

# **APPENDIX A**



**Christine Cowser**  
 Vice President  
 Gas Asset Management & System  
 Operations

6111 Bollinger Canyon Road  
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 Christine.Cowser@pge.com

April 16, 2020

Mr. Terence Eng  
 Gas Safety and Reliability Branch  
 Safety and Enforcement Division Commission  
 505 Van Ness Avenue  
 San Francisco, CA 94102-3298

Reference: GO 112-F Section 101.3 Waiver Request for Leak Survey and Atmospheric Corrosion Inspections for CGI locations due to special circumstances

Dear Mr. Eng,

PG&E takes seriously the threat of the novel coronavirus (COVID-19) pandemic and is taking measures to protect the health and safety of our customers and our workforce while continuing to provide safe and reliable service. PG&E has developed guidance to identify the essential work that must continue for the benefit of our customers and communities, which was provided to the California Public Utilities Commission on March 27, 2020. As indicated in that guidance, we are temporarily suspending some work that does not have an immediate impact on system safety or reliability.

In accordance with GO 112-F Section 101.3, we are respectfully requesting a waiver for a six-month extension from the current due dates to complete Leak Surveys and Atmospheric Corrosion Inspections where a “Can’t Get In” (CGI) situation exists, as described in the letter on April 3, 2020. CGI situations typically include locations in customers’ homes, garages, basements, fenced backyards, and where unfriendly animals are present. We have attempted to access these locations on at least one prior field visit. However, under the current COVID-19 circumstances, we do not wish to request permission to enter customer premises unless the work is immediately essential for the continued safety of our gas delivery system. The temporary suspension of Leak Survey and Atmospheric Corrosion Inspection CGIs is to minimize the potential health risk to both our workforce and the public where social distancing is not possible, and the six-month extension is requested so this work can be incorporated into Leak Survey and Atmospheric Corrosion Inspection resource plans when the COVID-19 restrictions have been lifted. Documents are attached that detail the known assets where work has been temporarily suspended.

During the ongoing Leak Survey and AC Inspection work, additional CGIs will most likely be identified and some of these may be close enough to the due date that they will go past due. We will update you on the actual number of locations on a monthly basis in our CGI report.

<b>Month Due</b>	<b>49 CFR 192.723(b)(1) and GO112F 143.1 -Leak Survey – *Known Population – 1-year survey</b>	<b>49 CFR 192.723(b)(2) – Leak Survey – *Known Population – 5-year survey</b>	<b>49 CFR 192.481(a)– Atmospheric Corrosion Inspections – *Known Population</b>
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April	79	65	528
May	5	415	1950
June	110	366	5325
Estimated Total	204	846	7803

49 CFR 192.723 (b)(1) Distribution Systems: A leakage survey with leak detector equipment must be conducted in business districts, 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 an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year. We are respectfully requesting a six-month extension from the current due dates for this requirement

143.1 Leakage Surveys and Procedures

(a) A gas leak survey, using leak detecting equipment, 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 an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year. We are respectfully requesting a six-month extension from the current due dates for this requirement

49 CFR 192.723 (b)(2) Distribution Systems: Leakage Surveys requires that leakage surveys must be conducted as frequently as necessary, but at least once every 5 calendar years not exceeding 63 months. We are respectfully requesting a six-month extension from the current due dates for this requirement.

49 CFR 192.481(a)– Atmospheric Corrosion Control: Monitoring requires that each Operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion. Onshore locations must be inspected at least once every 3 calendar years, but with intervals not exceeding 39 months. We are respectfully requesting a six-month extension from the current due dates for this requirement.

We have made substantial progress on resolving the existing population of Leak Survey and AC Inspection CGI locations within the last year and it is our objective to resume these activities as soon as it is safe to do so. The COVID-19 situation is evolving, and we will continue to adjust our work as necessary to deliver safe, reliable energy and to keep our customers, communities, and workforce safe.

We appreciate your consideration of PG&E’s waiver request and look forward to answering any questions you may have.

Sincerely,

/s/ Christine Cowsert

Vice President, Gas Asset Management & System Operations

- cc: Leslie Palmer, CPUC
- Dennis Lee, CPUC
- Meredith Allen, PG&E
- Vince Tanguay, PG&E
- Eric Kurtz, PG&E

Susie Richmond, PG&E

Attachments : AC Inspection and Leak Survey CGI 2020 Suspension

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



April 29, 2020

Christine Cowsert, Vice President  
Gas Asset Management & System Operations  
6111 Bollinger Canyon Road, Room 4590-D  
San Ramon, CA 94583

SUBJECT: GO 112-F Section 101.3 Waiver Request for Leak Survey and Atmospheric Corrosion Inspections for CGI locations due to special circumstances

Dear Ms. Cowsert:

On April 16, 2020, Pacific Gas and Electric Company (PG&E) submitted a waiver request to the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) for a six-month extension from the current due dates to complete Leak Surveys and Atmospheric Corrosion Inspections where a "Can't Get In" (CGI) situation exists, due to special circumstances. On behalf of SED, the Gas Safety and Reliability Branch (GSRB) hereby grants this waiver request until October 29, 2020 or until 1 month after the Shelter-In-Place is lifted. The waiver request applies to the following code sections: 49 CFR 192.723 (b)(1), 192.723 (b)(2), 192.481(a), and General Order 112-F Section 143.1.

It is further ordered that upon the passage of sixty (60) days from the date this Order is signed and no objection from the United States Secretary of Transportation having been received-as provided for in 49 U.S.C. § 60118, this Order shall become final and effective.

GSRB staff reviewed PG&E's waiver request materials and considered the information provided to the GSRB in coming to our conclusion to grant the waiver request. GSRB considered the following factors:

1. The temporary suspension of Leak Survey and Atmospheric Corrosion Inspection CGIs is to minimize the potential health risk to both PG&E's workforce and the public where social distancing is not possible.
2. PG&E has made substantial progress on resolving the existing population of Leak Survey and AC Inspection CGI locations within the last year and it is PG&E's objective to resume these activities as soon as it is safe to do so.
3. The COVID-19 situation is evolving, and PG&E will continue to adjust its work as necessary to deliver safe, reliable energy and to keep its customers, communities, and workforce safe.
4. Typical layers of protection remain in place to address potential safety concerns from leakage, including: pipeline design elements, equipment testing & maintenance, and warning features (e.g. public awareness, gas odorant).

5. PG&E will provide notification to CGI customers to reinforce awareness to call PG&E if they smell gas or have concerns with their gas meter.
6. When the Shelter-In-Place is lifted allowing normal operations like customer appointments to be done safely, PG&E will conduct a reevaluation and assessment of the current total backlog at that point to support an escalated workplan. This plan will include preemptive customer engagement to optimize scheduling appointments using a variety of methods (phone, email, letters). Expanding appointment availability, increasing available personnel, and reinforcing the importance of the requirements will help better serve PG&E's customers and realign compliance due dates.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Terence Eng", with a long horizontal flourish extending to the right.

Terence Eng  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

cc: Dennis Lee ([dennis.lee@cpuc.ca.gov](mailto:dennis.lee@cpuc.ca.gov)), SED/GSRB,  
Wai Yin Chan ([wai-yin.chan@cpuc.ca.gov](mailto:wai-yin.chan@cpuc.ca.gov)), SED/GSRB

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

May 18, 2020

Christine Cowsert, Vice President  
Gas Asset Management & System Operations  
Pacific Gas and Electric Company  
6111 Bollinger Canyon Road, Room 4590-D  
San Ramon, CA 94583

**SUBJECT: GO 112-F Section 101.3 Waiver Request for Leak Survey and Atmospheric Corrosion Inspections for CGI locations due to special circumstances**

Dear Ms. Cowsert:

This is a follow-up to the Safety and Enforcement Division (SED)'s April 29, 2020 letter and provides further procedural clarification.

On April 16, 2020, Pacific Gas and Electric Company (PG&E) submitted a waiver request to SED for a six-month extension from the current due dates to complete Leak Surveys and Atmospheric Corrosion Inspections where a "Can't Get In" (CGI) situation exists, due to the current COVID-19 social distancing requirements. The temporary suspension of Leak Survey and Atmospheric Corrosion Inspection CGIs is to minimize the potential health risk to both PG&E's workforce and the public where social distancing is not possible. The waiver request, submitted under section 101.3 of General Order 112-F, applies to the following code sections: 49 CFR 192.723 (b)(1), 192.723 (b)(2), 192.481(a), as well as General Order 112-F Section 143.1.

On March 4, 2020, California proclaimed a State of Emergency and on March 19 Governor Gavin Newsom issued Executive Order N-33-20 that required Californians to maintain distance to protect the public health. On April 29, 2020, SED's Gas Safety and Reliability Branch (GSRB) favorably responded to PG&E via a letter supporting PG&E's request until October 29, 2020, or until one month after the Shelter-In-Place is lifted contingent upon multiple factors.

My review of General Order 112-F indicates that requests for waivers to comply with the rules, under section 101.3, are formally adopted by the California Public Utilities Commission (Commission). While in the ordinary course of business, a utility would formally apply for such a waiver, the importance of current social distancing requirements, as evidenced by the March 4 proclamation of a State of Emergency and Executive Order N-33-20, call for an immediate instruction that PG&E suspend Leak Survey and Atmospheric Corrosion Inspection CGIs is to minimize the potential health risk to both PG&E's workforce and the public where social distancing is not possible, as instructed by SED's GSRB on April 29, 2020.

Ms. Cowsert  
May 18, 2020  
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I am issuing this directive, under the authority granted by Commission Policy CL-1, which states:

.. it is the Commission's policy that:

4. The Executive Director shall have authority to act expeditiously and in coordination with other agencies of the State of California in emergencies endangering the public health, safety and the environment...

I intend to obtain ratification by the full Commission of the actions directed by this letter at a future Commission meeting where ratification will further satisfy the General Order's provisions regarding waivers.

Sincerely,



Alice Stebbins  
Executive Director

cc: Leslie Palmer, Director, Safety and Enforcement Division  
Terence Eng, Program Manager, Gas Safety and Reliability Branch





**Christine Cowser**  
Vice President  
Gas Asset Management & System  
Operations

6111 Bollinger Canyon Road  
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June 26, 2020

Mr. Terence Eng  
Gas Safety and Reliability Branch  
Safety and Enforcement Division Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

Reference: GO 112-F Section 101.3 Waiver Request for Leak Survey and Atmospheric Corrosion Inspections for CGI locations due to special circumstances – Addendum 1

Dear Mr. Eng,

We are submitting this addendum to our initial Waiver Request submitted 4/16 2020 and discussed during our meeting on 6/17/2020. Due to the continuing complexities and changing requirements of performing work during the on-going Covid-19 pandemic, we are amending our initial request to allow for a time extension through 12/31/2021 based on the information provided within this letter.

Due to COVID-19, we are requesting a due date extension for Leak Survey and Atmospheric Corrosion inspections designated as Can't Get In (CGI). These compliance inspections cannot be performed timely due to limited access to customer homes. The current waiver allows for a six-month extension; however, this will not allow for enough time to reallocate this work back into the plan in a manageable way.

COVID-19 concerns have resulted in a significant increase in customers denying us access to their homes to properly inspect the gas meter. We are requesting that we extend the waiver due date to 12/31/2021 which will allow us to level the work over the next 18 months in an efficient manner that aligns with planned resource levels. In a COVID-19 environment, we are re-establishing CGI desk operations to allow for indoor appointments beginning July 1<sup>st</sup>, 2020. However, we will continue to abstain from service disconnections which includes letters and notifications that previously included this language to encourage customer compliance. Without this language and adherence to the CGI process, we are limited in our approach to encourage customers to provide us with access to PG&E's gas meter.

The data below is a forecast based on the customer notifications without disconnections. There are still several other known and unknown factors that impact this process including due date extensions, new orders to Shelter-In-Place (SIP), and limitations to the service disconnection process that will all have an impact on the assumptions provided below.

### **Obstacles**

- Door knocks for access to customer homes during regular foot survey were halted to avoid the increased risk of exposing customers and employees to the virus. As a result, the CGI rate increased from 40% to 60% in the SF bay area. This increase equates to approximately 1,500 to 2,000 additional CGIs submitted per month.

- The increase in CGIs and upcoming due dates month-over-month has limited our ability to prioritize the work effectively and restricted our ability to manage the upcoming compliance dates with limited or no access to customer homes.
- The inability to communicate the potential for service disconnections and performing the actual service disconnections themselves limits our ability to encourage customer compliance.
- Unknown timeline for reduction or increases to Shelter-In-Place orders provides an unpredictable environment dependent on factors outside our control.
- Resource constraints due to a continued large number of resources off work due to COVID -19.

### **Leak Survey CGI Data**

- Jan 1, 2020 backlog started at **4,619**
- Current YTD June backlog is at **22,733**
- Number of new CGIs based on current COVID SIP protocols and current run rate is approx. 60%
- As of July 1, 2020, CGI find rate should reduce back down to 40% since door knocks will be re-initiated
- Average month-over-month find rate is **3,200**
- Average completion rate of levelized plan is **3,300**
- Nov 2020-Jan 2021 the find rate drops to **0** since no Leak Survey production survey takes place
- Plan to increase resources during these months (Nov-Jan) to reduce additional backlog
- Execution between Feb-Oct 2021 is levelized with resources with plan to increase resources Nov-Dec 2021 when traditional survey is completed to reduce remaining backlog
- Leak Survey CGI backlog EOY 2021 is anticipated to be back to normal levels for intake and backlog

### **Atmospheric Corrosion CGI Data**

- AC CGI backlog is system wide
- Jan 1, 2020 backlog started at **29,500**
- Current YTD June backlog is at **44,545**
- Average AC CGI find rate is approx. 19%
- Average month-over-month find rate is approx. **2,000**
- Average completion rate on levelized plan is **5,040**
- 2020-Mid 2021 plan for levelized resource plan
- Mid 2021-Dec 2021 will allow for increase in resources to achieve continued backlog reduction
- AC CGI backlog EOY 2021 is anticipated to be back to normal levels for intake and backlog

We have made substantial progress on resolving the existing population of Leak Survey and AC Inspection CGI locations within the last year and it is our objective to resume these activities as soon as it is safe to do so. The COVID-19 situation is evolving, and we will continue to adjust our work as necessary to deliver safe, reliable energy and to keep our customers, communities, and workforce safe.

We appreciate your consideration of PG&E's waiver request and look forward to answering any questions you may have.

Sincerely,

/s/ Christine Cowsert

Vice President, Gas Asset Management & System Operations

cc: Leslie Palmer, CPUC  
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Attachments : AC Inspection and Leak Survey CGI 2020 Suspension