

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 12, 2017

GI-2016-11-PGE29-05

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

SUBJECT: General Order 112 Gas Inspection of PG&E's Public Awareness Program (PAP) Effectiveness

Dear Mr. Singh:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112 inspection of Pacific Gas & Electric (PG&E) Company's Public Awareness Effectiveness Program from November 28 – December 2, 2016.<sup>1</sup>

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records that SED inspected during the audit.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the violations and observations noted in the Summary.

If you have any questions, please contact Sikandar Khatri at (415) 703-2565 or by email at [Sikandar.Khatri@cpuc.ca.gov](mailto:Sikandar.Khatri@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno - Program Manager  
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

cc: Dennis Lee, SED  
Mike Bradley, PG&E Compliance Gas Operations  
Susie Richmond, PG&E Gas Operations Regulatory Compliance and Risk Analysis

<sup>1</sup> General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.

## SUMMARY OF INSPECTION FINDINGS

### **I. Probable Violations**

1. Title 49 Code of Federal Regulations §192.616(d) states:

*“The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:*

*(1) Use of a one-call notification system prior to excavation and other damage prevention activities;*

*(2) Possible hazards associated with unintended releases from a gas pipeline facility...”*

SED reviewed different flyers PG&E uses for its Public Awareness Program. Some flyers such as 2016 flyers for the “Core Gas Mailer” and “Gas Safety Bill Insert” do not address 192.616(d)(2). Therefore, SED recommends to include this information in all PG&E documents where required.

2. Title 49 Code of Federal Regulations §192.616(e) states:

*“The program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.”*

PG&E procedure, TD-5801P-01 sections 1.3 and 4.1 list the stakeholders but has no mention of school districts. However, Appendix B of the procedure lists the school districts as part of outreach activities. PG&E need to amend the procedure to list “school districts” as one of the recipient.

## **II. Areas of Concern/ Observations/Recommendations**

SED made the following observations during the audit.

1. PG&E procedure TD-5801P-01, Appendix B outlines the stakeholders who should receive the communication. These include school districts, universities/college, businesses, hospitals, daycare centers and others. On an inquiry, PG&E mentioned that in most cases flyers inserted with bills usually go to the accounting personnel or administrators. However, SED expressed concerned that this information may not be reaching the personnel such as facility managers who need to know about the risks. SED recommends that facility administrators may be added as secondary recipients as a part of stakeholders.
2. PG&E performs annual effectiveness surveys for its Public Awareness Program through a third party vendor. SED observed that a sample size of 400 customers is selected randomly. On an inquiry PG&E provided information that increasing the sample size will not significantly provide more information. PG&E's has approximately 4.3 million gas customers which include a variety, such as residences, places of congregation (churches and community centers), businesses (small and large), farmers (which are considered relatively higher risk regarding excavation damage) and others. If the all customers are of same nature, probably 400 sample size was a good choice. SED recommends that appropriate samples from each segment of customer base be selected separately to get feedback, and also to have good representation of geographic areas its serves.
3. PG&E explained that a 'Working Group' of 'Distribution Public Awareness Council (DPAC)' develops questions for the 'effectiveness surveys'. The questions used for the surveys have been same since 2014, and PG&E maintained that these are kept same for the sake of comparison over years. SED suggests that after regular intervals, considering the feedback from effectiveness surveys, the questions should be revisited to determine that whether they are still useful for appropriate feedback and if there is a need for any additional questions.
4. SED recommends that it will be helpful for PG&E's Public Awareness Program to perform the effectiveness evaluations and outreach activities during or after the large incidents, for example, Napa Valley Earthquake in 2014. It will provide an opportunity to get feedback from a number of stakeholders such as in the case of Napa earthquake, public, businesses, emergency responders, public official, master meter parks and others.