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July 10, 2020

Mr. Robert Burrough  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
840 Bear Tavern Road, Suite 300  
West Trenton, NJ 08628

Re: Notice of Amendment (NOA) CPF 1-2020-0006M, - Pacific Gas and Electric Company (PG&E)  
Response and Closure Request

Dear Mr. Burrough:

Pacific Gas and Electric Company (PG&E) submits this response to NOA CFP 1-2020-0006M, dated June 12, 2020, including a copy of the amended PG&E procedure (TD-4413P-02), and respectfully requests your review in support of closure.

For clarity, the issue identified in the NOA will be repeated followed by PG&E's response.

Item #1:

**§ 192.605 Procedural manual for operations, maintenance and emergencies.**

- (a) *General.* Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

PG&E's procedures for reporting safety related conditions were inadequate. Specifically, PG&E's procedure TD-4413P-02 only required PG&E to notify California Public Utility Commission (PUC) of safety related conditions reports (SRCRs) at UNGS facilities rather than notifying Cal GEM for UNGS SRCRs. CalGEM is the state entity that has entered into an Agreement with PHMSA to perform safety inspections of intrastate UNGS facilities within the state of California.

At the time of the inspection, CalGEM discovered that PG&E's procedures did not require notification of UNGS SRCRs to be provided to CalGEM, as required by § 191.7(c)1

Response to Item #1:

PG&E's procedure on reporting of safety-related conditions (TD-4413P-02) has been updated to assure concurrent submission to CalGEM when dealing with a UNGS facility (see Section 3 of Attachment 01).

With the procedure amended, PG&E believes the issue identified in the NOA has been satisfactorily addressed. Upon completion of your review of the document, PG&E requests notification of closure of this NOA.

Please contact Justin Leany at (415) 603-9552 or justin.leany@pge.com for any questions you may have regarding this response.

Sincerely,

/s/ Christine Cowsert

Vice President, Gas Asset Management & System Operations

cc: Vince Tanguay, PG&E  
Susie Richmond, PG&E

Attachement: Att 01\_TD-4413P-02 Reporting SRC.pdf