 CFR §192.605(a) states in part:</p> <p style="text-align: center;"><i>“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.”</i></p> <p>a) PG&E Procedure O-16 requires yearly monitoring of areas where a section of the distribution steel main is tied to a cathodic protection system using a locating wire. SED found that during the Division’s cathodic protection area (CPA) resurvey in 2009, it did not include the following locations as yearly monitoring locations per PG&E standard O-16 in the CPAs listed:</p> <ul style="list-style-type: none"> • CPA M26-2: Yearly locations on Castello Court and Telles Lane • CPA M22-1: Yearly location on Olympia Fields Court <p>b) PG&E Procedure O-16 states in part:</p> <p style="text-align: center;"><i>“Schedule CPAs for restoration on distribution and local transmission lines when the areas show P/S on-potentials to be below adequate levels of protection. Check and record rectifier readings on the “Standard Cathodic Protection Maintenance Report,” Attachment D, or in PLM before restoring a CPA...If the CPA restoration work is (or is expected to be) over 30 days, the “CPA Follow-Up Action Plan” form (Attachment B) must be used and developed within 30 calendar days from the date the CPA is found below adequate levels of protection, as defined by the current 49 CFR 192, Subpart I. Please note that action plans shall also be established and maintained for short-term remedial actions that are in place for over 30 days.”</i></p> <p>The Division found CPA M12-4 to have an inadequate level of cathodic protection on 1/7/2012, but the Division did not have a properly documented CPA follow-up action plan containing supervisory acknowledgement and signature until 8/7/2012, seven months after it first discovered the inadequate cathodic protection level. The Division eventually restored the CPA on 2/4/2013.</p> <p>c) PG&E Standard S4110 requires a Grade 2+ leak to be repaired, cleared or downgraded, if applicable, within 90 calendar days.</p>
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	<p>During a routine leak survey, the Division found a Grade 2+ leak (Leak # 12-23047-1) on 7/21/2012. Division records showed the leak as 0.01% gas in air, which it detected 20 feet from a house over the service line. The Division classified the leak as a Grade 2+ due to its proximity to the house. However, the Division did not have records of repair or corrective action taken within 90 calendar days in accordance with their procedure. The Division eventually repaired the leak on 7/19/2013.</p> <p>d) PG&E’s TD-4110P-11-F03 Daily Leak Survey Log requires completion of the “Info Code” data field for leaks graded as 1, 2+, and 2 with a reading of 2% or less. The information code provides a general explanation for determining the leak criteria. SED reviewed the 2012 leak logs for Plats 20B-16, 20-C6, 20-C10, 20-C12, 20-D05, 20-D07 and found leaks that the Division graded as either 1, 2+, or 2 and with readings of 2% or less of gas in air that were missing the information code.</p>
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PG&E RESPONSE

1 a)

PG&E agrees with this finding. PG&E has added Castello Court (CPA M26-2), Telles Lane (CPA M26-2), and Olympia Fields Court (CPA M22-1) to its yearly monitoring program (See Attachment 1).

To prevent recurrence of these omissions from the annual cathodic protection maintenance plan, the Mission Division Corrosion Supervisor will ensure that any main protected by wire will be reviewed against the maintenance plan during each CPA resurvey. Furthermore, a refresher briefing was provided to Mission Division Corrosion Control personnel on February 10, 2014, reviewing the requirements for yearly monitoring as specified in PG&E’s Standard O-16 (See Attachment 2).

1 b)

PG&E agrees with this finding. To prevent recurrence, the Standard O-16 refresher briefing also reviewed the requirements for properly documenting and reviewing action plans.

Furthermore, the SAP maintenance scheduling tool will be programmed to generate a task on the corrective notification and send an email three weeks prior to the action plan being due, requiring an update to be made. One week prior to the 30-day deadline for the Action Plan update, SAP will include the notification on the SAP Compliance Report to remind responsible personnel of the task. This programming revision is expected to be in place by May 30, 2014.

1 c)

PG&E agrees with this finding. The Grade 2+ leak was detected on July 21, 2012 and repaired on July 19, 2013.

To prevent recurrence, in April 2014, Mission Division personnel will begin using mobile

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devices to electronically record leak repair and inspection (the A-Form and A1 Form) by crew foremen in the field. This system will communicate with PG&E's SAP leak management system to improve tracking and ensure timely collection of leak survey data.

1 d)

PG&E agrees with this finding. To prevent recurrence of missing inspection data, in April 2014, Mission Division personnel will begin using mobile devices with built-in data validations that will require data such as INFO codes when necessary.

ATTACHMENTS

Attachment #	Title or Subject
1	Standard Cathodic Protection Maintenance Reports for M26-2 and M22-1
2	Refresher Briefing – Cathodic Protection Maintenance

ACTION REQUIRED

Action To Be Taken	Due Date	Responsible Dept.
Revise SAP programming to generate corrective orders for low CP reads.	May 30, 2014	Gas Asset Strategy

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INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
July 15- 19, 2013	NOV – 2	Aimee Cauguiran	(415) 703-2055

INSPECTION FINDING

CPUC Finding	<p>2. 49 CFR § 192.465(a) states in part:</p> <p style="text-align: center;"><i>“Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months...”</i></p> <p>CPA M26-4 has a section of steel main on Vargas Road that the Division cathodically protects with galvanic anodes. The Division did not have any records to demonstrate cathodic protection monitoring for this section of steel main.</p>
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PG&E RESPONSE

<p>PG&E respectfully disagrees with this finding. The steel main on Vargas Road has been cathodically protected using galvanic anodes and PG&E has retained records demonstrating annual monitoring (See Attachment 3). PG&E apologizes for confusion during the audit, when CPUC inspectors viewed “CP Wall Maps” and noted that Vargas Road was in M26-4. It has been determined that the section of steel main on Vargas Road is in CPA M26-3, not M26-4. The correction to the “CP Wall Map” to accurately illustrate M26-3 has been completed (See Attachment 4).</p>
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ATTACHMENTS

Attachment #	Title or Subject
3	Standard Cathodic Protection Maintenance Report for M26-3 from 2005-2013
4	CPA Survey Map and section of CPA Wall Map

ACTION REQUIRED

Action To Be Taken	Due Date	Responsible Dept.
No further action required.		

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INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
July 15- 19, 2013	NOV – 3	Aimee Cauguiran	(415) 703-2055

INSPECTION FINDING

CPUC Finding	<p>3. General Order 112-E Rule 143.1 states:</p> <p style="padding-left: 40px;"><i>“Leakage Surveys and Procedures – A gas detector survey must be conducted in business districts and in the vicinity of schools, hospitals, and churches, including tests of the atmosphere in gas, electric, telephone, sewer and water system manholes, at cracks in pavement, and sidewalks, and at other locations providing opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year.”</i></p> <p>SED found the 2012 annual distribution leak survey of Plat 13D12 does not include the services to a business district at the intersection of Hesperian Avenue and Tennyson Avenue, and a Kaiser hospital on Sleepy Hollow in Hayward.</p> <p>Furthermore, the Division must review its distribution leak survey plats to ensure that all services in business districts, schools, hospitals, and churches are leak surveyed annually as required by General Order 112-E. The Division must also remind the leak surveyors to notify appropriate Division personnel of any map changes or updates observed while conducting leak surveys as stated in PG&E’s standard S4110.</p>
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PG&E RESPONSE

<p>PG&E agrees with this finding. The services serving the business district and Kaiser hospital on Plat 13D12 have been added to the annual leak survey map (See Attachment 5).</p> <p>To prevent recurrence, in 2013, PG&E’s Gas Distribution Mapping began using a centralized Public Assembly list to identify new areas of public assembly and update leak survey maps and schedules for distribution facilities system-wide. A third-party consultant, Cyera Strategies, verified that the Standard Industrial Classification codes used included all schools, hospitals, and places of worship. PG&E plans to update and implement the centralized list on an ongoing basis. Mapping reviews the plats annually to ensure facilities in vicinities of public assembly are scheduled for annual leak surveys.</p> <p>Furthermore, on November 6, 2013, PG&E provided a refresher briefing to Mission Division Leak Surveyors as to their roles and responsibilities as specified by TD-4110P-01, “Leak Survey Process” (See Attachment 6).</p>
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ATTACHMENTS

Attachment #	Title or Subject
5	Annual Leak Survey Plat Map 13D12
6	Refresher Briefing – Leak Survey and Response Processes

ACTION REQUIRED

Action To Be Taken	Due Date	Responsible Dept.
No further action required.		

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INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
July 15- 19, 2013	NOV – 4	Aimee Cauquiran	(415) 703-2055

INSPECTION FINDING

CPUC Finding	<p>4. 49 CFR Part 192.709 states in part:</p> <p style="text-align: center;"><i>“Each operator shall maintain the following records for transmission lines... (b) The date, location, and description of each repair made to parts of the pipeline system other than pipe must be retained for at least 5 years...”</i></p> <p>The Division found leak # 11-30274 during its 2011 transmission leak survey, which it documented on the sequence sheet instead of the leak log. During the audit, the Division personnel mentioned that since the leak was in a regulator station it was likely eliminated during a routine maintenance. However, the Division does not have records to demonstrate completion of the repair.</p>
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PG&E RESPONSE

<p>PG&E agrees with this finding. PG&E does not have a record of completion of the repair for leak #11-30274. Subsequent transmission leak surveys since 2011 have not detected gas at this location, and the leak has been “zeroed out” in PG&E’s leak management system.</p> <p>PG&E’s Utility Procedures TD-4110P-03, “Performing and Documenting Leak Survey,” and TD-4110P-09, “Leak Grading and Response,” revised in 2013, emphasize the appropriate responses and methods of documentation for non-hazardous leaks detected at transmission stations. Furthermore, the leak survey supervisor provided a refresher briefing to Mission Division leak surveyors, reviewing the process of electronically documenting leaks using the established mobile technology (See Attachment 6).</p>

ATTACHMENTS

Attachment #	Title or Subject
None	

ACTION REQUIRED

Action To Be Taken	Due Date	Responsible Dept.
No further action required.		

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INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
July 15- 19, 2013	NOV – 5	Aimee Cauguiran	(415) 703-2055

INSPECTION FINDING

CPUC Finding	<p>Title 49 CFR 192.703(c) states:</p> <p style="text-align: center;"><i>“Hazardous leaks must be repaired promptly.”</i></p> <p>Title 49 CFR 192.603(b) states:</p> <p style="text-align: center;"><i>“Each operator shall keep records necessary to administer the procedures established under 192.605.”</i></p> <p>The Division initially found a leak at 20175 San Miguel Lane in Castro Valley on 6/29/2010 (Leak #10-20298-1) during its leak survey. The Division leak surveyor graded the leak as Grade 1 due to its proximity to a housing structure. The Division eventually downgraded the leak about three hours later on the same day, noting that the leak was on the customer’s houseline.</p> <p>The Division did not have records to demonstrate that it conducted a gas leak investigation in accordance to its work procedure WP6434-01 <u>Gas Leak and Odor Investigation</u>¹ which describes PG&E Gas Service Representative’s (GSR) responsibility for responding to and investigating gas leaks². Additionally, the Division did not have records to show that it had informed the customer about the leak as required by its procedure, or that a subsequent recheck was conducted to verify that a corrective action was taken either by the customer or the Division.</p> <p>Subsequent to the SED audit, the Division contends that WP6434-01 does not contain a record-retention requirement. However, without these records or any record of a follow-up leak survey demonstrating corrective action taken to address the hazardous leak, the Division cannot provide assurance that it corrected the Grade 1 leak.</p>
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PG&E RESPONSE

<p>PG&E respectfully disagrees with this finding. PG&E has records to demonstrate a gas leak investigation was conducted in response to leak #10-20298-1 at 20175 San Miguel in accordance with work procedure WP6434-01 (See Attachment 7), providing assurance that the Grade 1 leak was corrected safely. PG&E apologizes for not readily having documentation at the time of the audit.</p>

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ATTACHMENTS

Attachment #	Title or Subject
7	Customer Care & Billing Premise History for 20175 San Miguel, Castro Valley

ACTION REQUIRED

Action To Be Taken	Due Date	Responsible Dept.
No further action required.		

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INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
July 15- 19, 2013	Field Review	Aimee Cauguiran	(415) 703-2055

INSPECTION FINDING

CPUC Finding	<p>C. Field Review</p> <p>1. SED found a high pressure regulator at 7010 Niles Canyon Road in Sunol which is located in an area close to a private roadway frequently traversed by motor vehicles that needed protection. Subsequent to the audit, the Division provided photos showing that it installed protection for the regulator which satisfies SED's audit field review finding.</p>
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PG&E RESPONSE

<p>This inspection finding has been addressed as described above.</p>

ATTACHMENTS

Attachment #	Title or Subject
None	

ACTION REQUIRED

Action To Be Taken	Due Date	Responsible Dept.
No further action required.		

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Mission Division**

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Inspection Dates	Finding	CPUC Contact	CPUC Phone #
July 15- 19, 2013	Field Review	Aimee Cauguiran	(415) 703-2055

INSPECTION FINDING

CPUC Finding	<p>C. Field Review</p> <p>2. SED observed that the service regulator vent at 580 Joaquin Avenue in San Leandro needed a protective screen to avoid dirt or debris from entering the regulator. Subsequent to the audit, the Division provided a copy of the work order for the installation of a regulator vent screen and possible re-positioning of the regulator vent. Please provide status of the corrective work.</p>
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PG&E RESPONSE

<p>PG&E agrees with this inspection finding and has completed the following corrective work:</p> <ol style="list-style-type: none"> 1) Protective screening has been installed at the domestic regulator internal relief valve vent, and 2) The internal relief valve openings to atmosphere were repositioned (see Attachment 8).
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ATTACHMENTS

Attachment #	Title or Subject
8	Photographs of “as-found” and “as-left” at domestic gas meter at 580 San Joaquin, San Lorenzo.

ACTION REQUIRED

Action To Be Taken	Due Date	Responsible Dept.
No further action required.		

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