



**ChristiAne Mason**  
Senior Manager  
Regulatory & Field Compliance  
Gas Operations

6111 Bollinger Canyon Road  
San Ramon, CA 94583  
**Phone:** 925.328.5795  
**E-mail:** [c6mw@pge.com](mailto:c6mw@pge.com)

April 21, 2014

Mr. Ken Bruno  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

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

Dear Mr. Bruno:

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 Public Awareness Program, from December 9 - 11, 2013. On March 20, 2014, the SED submitted their audit report, identifying violations and recommendations. PG&E appreciates SED’s assessment and has carefully considered each violation and recommendation, as described in the attached response to the CPUC audit report.

Please contact Larry Berg at (925) 328-5758 or [LMB5@pge.com](mailto:LMB5@pge.com) for any questions you may have regarding this response.

Sincerely,

/S/  
ChristiAne Mason

Attachments

cc: Aimee Cauquiran, CPUC  
Terence Eng, 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 March 20, 2014  
Public Awareness Program**

**INSPECTION INFORMATION**

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
December 9 - 11, 2013	AOC-1	Terence Eng	(415) 703-5326

**INSPECTION FINDING**

CPUC Finding	<p>1. <u>Audit Findings Identified in Protocol 1.04, Stakeholder Audience Identification</u></p> <p><u>Reference Title 49, Code of Federal Regulations (CFR) § 192.616 (d), (e), (f); American Petroleum Institute Recommended Practice (API RP) 1162 Section 2.2 and Section 3</u></p> <p><i>Does the operator’s program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?</i></p> <p>A. In PG&amp;E’s Risk Management Procedure (RMP)-12, Appendix A Baseline: Stakeholder Definitions, Identification and Outreach table, PG&amp;E explicitly states for each stakeholder audience how often the audience will be identified with the following exceptions:</p> <ul style="list-style-type: none"> <li>i. Affected Public – Residents, Business, or places of congregation located within 1000’ feet of Transmission Pipeline</li> <li>ii. Affected public - Residents, Business, or places of congregation located within 1000’ feet of a Gathering Pipeline</li> <li>iii. Excavators</li> </ul> <p>SED recommends PG&amp;E explicitly state how often PG&amp;E will identify the individual stakeholders for the aforementioned stakeholder groups.</p> <p>B. PG&amp;E verbally indicated that it will perform an analysis whenever a stakeholder list from one year to the next differs by more than 10% to determine the underlying cause. To ensure thoroughness and consistency, SED recommends that PG&amp;E consider documenting its procedure for performing the analysis and to include at a minimum the process, roles, and responsibilities. PG&amp;E should maintain records of the analysis and its findings.</p>
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**PG&E RESPONSE**

<p>A. In response to SED’s recommendation, PG&amp;E has added the following language to Revision 10 of RMP-12 Appendix A Baseline Definitions, Identification and Outreach table (See Attachment 1):</p> <ul style="list-style-type: none"> <li>• Affected Public contacts within 1,000’ feet of Transmission Pipeline will be identified or updated annually prior to each baseline campaign outreach.</li> </ul>
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Definitions:      NOV – Notice of Violation  
                          AOC – Area of Concern

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- Affected Public contacts within 1,000' feet of Gathering Pipeline will be identified or updated annually prior to each baseline campaign outreach.
- Excavator contacts will be identified or updated annually prior to each baseline campaign outreach.

B. In response to SED's recommendation, PG&E has added a new attachment to Revision 10 of RMP-12 that documents how variance analysis is conducted when lists differ by more than 10% from one year to the next (See Attachment 2).

**ATTACHMENTS**

<b>Attachment #</b>	<b>Title or Subject</b>
1	RMP-12 Appendix A Baseline Definitions, Identification and Outreach Table
2	RMP-12 Stakeholder Fluctuation Analysis

**ACTION REQUIRED**

<b>Action To Be Taken</b>	<b>Due Date</b>	<b>Responsible Dept.</b>
N/A		

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**INSPECTION FINDING**

CPUC Finding	<p>2. <u>Audit Findings Identified in Protocol 1.06, Written Evaluation Plan</u></p> <p><u>Reference Title 49, CFR § 192.616 (c), (i)</u></p> <p><i>Does the operator's program include a written evaluation process that specifies how the operator will periodically evaluate program implementation and effectiveness? If not, did the operator provide justification in its program or procedural manual?</i></p> <p>PG&amp;E's RMP-12 (Public Awareness Program Standard) states that the margin of error thresholds are in conjunction with advice from research firms and internal subject matter experts. SED recommends PG&amp;E consider including in its standard, or as an appendix to the standard, the thought process behind each threshold, industry standards referenced (if applicable), and identification of the research firms and subject matter experts consulted.</p>
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**PG&E RESPONSE**

<p>In response to SED's recommendation, PG&amp;E is working with our internal research experts and external research partners to create a white paper that discusses the margin of error thresholds outlined in RMP-12 for public awareness effectiveness research, the assumptions associated with these thresholds and industry standards.</p>
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**ATTACHMENTS**

Attachment #	Title or Subject
None	

**ACTION REQUIRED**

Action To Be Taken	Due Date	Responsible Dept.
<p>Finalize Public Awareness Evaluation – Survey Margin of Error (MOE) Thresholds white paper as part of four-year program effectiveness review process</p>	April 30, 2014	Public Awareness

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December 9 - 11, 2013	AOC – 3	Terence Eng	(415) 703-5326

**INSPECTION FINDING**

<b>CPUC Finding</b>	<p>3. <u>Audit Findings Identified in Protocol 2.01, English and other Languages</u></p> <p><u>Reference Title 49, CFR § 192.616 (g); API RP 1162 Section 2.3.1</u></p> <p><i>Did the operator develop and deliver materials and messages in English and in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?</i></p> <p>PG&amp;E's RMP-12 states that the PAP administrator will monitor changes in languages using United States Census data and will recommend any changes through the annual review or program effectiveness report, but does not explicitly state how often Census data will be polled. SED recommends PG&amp;E explicitly state in its RMP how often it polls census data.</p>
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**PG&E RESPONSE**

<p>PG&amp;E has historically utilized the 5-year data set from the American Community Studies (ACS) data, a subset of the United States Census. The frequency and process for pulling, reviewing and utilizing ACS data to drive discussions and decisions regarding materials prepared in languages other than English is now documented in an attachment to RMP – 12 (See Attachment 3 and Attachment 4 Section 4.1 of RMP-12 Rev. 10).</p>
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**ATTACHMENTS**

<b>Attachment #</b>	<b>Title or Subject</b>
3	Attachment E: US Census & American Community Study Data Analysis
4	RMP-12 – Pipeline Public Awareness Program Rev10

**ACTION REQUIRED**

<b>Action To Be Taken</b>	<b>Due Date</b>	<b>Responsible Dept.</b>
N/A		

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**INSPECTION FINDING**

CPUC Finding	<p>4. <u>Audit Findings Identified in Protocol 2.02, Message Type and Content</u></p> <p><u>Reference Title 49, CFR § 192.616 (d)</u></p> <p><i>Did the messages the operator delivered specifically include provisions to educate the public, emergency officials, local public officials, and excavators on the:</i></p> <ul style="list-style-type: none"> <li>• <i>Use of a one-call notification system prior to excavation and other damage prevention activities;</i></li> <li>• <i>Possible hazards associated with unintended releases from a gas, hazardous liquid, or carbon dioxide pipeline facility;</i></li> <li>• <i>Physical indications of a possible release;</i></li> <li>• <i>Steps to be taken for public safety in the event of a gas, hazardous liquid, or carbon dioxide pipeline release; and</i></li> <li>• <i>Procedures to report such an event (to the operator)?</i></li> </ul> <p>A. SED recommends PG&amp;E consider explicitly stating the requirement to hand dig around pipe on the Bill Insert for Affected Public.</p> <p>B. On PG&amp;E’s School Transmission Line Safety Handout, the National Pipeline Mapping System link is labeled correctly as <a href="http://www.npms.phmsa.gov/PublicViewer">www.npms.phmsa.gov/PublicViewer</a>. Since the link does not work when lower-case letters are input, SED recommends PG&amp;E consider adding a notation to indicate that the website address is case-sensitive.</p> <p>C. Pipeline Emergency Response Guidelines, page 11, incorrectly states, “Ethane is an isomer.” PG&amp;E needs to revise or remove this statement because Ethane is not an isomer.</p> <p>D. Pipeline Emergency Response Guidelines, page 3, ambiguously states, “Despite statistics, accidents can happen”. SED recommends PG&amp;E elaborate the term “statistics”, e.g. statistics that show that pipelines are one of the safest modes of transportation.</p> <p>E. “2013 Excavation Guide for Excavators” is missing Item 7 (Gathering Pipeline Location and Purpose) on the message map.</p>
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**General Order 112-E Findings  
CPUC Inspection Report, dated March 20, 2014  
Public Awareness Program**

**PG&E RESPONSE**

A. PG&E has added hand dig requirement language to the bill insert that was distributed in March 2014 (See Attachment 5). In addition, hand dig requirement language was also added to the gas safety e-campaign that was distributed in March 2014 (See Attachment 6). The public awareness program manager is currently reviewing other materials for the affected public and will identify additional ways to communicate hand dig requirements.

B. PG&E notified the Pipeline Hazardous Material Administration (PHMSA) regarding the issue with the link. PHMSA changed the link to work with both upper and lower-case letters. PHMSA’s change to the NPMS system eliminates the need for PG&E to make additional changes to materials.

C. PG&E notified the Pipeline Association of Public Awareness (PAPA) board in December 2013 regarding the error. PAPA’s board will include the corrected content in the revised version of the 2014 Pipeline Emergency Response Guidelines that is expected to be finalized and distributed by December 2014.

D. PG&E notified the Pipeline Association of Public Awareness (PAPA) board in December 2013 regarding the error. PAPA’s board will include the corrected content in the revised version of the 2014 Pipeline Emergency Response Guidelines that is expected to be finalized and distributed by December 2014.

E. PG&E notified the Pipeline Association of Public Awareness (PAPA) board in December 2013 regarding the error. PAPA’s board included new language in the “2014 Excavation Guide for Excavators” to better communicate this message. The updated “2014 Excavation Guide for Excavators” will be mailed by April 30, 2014 (See Attachment 7).

**ATTACHMENTS**

Attachment #	Title or Subject
5	March 2014 Gas Safety Bill Insert
6	Customer Gas Safety E-mail
7	2014 Excavation Guide for Excavators – Message Map

**ACTION REQUIRED**

Action To Be Taken	Due Date	Responsible Dept.
Review materials for the affected public and identify other areas where hand dig requirement language can be included.	December 31, 2014	Public Awareness

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**INSPECTION FINDING**

<b>CPUC Finding</b>	<p>5. <u>Audit Findings Identified in Protocol 2.05, Considerations for Supplemental Program Enhancements, Reference Title 49, CFR § 192.616 (c); API RP 1162 Section 6.2</u></p> <p><i>Did the operator consider, along all of its pipeline systems, relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stakeholder audience?</i></p> <p>SED recommends PG&amp;E consider alternative means to remind excavators of the hand dig requirements. For example, after PG&amp;E marks their facilities in response to an Underground Service Alert ticket, PG&amp;E should consider, when submitting a positive response to the third party, including a reminder to hand dig where necessary.</p>
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**PG&E RESPONSE**

<p>PG&amp;E has added language regarding hand dig requirements to the positive response process. Language regarding hand dig requirements within the tolerance zone was incorporated and tested as part of the most recent Irth system update and is referenced in RMP-12 Appendix B: Supplemental Outreach Activities &amp; Triggers (See Attachment 8).</p>
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**ATTACHMENTS**

<b>Attachment #</b>	<b>Title or Subject</b>
8	RMP-12 Appendix B: Supplemental Outreach Activities & Triggers

**ACTION REQUIRED**

<b>Action To Be Taken</b>	<b>Due Date</b>	<b>Responsible Dept.</b>
N/A		

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**INSPECTION FINDING**

CPUC Finding	<p>6. <u>Audit Findings Identified in Protocol 2.06, Maintaining Liaison with Emergency Response Officials, Reference Title 49, Code of Federal Regulations CFR § 192.616 (c); API RP 1162 Section 4.4</u></p> <p style="color: red;"><i>Did the operator establish and maintain liaison with appropriate fire, police, and other public officials to: learn the responsibility and resources of each government organization that may respond, acquaint the officials with the operator’s ability in responding to a pipeline emergency, identify the types of pipeline emergencies of which the operator notifies the officials, and plan how the operator and other officials can engage in mutual assistance to minimize hazards to life or property?</i></p> <p>PG&amp;E currently reaches out to different agencies to provide emergency training, but with limited scheduling and tracking documentation, the process appears to be rudimentary. SED recommends PG&amp;E consider creating a database of agencies intended for outreach, including when each agency had received emergency training, and when they are due for future training.</p>
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**PG&E RESPONSE**

<p>In 2013, PG&amp;E combined the Public Awareness (PA) and Emergency Preparedness (EP) functions into a common department. As part of this integration, PA and EP have worked together to create new processes and tools for identifying emergency response agency contacts and tracking how the company interacts with these agencies as part of public awareness and emergency responder training activities.</p> <p>In the third quarter of 2013, PA and EP launched an electronic tool for tracking and analyzing emergency responder training workshop attendance. PA and EP combined existing emergency response agencies lists and utilized internal subject matter experts with local relationships to verify the accuracy and completeness of the updated agency list. Furthermore, PA and EP are currently evaluating the need for additional technological tools for tracking first responder agencies, including an online Customer Relationship (CRM) database tool.</p>
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**ATTACHMENTS**

<b>Attachment #</b>	<b>Title or Subject</b>
None	

**ACTION REQUIRED**

<b>Action To Be Taken</b>	<b>Due Date</b>	<b>Responsible Dept.</b>
Evaluate the need for additional technological tools including an online CRM database tool.	December 31, 2014	Emergency Preparedness

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**INSPECTION FINDING**

<b>CPUC Finding</b>	<p>7. <u>Audit Findings Identified in Protocol 4.02, Measure Program Outreach</u></p> <p><u>Reference Title 49, CFR § 192.616 (c); API RP 1162 Section 8.4.1</u></p> <p><i>In evaluating effectiveness, did the operator track actual program outreach for each stakeholder audience within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?</i></p> <p>Page 21 of PG&amp;E’s RMP-12 indicates that PG&amp;E may use online surveys and online panels to assess message comprehension and understanding, yet PG&amp;E verbally indicated that it has not exercised nor thoroughly examined these options. SED recommends PG&amp;E consider examining the feasibility and applicability of online surveys and panels for different stakeholder audiences.</p>
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**PG&E RESPONSE**

<p>PG&amp;E currently utilizes a variety of survey methods to measure public awareness effectiveness including phone surveys, mail surveys, interviews and online panels (through participation in JD Power and Associates Customer Satisfaction survey).</p> <p>PG&amp;E has considered using online surveys in the past but determined that other survey methods were preferable due to difficulty obtaining a significant percentage of e-mail addresses. PG&amp;E will consider online surveys for future research focusing on stakeholder audiences for which the company has a significant percentage of e-mail addresses.</p>
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**ATTACHMENTS**

<b>Attachment #</b>	<b>Title or Subject</b>
None	

**ACTION REQUIRED**

<b>Action To Be Taken</b>	<b>Due Date</b>	<b>Responsible Dept.</b>
N/A		

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**INSPECTION FINDING**

CPUC Finding	<p>8. <u>Audit Findings Identified in Protocol 4.06, Measure Bottom-Line Results</u></p> <p><u>Reference Title 49, CFR § 192.616 (c); API RP 1162 Section 8.4.4</u></p> <p><i>In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines? If not, did the operator provide justification in its program or procedural manual?</i></p> <p>A. PG&amp;E must explicitly provide a means to track reported pipeline damage occurrences that did not result in a release of gas. This is a violation of Title 49, CFR § 192.616 (c).</p>
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**PG&E RESPONSE**

<p>PG&amp;E disagrees with this violation. PG&amp;E currently tracks pipeline damage that did not result in a leak in our Non-Leaking Information System (NLIS). PG&amp;E includes these in the number of near miss events. The bottom-line results shared during the audit include reference to near miss events. As recommended in section 8.4.4 of API RP 1162, this data will be reported and trended over time to monitor trends as part of the four-year program effectiveness evaluation.</p> <p>As referenced in Section 6.2 of RMP-12, incidents that did not result in a leak will be analyzed and included in the four-year public awareness effectiveness report. The next four-year effectiveness report will be completed by June 20, 2014.</p>
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**ATTACHMENTS**

<b>Attachment #</b>	<b>Title or Subject</b>
4	RMP-12 – Pipeline Public Awareness Program Rev10

**ACTION REQUIRED**

<b>Action To Be Taken</b>	<b>Due Date</b>	<b>Responsible Dept.</b>
Ensure that data regarding “pipeline damage that did not result in a leak” is clearly labeled in the next four-year effectiveness report	June 20, 2014	Public Awareness

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**INSPECTION FINDING**

CPUC Finding	<p>8. <u>Audit Findings Identified in Protocol 4.06, Measure Bottom-Line Results</u></p> <p><u>Reference Title 49, CFR § 192.616 (c); API RP 1162 Section 8.4.4</u></p> <p><i>In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines? If not, did the operator provide justification in its program or procedural manual?</i></p> <p>B. SED recommends PG&amp;E explicitly define “near miss” in its RMP.</p> <p>C. SED recommends PG&amp;E consider tracking the number of incidents reported due to media coverage to correlate with the affected public’s perception of the safety of PG&amp;E’s pipelines.</p>
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**PG&E RESPONSE**

<p>B. PG&amp;E is currently working with a group of large gas utility operators across the country to develop an industry consensus definition for “near miss” that will distinguish between “near miss” events impacting transmission, gathering and distribution assets. This industry definition for “near miss” will be referenced in a future version of RMP-12.</p> <p>C. PG&amp;E currently measures the public’s perception of safety of PG&amp;E’s lines using survey data collected through a phone survey with individuals living within PG&amp;E’s gas service area. In addition, PG&amp;E tracks the number of incidents reported due to media coverage as part of our incident reporting process. We will investigate the benefits of correlating media coverage and safety perception during our four-year effectiveness review.</p>
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**ATTACHMENTS**

<b>Attachment #</b>	<b>Title or Subject</b>
None	

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**ACTION REQUIRED**

<b>Action To Be Taken</b>	<b>Due Date</b>	<b>Responsible Dept.</b>
Investigate the benefits of correlating incident media coverage and safety perception	June 30, 2014	Public Awareness

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