STATE OF CALIFORNIA EDMUND G. BROWN, JR., *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
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May 31, 2011

Agenda ID #10453
Ratesetting

TO PARTIES OF RECORD IN APPLICATION 09-09-013

This is the proposed decision of Administrative Law Judge (ALJ) Wong, previously designated as the presiding officer in this proceeding. It will not appear on the Commission's agenda sooner than 30 days from the date it is mailed. This matter was categorized as ratesetting and is subject to Pub. Util. Code § 1701.3(c). Upon the request of any Commissioner, a Ratesetting Deliberative Meeting (RDM) may be held. If that occurs, the Commission will prepare and publish an agenda for the RDM 10 days beforehand. When the RDM is held, there is a related ex parte communications prohibition period. (See Rule 8.2(c)(4).)

When the Commission acts on the proposed decision, it may adopt all or part of it as written, amend or modify it, or set it aside and prepare its own decision. Only when the Commission acts does the decision become binding on the parties.

Parties to the proceeding may file comments on the proposed decision as provided in Article 14 of the Commission's Rules of Practice and Procedure (Rules), accessible on the Commission's website at www.cpuc.ca.gov. Pursuant to Rule 14.3, opening comments shall not exceed 15 pages.

Comments must be filed pursuant to Rule 1.13 either electronically or in hard copy. Comments should be served on parties to this proceeding in accordance with Rules 1.9 and 1.10. Electronic and hard copies of comments should be sent to ALJ Wong at jsw@cpuc.ca.gov and assigned Commissioner. The current service list for this proceeding is available on the Commission's website at www.cpuc.ca.gov.

/s/ KAREN V. CLOPTON
Karen V. Clopton, Chief
Administrative Law Judge

JSW:avs

Attachment

Decision **PROPOSED DECISION OF ALJ WONG** **(Mailed 5/31/2011)**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company Proposing Cost of Service and Rates for Gas Transmission and Storage Services for the period 2011-2014 (U39G).	Application 09-09-013 (Filed September 18, 2009)

(See Attachment A for List of Appearances)

DECISION ON THE SAFETY PHASE PROTOCOLS AND PROCEDURES ADOPTED FOR PACIFIC GAS AND ELECTRIC COMPANY

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DECISION ON THE SAFETY PHASE PROTOCOLS AND PROCEDURES ADOPTED FOR PACIFIC GAS AND ELECTRIC COMPANY

1. Summary

Today's decision addresses the issues raised by the safety phase portion of this proceeding. This safety phase was opened as a result of the September 9, 2010 San Bruno explosion and fire (San Bruno explosion). Since this proceeding addresses the natural gas transmission and gas storage facilities and operations of Pacific Gas and Electric Company (PG&E) for the period from 2011 through 2014, this decision requires PG&E to incorporate a series of actions into its existing protocols and procedures to avoid some of the problems that have been highlighted as a result of the San Bruno explosion, and to ensure the safety and reliability of PG&E's gas transmission and storage system during the period covered by this rate cycle and beyond.

Among other things, this decision does the following: (1) formalizes the requirement that PG&E offer maps of the gas transmission lines, gas storage facilities, and associated shut-off valves to all of the fire departments and agencies in PG&E's service territory; (2) incorporates into PG&E's existing public safety and training efforts: (a) additional information about PG&E's gas transmission locations, gas operations, and shut-off valve information; (b) how to recognize or detect natural gas leaks in the absence of a fire; (c) evacuation procedures for a natural gas leak or fire; and (d) how best to coordinate PG&E's emergency response efforts with the responding fire departments or agencies; (3) incorporates additional procedures into PG&E's existing dispatch procedures; (4) requires PG&E to provide the inspection records of its gas transmission and gas storage shut-off valves; (5) requires PG&E to send annual bill insert information to its customers about the precautions to take before digging or

excavating so as to avoid damage to gas pipelines, and where to call in the event the odor of natural gas is detected; and (6) requires PG&E to expand its customer outreach activities to promote awareness of the general locations, and to promote confidence in the safety, of the gas transmission facilities located in urban and high consequence areas.

Today's decision builds on other actions this Commission has ordered PG&E to take to ensure the safety of PG&E's facilities and operations. In addition, the Commission has opened Rulemaking 11-02-019 to address natural gas safety issues on a statewide basis, Investigation (I.) 11-02-016 to look into PG&E's recordkeeping policies and practices, and I.10-11-013 into the December 24, 2008 gas explosion in Rancho Cordova. The Commission is also waiting for the reports of the National Transportation Safety Board and the Independent Review Panel before deciding if other actions should be taken.

2. Background

Today's decision addresses the remaining safety phase issues in this proceeding. Decision (D.) 11-04-031 approved and adopted a settlement in this proceeding which addressed the revenue requirement and rates associated with the gas transmission and storage (GT&S) facilities of Pacific Gas and Electric Company (PG&E) for the four-year rate cycle from January 1, 2011 through December 31, 2014. The settlement was reached, and the motion to adopt the settlement was filed, before the September 9, 2010 San Bruno explosion and fire (San Bruno explosion).[1] As a result of the San Bruno explosion, a revised scoping

[1] In a September 15, 2010 ruling, the parties were asked to comment on whether the settlement was adequate in light of the pipeline safety concerns raised by the San Bruno explosion. D.11-04-031 addressed the adequacy of the amounts in the settlement for

Footnote continued on next page

memo and ruling (revised scoping ruling) was issued on October 15, 2010 which added a safety phase to this proceeding to address safety concerns raised by the San Bruno explosion.

The revised scoping ruling asked the parties to file opening and reply comments on the types of protocols and procedures the Commission should order to ensure the safe operation of PG&E's GT&S operations over the next four years and beyond. The parties were asked to comment on the following: PG&E's procedures regarding the deployment and transportation of its personnel to an incident, and the type of coordination that exists between PG&E and emergency response personnel; whether PG&E's outreach to emergency response personnel concerning the availability of information about PG&E's gas transmission lines and shut-off valves was adequate or if additional steps should be taken to ensure that emergency response personnel have the type of information they need to assess and manage situations involving PG&E's gas transmission lines; the frequency of testing or monitoring of the shut-off valves for the gas transmission lines and gas storage; and whether other safety-related protocols or procedures should be required of PG&E during the rate cycle, and whether workshops and/or evidentiary hearings on these issues were needed.[2]

PG&E's planned pipeline safety, reliability, and integrity efforts over the rate cycle period.

[2] The revised scoping ruling also asked the parties to comment on the type of procedures that should be in place to monitor PG&E's reprioritization of its capital expenditures associated with its gas transmission lines. The Gas Transmission and Storage Safety Report (Safety Report), which was adopted in D.11-04-031, requires PG&E to provide a semi-annual report. This report will allow the Commission to monitor if these high priority projects are being carried out by PG&E, and to monitor PG&E's spending on gas storage and gas transmission safety, reliability, and integrity capital projects and maintenance activities.

PG&E was the only party who filed comments in response to the revised scoping ruling. PG&E's comments were summarized in the February 3, 2011 ruling. That ruling stated that no workshops or hearings were needed on these issues, and that a proposed decision would be prepared on the safety-related protocols and procedures that PG&E should be required to have in place during the four-year period covered by this rate cycle and beyond. Today's decision sets forth those safety-related protocols and procedures.

3. Safety Phase Procedures

3.1. Introduction

The safety phase of this proceeding was opened after the San Bruno explosion to focus on ensuring the safe operation of PG&E's GT&S operations over the four-year rate cycle and into the future, and to ensure that safety and emergency protocols are in place so that PG&E and emergency response personnel can react quickly to similar emergencies in the future. In addition to the Safety Report that was adopted in D.11-04-031, the purpose of this safety phase is to require PG&E to take steps to ensure that gas leaks and explosions are quickly responded to, that appropriate procedures and coordination with fire departments and agencies are in place, to make sure that these fire departments and agencies are aware of the GT&S facilities in their communities, and to ensure that gas shut-off valves are being tested on a regular basis.

We believe that the procedures and protocols described below are items which PG&E can and should be ordered to implement right away. It is also appropriate that PG&E be ordered to take these steps in this proceeding since this proceeding covers PG&E's operations of its GT&S facilities during the 2011 through 2014 rate cycle. Pursuant to Pub. Util. Code § 451, PG&E is obligated to "furnish and maintain such adequate, efficient, just, and reasonable service,

instrumentalities, equipment and facilities … as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public."

We do not expect the procedures and protocols adopted in today's decision to result in additional costs to ratepayers. PG&E is required to incorporate these procedures and protocols into its existing efforts to ensure the continuing safety and reliability of its GT&S facilities and operations as required by Pub. Util. Code § 451. Accordingly, the costs associated with the procedures and protocols adopted in today's decision shall be covered by the revenues that the Commission recently authorized in D.11-04-031.

We also note that today's decision builds on other actions this Commission has ordered PG&E to take to ensure the safe operation of PG&E's facilities and operations. These actions include: (1) reducing the gas pressure on certain of PG&E's gas transmission lines; (2) requiring PG&E to undertake an integrity assessment of all of its natural gas facilities around the San Bruno area; (3) requiring PG&E to conduct a leak survey of all of PG&E's gas transmission lines; (4) requiring PG&E to review all of its gas transmission valve locations to determine where to replace manually operated valves with automated valves; (5) in light of the National Transportation and Safety Board's (NTSB) discovery that the pipeline that exploded was not seamless as reported by PG&E, requiring PG&E to search for its gas transmission records relating to pipeline system components in class 3 and class 4 locations, and in class 1 and class 2 high consequence areas where the maximum allowable operating pressure (MAOP) has not been established through prior hydrostatic testing; and (6) to ensure the safe operation of PG&E's gas transmission lines, requiring PG&E to use the traceable, verifiable, and complete records that were located to validate the

MAOP of gas transmission lines in class 3 and class 4 locations, and in class 1 and class 2 high consequence areas that have not had a MAOP established through prior hydrostatic testing.

The Commission has also opened Rulemaking (R.) 11-02-019 to consider the adoption of new rules and regulatory measures that can be taken to ensure the safety and reliable operation of natural gas pipelines on a statewide basis. This includes determining the MAOP of the gas transmission lines for which the gas utilities lack sufficient documentation. The Commission has also opened Investigation (I.) 11-02-016 to determine whether PG&E's safety recordkeeping policies and practices for its gas transmission lines violated any provisions of the California Public Utilities Code, Commission general orders or decisions, or other applicable rules or requirements. In addition, I.10-11-013 was opened into PG&E's operations and practices into the December 24, 2008 gas explosion in Rancho Cordova.

Today's decision is also separate and distinct from whatever steps this Commission may take once the final report of the NTSB on the San Bruno explosion is released, and the report of the Commission's Independent Review Panel (IRP) is released. The IRP is conducting its own fact-finding investigation into the cause of the San Bruno explosion and the safety and integrity of PG&E's gas transmission lines. The IRP is also examining the Commission's operations and procedures to determine whether there were lapses in the Commission's oversight, and to make recommendations on how the Commission's processes can be improved.

PG&E is to incorporate the protocols and procedures described below into its existing public safety and training efforts, emergency operations plan, dispatch procedures, and customer education efforts.

3.2. Availability of Maps

Following the San Bruno explosion and the NTSB hearings in March 2011, one of the apparent problems was that the local fire departments may not have had maps or knowledge of PG&E's gas transmission lines in the San Bruno area. To remedy this, PG&E contacted all of the cities and counties in its service territory after the San Bruno explosion to offer meetings on gas safety and to provide information about PG&E's gas pipeline locations. PG&E also committed to "share more detailed valve location information with the Commission and local first responders."[3] As of November 18, 2010, PG&E had 98 meetings with local and county officials representing 88 jurisdictions to discuss pipeline facility locations and safety issues.

Today's decision formalizes the requirement that PG&E offer maps to each fire department or agency in PG&E's service territory of the GT&S facilities and the associated shut-off valves that are located in the jurisdiction of each particular fire department or agency.[4] The maps shall contain sufficient detail, such as street names and intersections or global positioning data, so that the locations of the facilities and valves can be easily determined. These maps shall be offered at no charge to these fire departments and agencies, and shall be in a print format, and/or in a digital format that these fire departments and agencies can use or access as an on-line resource.

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[3] See PG&E's October 25, 2010 letter to Executive Director Clanon, footnote 4 to Attachment 2.

[4] Due to the sensitive nature of the locations of the GT&S facilities, PG&E shall ensure that the fire departments and agencies who are to receive the maps are the entities authorized to respond to fire-related emergency situations. In addition, PG&E shall convey to these fire departments and agencies the sensitive nature of these maps.

PG&E shall be required to notify all of the fire departments and agencies in its service territory by mail that it is obligated by today's decision to provide the maps to each fire department or agency upon request, that PG&E will meet with them to discuss the maps, and PG&E will provide future training on responding to a natural gas leak or fire. These letters shall be sent out to all affected fire departments and agencies by July 29, 2011.[5] PG&E shall file a notice in this proceeding by August 26, 2011 that it has mailed such letters to all the affected fire departments and agencies, and a list of those departments and agencies and, if applicable, the names to whom the letters were addressed, shall be attached to the notice.

In the event PG&E adds additional gas transmission lines or changes the configuration or location of where the gas transmission lines or shut-off valves are located, PG&E shall offer an updated map to the affected fire department or agency within 60 days of the completion of such a change.

Requiring PG&E to provide the maps of its GT&S and associated shut-off valves to affected fire departments and agencies will provide those entities with the information they may need to control and manage fire emergencies involving PG&E's GT&S facilities.

3.3. Providing Training

Initial reports of the San Bruno explosion raised a question about whether the fire was caused by an airplane crash or a natural gas leak. The resulting fire also raised questions about whether the gas shut-off valves could

[5] These letters may also refer to the prior contacts and meetings that PG&E may have had with these fire departments and agencies regarding the availability of the maps. (See February 3, 2011 ruling at 7.)

have been turned off more quickly to cut the flow of gas or if the gas flow could have been cut off remotely, and the kind of evacuation procedures that should be followed for natural gas incidents.

As part of PG&E's public safety and training efforts, PG&E shall be required to provide free training to fire departments and agencies which incorporates training on the topics set forth in the next paragraph. By requiring PG&E to incorporate these topics into its training efforts, these fire departments and agencies can become more familiar with how PG&E's GT&S facilities operate, and how these departments and agencies can control and manage a natural gas leak or fire.[6]

PG&E's public safety and training on natural gas shall include information about the following topics.

1. A description of and an overview of the locations of PG&E's gas transmission, gas distribution lines, and gas storage facilities, in the area covered by the regional training; how these locations and facilities correlate to the maps that PG&E offers, including training in how to read the maps or accessing the maps as an on-line resource; common signage, i.e., line markers, used to indicate the general location of the gas transmission lines; the sensitive nature of the maps; and how these various facilities operate to transport, store, and deliver natural gas.

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[6] PG&E currently offers a free training class to emergency first responders, entitled Responding to Gas & Electric Emergencies, which is posted on PG&E's website at pgesafetyeducation.com. The availability of this training, however, may not be widely known to all of the fire departments and agencies in PG&E's service territory. We also note that although some of the training topics discussed in this decision are already included in PG&E's current training procedures, this decision elaborates on what additional items should be incorporated into the training.

2. How to reach PG&E at its emergency contact number(s), and an overview of how PG&E dispatches its response personnel to a report of a natural gas leak or to a fire involving PG&E's gas transmission or distribution lines.
3. The precautionary measures that fire departments and agencies should take in responding to a natural gas leak or fire so as to avoid unnecessary risk and to ensure the safety of the public and emergency response personnel.
4. How to recognize or detect natural gas leaks if there is no fire. This training is to cover the different indications of a natural gas leak, such as dead or dying vegetation, hissing or roaring noises, bubbling of water, smell, etc., and the use of instruments that may be used to detect natural gas leaks.
5. What sort of evacuation procedures and restricted access procedures should be instituted by responding fire departments and agencies in the event of a natural gas leak or fire, including where emergency response vehicles should be positioned to avoid damage in the event of a natural gas explosion.
6. What steps to take to prevent sparks or ignition from occurring in the area of the gas leak or fire.
7. How often shut-off valves are tested and maintained, and that the operation of the shut-off valves for PG&E's gas transmission and gas storage should only be done by PG&E's emergency response personnel as operation of the valves by others could worsen the situation and lead to other consequences.
8. Best methods for controlling and managing a natural gas fire, and dissipating the natural gas to avoid an explosion or fire.
9. Discuss the best methods for PG&E's dispatch to coordinate with emergency response personnel for escort assistance if traffic or other conditions delay a timely response from PG&E.

10. PG&E shall have the flexibility to include other safety-related topics in the training relevant to the safe and reliable operation of PG&E's gas facilities.[7]

PG&E shall incorporate the above training procedures into PG&E's public safety and training efforts, and PG&E shall offer natural gas training to every fire department and agency on a regional basis in PG&E's service territory at no charge.[8] At least 45 days before the scheduled training, PG&E shall notify, by letter, the fire departments and agencies in the region where the training will be held of the free training opportunity. This training shall first be offered to those fire departments and agencies with gas transmission lines located in densely populated and urban areas. The training in these areas shall be offered starting no later than October 2011 and completed by June 2012. Subsequent regional trainings shall then be offered to other fire departments and agencies where gas transmission lines or gas storage facilities are sited in more rural areas. The training in the rural areas shall be completed by October 2012. After this natural gas training has been offered in all of PG&E's service territory, this training shall be repeated thereafter at three-year intervals.

Once PG&E has developed a schedule of the dates and the tentative locations for these natural gas training opportunities, PG&E shall send a letter(s)

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[7] For example, PG&E may want to consult with the State Fire Marshal, the California Emergency Management Agency, and the California Fire Chiefs Association to discuss ways in which the natural gas training for fire departments and agencies can be altered to best meet the needs of the fire departments and agencies. If modifications to the training procedures set forth in this decision are needed, PG&E should file a petition for modification.

[8] PG&E may also offer this natural gas training in conjunction with PG&E's training regarding its electric facilities. However, it may be more effective to focus these initial training efforts on natural gas only.

to the Executive Director, the director of the Consumer Protection and Safety Division (CPSD), and to the assigned Administrative Law Judge (ALJ), informing the Commission of the schedule for these training opportunities. A copy of the PG&E materials to be used at such trainings shall also be sent to the Executive Director, the director of CPSD, and the ALJ once these materials are finalized for use. If CPSD or other Commission staff desire to observe this natural gas training, PG&E shall provide that opportunity.

The above-described training shall be integrated into or in addition to other coordination and outreach efforts that PG&E currently conducts with fire departments and agencies and other emergency response personnel. Additionally, PG&E should consider producing a digital video disc (DVD) of this natural gas training and distributing the DVD to fire departments and agencies for their own in-house training purposes.

3.4. Dispatch Procedures

The timeline of the San Bruno explosion, and the testimony at the March 1, 2011 NTSB hearing, reveal that it took approximately an hour and 10 minutes from the time PG&E's dispatch center was first notified about the San Bruno explosion until all of the natural gas to the area was manually turned off by PG&E workers. During this time, there appears to have been a lack of communication between PG&E's dispatch center and PG&E's gas control center, informing the responding fire departments of PG&E's estimated time to turn off the gas, and traffic problems which may have delayed PG&E's response. Based on this timeline, PG&E shall be required to incorporate the following changes into its dispatch and emergency response procedures within 60 days:

1. PG&E shall have personnel available 24 hours each day to answer emergency calls at its dispatch center, and to

have qualified personnel available to respond to an emergency call involving its natural gas operations.

2. PG&E shall provide all the fire departments and agencies in its service territory with the telephone number(s) for PG&E's emergency dispatch center.
3. Upon receiving an emergency call, the PG&E dispatch center shall try to ascertain whether the incident involves a fire, natural gas leak or odor, etc…, the location or vicinity of the incident, the name of the person calling and a contact number, and shall immediately dispatch qualified PG&E emergency response personnel who can timely respond to that particular type of emergency.
4. If PG&E dispatch can ascertain that the fire or leak involves a PG&E gas transmission line, PG&E dispatch shall contact PG&E's gas operations control to determine whether there are concurrent unusual readings, problems, or other abnormal operations on the gas transmission lines located in the area of the reported incident, and if so, PG&E dispatch shall immediately dispatch PG&E emergency response personnel qualified to respond to incidents involving gas transmission lines.
5. PG&E shall have all of the necessary valve shut-off tools and equipment that are used to respond to natural gas emergencies on board all designated PG&E emergency response vehicles, and at the PG&E maintenance yards.
6. The PG&E personnel dispatched to respond to the emergency call shall, upon dispatch, provide the dispatcher of: their current location; whether they need to go to the maintenance yard to retrieve the necessary tools, equipment and vehicle or if they can proceed directly to the incident; provide an estimate of how long it will take to retrieve the necessary tools, equipment and vehicle, and/or to arrive at the incident; contact PG&E dispatch every 15 minutes thereafter to provide an update on their location and the estimated time of

arrival to the incident; contact PG&E dispatch upon arrival at the incident; and contact PG&E dispatch upon turning off the natural gas to the incident area or resolving the situation.

7. The PG&E dispatcher shall: note the time of dispatch; the personnel dispatched; whether the personnel dispatched need to go to the maintenance yard first or if they are going directly to the incident; note the personnel's estimated time to retrieve the tools, equipment and vehicle and/or to arrive at the incident; and contact the personnel if they fail to contact PG&E dispatch as set forth above.
8. In an incident in which a fire department or agency has responded, PG&E dispatch shall notify the responding fire department or agency of the estimated time of arrival of the dispatched PG&E personnel.
9. If a traffic-related or other problem delays the dispatched PG&E personnel from getting to the incident within the time estimated, the dispatched personnel shall contact PG&E dispatch to update the estimated time of arrival. If the problem is likely to continue and prevent a timely response, PG&E's responding personnel shall ask PG&E dispatch to contact the responding fire department or agency and/or law enforcement for an emergency vehicle to escort the PG&E vehicle and personnel, if possible, so that PG&E personnel can timely respond to the incident. PG&E shall maintain an up-to-date list of the telephone number contacts of these emergency response departments and agencies for this purpose.
10. PG&E dispatch, gas control operations, and emergency response personnel, shall be trained on PG&E's dispatch and emergency response procedures once every two years. PG&E shall keep a record of the personnel who attended the training.

Within 90 days of the effective date of today's decision, PG&E shall transmit to the Executive Director, the director of CPSD, and the assigned ALJ, a copy of PG&E's emergency response and dispatch procedures that incorporate the dispatch procedures described above.

3.5. Other Issues

3.5.1. Gas Transmission Line Valves

Following the San Bruno explosion, the Commission expressed concern over the time in which it took to manually shut-off the gas valves in San Bruno. These concerns were expressed in the September 13, 2010 and September 17, 2010 letter directives from the Commission's Executive Director to PG&E, which were then incorporated into Commission Resolution L-403. Ordering paragraph 21 of that resolution states:

> PG&E shall conduct a review of all natural gas transmission line valve locations in order to determine locations where it would be prudent to replace manually operated valves with remotely operated or automated valves and shall report its results to the Commission within thirty (30) days of the issuance date of this Resolution.

In the October 15, 2010 revised scoping ruling, the issue of the frequency of testing or monitoring of PG&E's shut-off valves for its GT&S facilities was identified as a safety phase issue. Frequent testing of the shut-off valves is important to ensure that the valves are in working order and can be operated for regular maintenance and turned off in an emergency.

On October 25, 2010, PG&E responded to the Executive Director's letter directives and to Resolution L-403. As part of that response, PG&E provided a preliminary report on the replacement or retrofit of manually operated valves with automatic or remotely controlled valves on PG&E's gas

transmission lines.[9] Based on the preliminary report, PG&E estimates there are approximately 300 manual valves over 565 miles of gas transmission lines that should be further evaluated for potential replacement or retrofit with automatic or remotely operated shut-off valves. This evaluation is to occur in PG&E's Pipeline 2020 program, which PG&E announced on October 12, 2010. According to PG&E, this program is designed to strengthen its natural gas system and to advance industry best standards in the coming years. As part of the Pipeline 2020 program, PG&E plans to expand the use of automatic or remotely operated shut-off valves in pipeline segments located in urban areas.

In response to the revised scoping ruling, PG&E's November 22, 2010 comments stated that it operates and maintains the gas shut-off valves once per calendar year and not less than every 15 months. PG&E's response also stated that this testing and monitoring is fully compliant with the valve maintenance procedures set forth in § 192.745 of Title 49 of the Code of Federal Regulations (CFR).[10]

The Commission opened R.11-02-019 to initiate rule and policy changes for the natural gas transmission and distribution lines in California. One of the likely new rules the Commission is considering in R.11-02-019 is to require gas utilities to evaluate whether automatic or remote controlled valves should be installed on gas transmission lines, and to require the gas utilities to develop criteria for installing such valves in a high consequence, Class 3 or Class 4 area.

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[9] PG&E's preliminary report was attached to its October 25, 2010 letter as Attachment 2.

[10] Section 143.2 of General Order (GO) 112-E also requires a gas utility to inspect and partially operate the valves on the gas transmission line at intervals not exceeding 15 months, but at least once each calendar year.

(See R.11-02-019, Att. B.) The Commission also stated in R.11-02-019 that PG&E's Pipeline 2020 program will be evaluated in that proceeding. (R.11-02-019 at 13.)

Since the Commission is considering in R.11-02-019 a rule to require the development of criteria for installing automatic or remotely controlled valves on gas transmission lines, and because PG&E's Pipeline 2020 program includes a plan to install automatic or remotely controlled valves, this decision defers such issues to R.11-02-019 to resolve.

As for PG&E's response that it is in compliance with the valve testing requirements of 49 CFR §192.745, we shall require PG&E to submit to the Executive Director, the director of CPSD, and to the ALJ, a copy of the records which support the inspections of the GT&S valves.[11] PG&E shall provide such inspection records for all the GT&S valves for 2009 and 2010 by September 30, 2011, and for 2011 and 2012 by March 30, 2013.

CPSD shall review these inspection records to ensure that PG&E has inspected all of its GT&S valves in accordance with the inspection requirement set forth in 49 CFR §192.745. The review of such records by CPSD will help ensure that PG&E has been inspecting and partially operating these GT&S valves in accordance with the schedule set forth in 49 CFR §192.745. Should CPSD detect problems in PG&E's inspection of its GT&S valves, CPSD shall bring this to the attention of the Executive Director and the Commissioners. If problems are detected with PG&E's inspection of its GT&S valves, CPSD should consider

[11] Section 192.709(c) of 49 CFR requires that the records of the inspections required by 49 CFR §192.745 be retained for at least five years or until the next inspection is completed, whichever is longer. Section 101.4 of GO 112-E requires PG&E to maintain the necessary records to ensure compliance with the rules in GO 112-E and with the applicable Federal Pipeline Safety Regulations.

expanding its review to include PG&E's inspection of its gas distribution line valves.[12]

3.5.2. Customer Education

Another safety-related issue is to promote customer education about the following: (1) the danger of excavations or dig-ins near gas transmission and distribution lines and whom to call to have a representative come out to mark the location of the pipeline ; (2) what someone should do if they smell the odor of natural gas and whom to call; and (3) informing local communities about gas transmission facilities that may be located in urban and high consequence areas. Although the revised scoping ruling did not list these as issues, the San Bruno explosion warrants a requirement that PG&E send out annual bill inserts concerning: (1) whom to call before excavation or digging takes place so that damage to natural gas pipelines can be avoided; and (2) what someone should do if they smell the odor of natural gas and whom to call. Educating the public on both of these topics will help ensure the safe and reliable operation of PG&E's gas operations. Promoting customer education about these two subjects can be easily achieved in a cost-effective manner by requiring PG&E to include such bill inserts into its customers' bills on an annual basis. In addition, PG&E shall be required to broaden its ongoing customer outreach activities to promote public awareness and confidence in the locations and safety of PG&E's gas transmission facilities that are located in urban and high consequence areas.

Accordingly, today's decision requires PG&E to prepare and mail out two bill inserts on the topics of: (1) whom to call before someone excavates or digs; and (2) the number(s) to call in the event someone smells the odor of

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[12] The inspection of PG&E's gas distribution line valves is required by 49 CFR §192.747.

natural gas and the precautions the caller should take if an odor is present. For the excavation and dig-in bill insert, it should contain information similar to what is set forth in PG&E's "Call Before You Dig" website pages, and list the number(s) a person can call before any excavation or digging takes place. For the bill insert on gas odors, it should contain information similar to what is set forth in PG&E's "Gas Odors and Pilot Lights" website page.[13] PG&E may also consider including other signs of potential gas leaks, as described in section 3.3. of this decision, into the gas odor bill insert.

A draft of these bill inserts are to be provided to the Commission's Public Advisor's office in San Francisco by September 2, 2011 for review and approval. Once these bill inserts are approved by the Public Advisor's office, the bill inserts are to be included in all of PG&E's customers' bills on an annual basis, and the initial mailing of the inserts shall be completed by December 31, 2011.

PG&E shall also be required to broaden its ongoing customer outreach activities to promote public awareness of the general location, and confidence in the safety, of PG&E's gas transmission facilities that are located in urban and high consequence areas. To the extent possible, PG&E should use community-based organizations to assist in disseminating this kind of information.

4. Comments of Proposed Decision

The proposed decision of ALJ John S. Wong in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and

[13] PG&E should also review its relevant web pages to ensure that the telephone numbers to call before digging, or where to call if the odor of gas is smelled, are easily accessed and displayed prominently on its web pages.

comments are allowed pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure. Opening comments were filed on _____, and reply comments were filed on _____.

Since this safety phase decision involves protocols and procedures that require outreach by PG&E to fire departments and agencies, the ALJ will send a copy of the proposed decision to the Office of the State, the California Emergency Management Agency, and the California Fire Chiefs Association, and invite those organizations to provide letter responses to the protocols and procedures recommended in the proposed decision. If a timely response(s) is received from those organizations, the ALJ will serve a copy of the response(s) on the service list.

5. Assignment of Proceeding

Timothy Alan Simon is the assigned Commissioner and John S. Wong is the assigned ALJ in this proceeding.

Findings of Fact

1. The safety phase of this proceeding was opened after the San Bruno explosion to focus on ensuring the safe operation of PG&E's GT&S operations over the four-year rate cycle covered by this proceeding and into the future.

2. PG&E is obligated under Pub. Util. Code § 451 to provide "adequate, efficient, just, and reasonable service, instrumentalities, equipment and facilities … as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public."

3. Today's decision builds on other actions this Commission has ordered PG&E to take to ensure the safe operation of PG&E's facilities and operations.

4. Prior to the San Bruno explosion some of the local fire departments may not have had maps or knowledge of PG&E's gas transmission lines in the San Bruno area.

5. Following the San Bruno explosion, PG&E contacted all of the cities and counties in its service territory to offer meetings on gas safety and to provide information about PG&E's gas pipeline locations.

6. Requiring PG&E to provide the maps of its GT&S and associated shut-off valves to affected fire departments and agencies will provide those entities with the information they may need to control and manage fire emergencies.

7. Initial reports of the San Bruno explosion raised a question about whether the fire was caused by an airplane crash or a natural gas leak, and the resulting fire raised questions about whether the gas shut-off valves could have been turned off more quickly, and the kind of evacuation procedures that should be followed for natural gas incidents.

8. The timeline of the San Bruno explosion, and the testimony at the March 1, 2011 NTSB hearing, reveal that it took approximately an hour and 10 minutes from the time PG&E's dispatch center was first notified about the San Bruno explosion until all of the natural gas to the area was manually turned off by PG&E workers.

9. During this timeline, there appears to have been a lack of communication between PG&E's dispatch center and PG&E's gas control center, informing the responding fire departments of PG&E's estimated time to turn off the gas, and traffic problems which may have delayed PG&E's response.

10. In letter directives and in Resolution L-403, the Commission expressed concern over the time in which it took to manually shut off the gas valves in San Bruno.

11. The revised scoping ruling identified the frequency of testing or monitoring of PG&E's shut-off valves for its GT&S facilities as a safety phase issue because frequent testing of the valves ensures that the valves are in working order and can be operated for regular maintenance and turned off in an emergency.

12. As part of PG&E's Pipeline 2020 program, which is to be evaluated in R.11-02-019, PG&E plans to expand the use of automatic or remotely operated shut-off valves in pipeline segments located in urban areas.

13. According to PG&E's November 22, 2010 comments, PG&E operates and maintains the gas shut-off valves once per calendar year and not less than every 15 months.

14. One of the likely new rules the Commission is considering in R.11-02-019 is to require gas utilities to evaluate whether automatic or remote controlled valves should be installed on gas transmission lines, and to require the gas utilities to develop criteria for installing such valves in certain areas.

15. Another safety-related issue is to promote customer education about the dangers of excavations or dig-ins near gas transmission and distribution lines, what someone should do and whom to call if they smell the odor of natural gas, and promoting customer awareness of the general locations and safety of gas transmission facilities in urban and high consequence areas.

16. Promoting customer education on dig-ins and the odor of natural gas can be achieved in a cost-effective manner by requiring PG&E to include such bill inserts into its customers' bills on an annual basis.

Conclusions of Law

1. The costs associated with the procedures and protocols adopted in today's decision shall be covered by the revenues that the Commission recently authorized in D.11-04-031.

2. This decision formalizes the requirement that PG&E offer maps at no charge to each fire department or agency in PG&E's service territory of the gas transmission lines, gas storage facilities, and the associated shut-off valves, that are located in the jurisdiction of each particular fire department or agency.

3. The issue of whether PG&E should be required to install automatic or remotely controlled valves is to be decided in R.11-02-019.

4. PG&E should be required to provide the inspection records for the GT&S valves as set forth in the ordering paragraph.

5. CPSD should be directed to review these inspection records to ensure that PG&E is in compliance with 49 CFR §192.745, and to bring to the Commission's attention if problems are detected with PG&E's inspection of its GT&S valves.

6. PG&E should be required to prepare and mail out two bill inserts on the topics of: (1) whom to call before someone excavates or digs; and (2) the number(s) to call in the event someone smells the odor of natural gas and the precautions the caller should take if an odor is present. PG&E should also be required to broaden its existing and ongoing customer outreach activities to promote public awareness of the general location, and confidence in the safety, of PG&E's gas transmission facilities that are located in urban and high consequence areas.

7. PG&E should be ordered to incorporate the protocols and procedures described in this decision into PG&E's existing public safety and training efforts,

emergency operations plan, dispatch procedures, and customer education efforts.

O R D E R

IT IS ORDERED that:

1. As described in this decision, Pacific Gas and Electric Company (PG&E) shall incorporate the following protocols and procedures into its existing public safety and training efforts, emergency operations plan, dispatch procedures, and customer education efforts.

   a. At no charge, PG&E shall offer maps with sufficient detail to each fire department or agency in PG&E's service territory of the gas transmission lines, gas storage facilities, and the associated shut-off valves that are located in the jurisdiction of each particular fire department or agency. These maps shall be in a print format, and/or in a digital format that these fire departments and agencies can use or access as an on-line resource.

      (1) By July 29, 2011, PG&E shall notify all of the fire departments and agencies in its service territory by mail that it is obligated by this decision to provide the maps to each fire department or agency upon request, that PG&E will meet with them to discuss the maps, and that PG&E will provide future training on responding to a natural gas leak or fire.

      (2) By August 26, 2011, PG&E shall file and serve a notice in this proceeding that it has mailed such letters to all the affected fire departments and agencies, and a list of those departments, agencies, and names shall be attached to the notice.

      (3) If PG&E adds additional gas transmission lines or changes the configuration or location of where the gas transmission lines or shut-off valves are located, PG&E shall offer any updated map to the affected fire

department or agency within 60 days of the completion of such a change.

b. As part of PG&E's public safety and training efforts, PG&E shall be required to provide free training on natural gas to every fire department and agency on a regional basis in PG&E's service territory.

(1) At least 45 days before the scheduled regional training, PG&E shall notify, by letter, the fire departments and agencies in the region of this free training opportunity. This training shall first be offered to those fire departments and agencies with gas transmission lines located in densely populated and urban areas. The training in these areas shall be offered starting no later than October 2011 and completed by June 2012. Subsequent regional trainings shall then be offered to other fire departments and agencies where gas transmission lines or gas storage facilities are sited in more rural areas. The training in the rural areas shall be completed by October 2012. After this natural gas training has been offered in all of PG&E's service territory, this training shall be repeated thereafter at three-year intervals.

(2) Once PG&E has developed a schedule of the dates and tentative locations for these natural gas training opportunities, PG&E shall send a letter(s) to the Executive Director, the director of the Consumer Protection and Safety Division (CPSD), and to the assigned Administrative Law Judge (ALJ) informing the Commission of the schedule for these training opportunities.

(3) Once the materials for this natural gas training have been finalized, a copy of the materials to be used at such trainings shall also be sent to the Executive Director, the director of CPSD, and the ALJ. Should CPSD or other Commission staff desire to observe this training, PG&E shall provide that opportunity.

(4) PG&E's natural gas training shall incorporate the following topics, which are described in detail in section 3.3. of this decision:

(a) A description of and an overview of the locations of PG&E's gas transmission, gas distribution lines, and gas storage facilities, in the area covered by the regional training; how these locations and facilities correlate to the maps that PG&E offers; the sensitive nature of the maps; and how these various facilities operate to transport, store, and deliver natural gas.

(b) How to reach PG&E's emergency contact number(s), and provide an overview of how PG&E dispatches its response personnel to a gas leak or fire.

(c) The precautionary measures that fire departments and agencies should take in responding to a natural gas leak or fire.

(d) How to recognize or detect natural gas leaks if there is no fire.

(e) What sort of evacuation procedures and restricted access procedures should be instituted by responding fire departments and agencies in the event of a natural gas leak or fire.

(f) The steps to take to prevent sparks or ignition from occurring in the area of the gas leak or fire.

(g) Provide information to the fire departments and agencies about the shut-off valves.

(h) Provide information about the best methods for controlling and managing a natural gas fire, and dissipating the natural gas to avoid an explosion or fire.

(i) Discuss best methods for PG&E dispatch to coordinate with emergency response personnel for escort assistance if traffic or other conditions delay a timely response from PG&E.

(j) PG&E shall have the flexibility to include other safety-related topics in the training relevant to the safe and reliable operation of PG&E's gas facilities.

c. PG&E shall be required to incorporate the following changes, as described in section 3.4. of this decision, into its dispatch and emergency response procedures within 60 days of the effective date of this decision:

(1) PG&E shall have personnel available 24 hours each day to answer emergency calls at its dispatch center, and to have qualified personnel available to respond to an emergency call involving its natural gas operations.

(2) PG&E shall provide all the fire departments and agencies in its service territory with the telephone number(s) for PG&E's emergency dispatch center.

(3) Upon receiving an emergency call, the PG&E dispatch center shall try to ascertain whether the incident involves a fire, natural gas leak or odor, the location or vicinity of the incident, the name of the person calling and a contact number, and shall immediately dispatch qualified PG&E emergency personnel who can timely respond to that particular type of emergency.

(4) If PG&E dispatch can ascertain that the fire or leak involves a PG&E gas transmission line, PG&E dispatch shall contact PG&E's gas operations control to determine where there are concurrent unusual readings, problems, or other abnormal operations on the gas transmission lines located in the area of the reported incident, and if so, PG&E dispatch shall immediately dispatch PG&E emergency response personnel qualified to respond to incidents involving gas transmission lines.

(5) PG&E shall have all of the necessary valve shut-off tools and equipment on board all designated PG&E emergency response vehicles, and at the PG&E maintenance yards that are used to respond to natural gas emergencies.

(6) The PG&E personnel dispatched to respond to the emergency call, and the PG&E dispatcher, shall follow the procedures set forth in numbered paragraphs 6 and 7 of section 3.4. of this decision.

(7) In an incident in which a fire department or agency has responded, PG&E dispatch shall notify the responding fire department or agency of the estimated time of arrival of the PG&E personnel who was dispatched.

(8) If a traffic-related or other problem delays the dispatched PG&E personnel from getting to the incident within the time estimated, the dispatched personnel shall contact PG&E dispatch to update the estimated time of arrival, and if the problem is likely to prevent a timely response, PG&E dispatch shall contact the responding fire department or agency and/or law enforcement for an emergency vehicle to escort the PG&E vehicle and personnel, if possible, so that PG&E personnel can timely respond to the incident. PG&E shall maintain an up-to-date list of the telephone number contacts of these emergency response departments and agencies for this purpose in case assistance is required.

(9) PG&E dispatch, gas control operations, and emergency response personnel, shall be trained on PG&E's dispatch and emergency response procedures once every two years, and a record of those attending the trainings shall be maintained.

(10) Within 90 days of the effective date of today's decision, PG&E shall transmit to the Executive Director, the director of CPSD, and the assigned ALJ, a copy of PG&E's emergency response and dispatch procedures that incorporate the dispatch procedures described above.

d. PG&E is directed to submit to the Executive Director, the director of CPSD, and to the ALJ, a copy of PG&E inspection records for its GT&S valves.

(1) PG&E is directed to submit the inspection records for 2009 and 2010 of all the GT&S valves by September 30, 2011, and the inspection records for 2011 and 2012 by March 30, 2013.

(2) CPSD is directed to review these inspection records to ensure that PG&E has inspected all of its GT&S valves in accordance with § 192.745 of Title 49 of the Code of Federal Regulations. If CPSD detects problems in PG&E's inspection records, CPSD shall bring this to the attention of the Executive Director and the Commissioners.

e. In accordance with section 3.5.2. of this decision, PG&E shall prepare and mail out two bill inserts on the topics of: (1) whom to call before someone excavates or digs; and (2) the number(s) to call in the event someone smells the odor of natural gas, and the precautions the caller should take if an odor is present.

(1) PG&E shall provide the Public Advisor's office with a draft of the two bill inserts by September 2, 2011 for review and approval.

(2) Once the bill inserts are approved by the Public Advisor's office, PG&E shall mail out these two bill inserts to all of its customers by December 31, 2011, and on an annual basis thereafter.

f. In accordance with section 3.5.2. of this decision, PG&E shall over the rate case period broaden its existing and ongoing customer outreach activities to promote public awareness of the general location, and confidence in the safety, of PG&E's gas transmission facilities that are located in urban and high consequence areas. To the extent possible, PG&E should use community-based organizations to assist in disseminating this kind of information. PG&E shall provide an annual report of these efforts to the Executive Director, the director of CPSD, and to the ALJ, beginning January 30, 2012, and ending on January 30, 2015.

2. Application 09-09-013 is closed, but the Docket Office may accept after the closing of this proceeding any documents that are required by this decision to be filed.

This order is effective today.

Dated _____, at San Francisco, California.

ATTACHMENT A
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