U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

February 14, 2023

Philip Simpkins
Senior Counsel
Pacific Gas & Electric Company
Law Department
77 Beale Street
San Francisco, CA 94105

Dear Mr. Simpkins:

In your December 19, 2022, letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA) you requested an interpretation of the federal pipeline safety drug & alcohol (D&A) regulations in 49 CFR Part 199 with respect to employees who perform back-up coverage of emergency dispatching job duties that are regularly performed by PG&E's Work & Resource Dispatcher – Gas employees ("Gas Dispatchers").

You detailed the role of PG&E's Gas Dispatchers in your letter with regards to emergency gas calls and, while not specifically stated, your letter implies that PG&E has determined its Gas Dispatchers are covered employees subject to PHMSA's D&A Testing regulations.

The D&A regulations in § 199.3 define *"performs a covered function"* to include *"actually performing, ready to perform, or immediately available to perform a covered function."* Moreover, PHMSA has issued several interpretations wherein we consistently explain that an employee who performs a covered function is a covered employee regardless of their job title or whether they perform those functions full-time, part-time, or as a back-up.

Based on the information you provided, the PG&E Electric Dispatch employees who perform the back-up Gas Dispatch duties you described are covered employees as defined in § 199.3 and are subject to PHMSA's D&A Testing regulations because PG&E has determined that their Gas Dispatchers are covered employees.

If we can be of further assistance, please contact Tewabe Asebe at 202-366-5523.

Sincerely,

JOHN A GALE

Digitally signed by JOHN A GALE
Date: 2023.04.06 08:16:00 -04'00'

John A. Gale
Director, Office of Standards
and Rulemaking

Pacific Gas and Electric Company ™

Philip Simpkins
Senior Counsel

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Via U.S. and Electronic Mail

December 19, 2022

John A. Gale
Director, Office of Standards and Rulemaking
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Interpretation of 49 CFR § 199.1 re Back-up Dispatch for Gas Emergencies

Dear Director Gale:

The purpose of this letter is to request an interpretation regarding the applicability of PHMSA's Drug and Alcohol Testing regulations, codified in 49 CFR Part 199, to specific classifications of employees working at Pacific Gas & Electric Company ("PG&E") and represented by the International Brotherhood of Electrical Workers, Local 1245 ("Local 1245"). The pertinent classifications of employees perform back-up coverage of emergency dispatching job duties that are regularly performed by PG&E's Work & Resource Dispatcher – Gas employees ("Gas Dispatchers"), as further explained below. PG&E and Local 1245 are jointly submitting this request in the hopes that a definitive response from your office will help the parties avoid the need to submit this issue of regulatory interpretation to a labor arbitrator who lacks specific expertise in PHMSA's anti-drug and alcohol misuse prevention requirements.

Under 49 CFR § 199.1, operators of pipeline facilities are required to test covered employees for the presence of prohibited drugs and alcohol. Covered employees include any employees who perform an emergency-response function as part of work regulated by Part 192 on a pipeline or on an LNG facility. As clarified by the Office of Pipeline Safety in its Interpretation Response PI-90-019 (a copy of which is attached as **Exhibit A**), "dispatch[ing] service personnel" to gas pipeline emergencies and "notifying fire and police officials" of the pipeline emergency are both emergency-response functions regulated by Part 192. More recently, the Office of Standards and Rulemaking in its Interpretation Response PI-22-0001 reaffirmed that "dispatching of personnel to the scene" of a gas leak (and presumably any other gas emergency concerning a pipeline) is an emergency response function regulated by Part 192 and performed on a pipeline. (**Exhibit B**.) Part 199 explains that a worker "performs a covered function" when that individual is "actually performing, ready to perform, or immediately available to perform a covered function." This

definition, which we recognize was updated in 2001, appears to be consistent with prior explanations by George W. Tenley, Jr., Associate Administrator for Pipeline Safety, regarding the scope of work that will bring employees into coverage because they are considered to be performing emergency-response duties, in interpretations he authored on February 5, 1991 and May 9, 1991. (**Exhibits C & D**.) Those responses explained that employees who "seldom," "infrequently," "only temporarily," or "rarely" perform emergency response duties are included within the scope of Part 199 and, even those whose assignments "have a potential to do a covered function…even if that person has not yet done a covered function" are still considered employees who perform emergency response functions.

PG&E's Gas Dispatchers take emergency calls routed to them by PG&E's Customer Contact Centers, including calls reporting suspected gas leaks, which can include leaks inside the customer's home or business, at the meter, or elsewhere on their property. They also take calls from 911 agencies (fire, police) reporting gas emergencies, such as gas leaks, dig-ins to pipelines, fires, vehicle impacts to gas facilities, exposed gas pipes, and even potential explosions. Calls from 911 agencies are first directed to a subset of Gas Dispatchers, called the Powerline Dispatch team, during the Powerline working hours of 6 a.m. to 6 p.m., Monday through Friday, and 8 a.m. to 6 p.m. on weekends. Outside of these regular service hours, or whenever Powerline Dispatch is non-operational because of a systems-down condition, then 911 agency calls are routed directly to all available Gas Dispatchers. 911 calls also will roll over to the Gas Dispatchers when there is an increase in call volume beyond what Powerline Dispatch is able to handle. For any emergency gas calls handled by a Gas Dispatcher, the individual is expected to manage the emergency response coordination. Because PG&E does not know, until it has personnel on the scene, how serious a potential gas emergency may be, all potential gas emergency calls are dispatched as "Priority Zero," meaning that immediate response to the scene is required. (See **Exhibit E**.) Dispatcher's coordination of this response includes using PG&E's field automation system (FAS) dispatch application to report the incident and send a Gas Service Representative (GSR) to the scene of the incident. If the GSR needs assistance, the Gas Dispatcher notifies the GSR's supervisor and command is transferred to the supervisor upon their arrival at the scene. Gas Dispatchers are also responsible for dispatching any other appropriate field responders to the scene of a gas emergency and serve as the primary link between all internal and external first responders.

PG&E's Work & Resource Electric Dispatchers ("Electric Dispatchers"), in turn, serve as back-up to the Gas Dispatch team. If Gas Dispatch is overloaded or if Gas Dispatch otherwise goes offline, due to technology issues, building evacuations (e.g., a fire alarm), or natural disaster (e.g., an earthquake), emergency gas calls – which may be routed from a Customer Contact Center or directly from 911 agencies – are sent to Electric Dispatch. When serving this back-up function, Electric Dispatchers perform all the same functions as their Gas Dispatch counterparts. Electric Dispatchers are specifically trained in how to handle Gas Dispatch work, including gas emergency calls. The utilize the FAS dispatch application to report the incident and to send a GSR and/or a GSR supervisor to the scene. The role of Electric Dispatchers as back-up to Gas Dispatch for gas emergencies is identified in PG&E's "Gas Dispatch and Scheduling Handling 911 Calls – Emergency Response" and "Electric Operations Restoration Dispatch – Gas

Dispatch Tech Down" procedure bulletins, which are part of PG&E's "Gas Emergency Response Plan" developed and maintained as required by Part 192. (See, respectively, **Exhibits F, G, and H**.)

As mentioned above, PG&E and Local 1245 are requesting a definitive answer as to whether Electric Dispatch employees who perform the above-described functions, in the above-described back-up role, should be considered covered employees under Part 199.3 and therefore subject to PHMSA's Drug and Alcohol Testing regulations. If a definitive response cannot be provided, then PG&E and Local 1245 would appreciate any insight the Office of Standards and Rulemaking can provide regarding this issue.

Sincerely,

/s/Philip Simpkins
Philip Simpkins

cc (email only):
Bob Dean, Business Manager, Local 1245
Bryan Carroll, Assistant Business Manager, Local 1245
Alex Pacheco, General Counsel, Local 1245
Matt Levy, Senior Director, Labor Relations, PG&E
Robin Wix, Manager, Labor Relations, PG&E
Missy Parry, Chief Counsel, PG&E

EXHIBIT A

May 18, 1990

Mr. Jay C. Rounds
Director of Personnel Services
City of Palo Alto
P.O. Box 10250
Palo Alto, CA 94303

Dear Mr. Rounds:

Your letter of April 20, 1990, to Cesar De Leon requests our assistance in determining whether positions called Communication Dispatcher, Chief Communications Dispatcher, and Manager Communications Operations, which have duties in connection with the City's natural gas distribution system, are subject to drug testing under 49 CFR Part 199.

A person is subject to drug testing under Part 199 when that person performs on a gas pipeline an operation, maintenance, or emergency-response function that is regulated by 49 CFR Part 192. (See the Part 199 definition of "employee.") This jurisdictional test may be transformed into two questions, both of which must be answered affirmatively for Part 199 to require drug testing of a person working on a gas pipeline:

(1) Does the function the person performs involve operation of a pipeline, maintenance of a pipeline, or response to a pipeline emergency?

(2) Is the function the subject of a Part 192 regulation?

The information you provided indicates that the Communications Dispatcher receives calls about pipeline emergencies and dispatches service personnel. These functions involve responses to a pipeline emergency that are regulated under § 192.615. Therefore, persons in the position of Communications Dispatcher are subject to drug testing under Part 199.

Persons in the Chief Communications Dispatcher position and Manager Communications Operations position would not be subject to drug testing for directing the work of the Communications Dispatchers. However, if they perform either of the above functions of the Communications Dispatcher or any of the other emergency communications functions regulated by § 192.615, such as notifying fire and police officials, they would be subject to drug testing.

dal/199.3
90-05-18.2

I trust this adequately responds to your inquiry.

Sincerely,

George W. Tenley, Jr.
Director
Office of Pipeline Safety

dal/199.3
90-05-18.2

EXHIBIT B

U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

March 03, 2022

Ms. Melissa Kurtz
Business Representative
I.B.E.W. Local Union 503
2657 Route 17M
Goshen, NY 10924

Dear Ms. Kurtz:

In your December 7, 2021, letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA) you requested an interpretation of the federal pipeline safety regulations in 49 CFR § 192.615 with respect to customer service representatives (CSRs) working for Orange and Rockland Utilities, a subsidiary of Con Edison. Essentially, you asked if these CSRs are PHMSA drug and alcohol (D&A) "covered employees" subject to the Department of Transportation (DOT) drug testing.

While 49 CFR Part 199 refers to Parts 192, 193, and 195 and knowledge of those federal pipeline safety regulations is essential to meet the D&A testing regulations in Part 199, the D&A regulations requiring interpretation are found in 49 CFR Part 199, not § 192.615. Specifically, in § 199.3, PHMSA defines a D&A "covered employee" and "covered function."

PHMSA promulgated the first drug testing regulations in 1988 wherein PHMSA required pipeline operators to have an "anti-drug program for employees who perform certain sensitive safety-related functions covered by the pipeline safety regulations."[1] While the original drug testing rule did not define covered employee or covered function, it was explained in the rule preamble that the drug testing regulations were limited to "those who perform regulated operation, maintenance, or emergency-response functions…on existing pipelines." [2]

PHMSA added the definitions of "covered employee" and "covered function" to Part 199 with Amendment 199-15 on March 17, 1998. In that amendment, PHMSA defined "covered function" to mean "an operations, maintenance, or emergency-response function conducted on the pipeline or LNG facility that is regulated by Part 192, 193, or 195."[3] PHMSA changed the definition of "covered function" to the current version with Amendment 199-19 on September 11, 2001. Covered function now means "an operations, maintenance, or emergency-response

[1] 53 FR 47084.
[2] 53 FR 47089.
[3] 63 FR 12998, 13000 (emphasis added).

function regulated by [P]art 192, 193, or 195 of this chapter that is performed on a pipeline or on an LNG facility."[4]

From the onset of the drug testing regulations in 1988, PHMSA has specified that the functions performed by employees subject to the regulations are operations, maintenance, and emergency-response functions performed on a pipeline.

Your question relates to a natural gas pipeline facility regulated under Part 192, in which § 192.3 defines a "pipeline" to mean "all parts of those physical facilities through which gas moves in transportation, including pipe, valves, and other appurtenance attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies." You also reference § 192.615, which, among other things, requires operators to establish written procedures and perform other actions to minimize the hazard resulting from a gas pipeline emergency.

The D&A testing regulations do not necessarily cover all emergency-response functions listed in § 192.615. Only those functions in § 192.615 that are performed on a pipeline are "covered functions." So, while "receiving, identifying, and classifying notices of events which require immediate response by the operator" [§ 192.615(a)(2)] is a required emergency-response function, it is not performed on a pipeline and is therefore not a D&A covered function. However, the "emergency shutdown and pressure reduction in any section of the operator's pipeline system necessary to minimize hazards to life or property" [§ 192.615(a)(6)] is a D&A covered function because it is performed on a pipeline.

In your letter, you referenced PHMSA interpretation PI-20-0007 (April 24, 2020), which cited to an earlier interpretation (PL-90-003 dated February 13, 1990) that stated service clerks responsible for performing the following three things are "covered employees" subject to D&A testing:

1. receiving telephone notices of gas leaks,
2. identifying those notices that require immediate response by the company; and
3. dispatching personnel to the scene.

PHMSA listed those three steps because the accomplishment of all three steps is necessary to meet the requirement that the emergency response function is being performed on a pipeline. In the absence of step three, the emergency response of the CSRs is not performed on a pipeline.

You also explain in your letter that the CSRs working for Orange and Rockland Utilities receive telephone notices of gas leaks and identify those notices that require immediate response by the company, but they do not dispatch personnel to the scene. Instead they send gas emergency calls to the operator's gas emergency response center (GERC), the hub for all gas leak dispatching.

Without reviewing the operator's CSR processes, and based only on the information you provided in your letter, the "dispatching of personnel to the scene" function (item # 3 above) is not performed by the CSRs but by the operator's GERC. If that is correct, then the CSRs are not

[4] 66 FR 47114, 47118 (emphasis added).

performing an emergency response on the pipeline and, therefore, are not "covered employees" subject to PHMSA drug testing.

Notwithstanding the above, nothing in Part 199 prohibits an employer from D&A testing any of its employees using non-DOT procedures, including those employees already subject to D&A testing under PHMSA regulations.

If we can be of further assistance, please contact Tewabe Asebe at 202-366-5523.

Sincerely,

John A. Gale
Director, Office of Standards
and Rulemaking

I.B.E.W.
LOCAL UNION 503

2657 ROUTE 17M GOSHEN, NY 10924
PHONE (845) 294.1337
FAX (845) 294.9754
EMAIL: IBEW503@IBEW503.COM

December 7, 2021

Office of Pipeline Safety (PHP-30)
PHMSA, U.S. Department of Transportation
1200 New Jersey Avenue SE.
Washington, DC 20590-0001

Good afternoon,

My name is Melissa Kurtz and I am the Business Representative for I.B.E.W. Local 503 located in Goshen NY. My Local represents many of the workers at Orange and Rockland Utilities which is a subsidiary of Con Edison.

Many of the Members that work in the Customer Service Department have come to us with a concern that they are falsely being deemed "covered employees" for D&A testing and should not be tested for marijuana.

I am writing you today to request that PHMSA perform an interpretation of the federal pipeline safety regulations in 49 CFR 192.615 with respect to the Customer Service Representatives (CSRs) working for Orange and Rockland Utilities. In interpretation response #PI-20-0007, you state, "*Under 49 CFR 192.615, any person who performs on a gas pipeline a regulated operating, maintenance, or emergency response function is subject to DOT mandated drug testing.*" This office also lists three tasks associated with being a "covered employee" subject to D&A testing:

1. Receiving telephone notices of gas leaks. **The CSRs at Orange and Rockland Utilities do perform this task. They routinely answer both electric and gas emergency calls as well as other billing inquiries.**
2. Identifying those notices that require immediate response by the Company. **Through the use of a Company developed line of questioning the CSRs are trained to send the gas emergency calls to the GERC.**
3. Dispatching personnel to the scene. **This task is NEVER performed by our CSRs. Orange and Rockland has an established GERC (Gas Emergency Response Center) which is the hub for all gas leak dispatching, time reporting and leak tracking. At no time does a CSR dispatch any gas response personnel to any leak or location.**

Local 503 believes that due to the fact that the CSRs at Orange and Rockland Utilities do NOT perform all three functions making them "covered employees", that they are wrongfully being tested for marijuana using DOT procedures. This Local is not disputing that the Company has the right to drug and alcohol testing, we simply do not believe that the CSRs fall into the DOT testing pool.

If any further information is needed, please feel free to contact me at (845) 294-1337. I look forward to an interpretation response from PHMSA regarding this issue.

Sincerely,

Melissa Kurtz

Melissa Kurtz
Business Representative
I.B.E.W Local Union 503

EXHIBIT C

February 5, 1991

Mr. Patrick J. Clark
Sr. Industrial Relations Representative
Orange and Rockland Utilities, Inc.
One Blue Hill Plaza
Pearl River, NY 10965

Dear Mr. Clark:

I am responding to your letters of November 21, 1990, and January 28, 1991, regarding our drug testing rules in 49 CFR Part 199. You asked whether personnel who relieve Orange and Rockland's customer service representative during severe storm conditions are subject to drug testing.

Your November letter indicated that the customer service representatives are subject to drug testing under Part 199 because they record information customers report about gas leaks. In addition, you said that sever storm conditions occur rarely, and that relief personnel do not usually receive reports of leaks during the short span of their relief assignments.

Recording information about gas pipeline leaks is a regulated emergency-response function to which Part 199 applies. When an operator engages a person to do this function, that person is subject to drug testing under Part 199.

We conclude from your November letter that relief personnel are responsible for recording leak reports that come in while they are on duty during a severe storm. Although the relief personnel may seldom receive such reports, Part 199 does not except from coverage persons who do regulated emergency-response functions only temporarily or rarely. Therefore, the relief personnel are subject to drug testing under Part 199 as well as the customer service representative.

I apologize for not answering your first letter sooner. We are always pleased to provide whatever information operators may need to understand the Part 199 drug testing requirements.

Sincerely,

George W. Tenley, Jr.
Associate Administrator for
Pipeline Safety

EXHIBIT D

May 9, 1991

Mr. Steven G. Rush
Dorsey & Whitney
2200 First Bank Place East
Minneapolis, MN 55402-1498

Dear Mr. Rush:

I am responding to you letter of March 28, 1991, to Cesar De Leon regarding RSPA's drug testing regulations in 49 CFR Part 199. You asked whether persons who do a covered function infrequently or who have a potential to do a covered function are subject to all five types of drug testing.

As you correctly noted, the persons subject to drug testing under Part 199 are those that come under the Part 199 definition of employee. Part 199 are those that come under the Part 199 definition of employees. Part 199 does not except from drug testing persons who serve infrequently as an employee, such as someone who substitutes for an employee on vacation or sick leave.

Also, Part 199 does not allow pipeline operators to conduct only some types of drug testing with respect to persons used infrequently as employees. However, persons to remain continuously under a Part 199 drug testing program would be subject to pre-employment testing only the first time they are engaged to perform a covered function.

As for persons who have a potential to do a covered function, each person an operator engages as a Part 199 employee is subject to drug testing, even if that person has not yet done a covered function. For example, a person an operator employs for an emergency-response function may not have to do the function until sometime in the future. Meanwhile, the person is subject to each type of drug testing to assure that prohibited drugs do not impair the person's capacity to do the function should an emergency occur.

Thank you for your inquiry. Please let me know if you need any more information about our drug testing requirements.

Sincerely,

George W. Tenley, Jr.
Associate Administrator for
Pipeline Safety

EXHIBIT E

Gas Dispatch and Scheduling Procedure for Priority Zero Gas Field Orders

SUMMARY

This utility procedure describes how Pacific Gas and Electric (PG&E or Company) work and resource (W&R) gas dispatch personnel process immediate response (IR) Priority Zero gas field orders (FOs) on a 24-hour, 365-day basis.

Level of Use: Informational Use

TARGET AUDIENCE

Gas W&R dispatch personnel

For information only: Field Services personnel

SAFETY

Potential hazards associated with gas dispatch and scheduling work include ergonomic risks from general office activity.

BEFORE YOU START

Successfully complete the dispatcher-in-training (DIT) program or (if currently in the DIT program) work under the direction of fully-trained gas W&R dispatchers, relief dispatchers, or supervisors.

TABLE OF CONTENTS

Gas Dispatch and Scheduling Procedure for Priority Zero Gas Field Orders

PROCEDURE STEPS

1 Overview

1.1 Respond to each gas IR Priority Zero gas field order (IR FO) in a timely manner.

2 Dispatching an IR Priority Zero Gas Field Order

2.1 Determine the appropriate field service person to receive the IR FO as follows:

1. Using mapping tools as needed, assess location of field resources to identify field service personnel who can best respond to the IR FO location.

2. Minimize dispatching multiple IR FOs to one field service person.

   a. Attempt to identify to the closest field service person not assigned an IR FO before dispatching multiple IR FOs to the same field service person.

   b. Consider the nearest alternative available field service personnel in, but not limited to, the headquarters or division.

3. If necessary, use the appropriate 212 list.

2.2 Contact the identified field service person as follows:

1. Use the approved process of cell phone as the primary means of contact and radio as secondary (except in areas where the exception has been implemented).

2. Get verbal acceptance to respond to the IR FO (e-page only when radio and phone call not possible) and note their estimated time of arrival (ETA).

3. IF attempts to contact the field service person are unsuccessful (there is no mandated wait time),

   THEN direct the IR FO to the available field service person with the next shortest ETA.

4. Repeat Step 2.2.3 as needed until a field service person is contacted, or the list of shift personnel is exhausted.

5. IF list of shift personnel is exhausted,

   THEN determine, based on customer service representative's remarks, whether IR FO should be issued to field service personnel already working on an IR FO (stacking).

   a. IF stacking is appropriate,

      THEN obtain dispatch supervisor approval to issue IR FO to field service personnel already working on an IR FO.

Gas Dispatch and Scheduling Procedure for Priority Zero Gas Field Orders

2.2 (continued)

6. IF NO field service personnel are available,

   THEN follow the callout procedures.

7. IF NO field service personnel are available through callout,

   THEN contact the field service personnel supervisor for further instructions AND notify the dispatch supervisor.

2.3 After verbal or electronic acceptance of IR FO is received, dispatch the IR FO as follows:

1. Confirm whether the field service person is in available status in field automation system (FAS).

2. Dispatch the IR FO.

   a. Attempt to have all IR FOs dispatched in 4 minutes or less.

3. Use one of the following means to verify that the field service person arrives at the IR site by the ETA:

   - Verify via FAS (if available).
   - Make contact by the approved process of radio and/or phone.

4. IF field service personnel do not arrive at the IR site by the ETA provided,

   THEN perform steps below as needed.

   a. IF the delay will continue to prevent a timely arrival of the field service personnel,

      THEN dispatch additional or alternate field service personnel as needed.

   b. IF no other field service personnel are available

      THEN ask the nearest fire department or law enforcement agency to stand by AND request an emergency response escort to the location. When requesting police escort, state, “PG&E is requesting police escort for a serious gas leak.”

   c. IF a 911 agency is on-site and there is a delay on the original ETA provided,

      THEN provide the agency with the updated ETA.

Gas Dispatch and Scheduling Procedure for Priority Zero Gas Field Orders

2.4 Record the following information in the dispatcher remarks on the IR FO (for additional guidance, refer to Utility Procedure TD-6700P-01, Attachment 1, “Dispatcher Remarks”):

- All contact attempts. For unanswered calls, note “Tech ID RDNA/DNA (radio did not answer)” and time called.
- The ETA to the IR FO site. Record the estimated arrival time, not the amount of time needed to reach the site (e.g., 13:40, not 30 min.).
- The actual time of arrival (unless recorded in FAS).

3 Dispatching Field Orders to Personnel Currently Working on Another Field Order

3.1 IF an IR FO is dispatched to field service personnel currently planning or conducting a non-priority Company-generated FO,

THEN the gas W&R dispatcher may reschedule or reassign the Company-generated field order (not emergency work) to the same or other field service personnel for completion.

3.2 IF an IR FO is dispatched to gas field service personnel currently working a customer-generated FO,

THEN, if necessary, the dispatcher may reassign the customer-generated FO to other field service personnel to complete.

4 Dispatching Multiple IR Priority Zero Field Orders for the Same Area

4.1 When notified by field service personnel that an IR site has been made safe, perform the following steps:

1. Create a make-safe turn-on FO (4196) in customer care and billing (CC&B).
   a. Note “IRMS” (IR made safe) as the first characters, then copy and paste the original remarks of the made-safe FO in the Office Remarks.
2. Note “IRMS (IR made safe) + Tech ID of Make Safe GSR + LAN ID of Dispatcher” in DSP Remarks.

   Example: IRMS D2GD0M9 SAC4

Gas Dispatch and Scheduling Procedure for Priority Zero Gas Field Orders

5 Pipeline Ruptures and Explosions

5.1 IF an IR is due to an explosion or suspected transmission pipeline rupture, and field service personnel notify Gas Dispatch of a delay in response or ETA,

THEN perform the following steps:

1. Update the ETA on the IR FO.

    a. IF the updated time exceeds communicated on-site time response limits,

    THEN gas W&R dispatch personnel may attempt to dispatch other field service personnel.

    (1) IF other field service personnel are not available,

    THEN ask the nearest fire department or law enforcement agency to stand by AND request an emergency response escort to the location.

2. Notify Electric Dispatch personnel of an explosion or suspected transmission pipeline rupture report AND provide an address for the creation of an electric IR tag.

6 Area Odor Events

6.1 Gas W&R dispatcher may dispatch IR FOs related to the same area odor event to the same responding field service personnel.

6.2 Take appropriate actions as needed based on field service personnel findings per Utility Procedure TD-6700P-03, Attachment 5, “Area Odor Guideline.”

7 Potential Grade One Leak

7.1 IF field service personnel determine a subsurface gas leak is hazardous, as directed in Utility Procedure TD-6100P-02, “Gas Leak and Odor Investigations,”

THEN create a work order in the Event Management Tool (EMT), requesting that qualified gas maintenance and construction (M&C) field personnel repair the leak per Utility Procedure TD-4470P-01, “Gas Crew Tracking Process for Gas Leak or Odor Investigation.”

7.2 IF a field resource that is not qualified for leak grading encounters a subsurface gas leak that is non-hazardous, as described in TD-6100P-02

THEN perform the following steps:

1. Dispatch FO request to operator-qualified gas field personnel to grade the subsurface leak.

   a. IF no qualified field personnel are available,

      THEN create a work order in EMT (per TD-4470P-01), requesting leak grade-qualified gas M&C field personnel to investigate and grade leak per TD-TD-4110P-09.

2. IF a gas leak source is identified as another utility's gas main or service,

   THEN ask the responsible utility to respond.

8 Potential Cross Bore

8.1 IF Gas Dispatch receives 911 call or FO from contact center for a cross bore event,

THEN dispatch a gas service representative (GSR) and advise the M&C supervisor-in-charge of a potential cross bore.

1. Gas M&C supervisor may dispatch an M&C crew.

2. Gas dispatcher creates an EMT record identifying the incident as a "cross bore."

   a. IF identified as cross bore,

      THEN Gas Distribution Control Center (GDCC) will handle event,

      OTHERWISE Gas Dispatch will handle event

3. Create EMT event on initial cross bore field order

END of Instructions

Gas Dispatch and Scheduling Procedure for Priority Zero Gas Field Orders

DEFINITIONS

Cross bore: An intersection of an existing underground facility or structure by a second facility installed using trenchless technology resulting in direct contact between the facilities, compromising the integrity of the facility or underground service.

Priority Zero: Immediate response (IR) emergency field order.

IMPLEMENTATION RESPONSIBILITIES

The supervisors responsible for dispatch and scheduling will ensure that personnel who perform dispatch and scheduling work are trained and knowledgeable about this utility procedure.

GOVERNING DOCUMENT

Utility Standard TD-6700S, “Gas Dispatch and Scheduling Operating Practices”

COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

Records and Information Management:

Information or records generated by this procedure must be managed in accordance with the Enterprise Records and Information (ERIM) program Policy, Standards and Enterprise Records Retention Schedule (ERRS). REFER GOV-7101S, “Enterprise Records and Information Management Standard” and related standards. Management of records includes, but is not limited to:

- Integrity
- Storage
- Retention and Disposition
- Classification and Protection

REFERENCE DOCUMENTS

Developmental References:

Pacific Gas and Electric Company, “Code of Conduct for Employees”

Pacific Gas and Electric Company/IBEW Labor Agreement

Utility Manual TD-9660M, *Tariff Application Guide*

Gas Dispatch and Scheduling Procedure for Priority Zero Gas Field Orders

REFERENCE DOCUMENTS (continued)

Supplemental References:

Utility Procedure TD-4110P-09, “Leak Grading and Response”

Utility Procedure TD-4470P-01, “Gas Crew Tracking Process for Gas Leak or Odor Investigation”

Utility Procedure TD-6100P-02, “Gas Leak and Odor Investigations”

Utility Procedure TD-6700P-01, Attachment 1, “Dispatcher Remarks”

Utility Procedure TD-6700P-03, Attachment 1, “Area Odor Guideline”

APPENDICES

NA

ATTACHMENTS

NA

DOCUMENT RECISION

Utility Procedure TD-6700P-02, “Gas Dispatch and Scheduling Procedure for Priority Zero Gas Field Orders,” Rev. 1, published 06/21/2017

DOCUMENT APPROVER

Sally Romero, Director, Gas Dispatch & Scheduling

DOCUMENT OWNER

Dominique Erdozaincy, Associate Gas Engineer, Standards Engineering

DOCUMENT CONTACT

Doug Bounds, Supervisor, Gas Dispatch

(Document contact may change after publication. To find the current document contact, see the Gas Standards and Procedures Responsibility List.)

Gas Dispatch and Scheduling Procedure for Priority Zero Gas Field Orders

REVISION NOTES

Where?	What Changed?
Revision 2a (Publication Date: 11/17/2021 Effective Date: 02/01/2022)	
Step 2.2.1	Rewrite statement to read as follows: Use the approved process of cell phone as the primary means of contact and radio as secondary (except in areas where the exception has been implemented).
Step 4.1.2	Rewrite statement to read as follows: Note “IRMS (IR made safe) + Tech ID of Make Safe GSR + LAN ID of Dispatcher” in DSP Remarks. Example: IRMS D2GD0M9 SAC4
Compliance Requirement / Regulatory Commitment	Added Records and Information Management boilerplate text.
Document Contact	Added Document Contact boilerplate text.
Where?	What Changed?
Revision 2 (Publication Date: 04/17/2019 Effective Date: 07/17/2019)	
Section 2	Restructured to improve clarity/flow.
Step 2.2.1	Added exception to allow use cell phone when contacting field service personnel.
Step 2.3	Allowed electronic acceptance of IR gas field service personnel.
Step 2.3.2	Added Goal of dispatching Priority Zero field orders in 4 minutes or less.
Section 8	Changed response in potential cross bore event.

EXHIBIT F

Electric Operations Restoration Dispatch – Gas Dispatch Tech Down

SUMMARY

This utility procedure describes the restoration dispatch and scheduling operating practices employed when the loss of technology or facilities (a tech down event) necessitates the transfer of job responsibilities.

Level of Use: Informational Use

TARGET AUDIENCE

- Electric restoration dispatch and scheduling personnel
- Electric dispatchers
- Electric dispatch directors, managers, and supervisors

SAFETY

Personnel working in an office or home environment must adhere to proper ergonomic practices to minimize the risk of workplace injuries.

Follow PG&E's vision for electric operations to "become the safest, most reliable electric company in the nation," with the goal of enhancing communication and building trust with PG&E customers and communities.

BEFORE YOU START

NA

TABLE OF CONTENTS

PROCEDURE STEPS

1 Restoration Dispatch Overview

1.1 PG&E commits to keeping the public safe during potentially hazardous situations.

1.2 Public Safety Power Shutoff (PSPS) events are part of PG&E's Community Wildfire Safety Program, designed to reduce wildfire risks and strengthen communities for the future.

1.3 To support major events, ACTIVATE the Operations Emergency Center (OEC).

1.3 (continued)

1. SEE Utility Standard EMER-4510S, “Operations Emergency Center (OEC) Activation Requirements.”

1.4 Restoration dispatch personnel have the following responsibilities:

1. OPERATE 24 hours a day, 365 days a year, AND ACT as the centralized point of contact for all distribution electric emergencies.

2. ALLOCATE field personnel for customer committed work, compliance work, and immediate response orders throughout PG&E’s service territory.

3. FULFILL PG&E’s electric service obligation to ensure safety.

4. TAKE required actions to effectively manage 911 Standby calls.

2 Gas Dispatch Tech Down (Phone Lines Down)

2.1 Non-Evacuation Scenario

1. The gas dispatch supervisor NOTIFIES the restoration dispatch supervisor of downed phone lines.

2. The gas dispatch supervisor REQUESTS a transfer of all calls to electric restoration dispatch through Workforce Management (WFM) routing(s) until gas dispatch resumes normal operations.

3. The restoration dispatch supervisor CONFIRMS that all lines were successfully transferred.

   a. The restoration dispatcher REFERS to the following documents in preparation for receiving powerline calls:

   - Utility Procedure TD-6700P-03, “Gas Dispatch and Scheduling Handling 911 Calls – Emergency Response”

     o Attachment 1, “911 Script”

2.2 Building Evacuation Scenario

1. The gas dispatch supervisor NOTIFIES the restoration dispatch supervisor of building evacuations and downed phone lines.

2. The gas dispatch supervisor REQUESTS that all calls be transferred to electric restoration dispatch through WFM routing(s) until gas dispatch resumes normal operations.

2.2 (continued)

3. The restoration dispatch supervisor CONFIRMS that all lines were successfully transferred.

NOTE

The dispatcher **only** ADDRESSES electric and gas Incident Reports (IRs).

4. The dispatcher REFERS to Utility Procedure TD-6700P-03, "Gas Dispatch and Scheduling Handling 911 Calls – Emergency Response," AND Attachment 1, "911 Script," to prepare for receiving powerline calls.

   a. REFER to the Arcos Gas M&C "Supervisor Day" list for regular business hours and the Arcos Gas M&C "Supervisor After Hours ON-Call" list for after hours.

NOTE

HOLD all other work until normal operations resume.

Electric dispatch DOES NOT USE the Event Management Tool (EMT).

   b. The restoration dispatcher REFERS to Attachment 1, "Incident Report (IR) Job Codes," in preparation to dispatch gas IRs.

   c. Gas IRs with an ETA longer than 60 minutes require the use of Mutual Aid Responses (MARs).

      (1) Local emergency services for MARs have agreed to assist PG&E during IR events with extended ETAs.

      (2) REFER to the Mutual Aid [1] book.

5. For events affecting gas distribution and/or transmission after hours (such as those listed in Items b.(1) through b.(5) on Page 4), ADVISE the dispatch supervisor AND directly CONTACT either the Gas Distribution Control Center (GDCC) OR the Gas Transmission Control Center (GTCC).

   a. GDCC personnel MANAGE specific incidents, including: cross bore, dig in, evacuation, explosion, fire, pipe rupture, vehicle impact, and Grade 1 gas leaks on transmission facilities.

[1] The Mutual Aid book is only available to authorized personnel.

2.2 (continued)

b. Events that **involve a release of gas** from a transmission or distribution pipeline (up to and including the meter set) **and that result in on or more of the following:**

(1) Fatality or personal injury requiring admission to and an overnight stay in a hospital.

(2) Property damage of $50,000 or more, including loss to PG&E and others, but excluding the cost of lost gas.

(3) Dig In, Vehicle Impact, Pipe Rupture, or Fire resulting in a release of gas from PG&E gas facilities.

(4) Explosions that have or might have involved natural gas.

(5) Any other significant gas event confirmed by PG&E cross bores with or without a release of gas, including evacuations ordered by the fire department, police department, or onsite PG&E personnel, due to the following situations:

- Area odors with 10+ tags.
- Release of gas from PG&E facilities and presence of media on site.
- Loss of large customers (hospitals, schools, large businesses, tourist attractions, high profile communicates, transit agencies, utilities, power plants, refineries, prisons, and government offices).
- Loss of five or more residential/commercial customers.

NOTE

See Table 1 on Page 5 for area Points of Contacts (POCs) when dealing with evacuations.

2.2 (continued)

Table 1. Points of Contact (POCs)

GDCC			
Northern	**Bay Area**	**Central Coast**	**Central Valley**
Humboldt Sonoma North Valley Sacramento Sierra	Diablo East Bay North Bay San Francisco	Central Coast De Anza Mission Peninsula San Jose	Fresno Kern Stockton Yosemite
925-244-4201	925-244-4202	925-244-4203	925-244-4204
GTCC North 800-811-4111		**GTCC South 800-547-5955**	
Northern, North Bay, Diablo		Central Coast/Valley, East Bay, SF	

6. Priority Zero (0) FO

   a. Priority Zero (0) FO is the highest priority field order (FO) and is identified as “0” in the Ventyx® Dispatch Application.

   b. ASSIGN AND DISPATCH Priority 0 FO jobs to qualified field personnel as soon as possible.

7. A timely emergency response is required for the following Priority 0 FOs:

   - Asphyxiation, carbon monoxide poisoning, carbon monoxide alarm
   - Fire, explosion (may involve gas and/or electric with appliances, etc.)
   - Hazardous gas leaks
   - Customer cannot shut off appliance
   - Incidents involving or suspected of involving hazardous materials
   - Damage or suspected damage to PG&E property
   - Dig-in of gas underground facilities
   - Gas pressure complaints
   - Cross bore

Electric Operations Restoration Dispatch – Gas Dispatch Tech Down

2.2 (continued)

8. Restoration dispatchers ADDRESS Priority 0 Gas IRs as follows:

   a. SETUP Dispatch Application filter views to include gas IR Job Codes and gas field technicians. SEE Attachment 1, "Incident Report (IR) Job Codes," to this procedure.

   b. GENERATE a Gas Daily Work Plan (DWP).

      (1) IF DWP access is down,

      THEN REFER to the Archive DWP mailbox for back up DWPs. SEE Attachment 2, "Archiving the Daily Work Plan (DWP)," to this procedure.

   c. OPEN the Gas Dispatch Desk Book [2] (area guide).

      (1) REFER to Utility Procedure TD-6700P-03, "Gas Dispatch and Scheduling Handling 911 Calls – Emergency Response," AND Attachment 1, "911 Script," to prepare for receiving powerline calls.

      (2) REFER to Utility Procedure TD-6700P-02, "Gas Dispatch and Scheduling Procedure for Priority Zero Gas Field Orders".

9. Restoration dispatchers RECEIVE notification that gas facilities were restored.

10. Restoration dispatchers TRANSFER responsibilities back to gas dispatch personnel.

11. Restoration dispatchers GATHER DWPs for transferring information to gas dispatchers (sent by the restoration dispatch supervisor to the gas dispatch supervisor distribution list).

12. Restoration dispatch ENSURES all pending IRs are dispatched at the time of handoff.

    a. IF it is not possible to dispatch all IRs at the time of handoff,

    THEN the restoration dispatcher COMMUNICATES with the respective dispatcher to transfer the pending IRs.

13. The restoration dispatch supervisor and gas dispatch supervisor CONFIRM that the transfer of information was successful.

END of Instructions

[2] The Gas Dispatch Desk Book is only available to authorized personnel.

Electric Operations Restoration Dispatch – Gas Dispatch Tech Down

DEFINITIONS

NA

IMPLEMENTATION RESPONSIBILITIES

The manager responsible for reviewing dispatch and scheduling matters authorizes the handling of restoration dispatch emergency conditions in accordance with reporting from 911 agencies and other outside entities.

The dispatch supervisors responsible for assigning dispatch and scheduling work ensure that personnel who perform dispatch and scheduling assignments are trained and knowledgeable on TD-2201S and all associated procedures.

Restoration dispatch and scheduling personnel must understand and comply with TD-2201S and all associated procedures. Personnel must perform only those tasks for which they are qualified and trained, as outlined in their job description.

GOVERNING DOCUMENT

Utility Standard TD-2201S, “Restoration Dispatch and Scheduling Public Safety Power Shutoff Process”

COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

Records and Information Management:

Information or records generated by this procedure must be managed in accordance with the Enterprise Records and Information (ERIM) program Policy, Standards and Enterprise Records Retention Schedule (ERRS). Refer to GOV-7101S, “Enterprise Records and Information Management Standard,” and related standards. Management of records includes, but is not limited to:

- Integrity
- Storage
- Retention and Disposition
- Classification and Protection

REFERENCE DOCUMENTS

Developmental References:

Utility Procedures:

- TD-6100P-03, “Major Gas Event Response: Fire, Explosion, and Gas Pipeline Rupture”

Electric Operations Restoration Dispatch – Gas Dispatch Tech Down

REFERENCE DOCUMENTS (continued)

Utility Procedures:

- TD-6700P-02, “Gas Dispatch and Scheduling Procedure for Priority Zero Gas Field Orders”
- TD-6700P-03, “Gas Dispatch and Scheduling Handling 911 Calls – Emergency Response”
  - Attachment 1, “911 Script”

Utility Standard EMER-4510S, “Operations Emergency Center (OEC) Activation Requirements”

Supplemental References:

NA

APPENDICES

NA

ATTACHMENTS

Attachment 1, “Incident Report (IR) Job Codes”

Attachment 2, “Archiving the Daily Work Plan (DWP)”

DOCUMENT RECISION

NA

DOCUMENT APPROVER

Kari Chester, Director, Electric Dispatch and Scheduling

DOCUMENT OWNER

Kari Chester, Director, Electric Dispatch and Scheduling

DOCUMENT CONTACT

Elizabeth Greathouse, Restoration Dispatch and Scheduling Manager

Electric Operations Restoration Dispatch – Gas Dispatch Tech Down

REVISION NOTES

Where?	What Changed?
NA	This is a new utility procedure.

EXHIBIT G

Pacific Gas and Electric Company®

Gas Emergency Response Plan

Gas Annex to the Company Emergency Response Plan

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(Vacaville Emergency Response Center)

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www.pge.com

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EMER-3003M

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List of Tables

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Document Control

Gas Emergency Preparedness (GEP), part of Gas System Operations (GSO), maintains the *Gas Emergency Response Plan Annex (GERP)* to the *Company Emergency Response Plan (CERP)*. This section records the revisions made to the GERP, the responsible persons for its preparation, maintenance, and update, and signature authorities for Plan approval.

Change Record

The following table shows changes made to the Plan since the last revision (Version 10.0).

Where?	What Changed?	Who Initiated the Change?
Throughout	Updated references to several utility procedures and other references to reflect revised documents.	Various
	Updated links as needed.	Various
	Restructured sections for alignment with *CERP* and functional annexes.	Various
	Removed redundant information found in *CERP* or other supporting plans.	Various
3.4.3 Response Priorities	Added protect the environment as a response priority.	Susie Richmond
4.2.2 Gas Incident Reporting	Updated section to remove slang terminology and arbitrary reporting time of “within one hour of the incident”	Kari Kotula
Appendix A	Deleted glossary. Added reference to *CERP* for glossary terms.	Various
Appendix B: Heavy Rains/Landslides causing, Non-Contiguous Pipeline Breaks Response Aid	Added guidance to quarantine any unsafe areas.	
Appendix B: Cyber Security Response Aid	Update verbiage under Assess / Minimize Hazards to the following: Assess the expected impact to system safety and reliability if malicious control of equipment were to occur. If equipment has an increased risk of affecting safety and/or reliability, disconnect the equipment from the network as soon as it is safe to do so or implement other risk mitigation measures. Request Cybersecurity assistance in the review and assessment of the impacted systems.	Fred Doolittle
Page 1-7	Corrected link for “Cold Weather Communications Process”	Don Benesh

Recision Log

Document Number	Title
NA	NA

Document Preparer

Gas Emergency Preparedness

Document Owner

Name	Position	Date
Joe Forline	Senior Vice President, Gas Operations	12/06/2021

Document Reviewers

Asset Management and System Operations (AMSO), Gas System Operations (GSO), Gas Emergency Preparedness (GEP), and Gas Technical Document Management

Document Approvers

Name	Position	Date
Joe Forline	Senior Vice President, Gas Operations	12/06/2021
Jason Klemm	Senior Director, Gas Transmission and Distribution	11/29/2021
Frank Maxwell	Director, Gas Control	11/28/2021
Andy Wells	Manager, Gas Emergency Preparedness	11/27/2021

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Created on:	11/24/2021 5:05:37 PM	Status:	EDR request approved.
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Dollar Amount:	$0		
Job Order Num:			
ITWR Number:			
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Documents

Title	Version
GERP-V11_EDRSDraft.pdf	Original

Consolidate Files

Reviewers/Approvers

Add to CC List

Approvers	
Wells, Andrew	Approved on 11/27/2021 7:49:47 AM
Maxwell, Frank	Approved on 11/28/2021 9:40:33 AM
Klemm, Jason	Approved on 11/29/2021 10:18:51 AM
Forline, Joseph	Approved on 12/6/2021 4:13:32 PM

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Comments Add Comment

11/24/2021 5:14:26 PM - Moore, Colette Last edited on 11/24/2021 5:47:56 PM
This is the approval routing for EMER-3003M, Revision 11, "Gas Emergency Response Plan." Please review and approve this document by December 17, 2021.

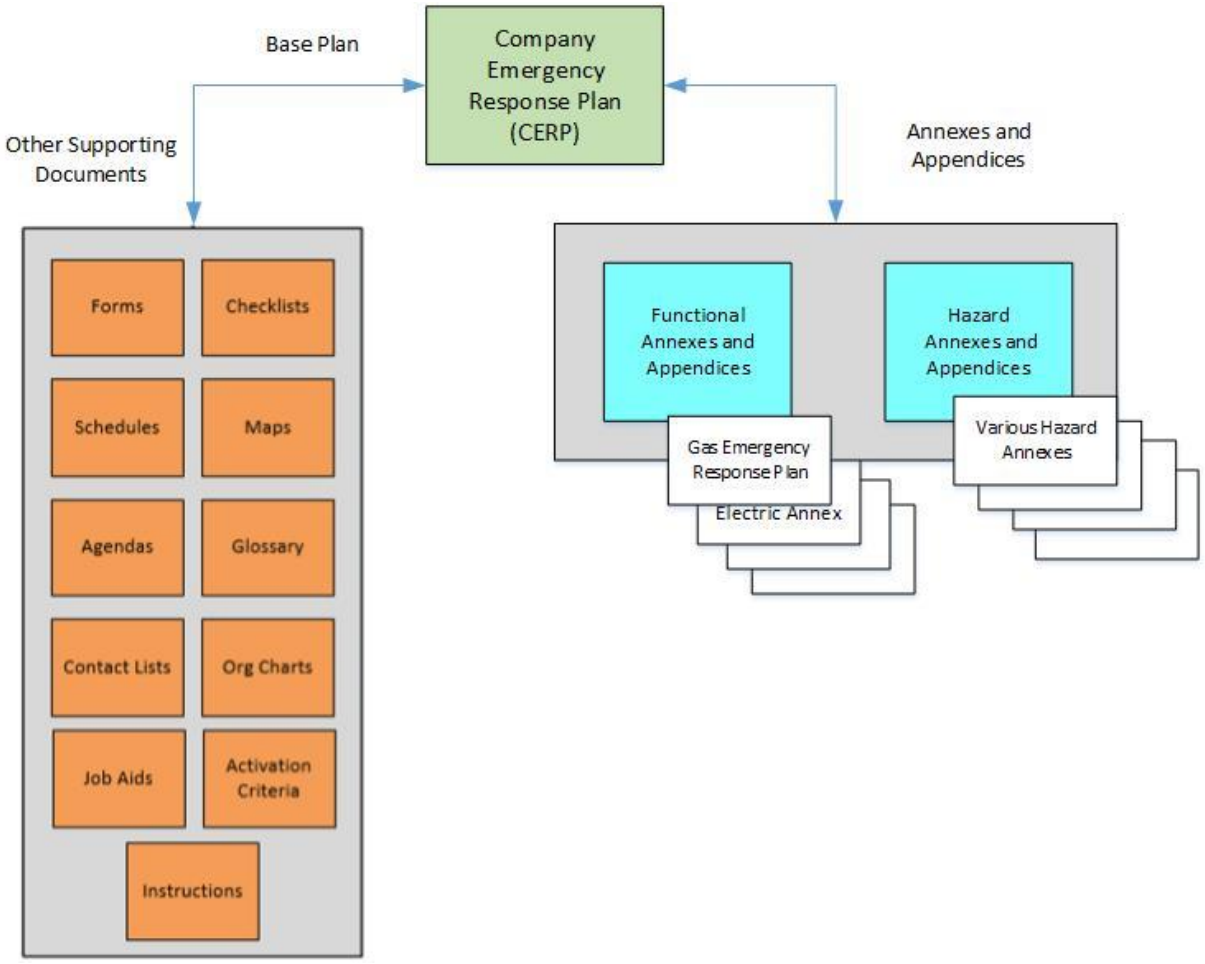
A Change Record of all changes made during this revision of the GERP can be found on Page vii.

The publication, effective, and approval dates will be updated, and the draft watermark removed, after approval and before publication.

1 Introduction

The Gas Emergency Response Plan (GERP) is a functional annex to the *Company Emergency Response Plan (CERP)*, the PG&E Base Plan for emergency response. Annexes are detailed emergency response plans for specific operations, functions, or hazards. They refer to the *CERP* and other annexes, or specific procedures. **Figure 1-1** illustrates the relationship between the *Gas Annex,* the *CERP*, other functional and hazard-specific annexes, and supporting documents. The list provided in **Figure 1-1** is not all-inclusive.

Figure 1-1: *Gas Annex* Relation to *CERP* and Supporting Documents



1.1 Purpose

The purpose of the *GERP* is to assist PG&E personnel with a safe, efficient, and coordinated response to incidents affecting gas systems. The *GERP* provides an outline of Gas Operation's organizational structure, roles, and responsibilities, and describes the activities undertaken in response to gas emergencies.

1.2 Scope

The scope of this document covers actions and strategies to prepare for, mitigate against, respond to, and recover from gas incidents directly or potentially impacting PG&E. The *GERP* references other technical and operational plans that demonstrate how certain actions and strategies are implemented; it is not a replacement or substitute for those documents.

1.2.1 *GERP* Supplementary Tools and Resources

1.2.1.1 Gas Emergency Response Guide

The Gas Emergency Response Guide (*GERP* Guide) is designed for use by a responder to initiate, augment, and expand a response as the event dictates. All information in the guide is derived from the *GERP*. The *GERP* Guide is not a replacement for the *GERP*. It is designed to give information in a timely manner when conditions do not allow for a more in-depth review of the *GERP*.

The *GERP* Guide is available electronically on the *GERP* website and is part of the *GERP* Drive available on emergency center personnel laptops and iPhones. Response Aids contained in the *GERP* Guide that describe actions that PG&E personnel could take during common emergency situations involving Gas Operations can also be located in **Appendix B-1** of this document. To request electronic access to the *GERP* Drive or iBook version contact GERP@pge.com.

1.2.1.2 GERP Resource Directory

This GERP Resource Directory is an online database for emergency resources that may be used in the event of an emergency. This database includes personnel contact lists, Emergency Center Team rosters, materials, equipment, and vehicle listings. The database is based on SharePoint and is routinely backed up and then pushed to gas emergency staff computer desktops through the GERP Drive Copy. Information on how to access the database is covered in **section 1.6.2** (GERP Distribution).

1.3 Regulations and Authorities

The *GERP* adheres to multiple federal and state regulations and internal standards. In addition, the Gas Emergency Preparedness (GEP) team utilizes several federal and state emergency management directives, guidelines, and principles as a foundation.

Federal and State Regulatory Requirements

- Code of Federal Regulations (CFR) Title 49, Transportation, Part 192—Transportation of Natural and other Gas by Pipeline: Minimum Federal Safety Standards:
  - §192.605 – Procedural manual for operations, maintenance, and emergencies
  - §192.615 – Emergency Plans
- 49 CFR Part 199 – Drug and Alcohol Testing
- California Public Utilities Commission (CPUC) General Order (GO) No. 112-F: State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems
- California Public Utilities Code 956/956.5
- California Senate Bill (SB) 705, Natural gas: service and safety (2011-2012)

- SB-887, Pavley. Natural gas storage wells (2015-2016)
- California Air Resource Board Regulations
- Division of Oil, Gas, and Geothermal Resources (DOGGR) Regulations
- California Code of Regulations Title 14, Division 2, Chapter 4 and the Pipeline and Hazardous Materials Safety Administration (PHMSA) Interim Final Rule (IFR)

PG&E Plans and Standards

- *CERP*
- *Earthquake Annex*
- *Cybersecurity Annex*
- Utility Policy EMER-01, *Emergency Preparedness and Response Policy*
- Utility Standard EMER-1001S, *Business Continuity Planning, Training, Exercise and Improvement Planning Standard*
- Utility Standard EMER-2001S, *Company Emergency Operations Plans Standard*
- Utility Standard TD-5801S, *Pipeline Public Awareness Program*
- Utility Standard EMER-6010S, *Gas Emergency Response Plan Training, Exercise, and Evaluation*
- PG&E *Gas Safety Plan*

Federal and State Government Emergency Management Directives and Guidelines

- 2017 National Incident Management System (NIMS)
- Standardized Emergency Management System (SEMS)
- Incident Command System (ICS)
- Presidential Policy Directive 8 (PPD-8)
- National Preparedness System
- National Preparedness Goals
- Federal Emergency Management Agency's (FEMA) Developing and Maintaining Emergency Operations Plans, Comprehensive Preparedness Guide (CPG 101)
- Homeland Security Exercise Evaluation Program (HSEEP), 2020

Industry Certifications

- International Organization for Standardization (ISO) 55000 series of Asset Management standards
- Public Availability Specification (PAS) 55 of Asset Management
- Responsible Care Management System RC14001
- American Petroleum Institute (API) Recommended Practice 1171: Functional Integrity of Natural Gas Storage in Depleted Hydrocarbon Reservoirs and Aquifer Reservoirs for the design, operation, and maintenance of storage facilities.

- AP1-RP-1173, “Pipeline Safety Management Systems,” section 12 – Emergency Preparedness and Response and section 13 – Competence, Awareness, and Training.

1.4 Role of Gas Emergency Preparedness

1.4.1 GEP Response Operations

The Gas Emergency Preparedness (GEP) team members support gas emergency center facilities and teams, and may fill the role of an Incident Command (IC) Advisor, or “IC Advisor,” to support the Incident Commander (IC) and staff in implementing the *GERP*, emergency plans, and utilization of the ICS.

The GEP team maintains 24/7/365 rotational on-call status for emergencies and responds to Gas Emergency Centers (GECs), including the PG&E Emergency Operation Center, upon notification of a gas incident or emergency center activation. **The Gas Emergency On-Call Hotline is (925) 244-4000.**

IC advisors support both the Incident Management Team (IMT) and the Incident Support Team (IST)/GEC team activations at ICPs, the GEC, and Base Camps.

While Emergency Preparedness Coordinators (EPCs) have home bases in North, South, and Bay Area locations, they will respond to any an incident in any part of the service territory based on an on-call schedule.

1.4.2 GERP Training and Exercise

PG&E trains internal emergency responders to know and understand the *GERP*. Internal training is implemented through specialized training classes and practical exercises that align with the National Incident Management System (NIMS), Standardized Emergency Management System (SEMS), and Incident Command System (ICS). Annually, the Senior Vice President (SVP) of Gas Operations will oversee *GERP* training and exercises. GEP staff act on behalf of the SVP to design, plan, and deliver *GERP* training.

Available training and requirements for PG&E employees are found in the Utility Standard EMER-1001S, “Business Continuity Planning, Training, Exercise & Improvement Planning Standard” and Utility Standard EMER-6010S, “Gas Emergency Response Plan Training, Exercise, and Evaluation.” GEP may use tools such as a Multi-Year Training and Exercise Program (MYTEP) to align long-term strategies based on core capabilities, prioritized efforts, and guided training and exercise activities. For more information on *GERP* training, exercise, and evaluation activities please see EMER-6010S.

1.4.2.1 Training Program

GEP and the PG&E Learning Academy work together to coordinate, design, and document all *GERP*-related training. All Gas Operations personnel are profiled for *GERP* training according to their emergency center responsibilities and job classifications. Emphasis is on those designated with primary or back-up Emergency Center roles described in the *GERP*.

1.4.2.2 Exercise Program

An essential component of the *GERP* is the exercise program allowing for realistic testing and evaluation of PG&E core capabilities so incident processes outlined in the *GERP* can be strengthened and improvement items shared. All exercises are designed and executed in

accordance with Homeland Security Exercise and Evaluation Program (HSEEP) methodology and the MYTEP. The exercise program applies to both internal exercises and joint exercises conducted with external public safety agencies such as local offices of emergency services, police and fire departments, and state and federal agencies.

1.5 Related Planning

1.5.1 Business Continuity Plan

In addition to the *GERP*, GEP maintains the Manage Emergency Response (MER) Business Continuity Plan (BCP). The MER BCP describes how Gas Operations continues mission-critical emergency response processes in the event of an emergency disruption to the normal operation of facilities, technology, or personnel work conditions.

1.5.2 Recovery Planning

PG&E coordinates recovery activities through the Business/Utilities Operations Center (BUOC) at the California State Operations Center (SOC) through California Emergency Support Function (CA-ESF) #12 Utilities, with representation from the California Utilities Emergency Association (CUEA) and the State Resources Agency. In addition, PG&E supports efforts implemented by Federal Emergency Support Function (ESF) #14 – Long Term Community Recovery, whereby Federal agencies help affected communities identify recovery needs and provide long-term community recovery planning support as needed.

As a private sector partner, PG&E, in coordination with California Governor's Office of Emergency Service (Cal OES), local governments, and other businesses, plays a key role in donating goods and/or services for community recovery. In addition, PG&E supports the evaluation of incidents to identify lessons learned, post-incident reporting, and the development of initiatives to mitigate the effects of future incidents.

1.5.3 Gas Safety and Risk Management Planning

The PG&E Gas Safety Plan describes PG&E's progress in pursuit of Gas Safety Excellence. Safety culture, process safety, and asset management are the foundation of these efforts and include key programs such as the Corrective Action Program (CAP) and PG&E's governance committees (see **Figure 1-2**).

Emergency Preparedness and Response which includes the Gas Emergency Response Plan is one of the elements of the PG&E Gas Safety Excellence Management System (GSEMS). GSEMS provides the structure to systematically manage and maintain operational excellence with a commitment to continuous improvement and in compliance with best-in-class industry standards.

The PG&E Gas Safety Plan describes how PG&E manages risk; both the inherent risk of the assets and the risk of working on those assets safely. PG&E describes how it achieves safety through asset management by discussing how the Company identifies risk, prioritizes risks, and then works to mitigate them. Three major categories of gas system risk the Company manages are: loss of containment, loss of gas supply, and inadequate emergency response.

GERP planning efforts are a key element of the PG&E Gas Safety Plan.

Figure 1-2: Gas Safety Excellence Framework

1.5.3.1 Safety Planning and the Risk Management Process

1.5.3.1.1 Gas Safety Excellence Management System (GSEMS)

The Gas Operations organization has adopted Utility Standard TD-4011S, "Gas Operations Asset Management System Risk Management." It is a program and risk management process providing a repeatable and consistent method to identify, assess, rank, and mitigate risk. The PG&E Risk Management team prioritizes risks based on how likely an event is to occur and how severe it might be. This team then provides direction to PG&E gas operations employees who work continuously towards mitigating these risks. Each year, using a consistent methodology, Gas Operations identifies, assesses, and ranks its risks in a Risk Register. The PG&E Gas Safety Plan includes a table of Gas Session D Risks.

For additional details on the risk management process, refer to the PG&E Gas Safety Plan.

1.5.4 Hazard Specific Incident Planning

The *GERP* supports incident planning efforts found throughout the many programs within Gas Operations. Planning efforts include participating in the development of enterprise hazard specific plans, playbooks, planning annexes, instruction manuals, response aids, etc. (see **Table 1-1**). For a list and access to additional gas hazard-specific materials please refer to the Toolkit on the *GERP* intranet site.

The *CERP* provides and updates additional hazard specific plans. These additional plans and annexes are available in the PG&E Guidance Document Library and the Emergency Response SharePoint Site.

Table 1-1: Incident Response Planning Documents

Planning Document
Earthquake
Asset Management & System Operations (AM&SO) Earthquake Playbook https://pge.sharepoint.com/:f:/r/sites/RMP/Shared%20Documents/AK%20and%20IM%20Earthquake%20Playbook/AMSO%20Earthquake%20Playbook%202021?csf=1&web=1&e=lMAzCu

Planning Document
Cold Weather
Cold Weather Communication Process https://pge.sharepoint.com/:f:/r/sites/StrategyTechnologySupport/Winter%20Planning/Cold%20Weather%20Communication%20Flow%20Process?csf=1&web=1&e=pg1ksg
Rainfall
Utility Standard TD-4814S, "Gas Transmission Heavy Rainfall Response" Utility Procedure TD-4814P-01, "Gas Transmission Heavy Rainfall Preparation and Response"
Gas Storage Well
Well Control Tactical Considerations http://pgeweb.utility.pge.com/topics/ep/gas/Pages/GasStoragePlans.aspx
Los Medanos PGE Relief Well Contingency Plan http://pgeweb/topics/ep/gas/Pages/GasStoragePlans.aspx
Los Medanos PGE Surface Intervention Plan http://pgeweb/topics/ep/gas/Pages/GasStoragePlans.aspx
Pleasant Creek PGE Relief Well Contingency Plan http://pgeweb/topics/ep/gas/Pages/GasStoragePlans.aspx
Pleasant Creek PGE Surface Intervention Plan http://pgeweb/topics/ep/gas/Pages/GasStoragePlans.aspx
McDonald Island PGE Relief Well Contingency Plan http://pgeweb/topics/ep/gas/Pages/GasStoragePlans.aspx
McDonald Island PGE Surface Intervention Plan http://pgeweb/topics/ep/gas/Pages/GasStoragePlans.aspx
Gas System Planning
Gas System Planning Emergency Response Reference Guide https://pge.sharepoint.com/:w:/s/gso/gsp/ET_nB5WouhlOpATksbcKFqgBiBJc1BbJ8ZbcLYG2Srmxwg?e=kwDayW
Portable Natural Gas (PNG) Program
Utility Procedure LCNG-4552P-31, "Hazardous Materials Trailer Transportation Incident Response and Recovery Procedure- LNG/CNG" https://sps.utility.pge.com/sites/cng/CNG%20Projects/T.%20Charlotte/LCNG-4552P31%20Hazardous%20Materials%20Trailer%20Transportation%20Incident%20Response%20and%20Recovery%20Procedure.pdf

1.6 *GERP* Maintenance

The Senior Vice President (SVP) of Gas Operations is the document owner of the *GERP*, and delegates Plan maintenance to Gas Emergency Preparedness (GEP). The *GERP* is reviewed annually, at intervals not exceeding 15 months, and updated as necessary to reflect organizational changes, new requirements, best practices, lessons learned, and corrective actions identified through incident response and exercises.

1.6.1 *GERP* Development and Updates

This document is prepared by Gas Emergency Preparedness with assistance from Gas Operations and other company departments including, but not limited to Corporate Emergency Preparedness and Response, Public Safety Specialists, Environmental Planning, Safety, Cybersecurity, the Department of Transportation (DOT), and Regulatory Compliance. Annually, representatives are asked to update their relative portions of the *GERP* per 49 CFR 192.605, "Procedural manual for operations, maintenance, and emergencies."

1.6.1.1 Change Requests

To request changes, corrections, or additions to the *Company Emergency Response Plan (CERP)* or associated annexes, submit a completed copy of *EMER-2001S-F01, Company Emergency Response Plan or Annex Change Request Form*, to EPRCERP@pge.com. EMER-2001S-F01 is located on the Guidance Document Library: Emergency Response - EMER (pge.com) You may also email requests to GERP@pge.com.

1.6.2 *GERP* Distribution

- This *GERP* is produced and distributed electronically. The *GERP* can be accessed by PG&E personnel in the following locations:
- The Guidance Document Library (GDL) under Emergency Response – EMER and the GERP Website.
- Type 'GDL' into the PG&E web browser to access the site
- Select 'Emergency Response – EMER'
- Select 'EMER-3003M Gas Emergency Response Plan'
- The Gas Emergency Preparedness internal website.
- Type 'GERP' into the PG&E web browser to access the site
- The Toolkit in the right column provides access to the *GERP* and the Gas Emergency Response Guide
- GERP Drive*
- Enter 'Gas Emergency Response Plan' into computer's Start menu
- Select document and pin to Start menu
- GERP Drive also contains:
- Gas Emergency Response Guide
- *CERP*
- Other LOB emergency plans
- ICS Forms
- Emergency center specific resources such as meeting agendas and scripts etc.
- iPhone*
- Open 'Books' application
- Select 'Gas Emergency Response Plan
- Books application also contains:

- Gas Emergency Response Guide

External stakeholder and response partners can request a redacted copy from the Gas Operations Support Team (GOST) by emailing SBResponderGroup@pge.com.

** To request a copy of the iBook or GERP Drive copy contact GERP@pge.com.*

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2 Emergency Organization and Responsibilities

2.1 Facilities

PG&E response may include the use of a variety of facilities depending on the size and complexity of the response. Locations may vary due to potential damage to a site or inability of personnel to respond to a location. More information regarding gas emergency facilities, purpose, authority to activate and command authority can be found in **Table 2-2.** For details on all PG&E Emergency Centers and Support Centers, please refer to Emergency and Coordination Centers in the *CERP*.

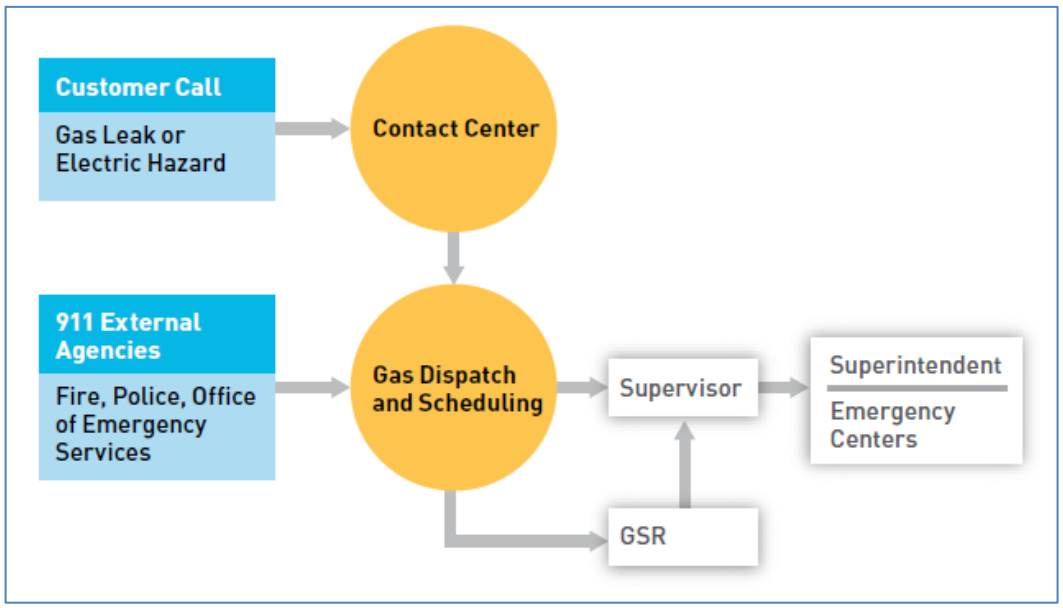
2.1.1 Gas Coordination Facilities

2.1.1.1 Gas Dispatch and Scheduling

Gas Dispatch and Scheduling is located at the Gas Operations Center in San Ramon, along with the Gas Transmission Control Center (GTCC) and the Gas Distribution and Control Center (GDCC).

Calls into Customer Contact Centers or from 911 agencies go directly to Gas Dispatch and Scheduling. Gas Dispatch primarily manages incident coordination for gas distribution emergencies. **Figure 2-1** shows how Gas Dispatch and Scheduling receives emergency calls, dispatches resources, and escalates command. Upon receiving an emergency call, Gas Dispatch uses the field automation system (FAS) dispatch application to report the incident and sends a Gas Service Representative (GSR) to the incident. If the GSR needs assistance, their supervisor is notified through Gas Dispatch and command is transferred to the supervisor, upon arrival at the scene. Gas Dispatch tracks incidents in the Event Management Tool (EMT). If the incident escalates beyond the supervisor's capacity, activation of an Emergency Center may be requested.

Figure 2-1: Emergency Call Escalation through Gas Dispatch and Scheduling



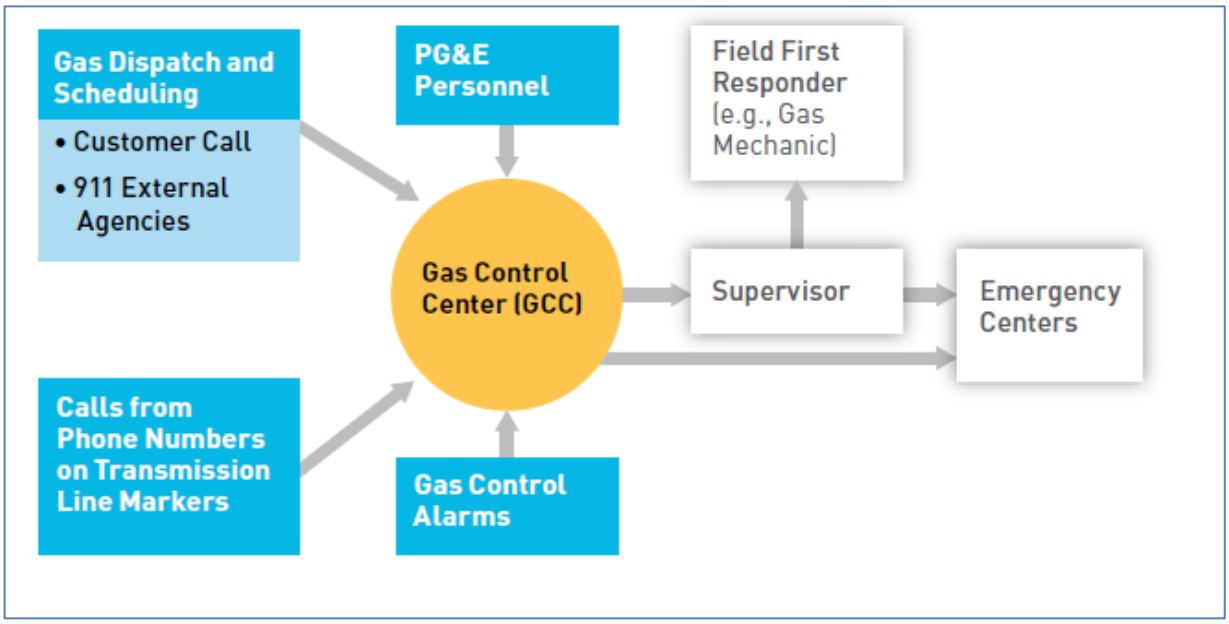
2.1.1.2 Gas Control Center

The Gas Control Center (GCC) primary facility is located within the Gas Operations Center on the 5th Floor of 6121 Bollinger Canyon Road in San Ramon, CA. The GCC is responsible for the overall operation of the PG&E gas system (transmission and distribution inclusively), and closely monitors and coordinates incident notifications, dispatching, system isolations, and restorations. The alternate GCC (AGCC) site is located at the Vacaville Emergency Response Center (VERC). and the tertiary site is located at 1421 Vineyards Parkway in Brentwood, CA.

GCC personnel primarily monitor and control critical assets remotely and are alerted of system irregularities via alarms. When these alarms activate, GCC notifies appropriate 911 agencies and departments within PG&E to ensure that incident response resources are informed and dispatched.

The GCC manages initial incident coordination for gas transmission and distribution emergencies. **Figure 2-2** shows how GCC receives emergency calls, dispatches resources, and escalates an incident. Once the GCC receives an emergency call or an indicator from a Gas Control Supervisory Control and Data Acquisition (SCADA) alarm, a Gas Pipeline Operations and Maintenance (GPOM) Supervisor or Maintenance and Construction (M&C) Supervisor, as appropriate, is contacted to coordinate field level response. The GCC has the authority and responsibility to remotely isolate a gas system during an emergency operating condition to make the system safe. If the incident escalates beyond the PG&E field first responder's (e.g., gas mechanics) capacity, or requires additional resources/coordination, command is transferred to the superintendent or higher-level authority.

Figure 2-2: Emergency Call Escalation through GCC/GSO



2.1.2 Gas Emergency Centers

2.1.2.1 Operations Emergency Centers

The Operations Emergency Center (OEC) is traditionally a physical location allowing IMT personnel to set-up and provide management oversight at the division and/or district level (**Figure 2-3**). When activated, OEC personnel direct and coordinate field personnel responsible for damage assessments, securing hazardous situations, restoring service, and communicating information internally and externally.

Gas Operations has 18 strategically located OEC facilities throughout the service territory, one per division, that can act as an Incident Command Post (ICP) location (see **Table 2-1**). The 12 transmission districts are supported by the division level OECs based on the overlapping of their respective geographical areas. The IC may also choose to activate the OEC in a virtual environment.

Figure 2-3: Operations Emergency Center

Table 2-1: OEC Facility Locations

Operations Emergency Center (OEC)	
Northern	**Southern**
Diablo OEC 1030 Detroit Avenue, Concord	Central Coast OEC 401 Work Street, Salinas
East Bay OEC 4801 Oakport, Oakland Conference Room B	De Anza OEC 10900 N. Blaney Avenue, Cupertino
Humboldt OEC 2475 Myrtle Avenue, Eureka	Fresno OEC 3580 E. California Avenue, Fresno
Mission OEC	Kern OEC

Operations Emergency Center (OEC)	
Northern	**Southern**
24300 Clawiter Road, Hayward	4101 Wible Road, Bakersfield
North Bay OEC 1220 Andersen Drive, San Rafael MC Bull Room	Peninsula OEC 275 Industrial Road, San Carlos
Sacramento OEC 5555 Florin Perkins Road, Sacramento	San Francisco OEC 2180 Harrison Street, San Francisco
Sierra OEC 12789 Earhart Ave, Auburn	San Jose OEC 308 Stockton Street, San Jose
North Valley OEC 11239 Midway, Chico	Stockton OEC 4040 West Lane, Stockton
Sonoma OEC 3965 Occidental Road, Santa Rosa	Yosemite OEC 1524 N. Carpenter Road, Modesto

2.1.2.2 Gas Emergency Center

The Gas Emergency Center (GEC) is located at 6121 Bollinger Canyon Road, San Ramon, on the 5th floor of Building Z, adjacent to the Gas Control Center (GCC). A secondary or backup GEC can be established at the Vacaville Emergency Response Center (VERC) and the GEC can also be operated as a virtual emergency center.

GEC personnel support an incident in coordination with activated OEC(s) and interact with the Emergency Operations Center (EOC), if activated. In its support role, the GEC may set system-level priorities and strategies, but overall command and control remains with the IC at the ICP.

Table 2-2: PG&E Gas Emergency Centers, Activate Authority, and Command Authority

Emergency Center	Purpose/Function	Authority to Activate	Emergency Team	Command Authority
Operations Emergency Center (OEC)	A physical location that allows staff to provide management oversight at the Division and/or District level. The OEC can also be activated virtually if needed. Focuses on operations section functions but can activate other roles at a Level 2.	Incident Commander Sr Gas OPS Management GCC Manager/Sr Manager M&C Superintendent M&C Supervisor M&C Director GPOM Superintendent GPOM Supervisor GPOM Director Field Services Supervisor Field Services Manager Field Services	IMT	Incident Commander

Emergency Center	Purpose/Function	Authority to Activate	Emergency Team	Command Authority
		Director GC Supervisor GC Superintendent GC Director GEP Manager		
Gas Emergency Center (GEC)	A physical location that supports the incident in coordination with activated ICP(s). The GEC may set system-level priorities and strategies. The GEC communicates the status of the incident response to senior management, other Emergency Centers, and departments involved in the incident. The GEC may also coordinate all resources for deployment within Gas Operations, and the use of external mutual assistance as necessary. Typically focuses on coordination and communications for Level 3 or higher emergencies.	The Senior Vice President of Gas Operations All Vice Presidents of Gas Operations All GEC Directors Senior Director of GPOM Senior Director of GSO Senior Director of General Construction Senior Director of Gas Integrity Management Senior Director of Gas T&D Operations Director of Field Services Director of M&C Director of GPOM Director of Field Service Senior Director of General Construction Manager of GEP Designees/delegates of the above	IST	GEC Director

2.1.3 Mobile Field Facilities

Field facilities are temporary and, at times, portable emergency response sites set-up to facilitate restoration and response activities. Refer to the *CERP* for more information on Emergency Field Facilities used by PG&E.

2.1.3.1 Incident Command Post

The Incident Command Post (ICP) is a field location where the primary tactical-level, on-scene incident command functions are performed. During a minor incident, activities of on-scene response personnel are typically managed at a local ICP location. For larger or more complex events, the ICP may be managed at an OEC location or other offsite location.

2.1.3.2 Mobile Command Vehicles

A Mobile Command Vehicle (MCV) is a specialized vehicle that can be deployed to and stationed at the scene of an incident. An MCV can be used as a location for an ICP or an emergency center if warranted. MCVs help facilitate communication between response crews, command staff, and government agencies. MCVs are specially outfitted for incidents that may require multiple personnel to be stationed near the site of an incident for one or more days.

The types of MCVs available are:

- Type I Commander, which is outfitted for large, multi-day incidents
- Type II Lieutenant (Lt.) Commander, which is a mid-size motor coach which is between the size of a Commander and a Sprinter
- Type III Sprinter, which is used for short-duration incidents that do not require extensive capabilities

See the *CERP* for vehicle equipment specifications, (e.g., size, fuel capacity, generator run time, and installed equipment, including radios, phones, work stations, printers).

2.1.3.3 Base Camps

Base camps may be set up to support crews in the field when the damage caused by an event (major storm, fire, tsunami, tornado, etc.) or incident (earthquake, ruptured gas line resulting in a fire, etc.) requires PG&E to bring crews in from outside the impacted area (PG&E, Contractor or Mutual Assistance crews) and permanent facilities are not accessible, operational, or otherwise unsuitable. A base camp may also be set up closer to the incident location to reduce crews and support personnel travel time to the impacted areas. A base camp may be co-located with the ICP and/or function as an OEC.

2.2 Personnel

Gas Operations employs a variety of specialized teams and work crews to respond to emergency incidents. The determination of which of these teams and crews are utilized is based on several factors—including geographical and functional abilities.

2.2.1 Emergency Management

2.2.1.1 Gas Emergency Preparedness

Gas Emergency Preparedness (GEP) assists Gas Operations with incident planning, preparedness, maintain 24/7/365 rotational on-call status for emergencies, and respond to Gas Emergency Centers and the PG&E Emergency Operation Center upon notification of a gas incident or emergency center activation. The Gas Emergency On-Call Hotline is (925) 244-4000. During incidents, GEP Team members support gas emergency center facilities and teams and fills

the role of an Incident Commander (IC) Advisor to support the IC and staff in implementing the *GERP*, emergency plans, and utilization of the Incident Command System (ICS). GEP functions also include the following:

- Executes Utility Standard EMER-6010S.
- Promotes incident management doctrine and principles
- Develops and maintains the *GERP*
- Trains Gas Operations personnel (including internal first responders) to the *GERP*
- Exercises the *GERP*
- Facilitates the use of the PG&E Corrective Action Program (CAP) following gas incidents and exercises, which may include hosting one or more of the following: Hot Wash Discussions and After-Action Review (AAR)
- Implements continuous improvement/corrective action items related to Gas Operations incident preparedness and response program (inclusively)
- Maintains the Gas Operations Manage Emergency Response Business Continuity Plan
- Submits incident response plans annually to the California Public Utilities Commission (CPUC)
- Participates in industry benchmarking on Emergency Management solutions and best practices
- Organizes and equips gas emergency center teams and facilities
- Participates in industry benchmarking on Emergency Management solutions and best practices
- Manages and maintains Operations Emergency Center (OEC) and the GEC facilities

2.2.1.2 Incident Response Staffing

PG&E Gas Operations has identified four levels of response based on the Gas Incident Levels and need to have a trained pool of resources to draw from when an incident occurs. These levels are for guidance only and may be adjusted based on incident activity and/or operational need.

The 4 levels are:

1. For Gas Incident Level 1 and 2 responses, a local IC at an ICP.
2. For Gas Incident Level 3-5 responses, Incident Management Team (IMT) members are dispatched to an ICP to assume incident command.
3. The Incident Support Team (IST) is activated to support the IMT throughout the response as necessary.
4. Gas Operations Branch Director is established at the EOC when the EOC is activated.

For a large-scale, dual-commodity response, Gas Operations shall follow emergency response guidance identified in the *CERP*.

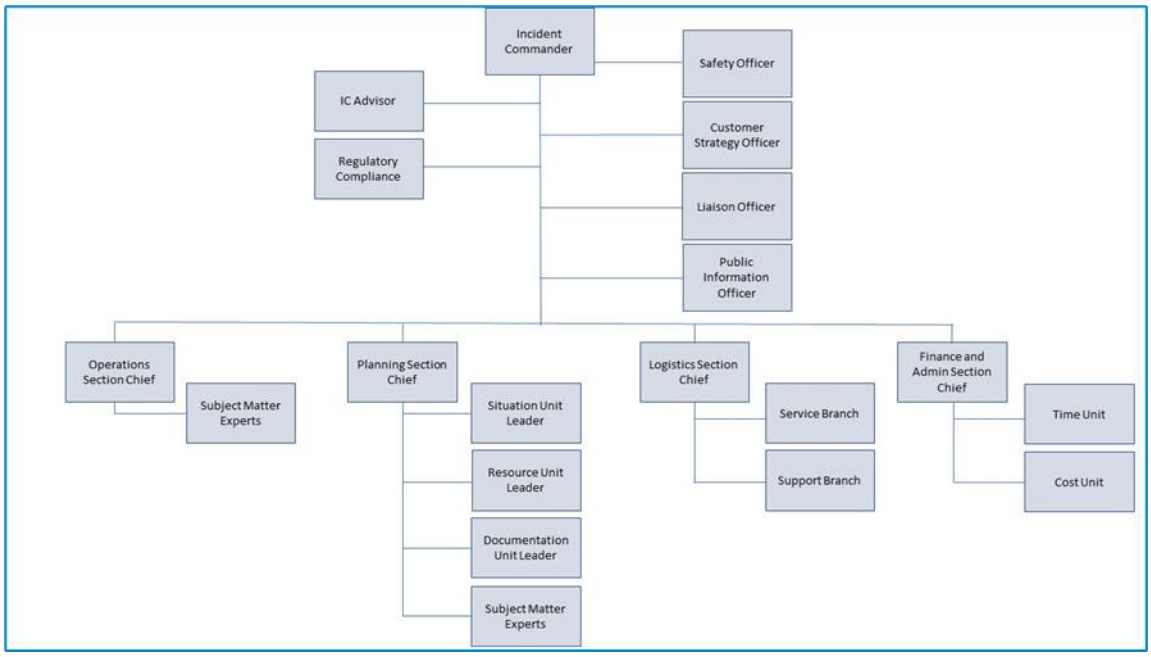
2.2.1.2.1 Incident Management Teams

An Incident Management Team (IMT) is comprised of an Incident Commander and Command and General Staff personnel assigned to an incident. Incident teams, when assembled, have direct

authority to plan and execute the response. Gas Operations utilizes one pool of trained resources, divided into North, South and Bay Area regions, to fill Command and General Staff roles on the IMT. IMT members typically report to the ICP but may provide support remotely in the event of a virtual activation.

A typical IMT organizational structure can be seen in **Figure 2-4**. More information regarding IMT position roles and responsibilities is located on the *GERP* intranet site.

Figure 2-4: Incident Management Team (IMT) Organization Chart



2.2.1.2.2 Incident Support Teams

An Incident Support Team (IST), consisting of on-call personnel directed by executive leadership, is available 24/7 to support OEC/ICP activations. The IST is commonly referred to as the "Gas Emergency Center," or "GEC" Team. IST personnel will typically be organized under the appropriate OEC/ICP Section (P&I or Operations) and primarily report to the GEC facility to support an incident in coordination with any activated ICP(s). IST's may also provide support remotely in the event of a virtual OEC and/or GEC activation.

IST incident support functions may include:

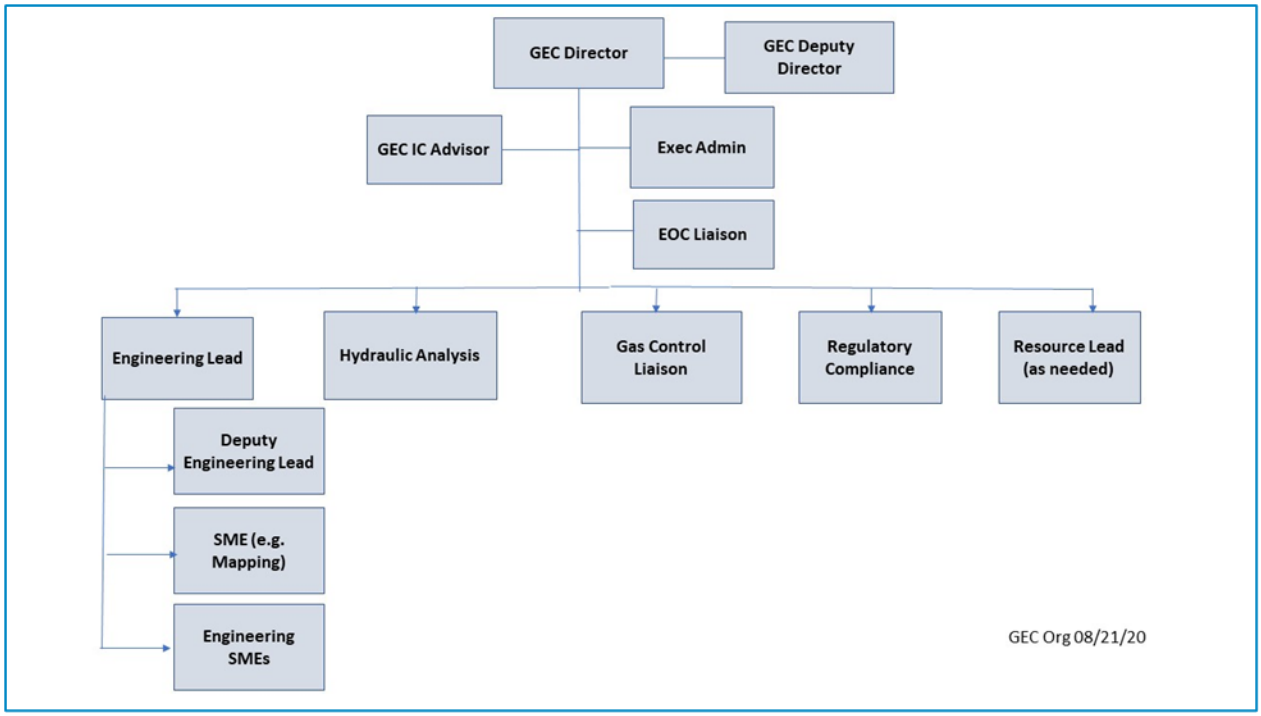
- Supporting the IC with communications and coordination until the OEC/ICP becomes operational.
- Communicating incident response status to senior management, other emergency centers, and departments involved in the incident.
- Coordinating Gas Operations resources as well as other PG&E and external resources
- Providing early and ongoing incident support such as:
  - General engineering support
  - Advanced Planning
  - Clearance writing

- Hydraulic analysis
- Mapping

- Establishing a Gas Operations Branch Director in an activated EOC.

A typical IST organizational structure can be seen in **Figure 2-5**. More information regarding IST position roles and responsibilities is located on the *GERP* intranet site.

Figure 2-5: Gas Emergency Center (GEC) Organizational Structure



2.2.1.2.3 Subject Matter Experts

A Subject Matter Expert (SME) is considered an authority on a particular subject, topic, or system based on their work and/or educational experience. SME roles will be filled on an as-needed basis utilizing local resource lists consisting of both active IMT/IST members and non-members.

2.2.1.2.4 Response Team On-Call Responsibilities

On-Call Team members provide GEP email address, home, cell, and landline phone numbers to ensure that they receive all pertinent notifications and communications. The notification system currently in use is Everbidge, used in coordination with Gas Control Center e-page messaging.

A staffing plan and/or contact list may identify on-call individuals for a given time-period. Responsibilities for personnel consider on-call include the following:

- Provide a safe response time within two hours, given a published schedule.
- Maintain a heightened sense of situational awareness of all potential, forecast, and in-process incident developments.
- Be knowledgeable of the considerations and activities of the respective emergency center for each incident level.

- Maintain Company Fitness for Duty (FFD) standards during entirety of on-call and/or activation status.

Employees should ensure their supervisors have access to current telephone numbers to reach them when warranted. Employees should also have a plan for contacting their immediate family and relatives in the event they are unable to return home promptly. It is recommended that they designate an out-of-state relative or friend that their family or significant other can contact to coordinate messages.

Gas Operations provides on-call personnel with an onboarding document that outlines critical items to maintain while on-call:

- Company ID card/building access card
- Laptop
- Gas Emergency Response Guide
- Satellite phone (if assigned)
- Cell phone (if assigned) and vehicle charger
- Personal protective equipment (PPE)
- Government Emergency Telecommunications Service (GETS) card (if assigned)

On-call employees are also encouraged to maintain personal emergency supplies at their primary work location, base yard, or carry with them in a “ready-bag.” This ready bag may include the following items: a change of clothing, extra socks, sturdy shoes, toiletries, and any necessary medications needed over the course of three days.

2.2.2 Gas Field Operations

This section lists groups in Gas Field Operations that work together in emergency response.

2.2.2.1 Gas Transmission Control Center (GTCC)

- Responds to transmission emergencies.
- Responsible for coordinating emergency restoration efforts for the gas transmission system.
- Uses Supervisory Control and Data Acquisition (SCADA) to monitor and control gas flow and pressure.

2.2.2.2 Gas Dispatch and Scheduling

- Dispatches appropriate field responders to the scene.
- Serves as the primary link between all internal and external first responders.
- Tracks incidents in the Event Management Tool.

2.2.2.3 Gas Distribution Control Center (GDCC)

- Responds to distribution emergencies.
- Responsible for coordinating emergency restoration efforts for the gas distribution system.

2.2.2.4 Gas Service Representative (GSR)

- First personnel dispatched to an emergency.
- Performs routine maintenance and resolve issues.
- Assesses the situation and contacts Gas Dispatch if determined additional support is needed.

2.2.2.5 Maintenance and Construction (M&C)

- Dispatched to the scene if a gas emergency causes damage to any facilities.
- Responsible for managing distribution emergencies and either report virtually or respond to the designated OEC, ICP, or MCV.

2.2.2.6 Gas Construction Crew

- Repairs damaged facilities and provides labor for emergencies.
- Generally, the work done in an emergency is not substantially different from normal work assignments.

2.2.2.7 Gas Pipeline Operations and Maintenance (GPOM)

- Operates compressor stations, gas storage fields, valves, regulators, and control equipment to bring the gas emergency under control.
- Helps to maintain the system at a safe working level while emergency repairs are being made.
- Maintains SCADA equipment.

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3 Concept of Operations

This section provides an overview of the PG&E incident response system and explains how to apply it to gas emergencies. When a gas incident occurs, this plan will be activated to assist in the coordination of incident processes, resources, personnel, and equipment required for an effective response.

3.1 Planning Assumptions

Gas Operations recognizes that an incident can be the result of any natural or man-made incident, including terrorism, and has the potential for casualties to the public served, as well as PG&E personnel. Accordingly, the *GERP* uses all planning assumptions for catastrophic emergencies stated in **section 3** of the *CERP*.

Planning assumptions used are as follows:

- Safety is our most important responsibility.
- Institutionalized emergency response processes can be used during most emergency incidents.
- Emergencies during business (Level 1) are best handled at the local field or Incident Command Post (ICP) level with the resources and capabilities within that division.
- Resource movement between divisions does not need to be ordered through the Gas Emergency Center (GEC) for a single incident that is easily handled within a given division.
- The GEC may be opened during a Level 3 incident; but Command and Control remain within the affected Division ICP.
- Gas response practices should easily integrate with external first responders by incorporating compatible Standardized Emergency Management System (SEMS), National Incident Management Systems (NIMS), National Preparedness Goal Core Capabilities, and follow the Incident Command System (ICS).
- Gas Control and GEP staff will facilitate and coordinate the incident escalation process should an Emergency Center (EC) require activation. For example, if an incident escalates from a Level 1 (day-to-day Incident) to a Level 2 (escalated incident requiring an EC activation for additional support and coordination).

3.2 Incident Management Concepts and Guidelines

PG&E aligns its emergency preparedness and response practices and structure with:

- NIMS
- SEMS
- ICS

More information on these systems can be found in **section 4** of the *CERP*.

3.2.1 National Incident Management System

National Incident Management System (NIMS) is designed to provide guidance to government organizations, non-profits, and private sector businesses to work cohesively to manage incidents resulting from all hazards, regardless of their size, complexity, or location. The purpose of NIMS is to reduce loss of life, damage to property, and harm to the environment.

The five components of NIMS are:

- Preparedness
- Resource Management
- Communication and Information Management
- Command and Management
- Ongoing Management and Maintenance

3.2.2 Standardized Emergency Management System

The Standardized Emergency Management System (SEMS) outlines the fundamental structure for response to emergency incidents in California. This system integrates California's emergency management entities and standardizes key elements of response phase planning and execution.

The main concepts and principles of SEMS include:

- Incident Command System (ICS) – An incident management system developed to improve preparedness and response capabilities and coordination of government, private and non-profit entities.
- Multi-/inter-agency coordination – Coordination of affected agencies and organizations to handle emergency response activities as well as resource allocations.
- Mutual Aid – A system designed to obtain additional resources for response from non-affected jurisdictions.
- Operational Area concept – Management and coordination of information, resources, and priorities among local governments. The Operational Area is the link between local and regional levels of emergency management coordination.

3.2.3 Incident Command System

The Incident Command System (ICS) is designed to effectively manage equipment, facilities, personnel, procedures, and communications within an organization. The use of ICS or a compatible ICS system by PG&E is mandated by GO-112F, 143.6 Compatible Emergency Response Standard. In addition, a natural gas release can be considered a release of a hazardous material. As per 8 California Code of Regulations (CCR) 5192(q), response to the release of a hazardous material also mandates the use of ICS. See **Appendix C** for additional details on ICS.

The ICS is based on the following 14 proven NIMS management characteristics, each of which contributes to the strength and efficiency of the overall system:

- Common terminology: Establish common terminology amongst company facilities and response groups. This allows diverse responders to work together across a wide variety of incident management functions and hazard scenarios.

- Modular organization: Identify a response organizational structure based on the incident, hazardous effects, size, and complexity. As an incident complexity increases, the organization expands from the top down as functional responsibilities are delegated.
- Management by objectives: Establish specific, measurable objectives for various incident management functional activities and direct efforts to attain them. Planning should allow for a timely response, documentation of the results, and a way to facilitate corrective actions.
- Incident action planning: Incident Action Plans (IAPs) guide response activities and provide a concise means of capturing and communicating a company's incident priorities, objectives, strategies, protocol, and tactics in the contexts of both operational and support activities.
- Manageable span of control: Supervise, communicate, and manage all resources using ICS recommended span of control, which should be limited to three to seven immediate subordinates, with the optimum being five. The number may vary depending on the needs of the company and specifics of the incident.
- Incident facilities and locations: Identify various external operational support facilities in the vicinity of an incident for assistance.
- Comprehensive resource management: Maintain an accurate and up-to-date picture of available resources.
- Integrated communications: Develop, comprehend, practice, and use an interoperable communications plan and streamlined procedures.
- Establishment and transfer of command: Clearly identify and establish the command function from the beginning of incident operations. If command is transferred during an incident response, a comprehensive briefing should capture essential information for continuing safe and effective operations.
- Chain of command and unity of command: Identify clear responsible parties and reporting relationships, eliminating confusion caused by multiple, conflicting directives and authorities.
- Unified command: Unified command allows agencies with different legal, geographic, and functional authorities to work together effectively without affecting individual agency authority, responsibility, or accountability.
- Accountability: Develop process and procedures to ensure resource accountability including check-in/check-out, Incident Action Planning, unity of command, personal responsibility, span of control, and resource tracking.
- Dispatch/deployment: Limit overloading response resources by enforcing a "response only when requested or dispatched" process in established resource management systems.
- Information and intelligence management: The incident management organization must establish a process for gathering, analyzing, assessing, sharing, and managing incident-related information and intelligence.

3.3 Emergency Plan Activation

PG&E Gas Incident Levels categorize incidents and support PG&E in understanding the complexity of an incident and the actions that may be employed at each level (e.g., emergency center activations, resources requests). To ensure a consistent and well-coordinated response to emergencies, the company has adopted the following incident classification system:

- Level 1 – Routine
- Level 2 – Elevated
- Level 3 – Serious
- Level 4 – Severe
- Level 5 – Catastrophic

The Gas Incident Level Activation Matrix (see **Table 3-1**) is a guide used by Emergency Center Incident Commanders, Gas Leadership, and Gas Emergency On-Call personnel to determine what level the incident should be classified as, and whether the *GERP* and associate emergency centers should be activated. The activation matrix can be used following an incident or in anticipation of an event. This matrix is not all-inclusive and the decision to activate at a particular incident level may be based on additional factors or risks and it does not replace the sound judgment and experience of the IC and Gas Leadership.

Plan activation occurs when authorized individuals classify an incident based upon the activation criteria set forth in the Gas Incident Levels in **Table 3-1**, or other circumstances, and request the activation of any supporting Emergency Center(s).

For additional details on PG&E incident levels, refer to the *CERP* and the *CERP*, Appendix B, “Levels of Emergency and Activation Criteria for PG&E.”

Note: Any gas incident level can be reportable to DOT and/or the CPUC if it meets the specified criteria found in Utility Procedure TD-4413P-01, "Reporting of Gas Events."

Table 3-1: Gas Incident Level Matrix

Severity	Level	Considerations	Customer Impact	Emergency Centers	Gas Resources	External Interest/Media/Reputation
Routine	1	• Customer call of a gas-related incident • Leak indication • SCADA alarm • Structure fire **Storage Well** • Cannot circulate well • Shut in well to control kick • Failure of a component on the BOP (ram change out, bag torn) • Wire line tool broke off, but retrievable via fishing	• Less than 200 core customers	• No activation	• Local crew and resources utilized	• Routine local incident or customer issue with no or minimal public or media interest. Police or fire may be on scene.
Elevated	2	• More than 20 customer calls within the first hour of a gas-related incident appearing to occur within a localized geographic area • Incident requiring out-of-area or division resources • More than 50 unplanned service interruptions or re-light efforts • Odorant equipment incident: high or low odorant levels in the gas line, or uncontrolled odorant release to atmosphere or pipeline • Low impact wildland fire **Storage Well** • Collapse of casing (primary barrier) • BOP has failure (hydraulic) • Failure of surface equipment (damage to well head causing containment concerns) • Wire line stuck in the well	• Greater than 200 core customers • Major impact to non-core customers	• ICP activation	• Local crews and resources. Area/division resources and out-of-area / division resources	• Local emergency or customer issue with increased public, media, government, or regulatory interest. City or county activation.

Table 3-1: Gas Incident Level Matrix (continued)

Severity	Level	Considerations	Customer Impact	Emergency Centers	Gas Resources	External Interest/Media/Reputation
Serious	3	• Dig-in or line rupture to transmission line with blowing of gas or ignition • High-profile incident with significant media interest • Need for communication/ coordination to support major gas incident • Failure of critical transmission equipment or facility • Capacity shortage • Cold Winter Day (CWD) • Gas-related serious injury or fatality; injury is of a nature requiring in-patient hospitalization • Natural or man-made disaster • Damage to PG&E's brand reputation **Storage Well** • Loss of primary barrier	• Between 2,000 – 10,000 core customers • Major Impact to multiple non-core customers	• ICPs activation. GEC, EOC activation optional Supports REC (Electric), when applicable	• Local crews and resources. Possible GC and out-of-area / division resources	• Local/regional emergency or customer issue with increased public, media, government, or regulatory interest. City, County, or State activation.
Severe	4	• Significant natural or man-made disaster • Significant life safety or environmental impact • Credible terrorist threat specific to gas facility • Damage to PG&E's brand reputation • National media attention **Storage Well** • Loss of primary barrier with loss or impending loss of secondary barrier (Impending blowout) • Blowout (loss of containment and control, surface, or underground flow)	• Greater than 10,000 core / non-core customers • Major Impact to multiple non-core customers	• ICPs, GEC, and EOC activation • Supports REC (Electric), when applicable	• Local crews and resources. Possible GC and out-of-area / division resources • Curtailment of routine work • Mutual aid	• Severe emergency or customer issue with considerable public, media, regulatory, and government interest across state and national levels. Regional or State EOC activation and declaration.

Table 3-1: Gas Incident Level Matrix (continued)

Catastrophic	5	• Major natural or man-made disaster with significant harm to the public and gas system operations • Major issues regarding employee resource availability • Significant life safety or environmental impact • Terrorist Act • Impact to PG&E's brand reputation • National media attention	• Greater than 10,000 core customers	• ICPs, GEC, and EOC activation Supports REC (Electric) when applicable	• Full mobilization and prioritization of company-wide resources required • Significant need for contractor or mutual assistance	• Catastrophic emergency or customer issue with extensive public, media, regulatory, and government interest across state and national levels. State and/or Federal disaster declaration.

3.4 Emergency Response Process

The PG&E Gas Operations emergency response process is designed to provide a safe, standardized, and effective incident management approach that supports the *CERP* and uses ICS as its fundamental response framework. By using ICS, Gas first responders can integrate seamlessly with community first responders and more effectively respond to and manage gas related emergencies. The following sections delineate Gas Operation's emergency response process.

3.4.1 Flexible Emergency Response for the Incident Commander

There may be situations and circumstances where the criteria for activation to one of the five levels is not exactly matched or met. The IC and those on-scene may take the following into account, as well as pre-determined Gas Incident Level criteria to determine the level of response:

- Matching the size and type of the response to the emergency: Although PG&E expects and supports a robust resource response presence, resources should match the scale of the event.
- Short-term versus long-term response: A short-term response does not allow opportunity for personnel and resources to arrive on-time to be effective or engaged. If the response is expected to last less than 24 hours, there may not be the need to order more resources. If a response is expected to last longer than 24 hours, and more resources are needed, order them as soon as possible.
- Safety and fatigue management: Personnel may be faced with long and fatiguing travel before arrival on-scene. Allow for proper rest before using such personnel. Plans should be made early-on for shift relief, with personnel working long-hours having a designated replacement.
- CPUC/DOT Drug and Alcohol criteria: If the use or abuse of drugs or alcohol by PG&E personnel is suspected in either accident cause, or causing inability of person to safely perform their job, responders will follow the PG&E drug and alcohol testing policy.

3.4.2 Notifications

3.4.2.1.1 Dual Commodity Response (GEC and EOC)

For a Dual Commodity incident (e.g., Electric and Gas) including an EOC activation, Gas Operations can support providing a Deputy EOC Commander to the EOC from the GEC Director/Deputy Director roster. If requested, additional EOC support can be provided from the gas IMT roster.

A dual (or multiple) commodity incident is managed as a single coordinated event with:

- One set of incident objectives
- One Incident Action Plan (IAP)
- One Operations Section
- One single coordinated process for resource management

An integrated incident organization may be used in a shared facility or base camp, rather than activating separate ICPs and OECs for Gas, Electric, and other Lines of Business (LOBs). This integrated structure scales up/down as needed, based on incident needs. Management and reporting relationships include several options:

- Single Command – The IC oversees the emergency response of both Gas and Electric (or other LOBs), with the creation of gas and electric branches within the Operations section to manage execution of the commodity response
- Unified Command – ICs from Gas and Electric (or other LOBs) make joint decisions in an ICP, OEC, or base camp

Single Command with a Deputy Incident Commander – An IC from one commodity and a Deputy IC from another commodity manage the emergency response

For additional dual commodity response structure information see the *CERP*.

The EOC, if activated for another incident, should be notified of a separately occurring Gas Incident Level 2 or above. Depending on the situation, Customer Care and Public Affairs may also need rapid notification of an incident.

3.4.3 Notification and Escalation Procedures: Response Priorities

All PG&E incident planning and response activities are governed by the following priorities, which are contained in the *CERP*:

- Protect health and welfare of the public, PG&E responders, and others
- Protect property of the public, PG&E, and others
- Protect the environment
- Inform customers, governmental agencies and representatives, the news media, and other constituencies
- Restore gas and electric service, and power generation
- Restore critical business functions and move to resume business as usual

- Additionally, these priorities are maintained through all phases of response to an emergency and are the foundation of the *CERP*:
- Consistent incident management, planning and response concepts, processes, and procedures
- Scalable staffing model to provide emergency support as needed across the enterprise
- Respond to all emergency incidents safely, transparently and with a strong sense of urgency
- Align PG&E's planning and response efforts with the needs of the communities it serves
- Establish close working relationships with external emergency public entities consistent with the National Incident Management System (NIMS), Standardized Emergency Management System (SEMS) and Incident Command System (ICS) principles

3.4.4 Key Incident Response Steps

The PG&E emergency readiness and response sequence may be summarized by the following seven steps:

1. Pre-incident Readiness
2. Make Safe and 9-1-1 Standby
3. Establish Command
4. Notify
5. Assess Damage
6. Restore
7. Demobilization

3.4.4.1 Pre-Incident Readiness

All employees involved with emergency response will be oriented to this *Gas Annex*, applicable department emergency plans, and their respective emergency centers' contact list. When an impending incident is determined, PG&E takes proactive actions to prepare for the potential incident.

These actions include, but are not limited to:

- Conference calls
- Placing IMT/IST personnel on alert status
- Reviewing emergency plans
- Identifying key personnel available for response and restoration activities
- Pre-staging personnel and/or equipment
- Evaluating supplies and equipment
- Canceling or postponing non-critical meetings

Gas Operations uses several systems to acquire and maintain situational awareness of the gas system. Many of these systems are used in both day-to-day operations and incident response.

Gas Operations shares information for situational awareness using the following tools and technology systems:

- Supervisory Control and Data Acquisition (SCADA)
- Field Automation System (FAS)
- Tactical Analysis Mapping Integration (TAMI)
- Daily Briefing Dashboard (DBD)
- Event Management Tool (EMT)
- MapGuide
- Gas Logging System (GLS)
- Microsoft Teams

3.4.4.1.1 Severe Weather Notifications

Weather Warnings will be issued for any division where there is an imminent threat of severe weather within the next 12 hours unless the imminent threat was already anticipated and/or communicated through other notification methods such as E-page.

3.4.4.1.2 Other Weather-Related Plans

Wildfire event prediction and response actions can be found in the *CERP* and the *Public Safety Power Shutoff Annex* (EMER-3106M) to the *CERP*.

3.4.4.1.3 Non-Weather-Related Warnings

Non-weather-related warnings may be obtained from several sources including operations reports and alerts from the state or local Office of Emergency Services (OES).

Cal OES information can be found at: www.caloes.ca.gov.

3.4.4.1.4 Pre-Staging Resources

When indicated by the nature and severity of the pre-event forecast, the GEC Director may direct pre-staging of crews, personnel and/or certain equipment (e.g., CNG/LNG, MCVs) in areas expected to be severely impacted. Gas Operations officers will be advised of all pre-event actions to be implemented. Incident Commanders, with support from their respective logistics sections, may also activate local staging areas.

As necessary, IMT-EOC Logistics will work with the Materials Transportation Coordination Center (MTCC) to support resource requirements including pre-arranging equipment and supplies at the distribution centers, specialty stores and service centers, as well as verifying service center inventory stocking levels are adequate to support the event.

3.4.4.2 Make-Safe and 9-1-1 Standby

“Make-safe” actions are those actions taken by PG&E personnel in response to conditions threatening the public, other first responders, or PG&E personnel. Make-safe actions often include:

- Determining an isolation strategy
- Restricting site access

- Eliminating ignition sources
- Closing valves or engaging automatic shut-off valves

Make-safe actions may occur at any time throughout the incident response.

Field responders may initially facilitate evacuation measures while initiating actions required in making a gas incident safe for the public, company personnel, and others. As all incidents are different, the need to evacuate will vary. Field responders may also conduct air monitoring and determine a safe zone.

In addition, external first responders may also coordinate evacuation measures with their internal plans and procedures. DOT provides evacuation guidance related to natural gas incidents for external first responders, which is included in the DOT Emergency Response Guide (ERG).

Further, field responders consider the potential for subsurface gas migration and/or escaping gas and the potential for ignition in their decisions on determining an evacuation zone prior to commencement of leak pinpointing. Field responders will also attempt to eliminate sources of ignition during the make-safe process. Gas Operations field responders will coordinate with Electric Operations in such activities, if appropriate.

Refer to Utility Procedure TD-6100P-02, “Gas Leak and Odor Investigations,” and Utility Procedure TD-4110P-09, “Leak Grading and Response,” Appendix A, “Evacuation Process,” for additional information

3.4.4.3 Establish Command

The first responding person on-scene is the initial Incident Commander until relieved. Incident Commanders have the authority to make decisions and commit resources consistent with the scale of the emergency and PG&E’s delegation of authority. If the Incident Commander determines there is sufficient local personnel, equipment, and resources the incident command may remain at the Local level. If the IC determines the response is beyond local resources, the IC may request to activate an IMT. Gas Emergency Preparedness maintains a list of pre-designated qualified Incident Commanders.

3.4.4.4 Internal Notifications

3.4.4.4.1 PG&E Gas Center Operations

PG&E is notified of gas emergencies through Gas Dispatch and the GCC, collectively known as the Gas Operations Center. In the event of an emergency or abnormal operating condition that has the potential of impacting the public, property, or the environment, Gas Dispatch and Scheduling and the GCC maintain notification and escalation procedures for:

- Level 1-5 Gas incidents
- Gas incidents that require Field Supervisory resources
- Gas incidents that meet specified reportable DOT or CPUC criteria

For such incidents, both Gas Dispatch and the GCC generally maintain communications between departments to ensure adequate system monitoring, resource deployment, and operational response to an incident.

The standard, the procedures that implement these requirements, and supporting referenced documents for the GCC are contained in the Control Room Management (CRM) Operations Manual. The CRM manual contains a 911 Notification Process, specific to the GCC.

Procedures and processes of both Gas Dispatch and GCC ensure that immediate notification to establish "situational awareness" and an open communication channel between Gas Dispatch, GCC, and the responsible external 911 emergency response centers. This includes information on the estimated time of arrival (ETA) of gas field personnel to the incident. If on-scene personnel are requested by a GSR, Gas Dispatch notifies GCC.

3.4.4.4.2 Gas Emergency Preparedness

The Gas Emergency Preparedness On-Call Advisor should be notified of all Level 2 and above Emergency Center activations and can be reached at the **Gas Emergency Hotline 925-244-4000 (external).** The GEP Advisor will assist the IC in making additional internal notifications, if needed.

3.4.4.5 External Notifications

PG&E notifies the CPUC of the location, possible cause, and expected duration of an outage. PG&E generally treats "newsworthy events" as incidents within the category of Level 3 or greater incident, where the GEC and/or EOC are activated. Please refer to **section 4.3** for additional information and details.

3.4.4.6 Call-Out Procedures

Each Emergency Center Incident Commander/Director will coordinate with supporting IC Advisors, as applicable, to determine the ICP and/or IST positions that will be activated and staffed. This decision will be based upon the nature and scope of the incident, the need to coordinate with multiple internal and external groups, and the time of day of the occurrence.

The IMT and IST contact lists are located on the Gas Emergency Response Team Roster.

3.4.4.7 Safety-Related Notifications

All personnel assigned in response incidents must immediately notify their direct lead, supervisor, etc. (i.e., to whom they are assigned during the incident) of any incident related injuries. Further, injured/ill personnel must also notify their home base supervisor, etc. and/or the Nurse Care Line per their program, department, or LOB procedures. Leads, supervisors, etc., who are notified of any incident related injury or illness, must notify the Safety Officer assigned to the activated emergency center. The Safety Officer must track and report all incident related injuries or illnesses.

3.4.4.8 Assess Damage

Higher consideration should be given to requests for priority restoration of customers such as:

- Individuals on life support
- Hospitals
- Fire departments
- Police stations
- Critical communications centers

- Emergency shelters
- Sewage treatment plants
- Critical water pumping stations

During emergency events, all levels of the organization shall coordinate its efforts with local and state governments.

In larger emergencies when resources are constrained, it may be necessary to establish work priorities for restoration of service. These priorities are operationally driven and are primarily focused on restoring as many customers as soon as possible. However, priorities may need to be modified to accommodate the needs of the communities served. Work may also need to be coordinated with other infrastructure repairs that may be occurring simultaneously by other utilities, government, and property owners. Activated Emergency Centers will manage priority/objective-setting in a coordinated manner whenever possible and work with local government and other impacted utilities.

3.4.4.9 Resource Management

During any emergency event, PG&E personnel play a central role in restoring gas to customers through an effective and efficient use of available resources. Resources must be organized, assigned, directed, tracked, and otherwise managed throughout the duration of an event to effectively respond. The following describes PG&Es approach in Gas Operations to resource management during emergencies.

Using available information and sound judgment, the Emergency Centers will allocate resources to support established response priorities. Gas Operations re-evaluates response priorities throughout the incident to ensure optimum allocation and deployment of resources. Gas Operations uses multiple internal and external systems for resource requesting and management.

The Logistics section facilitates the ordering of resources during incidents. Gas Operations local resources (personnel, vehicles, equipment, and supplies) can be found in the GERP Resource Directory.

In localized, short-term emergencies (Level 1), gas service M&C representatives needing resources from neighboring Division headquarters can request them from the Region GC Superintendent.

For larger incidents, the *Logistics Annex* provides an outline of the PG&E Logistics structure, roles, and responsibilities, and describes activities undertaken in response to incidents.

The Logistics Section Chief at the affected Emergency Center contacts the Resource Management Center (RMC) if supplementary clerical and estimating resources are needed.

In Gas Incident Level 1 emergencies: Materials and equipment requested by field personnel are provided by Supply Chain (Materials Operations and Sourcing) and Transportation and Aviation Services Departments.

In Gas Incident Level 2 emergencies: The ICP Logistics Section Chief assumes responsibility for obtaining material and moving resources and equipment, with the approval of the GEC/EOC On-Call representatives if they are activated. In addition, the Field Service Resource Coordinator (FSRC) is responsible for obtaining and moving gas service personnel between Divisions.

Materials and equipment requested by field personnel are provided by Supply Chain (Materials Operations and Sourcing) and Transportation and Aviation Services Departments.

In Gas Incident Level 3 or higher emergencies: The Materials Transportation Coordination Center (MTCC) may be activated through the GEC/EOC to provide materials and equipment. Within the GEC/EOC, representatives from the Supply Chain (Materials Operations and Sourcing) and Transportation and Aviation Services Departments also coordinate support for restoration efforts.

In Gas Incident Level 3 or higher emergencies involving multiple regions: The EOC/GEC will establish priorities for the allocation of resources. The Field Service Resource Coordinator (FSRC) will report to Bishop Ranch on the 5th floor, adjacent to Dispatch and Scheduling.

Gas Operations uses Rental Central for vehicle and equipment rental process provided by PG&E Safety and Shared Services.

- Call **530-757-5959 (8-254-5959 internally)** for all rental needs including light duty vehicles, heavy duty vehicles, construction equipment, portable restrooms, and tools.
- The Rental Central team is available 24 hours a day.
- Managers approve or deny all rentals by phone or email. If rentals aren't approved within 4 hours, they will be approved by the rental group and reported after the fact. The rentals can be approved or denied by email using a smart phone.
- The rental group will handle all billing. Rental fees will be charged back to the LOBs. Clients will continue to manage budgeting and cost allocations.

Additional information including procedures, job aids, etc. is available on the Rental Central intranet.

3.4.4.10 Check-In and Check-Out Process

Resource management begins with accurate check-in and check-out processes of available personnel. Understanding correct resources during an event is critical to an effective incident response.

The Resource Unit Leader at the ICP will establish and oversee the check-in/out function at designated incident locations. When the GEC is activated, the GEC Admin or IC Advisor will ensure check-in/out is completed. Maintaining the status of all checked-in personnel is vital for tracking resources and is essential for personnel safety, accountability, and fiscal control. The Resources Unit maintains the ICS Form 211 – Check-in and Check-out Log throughout the incident to ensure accountability of all personnel. The ICS-211 is collected at the end of each day of the operation at each location, provided to the Documentation Unit, and stored with incident documents. If the Resource Unit has not been activated, the Director, Incident Commander, or Planning Section Chief (PSC) is responsible for setting up the check-in/out process.

Personnel must check-in upon arrival to any PG&E reporting location (i.e., emergency center, service center, base camp, staging area, or micro site) using the ICS-211. Once checked-in on the ICS-211, personnel should report to their Supervisor or Emergency Lead for assignments. All personnel will receive a safety briefing before commencement of work. To check-out, personnel should receive a safety debriefing and demobilization briefing using ICS Form 221, Demobilization Check-Out. Personnel must also sign out on the ICS 211 of the emergency location or Emergency Center.

3.4.4.11 PG&E Contract Crew Support

PG&E has contracts in place to use Contract Crew and/or equipment resources during incidents where Company resources alone are not able to restore the gas infrastructure in a timely manner.

3.4.4.12 Contracts for Incident Response

Supply Chain-Sourcing issues contract agreements to aid in restoring gas service during an incident response. Agreements are established with contractors to aid upon request, and include furnishing personnel, equipment, and/or expertise in a specified manner. During an emergency event, the ICP Logistics Section Chief is responsible for managing the contracts and issuing incident purchase orders.

3.4.4.12.1 Contract Crew Request

Once a need arises for contract crews, the Contract Logistics Manager makes an initial call to determine current contractor availability on property. If more contract crews are needed, the Contract Logistics Manager contacts the contractors for additional resources. If there is still a shortage of resources, the Mutual Assistance process is followed to release contract crews from other Utilities. Arriving personnel should report to the ICP, which may be in an emergency center, other facility, or in the field.

3.4.4.12.2 Assessment Goals and Guidelines

The initiation of damage assessment actions, in many cases, is automatically triggered by the event occurrence and existing procedures; however, some facilities will require specific deployment of qualified personnel and equipment. Damage estimates will be collected at the field level and reported up to the appropriate Emergency Center. The following sections provide an overview on possible damage assessment actions by each organization within Gas Operations.

3.4.4.12.2.1 Incident Investigation

Upon arriving at an incident site, field personnel responding to an incident involving accidents and failures assess the situation and take actions to make safe. This can includes, where appropriate, initial collaboration with an Incident Investigation team to gather and preserve the data that may be useful in investigating the incident (e.g., parts, equipment, personnel, paper, photos, position information, and electronic data), preserve evidence, and follow chain-of-custody procedures for cause evaluation purposes. The Gas Incident Investigation team can be comprised of Gas Process Safety Engineers, CAP specialists, Integrity Management Engineers, and/or DIRT Investigators as appropriate. Per 49 CFR §192.617, “Investigation of failures,” the Incident Investigation team’s role is to analyze accidents and failures, including the collection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.

An investigation may start while incident response activities are still being conducted if the investigation can begin concurrently without interfering, hindering, or delaying incident response activities. If so, then preservation and collection of data can be performed in parallel to the response. If not, incident investigation should begin as soon as possible after the end of the emergency. Access to the incident site and any associated records, should be controlled to preserve all relevant incident data. Only personnel specifically authorized by the investigation team should be permitted entry to the site.

Incidents will be investigated using the referenced procedures below, where applicable. A CAP should be submitted to determine if a Causal Evaluation is required. **Any** laboratory examinations will be led by an appropriate Subject Matter Expert based on the nature of the failed facility or equipment.

- *GERP*, Appendix B, Response Aid A, First Responder/Incident Commander
- *GERP*, Appendix B, Response Aid B, Emergency Center Activation
- *GERP*, Appendix B, Response Aid C: Incident Specific Matrix: Dig-in
- GOV-6101P-08, "Corrective Action Procedure"
- GOV-6102P-06, “Enterprise Cause Evaluation Procedure”
- Utility Procedure TD-5811P-401, " Dig-in First Responder "
- Utility Procedure TD-4100P-14, “Removing, Documenting, and Preserving Gas Transmission Pipe and Components”
- Utility Procedure TD-4810P-26 “Direct-Cause and Root-Cause Analysis”

3.4.4.12.3 Gas Transmission System

Transmission Integrity Management Program (TIMP)

- Determines iterative transmission pipe patrol scope and provides guidance to Pipeline Patrol.
- Provides direction to field crews and works with Pipeline Engineering (PLE) to mitigate exposed and damaged transmission pipe.

Pipeline Engineering (PLE)

- Performs and collects Initial Damage Evaluation (IDE) data on transmission pipe in affected area.
- Acts as liaison between TIMP and ICP/GEC.
- Works with TIMP to mitigate exposed and damaged transmission pipe.

Pipeline Patrol

- Performs aerial and ground patrol of transmission pipe in affected area and communicates findings to ICP/GEC and TIMP.
- Works with TIMP to perform iterative patrols as extent of damage is known.

Leak Survey

- Performs leak survey in affected area.
- Reports all transmission leaks to the OEC/GEC and TIMP.
- Compiles and reports result to Distribution Integrity Management Program (DIMP) personnel and production mapping.
- Coordinates deployment of Picarro units.
- Conducts ground “foot” patrol.

3.4.4.12.4 Gas Distribution System

Distribution Integrity Management Program (DIMP)

- Determines iterative leak survey scope and provides scope to Mapping to create a leak survey package.
- Provides direction to leak survey and field crews to assess and mitigate damage to the distribution system.

Mapping

- Creates leak survey packages for Leak Survey based on the Dynamic Automated Seismic Hazard (DASH) Report and DIMP direction.
- Upon receipt of leak survey results, verifies leaks in SAP and can provide maps to the EOC/GEC, as necessary.

3.4.4.12.5 Storage Wells

Gas Storage Asset Management

- Gas Storage Asset Management (GSAM) monitors the integrity of the gas storage wells, designs, and executes work to inspect or correct a wells integrity to mitigate uncontrolled flow from a storage well.
- GSAM provides direction and scope of well inspections and mitigates damage to a storage well including development of the Well Control Tactical Considerations Plan for an uncontrolled flow from a storage well.

Flooding

- Gas Transmission Operations (GTO) is responsible for day-to-day operations and the initial assessment for a flood response.

Uncontrolled Flow from a Storage Well

- GTO is responsible for day-to-day operations and the initial assessment for incident response involving gas storage facilities (McDonald Island, Los Medanos, and Pleasant Creek). PG&E also has a 25% interest in the Gill Ranch Facility located near Fresno.
- GTO will conduct an initial inspection of the impacted gas storage facility.
- The station operator or other qualified employee is responsible for completing the inspection list and submitting the form to the OEC and GEC, if activated.
- Based on the initial inspection, the OEC Incident Commander and/or GEC Director shall consult with the Storage Well Disaster Response Team (DRT) Commander whether to activate the DRT.
- The IC/GEC and DRT shall share and coordinate information as per DRP Recovery Annexes.
- PG&E notifies Wild Well Control for response coordination.
- As directed by the GTO, the Facilities, Measurement, and Gas Storage Asset Management supports initial assessment and personnel activation.

- Upon receipt of leak survey results, verifies leaks in SAP and can provide maps to the activated Emergency Center, as necessary.
- GTO will coordinate the sharing of contractor optical gas monitoring video streams with any activated Emergency Center Situation Unit in the Planning and Intelligence Section.
- Detailed gas operations emergency response information for gas storage facilities is available through the Well Control Tactical Considerations Plan. Additional reference documents for Gas Storage Facilities and responses include Utility Standard TD-4110S, "Gas Leak Survey and Detection Program," and Utility Procedure TD-6100P-03, "Major Gas Event Response: Fire, Explosion, and Gas Pipeline Rupture."

3.4.4.12.6 Gas System Planning

During emergencies, Gas System Planning (GSP) provides hydraulic planning and modeling support for immediate make safe. GSP provides immediate hydraulic operational support to bring the gas system to a safe condition. GSP addresses the need for shutting in portions of the system to make-safe by determining the best method for system isolation and resulting impacts to customers on the remaining portions of the gas system. GSP also facilitates the development of contingency strategies for incidents. (Refer to the Gas System Planning Emergency Response Reference Guide for detailed GSP Make-safe activities). Overall GSP provides the following:

- Hydraulic modelling and analysis to determine system efficiency
- Input on gas facilities that are critical to serving customers
- Prioritization of gas facility damage assessment

To facilitate prioritization of restoration and resource deployment in a Level 2 or higher incident, information is required regarding damage sustained and estimates of work required to restore equipment to operations. Local facility management and field personnel are trained to identify and report the condition of damaged equipment for use in repair/restoration. This information will be shared with the GEC and EOC, if activated.

3.4.4.12.7 Damage Assessment Tools

The Initial Damage Estimate (IDE) program provides immediate response guidance for earthquakes. Asset Management and System Operations (AMSO) provides key damage assessment response protocols.

Gas Operations may use decision matrices such as the “Resource Decision Matrix” from the Field Services Supervisors Handbook to assist in determining resource needs when responding to an incident. **Figure 3-1** is an example of this matrix. Additional methods may be used based on specific incident needs and resource availability. Please refer to Field Services for the most up to date version.

Figure 3-1: The Field Service Resource Coordinator, Emergency Gas Shutdown and Restoration Resource Decision Matrix

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FSRC Emergency Gas Shutdown and Restoration Resource Decision Matrix

PPE: NA	Tools: NA	Guidance Document References: Utility Procedure TD-6435P-08, "Gas Outage Restoration Procedure."	Level of Use: ✓Information ☐Reference ☐Continuous

TD-6435: "Establishing and Discontinuing Gas and Electric Service."

Table 1. FSRC Emergency Gas Shutdown Resource Decision Matrix

CUSTOMERS	1 DAY* (12 HRS)	2 DAYS* (24 HRS)	3 DAYS* (36 HRS)
0 – 500	4	2	1
501 – 1,000	7	3	2
1,001 – 1,500	10	5	4
1,501 – 2,000	14	7	5
2,001 – 2,500	17	9	6
2,501 – 3,000	21	10	7
3,001 – 3,500	24	12	8
3,501 – 4,000	28	14	9
4,001 – 4,500	31	16	10
4,501 – 5,000	35	17	12

*** Factored at 12 gas meters shut off per hour.**

Table 2. FSRC Emergency Gas Restoration Resource Decision Matrix

CUSTOMERS	1 DAY* (12 HRS)	2 DAYS* (24 HRS)	3 DAYS* (36 HRS)
0 – 500	10	5	4
501 – 1,000	21	10	7
1,001 – 1,500	31	16	10
1,501 – 2,000	42	21	14
2,001 – 2,500	52	26	17
2,501 – 3,000	63	31	21
3,001 – 3,500	73	37	24
3,501 – 4,000	83	42	28
4,001 – 4,500	94	47	32
4,501 – 5,000	104	52	35

*** Factored at 4 gas meters turned on per hour.**

Example
There are 2,500 customers without gas due to a dig in. The gas line will be repaired and ready for restoral of gas service in 12 hours. Management wants gas restored within 12 hours after repairs are made. According to the matrix it will take 17 gas service representative (GSR) personnel to shut off all the gas meters within a 12 hour period and 52 GSR personnel to restore the gas within 12 hours.

3.4.4.13 Restore

As each incident varies in type, scope, severity, and duration, the respective response from Gas Operations must adapt to the incident. Repairing, restoring, and returning the gas system to normal involves different actions for each situation. Common Gas Operations activities such as isolation, curtailment, customer considerations/prioritization, and emergency clearances are discussed in this section. Departments within Gas Operations initiate these and other incident response actions often simultaneously to provide and efficient and effective response. Response actions taken and individual timelines are developed in coordination between the field (e.g., ICP, GEC, and EOC) in alignment with response priorities and incident objectives.

3.4.4.13.1 Repair and Restoration Strategies

Gas Operations will set repair and restoration strategies based on the most current situational awareness when responding to the incident. Strategies will prioritize safety and may include the development of triggers or decision points upon which repair and restoration/return to normal actions are taken.

3.4.4.13.2 Gas Distribution Emergency Shutdown Zones (ESZ) General Guidelines

Utility Procedure TD-4439S, “Distribution Valves for Operational Safety” gives criteria to establish and maintain distribution Emergency Shutdown Zones (ESZ). These are to be used for wide-scale catastrophes such as earthquakes or wildfires to make-safe and maintain public and Company personnel safety. Implementing an ESZ requires careful consideration and analysis due the potential of cutting service to several thousand customers. Note that using distribution ESZ are NOT intended for single location emergencies, such as blowing gas at a dig-in, but rather are intended for wide-scale catastrophic emergencies, such as earthquakes, wildfires, or the loss of gas supply to a large geographical area. Local Distribution Engineering should be consulted whenever the use of distribution ESZ are being considered. The priority of ESZ is to make-safe and maintain the safety of the public and Company personnel.

Use of a gas distribution ESZ requires very careful consideration and analysis. A zone could potentially contain several thousand customers within it who, if shut-in, would be without gas for several days. Shutting down this number of customers would have other implications for PG&E including, but not limited to: increased claims, rescheduled appointments, missed relights due to “Can’t Get In” (CGI), upset customers and regulators, and lower results from brand surveys.

If determining whether to implement an ESZ, the Gas Transmission Control Center can provide expertise and plan on how and when to do so. The Control Room Management Gas Transmission Control Center (GTCC) Emergency Shutdown Zone Plan provides direction to GTCC personnel during an emergency operating condition requiring the immediate isolation of a gas transmission system to prevent and minimize hazard to the public, property or the environment. Under this plan, GTCC personnel will activate a previously reviewed and approved Emergency Shutdown Zone Process based on the specified geographic location, and the nature of the emergency operating condition. The GTCC will initiate the Transmission Emergency Shutdown Zone Plan after analyzing data from SCADA and other sources including input from GTCC personnel. See the GTCC Emergency Shutdown Zone Plan for initiation criteria.

3.4.4.13.3 General Customer Curtailment Guidelines

1. Determine magnitude and location of load reduction needed to maintain customer service to portions of the system not isolated.
    - Determine level of analysis required to meet response time requirements.

- Communicate need for additional planning engineer support to incident leads.

2. Determine customers to be curtailed.
    - Consider time required to curtail customers, and time required to restore service when developing customer curtailments.
    - Note hierarchy of curtailments.
    - Non-core customers curtailed first.
    - Non-critical core customers curtailed next (retail outlets, office buildings, etc.).
    - Single core customers with larger load relief should be curtailed ahead of multiple small customers to increase system isolation and restoration times.
    - Residential customers should have higher priority for maintaining service.
    - Critical customers to community health and safety such as hospitals and shelters should be curtailed last.
3. Support restoration of customer service in reverse order of 2.

3.4.4.13.4 General Critical Customer Guidelines During Emergencies

1. Identify critical customers in portion of gas system being affected.
    - Customers critical to public health and safety (hospitals, shelters, sewage treatment, etc.).
    - Residential customers due to health and cooking issues especially for longer term outages and/or if outages occur during colder weather.
    - Depending on damage to electric grid and Electric Grid (EG) facilities, certain gas fired EG may be critical.
    - Refineries may be critical if fuel supply shortages occur.
    - Electric Generation or other customers may drive economic impacts.
2. Communicate critical customers to incident team.

3.4.4.13.5 Portable Natural Gas: LNG/CNG Response

Early notification of the Portable Natural Gas (PNG) team concerning the potential loss of customers is critical to Gas Operations incident response. Early notification allows time to for PNG personnel to prepare and respond to the location needed and can provide the following benefits:

- Prevents the outage to the customer (eliminating the need for relights)
- Shortens the duration of supply interruptions
- Provides a higher level of contingency if a pipeline has the potential to be shut in

Typically, equipment and operators can respond from multiple locations within 1-2 hours of the portable gas callout plus travel time from our nearest portable natural gas storage location (Can vary depending on time of day and day of week).

3.4.4.13.6 Emergency Clearances

An important part of public safety is ensuring that the Company uses a clearance procedure (see Utility Procedure TD-4441P-04, “Emergency Clearances for Gas Distribution Facilities”) for Gas Operations. Clearance procedures are an added safety step to confirm that a plan and procedure

is in place before work is performed. The Transmission Clearance Procedure is used for work that impacts gas flows, pressures, or gas quality. If a transmission facility is to be taken out of service for repairs, a plan and procedure ("clearance") must be formalized in writing and reviewed by the field and engineering personnel scheduled to perform the work. Transmission system clearances are managed and approved by Gas Transmission Control.

PG&E implemented a gas distribution clearance process to permit the GDCC to oversee safety monitoring and risk mitigation from the inception of a project through its completion. Any work that affects gas pressure, flow or quality, deactivation, or activation of facilities, affects remote monitoring and control, or may impact the ability to maintain service to customers require a gas clearance. Clearances are prepared with the input of the team that will perform the work, the engineering team, and the team that executes the clearance. Clearance initiation includes identifying a way to safely isolate the work area, maintain service to customers, and to develop the steps that will be taken to isolate the work area. Every request for a clearance must be requested and scheduled through, and then managed by, the GDCC.

Upon completion of an emergency clearance:

- Transfer the gas system back to GCC.
- Communicate the Return to Normal status.

If facilities must be restored, the GCC and site IC must transfer control to the restoration team:

- GCC transfers internal and external communication to Gas Dispatch, and reporting responsibilities to the restoration team lead.
- Site IC transfers incident command to the restoration team lead.

3.4.5 Demobilization

Demobilization includes overseeing and validating the safe and efficient return of resources to their original location and status when they are no longer needed to support the response. As service is restored, fewer resources are required, and the demobilization process begins.

3.4.5.1 General Demobilization Process

Planning for demobilization starts soon after the resource mobilization process begins to facilitate accountability of resources. The order for demobilization is executed in reverse of the deployment order and includes, but is not limited to:

- Non-PG&E Resources (Mutual aid, contract crews from outside utilities)
- PG&E non-gas resources
- PG&E gas resources from outside of affected Region
- PG&E gas Regional resources from outside of affected Division
- PG&E gas resources from affected Division

3.4.5.2 Demobilization Process for the Release of Non-PG&E Resources

When gas mutual aid is no longer needed by an incident command, the Gas IMT Planning Section Chief will inform the GEC Director that mutual aid/assistance is no longer needed. The GEC Director will determine if these mutual aid/assistance resources are to be transferred to assist gas restoration in another Region. If there is no further need for gas mutual aid/assistance, the GEC

Director will contact the company EOC, if activated, to determine if there are additional company needs for these resources or if they are to be demobilized and returned to their own Utility. Demobilization will be consistent with the Demobilization Plan and will be agreed to by the EOC IC and the EOC Operations Section Chief. Upon demobilization, a release process is followed that includes a debriefing of the mutual aid/assistance personnel, return of equipment borrowed from PG&E, and other steps.

Demobilization priority considerations may be revised based on concerns such as returning GC or division/district crews to critical projects not related to incident response.

3.4.5.3 Plan Deactivation/Deactivation of Emergency Centers

Deactivation of the plan and the deactivation of emergency centers occurs when the incident no longer meets activation criteria, critical business services have been restored and when work is reverting to “business as usual.” Deactivation begins with the demobilization process and the scaling down of resources and then to the deactivation of emergency centers.

If the EOC has been activated, the decision to deactivate will be made by the EOC Commander in consultation with the VP Electric Transmission Operations and the EOC Command and General Staff and will be communicated to all emergency centers, the company as a whole, key external constituencies, and regional government EOCs.

If the IST has been activated, the decision to deactivate will be made by the GEC Director in consultation with the Incident Commander to ensure no additional support is needed. If the IMT is also deactivating, the Operations Section Chief will prepare a project plan with a responsible lead identified for additional non-emergency related work that will need to continue because of the incident.

If a single IMT has been activated, the decision to deactivate will be made by the IC. The IC will ensure a project plan is in place with a responsible lead identified for additional non-emergency related work that will need to continue because of the incident.

4 Coordination and Communication

4.1 Internal Coordination and Communication

The PG&E incident response system is designed to provide a comprehensively safe and effective incident management approach. It includes the *CERP*, the *GERP*, field resources, Emergency Centers, Coordination Centers, and the training and exercise system, and it may include additional mutual assistance resources. See **Appendix D, Mutual Assistance Agreements and Memorandum of Understanding** for more information regarding mutual assistance.

The GCC coordinates internal communications through procedures and internal communications plans. For example, the GTCC maintains a detailed Incident Response Process by which the following internal stakeholders are appropriately notified of issues affecting their functions.

4.2 Gas Operations Reporting

Gas Incident Reporting is completed to maintain situational awareness and communicate information out to internal stakeholders. To accomplish this, Gas Operations provides both pre-incident reporting, Gas Incident Reports, and Incident Action Plans, as needed.

4.2.1 Pre-Incident Reporting

Routine operations reports are distributed throughout Gas Operations for situational awareness and coordination.

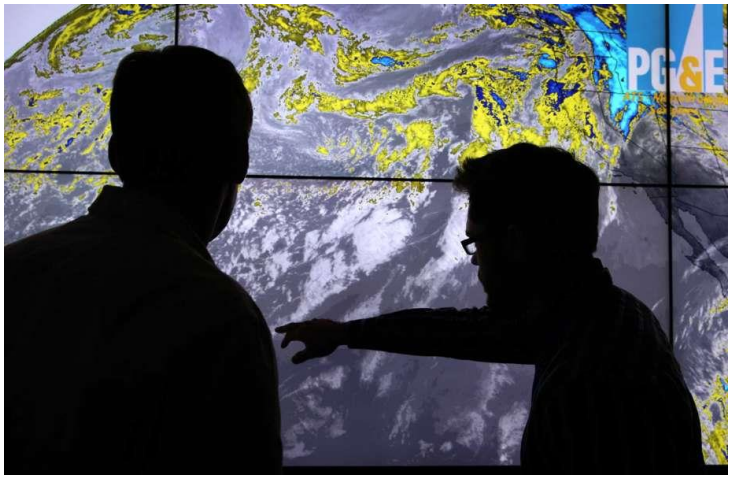
4.2.1.1 Gas Operations Daily Briefing

Gas System Operations facilitates a daily conference call with Gas Leadership at 7:30 a.m. to discuss current system status, gas operations projects, as well as situations that may have an impact on the gas system. In addition, anticipated events such as Cold Weather Events, are discussed on the call held weekly to update status of preparedness and response activities. During an emergency response, Incident Commanders and the GEC Director may be called upon to provide a situation report on this call.

4.2.1.2 PG&E Service Area Forecast

Meteorology Operations and Analytics provide daily weather reporting through both email and a weather site. The meteorology team also provides incident specific weather forecasts (**Figure 4-1**).

Figure 4-1: ATS Meteorology Operations and Analytics



4.2.1.3 Dynamic Automated Seismic Hazard Reports

The Dynamic Automated Seismic Hazard (DASH) system automatically generates rapid, facility-specific damage estimates for use in prioritizing initial PG&E post-earthquake facility inspections. DASH reports are distributed automatically via company email after an earthquake to subscribers and are archived to the DASH website.

DASH provides the following major benefits:

- **Awareness** – within minutes of a major earthquake, DASH subscribers receive the best available information about the potential impact to PG&E facilities.
- **Response** – DASH automatically prioritizes post-earthquake response for PG&E facilities susceptible to damage based on factors such as customer impact and highest likelihood of land movement risk to inform where a data-driven first response is needed most.
- **Preparedness** – facilitates effective emergency response planning and preparedness via a library of earthquake scenarios for PG&E's service area.

All PG&E employees can sign up at http://DASHweb to be automatically notified of DASH reports with the option to sign up for more detailed line-of-business reports as well.

For more information in regard to PG&E Earthquake planning and DASH reporting please refer to the AM&SO Earthquake Playbook.

See **Figure 4-2** for an example of a DASH Report forecasting Gas Distribution emergency response for a potential earthquake along the Hayward Fault. Refer to the AM&SO Earthquake Playbook for additional examples and information.

Figure 4-2: Example of a DASH Report

GD DASH Report

Scenario Event **Version 1**

M6.9 SCENARIO - Loma Prieta (1989)
USGS Event ID 99900424

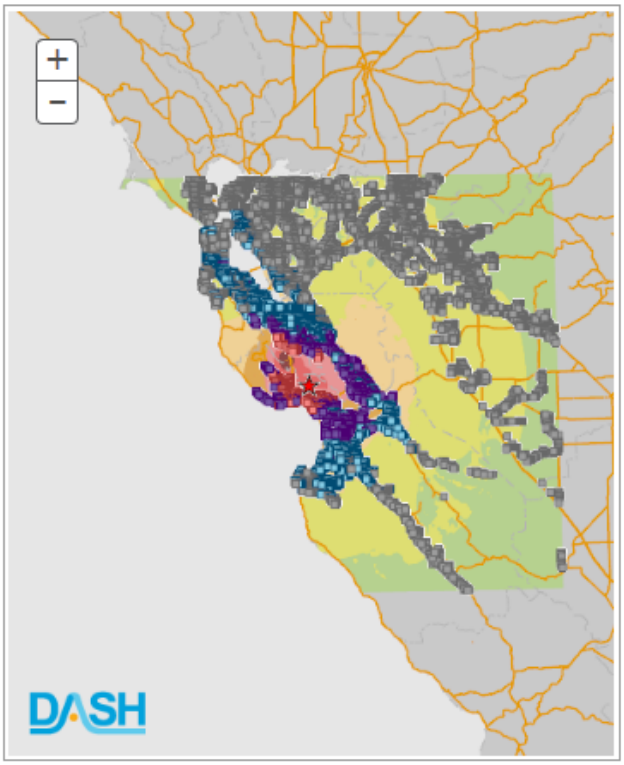
Thu 2016-12-01 17:23:49 PST
Created 11 min. after event

Emergency Response Priorities | Damage Model Estimates

Event Description

Reviewed by: Scott Steinberg, Kent Ferré

This ShakeMap is a scenario provided by the USGS and incorporates seismic data recorded during the M6.9 Loma Prieta event of 17 October 1989. The ground motion values in this ShakeMap are acceptable based upon comparison with empirically predicted ground motion values. Significant damage is expected to the gas distribution system in the Central Coast and De Anza Divisions. Approximately 130,000 man-hours are required to make safe, repair, and restore. Mutual aid will be required.



Affected GD MAPS

Map #	Gas Div	PGA	EP	Pipe Len
5-3473-C07	De Anza	0.621	124	122
3-3675-D05	Central Coast	0.649	108	1625
5-3473-F03	De Anza	0.582	104	238
5-3473-E03	De Anza	0.577	103	54
5-3473-C01	De Anza	0.517	103	1225
3-3675-C06	Central Coast	0.583	97	1984
5-3473-D02	De Anza	0.542	96	78
5-3473-D01	De Anza	0.542	96	255
5-3472-C08	De Anza	0.481	96	188
5-3472-C07	De Anza	0.481	96	279
5-3473-E01	De Anza	0.481	96	2843
5-3472-B08	De Anza	0.481	96	1425
3-3675-E05	Central Coast	0.577	96	1938
3-3675-B06	Central Coast	0.583	93	1740
5-3472-C06	De Anza	0.461	92	24
5-3472-D08	De Anza	0.519	91	132
5-3473-C02	De Anza	0.517	91	1412
3-3675-C05	Central Coast	0.649	90	2943
3-3675-D06	Central Coast	0.649	90	1810
3-3675-E08	Central Coast	0.555	90	2489
3-3675-E07	Central Coast	0.555	90	2389
3-3675-F07	Central Coast	0.555	90	114
5-3473-C08	De Anza	0.570	87	875
5-3473-C03	De Anza	0.517	86	1823
5-3473-B03	De Anza	0.517	86	1770
5-3473-B02	De Anza	0.517	86	2681
5-3472-F08	De Anza	0.516	85	2878
3-3675-B05	Central Coast	0.583	85	2032
5-3473-E05	De Anza	0.582	85	1440
5-3473-E04	De Anza	0.582	85	463
3-3679-E07	Central Coast	0.426	85	494
3-3679-E06	Central Coast	0.425	85	454
5-3472-B07	De Anza	0.481	84	891
3-3679-C02	Central Coast	0.470	84	332
5-3472-F07	De Anza	0.550	84	1529

Emergency Response Priority

PRIORITY	LOW	MEDIUM	MED HIGH	HIGH
EP RANGE	1-19	20-39	40-66	≥67
GD PLTS	6726	2174	989	309

Estimated Ground Motions at Affected GD Facilities

PGA (g)	≥0.05	0.10-0.15	0.20-0.25	0.30-0.35	0.40-0.45	0.50-0.55	≥0.60

Full Listing of Affected Facilities (.csv file)

Emergency Contacts

Raymond Thierry
Director, DIMP
Location: San Ramon - Bishop Ranch Y
LanId: RXT5
Cell: (415) 793-4037
Ph: (925) 328-5936

Greg Molnar
Strategy and Analytics
Location: SFGO - 77 Beale
LanId: GCME
Cell: (617) 407-6204
Ph: (415) 973-9210

Kent Ferre
Geosciences
Location: SFGO - 245 Market
LanId: KSF1
Cell: (415) 308-3627
Ph: (415) 973-5291

4.2.2 Gas Incident Reporting

Field responders collect information for the Gas Incident Situation Report and communicate information to the GCC. As necessary, the GCC develops and distributes the Gas Incident Reports (GIRs) for Level 1 incidents meeting criteria for notifications.

Refer to **Appendix E.6, CPUC/DOT Required Notifications/Testing** for detailed DOT and CPUC reporting requirements.

Upon escalation to a Level 2 or above, the Emergency Center activated may continue to develop, update, and distribute the Gas Incident Situation Report or ICS Form 209. If a Gas Incident Report (GIR) is being completed, the Planning Section Chief (PSC) should be responsible for the preparation and communication of it. The GIR or ICS Form 209, while an important document, is a situation report only, and does not take the place of an ICS 201 or IAP.

For events lasting more than one operational period and requiring an IAP, the ICS Form 201 Incident Brief can act as the organizational response plan until completion, approval, and dissemination of the first IAP. However, the IC can opt to use an ICS 201 daily in lieu of an IAP for events using only local resources. For details on these reports and links to templates, refer to the *CERP* and the GERP Website.

GIRs are distributed to the following contact lists and other contacts per procedure: Gas Emergency Management Leadership, Gas North Update, Gas South Update, Gas Emergency Preparedness Team, and any other stakeholders as requested during the incident.

An example GIR is shown in **Figure 4-3**.

Figure 4-3: Example of a Gas Incident Report

Gas Incident Report # 2 9/6/2018 @ 1200 hours
LEVEL: # 2

Incident: At approximately 0825 hours, PG&E was notified of a Dig-In at 200 New York Ranch Rd, Jackson. A third-party contractor struck a 3" plastic main with an excavator. No injuries reported. Contractor provided expired USA# W008200295-01X. Local Maintenance and Construction (M&C) Superintendent and Field Services Manager activated the Stockton Operations Emergency Center (OEC) at 0930 hours. OEC was operational at 1030 hours. **GAS WAS SHUT IN AT 1034 hours.**

Current Actions: Maintenance and Construction (M&C) is in the process of repairing the main. Dig-in Reduction Team (DiRT) Investigator is onsite interviewing all parties. Field Services is supporting the incident with 33 GSRs enroute with ETA of 1300 hours. Public Safety Specialist (PSS) is enroute with ETA of 1100 hours. Mobile Command Vehicle (MCV) – Commander is enroute with ETA of 1200 hours.

Potential Customer Impact: ~309

- 4 Critical customers - Gas Service Representatives (GSRs) will make priority for relights

Communications
No media on-site, Public Information Officer onsite monitoring for inquiries.

Incident Objectives

	Incident Objectives	Action Owner	Time Completed	Estimated Completion Time	Action Taken
1	Maintain life safety of PG&E employees, contractors , and the public, ensure our response is incident and injury free	IC Commander	Ongoing	Throughout Incident	Assigned safety officer enroute @ 1030 to relieve IC of the safety position
2	Establish on-site incident command post (MCV)	IC Commander	1200	1150	MCV enroute @1000. Onscene @ 1200
3	Repair Gas Main	IC Commander		1500	Repairs underway. Adequate resources onsite.
4	Shut in estimated 309 Gas Meters	Restoration		1300	Onsite GSRs are shutting in customers, remainder of GSRs enroute and will begin shut in upon arrival
5	Purge and relight affected customers	Restoration		Begin upon completion of gas line repair and shut in completion – Time TBD – EST 1700	Purge plan issued. First pass of relights to be completed within two hours of line repair and purge.
6	Send IVR to affected customers	Customer Strategy		1500	IVR in process of being developed
7	Monitor media inquiries	Public Information Officer		Ongoing	Monitoring

Figure 4-3 Example of a Gas Incident Report (continued)

Incident Organization

OEC Operations Emergency Center (Stockton Service Center)
OEC Commander:
IC Advisor:
Field Services Restoration Branch Leader:
Customer Strategy Officer:
Public Information Officer:
Plans Section Chief:
Finance Section Chief:

Incident Command Post (ICP) Jackson Rancheria Casino- 12222 New York Ranch Rd., Jackson
IC:
Safety Officer:
IC Advisor:
Public Safety Specialist:
Operations Section Chief:
GPOM:
DIRT Investigator:

Next Update: 15:00 hours

4.2.3 Systems Information Management

Gas Operations uses a wide range of tools to provide situational awareness and respond to system conditions during normal, abnormal, and emergency operations including Gas Incident Levels 1-5. The SCADA system is the first line of defense allowing Gas System Operators to not only view data from the field sensors, such as pressure and flow, but also directly respond by adjusting valves in key locations where remote controllable devices are located. Live system data and alarms are replicated up to the PI system and Alarm Manager, respectively, for consumption by other Gas Operations teams. When system conditions require further investigation and planning, several tools are available including Synergee to run hydraulic models of the system, Tactical Analysis and Mapping Integration (TAMI) to geographically view PG&E and external data, and Smart Boards to collaborate locally and with remote locations. The Gas Control Center (GCC) uses the Turret phone system for direct calls. Gas Operations and Gas Dispatch use the Event Management Tool (EMT) to log event information and send out mass communications on event status to responders and management, and to log event information. Gas Management uses the Daily Briefing Dashboard (DBD) to review daily system events and conditions.

Gas Operations uses the following critical communications systems, tools, and devices during emergency events:

- **Supervisory Control and Data Acquisition (SCADA):** A system that allows the operator to analyze and control the gas system from a remote location.
- **Field Automation System (FAS):** Work orders from customers and first responders are input by CC&B, AFW, SAP, or OIS and then sent to FAS. FAS is then used by gas service representatives (GSRs), field meter technicians, electric restoration trouble men, dispatchers, and supervisors to assign, dispatch, and complete field work orders.
- **SAP:** A business operations software tool used by PG&E to track emergency jobs as they move through their life cycle. It is a tool that is used to plan, track, charge labor, and schedule work. SAP is integrated with FAS, so damaged locations that are assessed by

field resources and entered FAS are automatically sent to SAP. Gas Clearances are also tracked and approved in SAP.

- **Tactical Analysis Mapping Integration (TAMI):** Geographic Information System (GIS) that provides graphical displays of situational information including gas distribution and transmission system status, SCADA Alarms, FAS tickets, gas clearances, GSR locations, traffic, weather, etc.
- **Daily Briefing Dashboard (DBD):** A system that provides graphical dashboards of safety, reliability, operations, and compliance metrics and details about gas operations.
- **Emergency Management Tool (EM Tool):** The EM Tool collects all event data found across multiple PG&E data sources, presents the collective data on a single application for users, and sends out email and text messages from the GCC and Dispatch regarding incidents and emergency center activations. The EM Tool increases situational awareness by providing emergency responders with the latest event and reduces confusion by having a single source of information.
- **GDGIS:** An ESRI based GIS system that provides detailed graphical situational analysis of GD systems.
- **GTGIS:** An ESRI based GIS system that provides detailed graphical situation analysis of GT systems.
- **Turret Phone System:** A system that stores and notifies emergency contacts.
- **Send Word Now:** Electronic message (phone, e-mail, and text messaging) sent to notify activation or deactivation of emergency center personnel.
- **Calling Tree:** Gas Operations individual department-maintained phone lists for personnel.
- **SharePoint:** A software application that provides a secure documentation storage and collaboration platform for emergency responders.
- **Network:** A system used to monitor live broadcast news feeds.
- **Smart Boards:** Touchscreen devices used to provide situational analysis and collaborations between emergency centers and GCC.
- **Smart Phones:** Devices used to provide communications and photos.
- **Personal Hotspot/Tethering:** Smart Phone utility which provides user with internet access for devices (e.g. laptop, iPads, etc.) through their smartphone.
- **Satellite Phones:** Emergency communication phone which uses satellite service rather than standard analog or cellular service.
- **Virtual Private Network (VPN):** VPN provides secure, reliable, and fully functional remote access to PG&E network and software applications. This service is not allowed on a personal computer.
- **Citrix:** A service that allows remote access to Email and widely used applications using any computer that has an internet browser such as Microsoft Internet Explorer or Google Chrome. This service is especially aimed at those remote access users that have their own computers and Internet Service Provider (ISP).
- **RSA Security Token:** Either a hardware or software token which authenticates the identity of the remote access user before accessing the PG&E network through Citrix or VPN.

- **Gas Logging System (GLS):** Instant messaging and logging of system changes and conditions used by the GCC and PG&E manned stations.
- **Text (iMessage):** Instant messaging tool available on iPhones.
- **Government Emergency Telecommunications Service:** Individually assigned access card used to provide designated emergency personnel priority access and prioritized processing in the local and long-distance segments of the landline networks, greatly increasing the probability of call completion.
- **Wireless Priority Service (WPS):** Individually assigned access card used to provide designated emergency personnel priority access and prioritized processing in all nationwide and several regional cellular networks, greatly increasing the probability of call completion.
- **Microsoft Teams:** Microsoft Teams is a Microsoft Office 365 product that provides online meeting, teleconferencing, file storage, chat, and screen sharing capability.
- **Online Pipeline Simulator (OPS):** The Online Pipeline Simulator (OPS) is a hydraulic modeling software that analyzes and monitors real-time SCADA Data for leak indications. It is currently implemented on the backbone transmission lines: L400, L401, L2, L300A, and L300B.

4.3 External Coordination and Communication

This section provides an overview on external communications during an incident.

4.3.1 Communicating with the Public and the Media

Refer to the *CERP* for detailed information regarding communicating with the public and the media

4.3.2 Government Coordination

PG&E communicates with agencies responding to the same incident. The PG&E first responder and/or the responding agency establish communication at the scene upon arrival. The PG&E Incident Commander (the first responder) and the agency's incident commander meet to review the hazards and public safety issues, establish a command structure, and determine how and when they will communicate with each other. The PG&E Incident Commander can request Public Safety Specialists (PSS) to serve as agency representatives and facilitate communications with external first responders. Additionally, the PG&E MCVs are equipped with radio interoperability equipment that can cross-connect different radio networks used by first responder agencies.

Coordination with external agencies is critical for effective incident command and, in some cases, such coordination is a legal obligation. Depending on the type of incident, extensive coordination will be required. The Incident Commander may choose to assign one or more Liaison Officers to fulfill this important role.

A list of external agency contacts is included in Appendix E, External Resources (Non-Gas Operations Resources). Refer to this list when establishing coordination with public and regulatory agencies.

Refer to the *CERP* for additional details on how PG&E coordinates with governmental agencies.

4.3.2.1 911 Agency Communication

PG&E communicates with 911 agencies. This communication may initially take place between either the agency and Gas Dispatch and Scheduling or the agency and the GCC depending on how the interaction is initiated or on-scene personnel.

Please refer to **Figure 2-1** and **Figure 2-2** on how gas personnel receive local 911 agency notifications.

4.3.2.2 Agency Representative Communication

If the incident involves multiple agencies and PG&E, additional coordination between PG&E, the city, the county, and/or the state may be required. At that point, the Incident Commander may assign one or more Agency Representatives to various responding agency EOCs to coordinate communication, typically from Public Affairs or PSS group.

Refer to the *CERP* for detailed information regarding Agency Representatives and Liaison Officers.

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5 Documentation, Records, and Post-Incident Actions

This section provides an overview for incident and exercise documentation, records, and post-incident improvement planning. Documenting and recording actions during an emergency is critical in the ability to identify areas of improvement, best practices, and obtain historical and legal records of an event.

5.1 Documentation – ICS Form 214, Activity Log

Emergency Center personnel are responsible for maintaining a log to document aspects of the emergency response. This will include the date and time of key activities, decisions, contacts made, and similar topics. Personnel may use notebooks, but it is strongly recommended staff utilize the ICS Form 214, Activity Log, provided in each emergency center. All original documentation must be turned into the Documentation Unit prior to departing the Emergency Center and must be archived in accordance with Company policies for record retention. It is strongly recommended to use the ICS Form 214, Activity Log to ensure that personnel do not have to turn in other unrelated personal notes.

5.2 Recordkeeping

Gas Operations personnel use many technologies (e.g., FAS, SharePoint, shared drives) and hardcopy sources (e.g., ICS Form 211, ICS Form 214, notepads) to create and store records during gas incidents. Further, Gas Operations personnel are required to retain all relevant correspondence or other written materials relating to emergency center activations in accordance with:

- Corporation Standard GOV-7101S, “Enterprise Records and Information Management Standard,” which includes the Enterprise Records Retention Schedule.
- Corporation Policy GOV-01, “Enterprise Records and Information Management Policy”

5.2.1 Records

Records are managed in the normal course of business, consistent with all applicable legal, regulatory, and company requirements (including Enterprise Records and Information Management (ERIM) policies and standards). If any physical records are to be transferred to offsite storage, any known applicable legal holds must be identified during the standard intake process as defined in the ERIM Physical Records Storage Standard (GOV-7104S) and associated job aids. Records are defined in the Enterprise Records and Information Management Standard GOV-7101S. To learn more, please visit the ERIM website or contact ERIM at Enterprise_RIM@pge.com.

For Physical Information:

Physical information consists of all information in a physical format, such as paper documents, ICS Forms, maps, and photographs. Examples include documents such as meeting notes, organizational charts, written objectives, job site safety analyses (JSSAs), and ICS forms.

Duplicates can be shredded using the PG&E shred consoles at any time. For a document to be considered a duplicate, it must be free of all hand-written notes, sketches, highlights, or other

markup and alterations. If any such alterations exist, it is no longer considered a duplicate and may be subject to review.

Unless it is a duplicate, all information produced during activation must be turned over to the Document Unit Leader (DOCL) of the associated emergency center when no longer needed. The information must be placed in a documentation collection box. The box must be labeled with sufficient metadata describing the contents at the box level:

- LAN ID of Point of Contact for content (use Documentation Unit Lead if unknown)
- Line of Business
- Subgroup or Functional Department
- Address or Location
- Date Range of Contents
- Incident Name and Brief Description or Summary of Contents
- Emergency Center
- Legal Hold (leave blank if unknown)

At the end of the activation, the document collection box(es) must be transferred to the GEP team at Bishop Ranch where they will be retained for 60 days, at which point the information will be reviewed to determine if legal obligations exist (see **section 5.2.2**).

For Electronic Information:

Electronic information consists of emails, electronic documents, and other information in electronic format, including pictures. The DOCL should send out file path instructions during the activation for where to save incident-related digital files and records on the GEP team SharePoint. Electronic information produced by the Emergency Center will be retained for 60 days after deactivation, at which point the information will be reviewed to determine if legal hold obligations exist (see **section 5.2.2**). Non-records will be deleted appropriately.

For Level 1 or 2 Gas Incidents:

For level 1 gas incidents, non-record information should be shredded using the PG&E shred consoles unless otherwise directed by ERIM or the Law Department.

For level 2 gas incidents, the Document Unit Leader (DOCL), under the IMT PSC, is responsible for coordinating recordkeeping and documentation during an incident. The DOCL then turns all records into the applicable GEP staff member during the deactivation of the Emergency Center.

For Level 3+ Gas Incidents:

The DOCLs from each activated Emergency Center will include the ERIM Operations Resource in the distribution mailing throughout activation and provide them with the latest Incident Action Plan (IAP) as it becomes available at the end of each Operational Period.

If a Legal Officer is assigned to the Emergency Center (e.g., OEC, GEC, EOC), they will provide legal advice during the event until deactivation. If the Legal Officer does not include the ERIM Operations Resource on the distribution list for legal advice communications, the DOCL should bring this to the attention of the Legal Officer to ensure that ERIM remains properly informed to effectively support legal compliance.

The DOCL is responsible for informing all activated emergency centers of their requirements to retain non-duplicate information produced during activation. Reminder communications for these requirements should be distributed by the DOCL at the start of an activation and the beginning of each operational period. The ERIM Operations Resource will coordinate resources as necessary to assist the emergency centers in complying with these requirements.

The Legal Officer will work with the Law Discovery Team during activation and following deactivation to determine if legal obligations exist. Legal Holds are only issued by the Law Discovery Team.

After Deactivation:

All information will be retained for 60 days after deactivation. The Emergency Centers designated IC Advisor, from the GEP team, gathers the documentation collection boxes upon deactivation and brings those files to Bishop Ranch for review. The GEP team works with the GAS RIM and ERIM teams for the handling of all emergency response records.

ERIM publishes and maintains a list of Guidance Documents that establishes standards for how records are managed throughout their life cycle. These documents can be found in the Governance and Performance section of the Guidance Document Library and on the ERIM website.

For questions regarding the handling of records and information generated in the course of an incident response, or any other RIM related questions, contact the GERP team at gerp@pge.com or the Gas RIM team at RIM_GasOps@pge.com.

5.2.2 Legal Hold

Federal and State laws require PG&E to “preserve” (i.e., protect from deletion or destruction) Records, non-Records, and other information that might be relevant in a potential or existing legal proceeding or investigation. A legal hold, also known as a litigation hold, is the process by which PG&E meets this duty to preserve. A legal hold suspends the ordinary destruction of documents, information, or physical objects/evidence and overrides the retention periods set forth in the Enterprise Records Retention Schedule (ERRS) for documents and information that are subject to the legal hold. A legal hold is implemented when PG&E reasonably anticipates litigation, or a formal governmental or regulatory investigation and the Law Department determines that it is necessary to implement a legal hold. PG&E implements a legal hold through attorneys in PG&E’s Law Department. For general questions regarding a legal hold or the legal hold process, please email DiscoveryTeam@pge.com.

5.3 Post-Incident Actions, Hotwash, After Action Reviews, and the Corrective Action Program

Following a planned or unplanned gas emergency or exercise, it is critical to capture, and document lessons learned, best practices, and areas of improvement.

The CAP is used for identifying, reporting, and resolving asset, safety, performance and process-related issues involving or affecting any line of business (LOB) at PG&E. Gas Operations and the Gas Emergency Preparedness team uses the CAP as its primary tool to document and track key areas of improvement following a gas emergency or exercise. All PG&E personnel can submit a CAP item at any point during an emergency response or exercise.

In addition to using the CAP system, the GEP team may facilitate one or more of the following to encourage, document, and capture feedback and any key actions identified may be submitted to the CAP:

After Action Review (AAR)

For details regarding these programs and definitions please refer to Utility Standard GOV-6101S, “Enterprise Corrective Action Program Standard,” and its associated Utility Procedure GOV-6101P-08, “Corrective Action Program Procedure,” outline requirements and procedures for CAP.

For details and definitions regarding Hotwash discussions, and the AAR, please refer to Utility Standard EMER-6010S, “Gas Emergency Response Plan Training, Exercise, and Evaluation.”

6 Appendices

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Appendix A. **Acronyms and References**

Appendix A of this Plan presents information to assist with understanding the *GERP*.

This section provides a list of the reference documents used in developing the Plan.

A.1 Acronyms

Acronym	Meaning
AAR	After-Action Review; After-Action Report
AGCC	Alternate Gas Control Center
AM&SO	Asset Management and System Operations
API	American Petroleum Institute
BCP	Business Continuity Plan
Cal OES	California Office of Emergency Services
CAP	Corrective Action Program
CERP	Company Emergency Response Plan
CFR	Code of Federal Regulations
CNG	Compressed Natural Gas
CPUC	California Public Utilities Commission
CUEA	California Utilities Emergency Association
DASH	Dynamic Automated Seismic Hazard
DBD	Daily Briefing Dashboard
DIMP	Distribution Integrity Management Program
DOCL	Document Unit Leader
DOT	Department of Transportation
EC	Emergency Center
EG	Electric Grid
EMT	Event Management Tool
EOC	Emergency Operations Center
EPC	Emergency Preparedness Coordinator
ERIM	Enterprise Records and Information Management
ESF	Federal Emergency Support Function

Acronym	Meaning
ESZ	Emergency Shutdown Zones
FAS	Field Automation System
FEMA	Federal Emergency Management Agency
FSRC	Field Service Resource Coordinator
GCC	Gas Control Center
GDCC	Gas Distribution and Control Center
GDL	Guidance Document Library
GEC	Gas Emergency Center
GEP	Gas Emergency Preparedness
GERP	Gas Emergency Response Plan
GIR	Gas Incident Report
GLS	Gas Logging System
GPOM	Gas Pipeline Operations and Maintenance
GSAM	Gas Storage Asset Management
GSEMS	Gas Safety Excellence Management System
GSP	Gas System Planning
GSR	Gas Service Representative
GTCC	Gas Transmission Control Center
GTO	Gas Transmission Operations
HSEEP	Homeland Security Exercise Evaluation Program
IAP	Incident Action Plan
IC	Incident Command; Incident Commander
ICP	Incident Command Post
ICS	Incident Command System
IDE	Initial Damage Evaluation; Initial Damage Estimate
IMT	Incident Management Team
IST	Incident Support Team
JSSA	Job Site Safety Analysis
LNG	Liquified Natural Gas

Acronym	Meaning
LOB	Line of Business
M&C	Maintenance and Construction
MCV	Mobile Command Vehicle
MER	Manage Emergency Response
MTCC	Materials Transportation Coordination Center
MYTEP	Multi-Year Training and Exercise Program
NIMS	National Incident Management System
OEC	Operations Emergency Center
OES	Office of Emergency Services
OPS	On-line Pipeline Simulator
PHMSA	Pipeline and Hazardous Materials Safety Administration
PLE	Pipeline Engineering
PNG	Portable Natural Gas
PSC	Planning Section Chief
SAP	The Business Operation Software Program
SCADA	Supervisory Control and Data Acquisition
SEMS	Standardized Emergency Management System
SME	Subject Matter Expert
SVP	Senior Vice President
TAMI	Tactical Analysis Mapping Integration
TIMP	Transmission Integrity Management Program
VERC	Vacaville Emergency Response Center

A.2 References

This section lists the PG&E policies, standards, procedures, and other documents referenced in this Plan. The documents are listed in alpha-numeric order.

AGA Master Operations Assistance Agreement

Asset Management and System Operations (AM&SO) Earthquake Playbook

California Governor's Office of Emergency Services (Cal OES) State Emergency Plan

California Public Utilities Commission (CPUC) General Order No. 112-F: State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems

California Senate Bill (SB) 705, Natural gas: service and safety (2011-2012)

California SB-887, Pavley. Natural gas storage wells (2015-2016)

Cold Weather Communication Process

Control Room Management (CRM) Operations Manual

Corporation Policy GOV-01, "Enterprise Records and Information Management Policy"

Corporation Standard GOV-7101S, "Enterprise Records and Information Management Standard"

CPUC File No. 420, "Report of Gas Leak or Interruption"

EMER-3001M, *Company Emergency Response Plan (CERP)*"

Federal Emergency Management Agency's (FEMA) Developing and Maintaining Emergency Operations Plans, Comprehensive Preparedness Guide (CPG 101)

Form TD-4413P-01-F01, "Gas Incident Report Data Collection Form"

Gas System Planning Emergency Response Reference Guide

Gas Transmission Control Center (GTCC) Emergency Shutdown Zone Plan

Hazardous Materials Trailer Transportation Incident Response and Recovery Procedure

ICS 211 Form – Check-in and Check-out Log

ICS 215 Form – Operational Planning Worksheet

ICS 221 Form – Field Employee Demobilization Release

Mutual Assistance Program Request for Assistance (RFA)

Pacific Gas and Electric Company Gas Safety Plan, 2020

PG&E's DOT Drug and Alcohol Misuse Prevention Plan

PG&E's Drug-Free Workplace Program DOT Controlled Substance and Alcohol Testing Program

Pipeline Security Guidelines

Presidential Policy Directive 8 (PPD-8)

Utility Policy EMER-01, *Emergency Preparedness and Response Policy*

Utility Procedure GOV-6101P-08, *Corrective Action Program Procedure*

Utility Procedure LCNG-4552P-31, *Hazardous Materials Trailer Transportation Incident Response and Recovery Procedure*

Utility Procedure TD-4006P-01, “Process Hazard Analysis”

Utility Procedure TD-4006P-02, “Pre-Startup Safety Review”

Utility Procedure TD-4110P-01, “Leak Survey Process”

Utility Procedure TD-4125P-07, “Establishing Set Points on Regulators and Overpressure Protection Devices”

Utility Procedure TD-4412P-07, “Patrolling Gas Pipelines”

Utility Procedure TD-4413P-01, "Reporting of Gas Events"

Utility Procedure TD-4413P-02, “Reporting Safety-Related Conditions, Pressure Test Failures and Leaks, Over-Pressurization Events, Low Pressure System Problems, and Encroachments”

Utility Procedure TD-4413P-04, “Determining the Scope of Drug and Alcohol Testing for Gas-Related Events”

Utility Procedure TD-4435P-01, “Extreme Weather-Related Gas Service Curtailment Procedure”

Utility Procedure TD-4436P-01, “Gas System Operations CRM – Information Management”

Utility Procedure TD-4436P-02, “Gas System Operations CRM – Personnel Fatigue Mitigation”

Utility Procedure TD-4436P-03, “Gas System Operations CRM – Alarm Management”

Utility Procedure TD-4436P-04, “Gas System Operations CRM – Management of Pipeline Changes”

Utility Procedure TD-4436P-05, “Gas System Operations CRM – Evaluating Operational Experiences”

Utility Procedure TD-4436P-06, “Gas System Operations CRM – Gas Transmission and Gas Distribution Training Programs”

Utility Procedure TD-4441P-04, “Emergency Clearances for Gas Distribution Facilities”

Utility Procedure TD-4441P-10, “System New Clearances for Gas Transmission Facilities”

Utility Procedure TD-4444P-01, “Gas Distribution Control Emergency Response”

Utility Procedure TD-4444P-02, “Gas Transmission Control Center Emergency Response”

Utility Procedure TD-4470P-01, “Gas Crew Tracking Process for Gas Leak or Odor Investigation”

Utility Procedure TD-4570P-01, “Emergency Response to an Odorant Spill or Release”

Utility Procedure TD-4632P-02, “Cross Bore Immediate Response”

Utility Procedure TD-4814P-01, “Gas Transmission Heavy Rainfall Preparation and Response”

Utility Procedure TD-6100P-01, “Universal Responsibilities for Field Services”

Utility Procedure TD-6100P-02, “Gas Leak and Odor Investigations”

Utility Procedure TD-6100P-03, “Major Gas Event Response: Fire, Explosion, and Gas Pipeline Rupture”

Utility Procedure TD-6100P-04, “Gas Event Evacuation – For Gas Service Representatives (GSR)”

Utility Procedure TD-6100P-05, “Carbon Monoxide Investigation”

Utility Procedure TD-6100P-17, “Servicing Natural Gas Appliances”

Utility Procedure TD-6100P-18, “Inspecting Gas Appliance Venting”

Utility Procedure TD-6100P-19, “Inspecting Gas Appliance Locations and Combustion Ventilation Air (CVA)”

Utility Procedure TD-6700P-03, “Gas Dispatch and Scheduling Handling 911 Calls – Emergency Response”

Utility Procedure TD-6700P-04, “Gas Dispatch and Scheduling – Handling Emergency Conditions Reported by Outside Agencies”

Utility Standards EMER-1001S, “Business Continuity and Emergency Operations Plan, Training, Exercise and Critique Standard”

Utility Standard EMER-2001S, “Company Emergency Operations Plans Standard”

Utility Standard EMER-6010S, “Gas Emergency Response Plan Training, Exercise, and Evaluation”

Utility Standard GOV-6101S, “Enterprise Corrective Action Program Standard”

Utility Procedure TD-4439S, “Gas Distribution Emergency Shutdown Zones”

Utility Standard TD-1202S, “PG&E CIP-002 BES Cyber Systems Identification and Classification”

Utility Standard TD-1203S, “CIP-003 PG&E Cyber Security Management Controls Standard”

Utility Standard TD-1204S, “PG&E CIP-004: Cyber Security - Personnel & Training”

Utility Standard TD-1205S, “PG&E CIP-005 Cyber Security- Electronic Security Perimeters(s)”

Utility Standard TD-1207S, “PG&E CIP-007: Cyber Security - System Security Management”

Utility Standard TD-1208S, “PG&E CIP-008 Cyber Security — Incident Reporting and Response Planning”

Utility Standard TD-1464S, “Fire Danger Precautions in Hazardous Fire Areas”

Utility Standard TD-4050S, “Security Standard for Gas Operations”

Utility Standard TD-4014S, “Change Control (Management of Change)”

Utility Standard TD-4016S, “Gas Operations Records and Information Management”

Utility Standard TD-4110S, “Gas Leak Survey and Detection Program”

Utility Standard TD-4125S, “Maximum Allowable Operating Pressure Requirements”

Utility Standard TD-4413S, “Gas Event Reporting Requirements”

Utility Standard TD-4435S, “Gas System Curtailment Requirements”

Utility Standard TD-4436S, “Gas System Operations Control Room Management”

Utility Standard TD-4441S, “Gas Clearances”

Utility Standard TD-4444S, “Gas Control Emergency Response”

Utility Standard TD-4814S, “Gas Transmission Heavy Rainfall Response”

Utility Standard TD-5801S, “Pipeline Public Awareness Program”

Utility Standard TRAN-2005S, “Drug and Alcohol Testing Requirements Standard”

Well Control Tactical Considerations

Western Region Mutual Assistance Agreement (WRMAA)

49 CFR §192.605, “Procedural manual for operations, maintenance, and emergencies”

49 CFR §192.616, “Public awareness”

49 CFR §192.617, “Investigation of failures”

49 CFR §192.631, “Control room management”

49 CFR Part 199, “Drug and Alcohol Testing”

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Appendix B. **Response Aids**

Appendix B contains Response Aids (formerly known as Training Aids) that describe actions that PG&E personnel could take during common emergency situations involving Gas Operations. Response Aids can be accessed from the GERP website, under the Toolkit.

The Response Aids in Appendix B, begin with First Responder/Incident Commander Immediate Action (Response Aid A) and provides general guidance to PG&E first responders and Incident Commanders during initial emergency assessment and then progress through Emergency Center Activation (Response Aid B).The Response Aid C is a matrix that includes incident specific guidelines PG&E responders may use for 19 common and potential emergency scenarios encountered within Gas Operations Response Aids describe actions that PG&E personnel could take during common emergency situations involving Gas Operations. Response Aids can be accessed from the GERP Website, under the Toolkit.

Note: The Response Aids are included for reference only and provide suggested actions that can apply to a broad range of emergency situations. They are not intended to replace or supersede any PG&E emergency policies and procedures.

Therefore, completion of these Response Aids should not impede emergency response, and it is understood that certain emergency response activities, such as evacuation, are not discretionary.

Response Aids: Index

Response Aid	Title
Response Aid A	**First Responder/Incident Commander**
Response Aid B	**Emergency Center Activation**
Response Aid C	**Incident Specific Matrix** 1. Asphyxiation and/or Carbon Monoxide 2. Bomb Threat/Suspicious Package on Gas Facility 3. Gas Curtailment – Emergency Load Shedding 4. Emergency Weather-Related Gas Curtailment 5. Dig-In 6. Earthquake 7. Fire/Explosion 8. Flood 9. Unintended Release of Gas or Environmental Material 10. Gas Leak and Odor Investigation 11. Low-Pressure/No Gas 12. Heavy Rains/Landslides Causing Non-Contiguous Pipeline Breaks 13. Over-Pressurization of Transmission or Distribution System 14. Impact to Gas Riser/Meter (e.g. Vehicle Impact) 15. Water in Low-Pressure System 16. Compressor Station Fire 17. Gas Storage Facility Fire or Uncontrolled Release of Gas from Storage Well 18. Wildland Fire 19. Cybersecurity Event 20. LNG/CNG Equipment Alarm Response

These Response Aids are primarily informational and do not supersede PG&E emergency policies and procedures.

Scenario specific Response Aid C and charts act as guidelines to help emergency responders identify key emergency response actions and Incident Command (IC)/support positions. The charts also identify key PG&E Emergency Centers that might be activated in each scenario.

Because all emergency situations are unique, these Response Aids cannot provide guidance for all potential hazards that PG&E personnel will encounter. Therefore, in addition to the actions suggested in these Response Aids, PG&E emergency responders should maintain situational awareness and respond consistently with the priorities outlined in the *CERP*:

- Protect the health and welfare of the public, PG&E responders, and others
- Protect the property of the public, PG&E, and others
- Restore gas and electric service and power generation

- Inform customers, governmental agencies and representatives, the news media, and other constituencies
- Restore critical business functions and move towards business as usual

Several Response Aids refer to evacuation (under “Evaluating Danger” and “Making Safe”). **Figure 6-1** is provided as a reference guide for minimum evacuation distances from distribution and transmission gas leaks. This should not be used in place of PG&E policies and procedures.

Figure 6-1: Reference Guide For Minimum Evacuation Distances From Gas Leaks

For Distribution Gas Leaks

Federal DOT’s Emergency Response Guidebook recommends as an immediate precautionary measure for flammable gases to isolate the spill or leak **at least** 330 feet (100 meters) in all directions.

For Transmission Gas Leaks

EVACUATION DISTANCES IN FEET

pressure (psig)	pipeline diameter (inches) 4	6	8	10	12	16	20	22	24	30	36	42
100	91	137	182	228	274	365	456	502	547	684	821	958
200	129	193	258	322	387	516	645	709	774	967	1161	1354
300	158	237	316	395	474	632	790	869	948	1185	1422	1659
400	182	274	365	456	547	730	912	1003	1094	1368	1642	1915
500	204	306	408	510	612	816	1020	1122	1224	1529	1835	2141
600	223	335	447	558	670	894	1117	1229	1340	1675	2011	2346
700	241	362	483	603	724	965	1206	1327	1448	1810	2172	2534
800	258	387	516	645	774	1032	1290	1419	1548	1935	2322	2709
900	274	410	547	684	821	1094	1368	1505	1642	2052	2462	2873
1000	288	433	577	721	865	1154	1442	1586	1730	2163	2596	3028
1100	302	454	605	756	907	1210	1512	1664	1815	2269	2722	3176
1200	316	474	632	790	948	1264	1580	1738	1896	2369	2843	3317
1300	329	493	658	822	986	1315	1644	1809	1973	2466	2959	3453
1400	341	512	682	853	1024	1365	1706	1877	2047	2559	3071	3583
1500	353	530	706	883	1060	1413	1766	1943	2119	2649	3179	3709
1600	365	547	730	912	1094	1459	1824	2006	2189	2736	3283	3830
1700	376	564	752	940	1128	1504	1880	2068	2256	2820	3384	3948
1800	387	580	774	967	1161	1548	1935	2128	2322	2902	3482	4063
1900	398	596	795	994	1193	1590	1988	2186	2385	2981	3578	4174
2000	408	612	816	1020	1224	1631	2039	2243	2447	3059	3671	4283
2100	418	627	836	1045	1254	1672	2090	2299	2508	3134	3761	4388
2200	428	642	856	1069	1283	1711	2139	2353	2567	3208	3850	4492

SOURCE: Pipeline Association for Public Awareness at *www.pipelineawareness.org* under “Emergency Response Resources,” in the document “Pipeline Emergency Response Guidelines,” pg 20 (Appendix A).

Not Applicable for butane, propane, or other hazardous gases or liquids.

Response Aid A: First Responder/Incident Commander

For: Staff Responding to Incident

Note: This aid is **not intended to replace** other response/operational policies, plans and procedures and is not all inclusive. It is intended to be used only as a **reference in addition** to these items.

Item		Action
Assess Situation and Minimize Hazards		
1.		Assess public safety, employee safety, and potential property damage.
2.		Make-safe.
3.		If required, safely evacuate people to a safe distance from the building (refer to **Figure 6-1** for recommended evacuation distances).
4.		Eliminate sources of ignition (e.g., overhead power lines, radios, cell phones).
5.		Warn other responding personnel and/or public of ignition hazards: open flames/smoking, electric switches and/or motors, equipment, or vehicle operations.
6.		If safe, administer First Aid based on level of training.
7.		Block off street/re-route traffic, if necessary. Secure perimeter with signs and caution tape.
8.		Determine if one or more PG&E Facilities are at risk (e.g., backbone transmission line, local transmission line, distribution line, Distribution Feeder Main (DFM), Regulator Station, service, main).
Notify and Coordinate		
1.		Contact GCC (Phone numbers listed in Item 1.i) with the following information on the situation:
	a.	Request 911 agency be notified and request a need for assistance.
	b.	Basic details of the abnormal or emergency condition.
	c.	Location – address and cross street.
	d.	Time situation occurred.
	e.	Notify if local first responders (Fire/Law Enforcement) or media are on-scene.
	f.	Request GCC contact Electric to de-energize power lines, if necessary.
	g.	If required, request the start of a Clearance Action Plan.
	h.	Request additional resources if needed, such as: Public Safety Specialist, LNG/CNG, MCV, and Emergency Preparedness Coordinator (EPC).

<table>
<tr><th>Item</th><th colspan="2">Action</th></tr>
<tr><td></td><td>i.</td><td>Note: Gas Control will make internal notifications and contact appropriate personnel to make external notifications (e.g. CPUC/DOT and other on-call personnel), as required.
<table>
<tr><th colspan="3">Emergency Contact Numbers</th></tr>
<tr><td>Gas Control - Distribution (24/7)</td><td>Northern: (925) 244-4201
Bay Area: (925) 244-4202</td><td>Central Coast: (925) 244-4203
Central Valley: (925) 244-4204</td></tr>
<tr><td>Gas Control – Transmission (24/7)</td><td colspan="2">Northern: (800) 811-4111
Southern: (800) 547-5955</td></tr>
<tr><td>Gas Dispatch (24/7)</td><td colspan="2">(888) 353-3477</td></tr>
<tr><td>Gas Emergency Preparedness On-Call (24/7)</td><td colspan="2">(925) 244-4000</td></tr>
<tr><td>Environmental Field Services (24/7)</td><td colspan="2">(800) 874-4043</td></tr>
<tr><td>Corporate Security</td><td colspan="2">(415) 973-6920
After Hours: (800) 691-0410</td></tr>
<tr><td>Media Hotline (24/7)</td><td colspan="2">(415) 973-5930</td></tr>
<tr><td>Pipeline Engineer Hotline (24/7)</td><td colspan="2">(925) 328-6266</td></tr>
<tr><td>LNG/CNG On-Call Hotline (24/7)</td><td colspan="2">(925) 244-4CNG / 925-244-4264</td></tr>
</table></td></tr>
<tr><td></td><td>j.</td><td>When situation is mitigated and work is completed, notify GCC so it can provide close-out communication.</td></tr>
<tr><td>2.</td><td colspan="2">Notify supervisor, manager or superintendent of situation and need for help at incident location.</td></tr>
<tr><td>3.</td><td colspan="2">If incident is near railroad, then notify railroad/Federal Railroad Authority. Work with Gas Control to accomplish this.</td></tr>
<tr><td>4.</td><td colspan="2">If Electric is involved or potentially involved, contact Gas Superintendent and request that he/she notifies the Electric Superintendent for the area. Notify a Gas Control Senior Coordinator and confirm that they will coordinate with appropriate Electric Control Centers.</td></tr>
<tr><td>5.</td><td colspan="2">If Physical or Cyber Security incident, then notify Corporate Security at the number listed in the Emergency Contact table in Item 1.i.</td></tr>
<tr><td>6.</td><td colspan="2">Contact community first responder agencies and establish a Unified Command. Share immediate actions and objectives.</td></tr>
<tr><th colspan="3">Consider the Following Actions</th></tr>
<tr><td>1.</td><td colspan="2">Consider the need to activate an Emergency Center. Determine level of activation based on pre-identified incident levels. Use Table 3-1, Gas Incident Level Matrix (in section 3) to determine the emergency level, based on the listed criteria.</td></tr>
<tr><td>2.</td><td colspan="2">IF Emergency Center activation is needed, THEN also refer to Response Aid B, “Emergency Center Activation.”</td></tr>
</table>

Item	Action
3.	Establish ICP in coordination with community first responders and communicate location to GCC or Dispatch.
4.	Follow established PG&E procedures for shutdown of affected pipes/systems.
5.	Review Response Aid C, “Incident Specific Matrix,” for incident specific actions, as applicable.
6.	Establish incident priorities/objectives, check-in process for PG&E personnel, and assess need for more resources (e.g., an emergency trailer).
7.	The use of an ICS Form 201 - Incident Briefing, to document the situation and initial objectives, strategies, and tactics.
8.	Environmental issues (e.g. environmental or gas release).
9.	Contact landowner to identify potential onsite hazardous materials/conditions, if necessary.
10.	Determine leak spread and venting as needed, per Utility Procedure TD-6100P-02, “Gas Leak and Odor Investigations.”
11.	Evaluate damages to third party property.
12.	Identify any environmental impacts resulting from the incident and notify a PG&E environmental engineer.
13.	Continue to assess situation and be aware of incident danger increasing, decreasing, or stabilizing.
14.	Preserve Gas Facilities for potential investigation and maintain chain of custody.
15.	Preserve and maintain any documents from scene.
16.	When situation is mitigated and work is completed, notify Gas Control Center so it can provide close-out communication.
17.	Determine if drug and alcohol testing is required.

Reference Documents

- Utility Procedure TD-4413P-01, "Reporting of Gas Events"
- Utility Standard TD-4413S, “Gas Regulatory Reporting Requirements”
- Utility Procedure TD-6100P-02, “Gas Leak and Odor Investigations”
- Utility Procedure TD-4110P-09, “Leak Grading and Response”

Response Aid B: Emergency Center Activation

For: Staff Responding to an Emergency Center

To Be Completed By: Incident Commander or Designee

Note: This aid is **not intended to replace** other response/operational policies, plans, and procedures, and is not all inclusive. It is intended to be use as a **reference in addition** to these items.

Item	Action
Assess Situation and Minimize Hazards	
1.	Determine level of activation based on pre-identified incident levels. Use **Table 3-1, Gas Incident Level Matrix** (in **section 3**) to determine the emergency level based on the listed criteria.
2.	Identify desired reporting time and location for Emergency Response Team(s). Consider the following: responder safety, routes of travel (Ingress/Egress), and weather.
3.	Develop initial objectives, strategies, and tactics based on current and predicted conditions.
4.	Assess resources needed to meet objectives (e.g., personnel, equipment, MCV, LNG/CNG, PSS).
5.	Identify Incident Safety Officers.
Notify and Coordinate	
1.	Notify and coordinate with Gas Control Center (GCC) with the following information:
	a. Emergency level.
	b. Which Emergency Response Teams needs to activate: IMT and/or IST/GEC.
	c. Reporting location for Emergency Response Teams.
	d. Time for Emergency Centers to be operational.
	e. Additional information required for initial E-Page and/or Incident Status Summary.
2.	Notify Supervisor, Manager or Superintendent of situation and need for help at incident location.
3.	LNG/CNG On-Call hotline (925) 244-4CNG / (925) 244-4264.
4.	Notify Gas Emergency Preparedness Coordinator (EPC) via the on-call hotline at (925) 244-4000, to do the following: • Coordinate initial incident briefing call • Request additional resources • Initial development of ICS 201, Incident Briefing Form

Item	Action
5.	Appoint Clearance Writer to work with GCC and ensure appropriate Planning Engineer is notified.
6.	**Emergency Contact Numbers** **Gas Control - Distribution (24/7)** — Northern: (925) 244-4201; Bay Area: (925) 244-4202; Central Coast: (925) 244-4203; Central Valley: (925) 244-4204 **Gas Control – Transmission (24/7)** — Northern: (800) 811-4111; Southern: (800) 547-5955 **Gas Emergency Preparedness On-Call (24/7)** — (925)244-4000
Ongoing Responsibilities	
1.	Review considerations for actions below and GERP Response Aid C for incident specific response actions, as applicable.
2.	Follow established PG&E procedures for shutdown of affected pipes/systems.
3.	Assess customer impact.
4.	Preserve gas facilities for potential investigation and maintain chain of custody.
5.	Preserve and maintain any photos or documents from scene.
6.	Determine DOT/CPUC reportable.
7.	Determine if drug and alcohol testing is required.
8.	Update priorities/objectives in coordination with ICP/IMT and First Responders based on incident development.
9.	Continuously communicate situation updates with Gas Control until the Emergency Center is fully operational.
Consider the Following Actions	
1.	If Electric is involved or potentially involved: • Validate electric does not pose ignition source • Contact Gas Superintendent to notify local Electric Superintendent • Ensure that Gas Control Senior Coordinator has been notified and confirm that they will coordinate with appropriate Electric Control Centers
2.	If LNG/CNG is needed, or potentially needed: • On-Call hotline (925) 244-4CNG / (925) 244-4264 • Consider possible injection points
3.	If incident is near railroad, then notify railroad/Federal Railroad Authority through GCC.

Reference Documents

- Utility Procedure TD-4413P-01, "Reporting of Gas Events"

- Utility Standard TD-4413S, “Gas Event Reporting Requirements”

Response Aid C: Incident Specific Matrix

For: Personnel responding to incident

Note: This aid is **not intended to replace** other response/operational policies, plans and procedures and is not all inclusive. It is intended to be use as a **reference in addition** to these items.

Caution: Ensure Response Aid A and Response Aid B have been completed **PRIOR** to using Response Aid C. This response aid matrix is designed as a supplement to Response Aid A and Response Aid B and only identifies incident specific actions, notifications, and considerations.

Incident	Specifics
Asphyxiation and/or Carbon Monoxide	**Assess | Minimize Hazards** • Measure combustible gas/carbon monoxide (CO)/oxygen level before entering the area using an intrinsically safe leak detection instrument. • Ensure victims get fresh air immediately. • If not previously accomplished, secure the area (use tape/cones) to cordon the area to prevent re-entry.
	Notify | Coordinate • Notify and coordinate with Gas Dispatch **(888) 353-3477** and request a Gas Service Representative (GSR) to investigate, as needed.
	Consider • Assess/determine CO/asphyxiation source. Take CO readings for as-found conditions at appliances and surroundings using an intrinsically safe leak detection instrument.
Asphyxiation and/or Carbon Monoxide (cont.)	**Reference Documents** • Utility Procedure TD-4413P-01, “Reporting of Gas Events” • Utility Procedure TD-4413P-02, “Reporting Safety-Related Conditions, Strength Test Failures, Over-Pressure Events, and Encroachments” • Utility Procedure TD-6100P-01, “Universal Responsibilities for Field Services” • Utility Procedure TD-6100P-02, “Gas Leak and Odor Investigations” • Utility Procedure TD- 4110P-09, “Leak Grading and Response” • Utility Procedure TD-6100P-05, “Carbon Monoxide Investigation” • Utility Procedure TD-6100P-17, “Servicing Natural Gas Appliances

Bomb Threat/Suspicious Package on Gas Facility	**Assess | Minimize Hazards**
	• The package should be isolated (**not handled**).
	• Radios should not be used to transmit in the proximity of the suspicious package.
	• If a bomb threat is received by phone, remain calm and keep the caller on the line if possible. **DO NOT hang up**, even if the caller does. Signal to nearby personnel for assistance and direct them to complete notifications. In addition, the call recipient should note the time of the call and attempt to ascertain the following information:
	  • Where is the bomb?
	  • When is it set to go off?

Incident	Specifics
Bomb Threat/Suspicious Package on Gas Facility (cont.)	• What does it look like? • Why is the caller doing this? • Unusual voice characteristics, gender of the caller, and background sound. • Assess safety to shelter in-place or evacuate. Sheltering in-place could be a safer option if the potential bomb / suspicious package is outdoors. • IF you are unsure what may or may not be safe, THEN complete notifications and wait for additional instructions from Law Enforcement and/or Corporate Security personnel.
	Notify | Coordinate • Notify the 24/7 Security Control Center **1-800-691-0410** immediately to assist in coordinating a response that may include: • Notify the local police or sheriff's department. • Follow authority's instructions. Facility supervisors and/or law enforcement will assess the situation and provide guidance regarding facility lock-down, search, and/or evacuation .
	Consider • If evacuation ordered, consider the following: the plan should include provisions for an assembly area that is close, but not co-located with the facility that is the subject of the threat. It should be far enough from the facility or have sufficient cover to ensure safety if there is a detonation. • Take accountability of personnel at the assembly point. • Ensure that all updates and details are communicated with Corporate Security, Law Enforcement personnel, and the **GCC (925) 244-4114**.
	Reference Documents • Utility Procedure TD-4110P-09, "Leak Grading and Response" • Gas Control Center Control Room Management (CRM) Operation Manual
Gas Curtailment – Emergency Load Shedding	**Assess | Minimize Hazards** • Determine what size area needs to be isolated and how many customers need to be curtailed. • Identify necessary customer shutoff valves to be closed. • Assess resource needs and personnel needed (crews and GSRs) and make contact.
	Notify | Coordinate • Notify and Coordinate with Customer Care.
	Consider • Obtain gas plats, operating maps and diagrams, and regulator station data sheets, as needed. • Depending on nature and extent of event, curtailment of noncore and other large customers should be considered prior to residential core customers. • For distribution main shutdowns, use Emergency Zone Valves Binders or request system-specific isolation plans. • For transmission shutdowns, use Operating Maps and consult Gas Control Center or Gas Planning for system-specific isolation plans. • Identify shutdown zones on plat maps and/or Operating Maps, as needed.

Incident	Specifics
Gas Curtailment – Emergency Load Shedding (cont.)	• Identify necessary distribution and/or transmission valves to be closed, or other locations to be used as squeeze points. • Make repairs to the affected system. • Develop purge plan to purge air from system and execute plan, as needed. • Restore service to customers. • Communicate with customers. • Determine the potential for increased media or regulatory attention.
	Reference Documents • Utility Standard TD-4435S, "Gas System Curtailment Requirements" • Utility Procedure TD-4435P-01, "Extreme Weather-Related Gas Service Curtailment Procedure" • Utility Procedure TD4439S, "Gas Distribution Emergency Shutdown Zones" • Utility Standard TD-4413S, "Gas Event Reporting Requirements"
Emergency Weather-Related Gas Curtailment	**Assess | Minimize Hazards** • Assess long term weather forecast. • Determine curtailment details based on near-term forecast (1-3 days ahead).
	Notify | Coordinate • Follow Cold Weather Communication Process. • Coordinate through OEC and GEC (Gas Control, Gas System Planning, and Customer Strategy Officer).
	Consider • Engaging the CSO and other local public agencies to set up 'warming' or 'cooling' shelters for customers • Follow steps in Utility Procedure TD-4435P-01, "Extreme Weather-Related Gas Service Curtailment Procedures." • Inform the OEC Hydraulic Analysis Lead and the Customer Strategy Officer if the customer does not make a reasonable effort to curtail. • If noncompliance is indicated, assist the Customer Strategy Officer with verification and enforcement. • If noncompliance is risking service to system, follow the Cold Weather Communications Process of actions to be taken.
	Reference Documents • Cold Weather Communication Process • Utility Standard TD-4435S, "Gas System Curtailment Requirements" • Utility Procedure TD-4435P-01, "Extreme Weather-Related Gas Service Curtailment Procedure"
Dig-In Dig-In (cont.)	**Assess | Minimize Hazards** • Determine if main or service is damaged. • If safe, stop the escape of gas. • Consider if Dig-in forces could result in pipe failure at other locations (e.g. service tee, mechanical, fitting, riser connection) on the main or service from the impact/pull on the

Incident	Specifics
Dig-In (cont.)	pipe. • Identify if Cross Bore is involved. If Cross Bore is involved, determine risk of migration through sewer system, monitor migration, and determine method to ventilate the sewer system. • Consider contacting landowner to identify potential onsite hazardous materials/conditions. • Is this incident close to railroad? If so, consider contacting railroad/Federal Railroad Authority (This is critical, specifically in Dig-ins).
	Notify | Coordinate • Notify and coordinate with Gas Engineering Department for repair consultation, as needed. • Notify and coordinate continuously with any activated emergency centers.
	Consider • Determine if main or service is damaged. • If safe, stop the escape of gas. • Consider if Dig-In forces could result in pipe failure at other locations (e.g. service tee, mechanical fitting, riser connection) on the main or service from the impact/pull on the pipe. • Obtain gas plans, operating maps and diagrams, and regulator station data sheets, as needed. • Identify if Cross Bore is involved. If Cross Bore is involved determine risk of migration through sewer system, monitor migration, and determine method to ventilate the sewer system. • For main shutdowns, use Emergency Zone Valves Binders. Request information for isolation plan from Gas Control Center. • Identify shutdown zones on plat maps and/or Operating Maps, as needed. • Identify necessary distribution and/or transmission valves to be closed, or other locations to be used as squeeze points. • Make repairs to the affected system. • Develop purge plan to purge air from system in coordination with GCC. • Restore service to customers. • Determine the potential for increased media or regulatory attention. • Contact Corporate Security if the scene needs security guard. • Preserve evidence and contact damage prevention to investigate.
	Reference Documents • Utility Standard TD-4110S, “Gas Leak Survey and Detection Program” • Utility Procedure TD-4110P-09, “Leak Grading and Response” • Utility Procedure TD-4632P-02, “Cross Bore Immediate Response”
Earthquake	**Assess | Minimize Hazards** • Assess available resources and notify employees. • Request Building Services evaluate facilities for any potential damage and have building inspected prior to re-entering after the shaking has stopped. • Be alert for secondary impacts including aftershocks, fires following earthquakes, water line breaks impacting gas and electric facilities, tsunami, liquefaction, landslides,

Incident	Specifics
Earthquake (cont.)	dam, and levee failure. • Assess area for ruptured lines with an intrinsically safe leak detection device. • If safe, shut off gas if it poses a danger and/or stop the escape of gas by controls or repairs.
	Notify | Coordinate • Notify and coordinate continuously with any activated emergency centers.
	Consider • Account for all personnel and notify Gas Control and activated Emergency Centers. • Conduct earthquake safety tailboards. • Be prepared to work in tech down mode. • Check the status of local personnel for injuries and arrange treatment or transport as necessary. • Request a (PSS) to coordinate with police/fire and local emergency services. • Assign personnel to specific coverage areas. • Dispatch field personnel to assigned areas with procedures to follow and all necessary emergency equipment including vehicle, safety equipment. • Isolate major damage areas. Implement shut in plan in coordination with Gas Control and Emergency Centers (OEC, GEC, and EOC). • For main shutdowns, use Emergency Zone Valves Book. • Review DASH report and call center data. • Perform damage assessment. • Perform leak survey on impacted systems. • Patrol known fault crossing locations. • Identify shutdown zones on plat maps. • See Wildfire procedure for widespread fire damage. • Protect health and welfare of the public, PG&E responders, and others. • Protect property. • Restore gas and electric service and power generation. • Keep customers, governmental agencies and representatives, the news media, and other constituencies informed. • Restore critical business functions and move towards business as usual.
	Reference Documents • Utility Standard TD-4110S, “Gas Leak Survey and Detection Program” • AM&SO Earthquake Playbook • Earthquake Damage Model and Resource Planning Tools • Utility Procedure TD-4413P-01, "Reporting of Gas Events"
Fire/Explosion	**Assess | Minimize Hazards** • If safe, shut off gas if it poses a danger and/or stop the escape of gas by controls or repairs. • Assess if gas is accumulating or burning.
	Notify | Coordinate • Notify and coordinate continuously with any activated emergency centers.

Incident	Specifics
Fire/Explosion (cont.)	**Consider** • Isolate the gas line. • Work with local first responders (FD/LE) to determine if fire should be extinguished or allowed to burn. • Determine source of gas. • Use intrinsically safe leak detection instrument in this process. • Determine if gas is migrating into nearby buildings or enclosed spaces. • Continuously re-evaluate and assess incident site, ensure that evacuation distances are safe, secure perimeter to prevent unauthorized entry to the area, and stay upwind of the site. • Determine extent of damages. • Keep customers, government agencies and representatives, the news media and other constituencies informed. • Check the status of personnel for injuries and arrange treatment or transport as necessary. • Account for all PG&E personnel on site. Advise Emergency Center or Gas Control of any deaths or injuries. • Request a PSS to liaison with police/fire and local emergency services.
	Reference Documents • Utility Procedure TD-6100P-03, “Major Gas Event Response: Fire, Explosion, and Gas Pipeline Rupture” • Utility Procedure TD-4110P-09, “Leak Grading and Response”
Flood	**Assess | Minimize Hazards** • Assess and determine if the flood condition has been controlled. • Gain situational awareness as rapidly as possible for gas and electric hazards. • Be alert for secondary impacts such as dam and/or levee failures. • If preparing for possible flooding, assess and determine if rise valves should be shut before flooding occurs.
	Notify | Coordinate • Request that Gas Control checks for and reviews any rainfall notifications of high-risk segments identified per Utility Standard TD-4814S, “Gas Transmission Heavy Rainfall Response” and Utility Procedure TD-4814P-01, “Gas Transmission Heavy Rainfall Preparation and Response.” • Notify and coordinate continuously with any activated emergency centers. • Notify Aerial and Ground Patrol (through GCC or Emergency Center).
Flood (cont.)	**Consider** • Purge all air from mains and services in affected area. • Determine whether riser valves be shut before flooding occurs. • Develop recovery plans for lines washing out or floating. • Determine whether the flood condition been controlled. • Coordinate with Gas Pipeline Patrol to determine if flooded areas are ground accessible. If so, contact Locate and Mark (L&M) group to perform depth of cover survey. • Determine whether it is safe to restore service. • Determine what size area needs to be restored.

Incident	Specifics
	• Obtain gas plats, regulation station data sheets. • Notify the Gas Control Center of restoration. • Request GPOM Supervisor inform the Gas Control Center which areas, valves, or Regulator Stations are to be restored. • Notify GPOM Supervisor before operating valves or Regulator Stations. • Open valves or regulator stations and pressurize system to normal pressure. • Coordinate gas storage facility and well shut-in with FIMP and GSAM
	Reference Documents • Utility Standard TD-4110S, "Gas Leak Survey and Detection Program" • Utility Standard TD-4814S, "Gas Transmission Heavy Rainfall Response" • Utility Procedure TD-4413P-01, "Reporting of Gas Events" • Utility Procedure TD-6100P-01, "Universal Responsibilities for Field Services" • Utility Procedure TD-4412P-07, "Patrolling Gas Pipelines" • Utility Procedure TD-4814P-01, "Gas Transmission Heavy Rainfall Preparation and Response" • AM&SO Earthquake Playbook • Russian River at Guerneville Flood Response Aid
Unintended Release of Gas	**Assess | Minimize Hazards** • If unknown, determine where gas is coming from. Use intrinsically safe leak detection instrument in this process. • Determine if gas is migrating into nearby buildings or enclosed spaces using intrinsically safe leak detection instrument. • If safe, stop the escape of gas. • Use signs/caution tape to prevent personnel from re-entering the area.
Unintended Release of Gas (cont.)	**Notify | Coordinate** • Notify and coordinate with Gas Engineering Department for repair consultation, as needed. • Notify and coordinate continuously with any activated emergency centers. • If Transmission Incident coordinate transfer of command from M&C/GPOM. • Notify and Coordinate with Environmental Field Specialist 24/7 at (800) 874-4043. • DOT PHMSA (through Gas Control and Company CPUC On-call Representative). • Air Quality Management District (AQMD) (through Environmental Field Specialist). • Notify and Coordinate with Public Information Officer by contacting the Media Hotline 24/7 at (415) 973-5930.
	Consider • Obtain gas plats, operating maps and diagrams, and regulator station data sheets, as needed. • Determine if system is dead-end or tied. Review maps of the area. • Identify if Cross Bore is involved. If Cross Bore is involved determine risk of migration through sewer system, monitor migration, and determine method to ventilate the sewer system. • For main shutdowns, use Emergency Zone Valves Binders. Request information for isolation plan from Gas Control Center. • Identify shutdown zones on plat maps and/or Operating Maps, as needed.

Incident	Specifics
	• Identify necessary distribution and/or transmission valves to be closed, or other locations to be used as squeeze points. • Make repairs to the affected system. • Develop purge plan to purge air from system in coordination with GCC. • Restore service to customers. • Determine the potential for increased media or regulatory attention.
	Reference Documents • Utility Standard TD-4110S, "Gas Leak Survey and Detection Program" • Utility Standard TD-4413S, "Gas Event Reporting Requirements" • Utility Procedure TD-4570P-01, "Emergency Response to an Odorant Spill or Release" • Utility Procedure TD-4110P-09, "Leak Survey and Response" • Utility Procedure TD-4470P-01, "Gas Crew Tracking Process for Gas Leak or Odor Investigation"
Gas Leak and Odor Investigation	**Assess | Minimize Hazards** • Turn off the gas at meter or curb valve if it poses a danger.
	Notify | Coordinate • Notify and coordinate with Gas Engineering Department for repair consultation, as needed. • Notify and coordinate continuously with any activated emergency centers. • Notify and Coordinate with Field Services through Gas Dispatch.
Gas Leak and Odor Investigation (cont.)	**Consider** • Complete a perimeter investigation. • Complete an above ground investigation. • Complete a below ground investigation using an intrinsically safe leak detection instrument. • Check all adjacent substructures using an intrinsically safe leak detection instrument. • Check whether gas is getting into nearby buildings or enclosed spaces. If so, determine how. • Identify if Cross Bore is involved. If Cross Bore occurred, determine risk of migration through the sewer system, monitor migration, and determine method to ventilate the sewer system. • Determine if system is dead-end or tied. Review maps of area. • Consider requesting a Picarro Survey through Gas Dispatch. • If valve is closed, determine how many customers will lose service. • Close service, curb, or control valve with plugs, clamps, stoppers, pipe squeezer, or other equipment. • For main shutdowns, use Emergency Zone Valves Book. • If not previously requested, request a PSS to liaison with police/fire and local emergency services.
	Reference Documents • Utility Procedure TD-6100P-02, "Gas Leak and Odor Investigations" • Utility Procedure TD-6100P-17, "Servicing Natural Gas Appliances

Incident	Specifics
	• Utility Procedure TD-4470P-01, “Gas Crew Tracking Process for Gas Leak or Odor Investigation” • Utility Procedure TD-4570P-01, “Emergency Response to an Odorant Spill or Release” • Utility Procedure TD-4632P-02, “Cross Bore Immediate Response”
Low Pressure/No Gas **Low Pressure/No Gas (cont.)**	**Assess | Minimize Hazards** • Determine extent of affected area by reviewing low pressure/no gas notifications. Work with Gas System Planning (GSP) and/or Gas Distribution Control Center (GDCC) to help with this determination. • Check pressure at critical locations, including regulation stations, SCADA, ERX, chart, and customer locations. • If low pressure or no pressure is detected in any part of the system, then assess the affected area and method to shut in. For LP systems, make this assessment if any part of the system has fallen below 4 inches water column (WC). GSP can model affected areas and the local distribution engineering group (DPM&E) can help with evaluations and recommendations. • If pressure is restored prior to shut-in, continue with shut in. • Determine personnel required and timelines needed (e.g., crews, GPOM personnel, GSRs, customer care personnel, media). It’s important to have a team put together quickly to shut in the customers affected. For example, GPOM resources are needed for pressure assessments and for non-residential work. • Determine if a leak survey is needed and request through Gas Dispatch and Leak Management. • Take % of gas-in-air reads throughout the impacted area to assess if a hazardous mixture is present within the pipeline system.
	Notify | Coordinate • Notify GCC, GPOM, Gas System Planning, and Local Engineering (DPM&E). • Notify and coordinate with Mapping for maps for field. • Notify and coordinate continuously with any activated emergency centers. • Notify the Workforce Routing Team (916) 923-7278, Tell customers calling in that we are aware of situation and actively restoring service. • Notify and Coordinate with Field Services through Gas Dispatch. • Notify News Department and Customer Care as needed for customer and media communications. • Notify LNG/CNG group for support as needed. • When situation is mitigated and work is completed, notify Gas Control Center so it can provide a close-out communication.
Low Pressure/No Gas (cont.)	**Consider** • Monitor the perimeter of the outage as the extent of the outage may expand with time and necessitate expanding the shut-in. • Obtain gas plats, regulation station data sheets, and map of affected customers. • Conduct systematic inspection for cause of condition. Consider both upstream (restricted flow) and downstream (loss of control / demand) activities as possible causes, review clearances that may impact the area, including maintenance and construction work. • Work with GSP and/or the GDCC to develop an isolation plan using Emergency Shutdown Zones and/or other resources.

Incident	Specifics
	• Establish coordination with Gas Control Center (GCC) Liaison in the Gas Emergency Center (GEC). If the GEC deactivates, the GCC Liaison will provide continuity of command and situational awareness into the GCC through the development of low-pressure triggers, identification of SCADA visibility and/or other low-pressure indicators which may be an indication for shut in and/or GEC personnel notification and reactivation. • Dispatch field personnel to assigned area with procedures, maps, and equipment. • Maintain a check-in/check-out plan. • Execute isolation plan and close customer riser valves. • Make repairs to affected system or equipment, as needed. • Develop purge plan to purge air from system in coordination with GDCC. Restore service to customers.
	Reference Documents • Utility Procedure TD-4413P-02, "Reporting Safety-Related Conditions, Strength Test Failures, Over-Pressure Events, and Encroachments" • Utility Procedure TD4439S, "Gas Distribution Emergency Shutdown Zones" • Utility Procedure TD-4441P-04, "Emergency Clearances for Gas Distribution Facilities" • Utility Procedure TD-6100P-10, "Gas Outage and Restoration" • Utility Procedure TD-6100P-06, "Gas Pressure Investigation"
Heavy Rains/Landslides causing, Non-Contiguous Pipeline Breaks	**Assess | Minimize Hazards** ▪ Determine extent of affected area(s). ▪ Quarantine any unsafe areas. ▪ Be alert for secondary impacts including water or other utility line breaks impacting gas and electric facilities. ▪ Assess area for ruptured lines with an intrinsically safe leak detection device. ▪ If safe, shut off gas if it poses a danger and/or stop the escape of gas by controls or repairs. ▪ Complete a perimeter investigation. ▪ Determine a gas leak pattern and establish a perimeter.
	Notify | Coordinate • Request that Gas Control Center checks for and reviews any rainfall notifications of high-risk segments identified per Utility Standard TD-4814S, "Gas Transmission Heavy Rainfall Response," and Utility Procedure TD-4814P-01, "Gas Transmission Heavy Rainfall Preparation and Response." • Request that Gas Control Center to coordinate with Integrity Management and notify Gas Aerial, Ground Patrol, and Leak Survey. • Notify and coordinate continuously with any activated emergency centers. • Obtain information from geoscience department.
Heavy Rains/Landslides causing, Non-Contiguous Pipeline Breaks (cont.)	**Consider** • Begin tracking all incidents (e.g. other areas where landslides are imminent).
	Reference Documents • Utility Standard TD-4110S, "Gas Leak Survey and Detection Program" • Utility Standard TD-4814S, "Gas Transmission Heavy Rainfall Response" • Utility Procedure TD-4110P-09, "Leak Grading and Response • Utility Procedure TD-4412P-07, "Patrolling Gas Pipelines"

Incident	Specifics
	• Utility Procedure TD-4810P-28, “Gas Transmission Pipeline Geohazard Assessment” • Utility Procedure TD-4814P-01, “Gas Transmission Heavy Rainfall Preparation and Response” • Utility Procedure TD-6100P-01, “Universal Responsibilities for Field Services”
Over-Pressurization of Transmission Or Distribution System	**Assess | Minimize Hazards** • Consult with GSP, GPOM, and GDCC to determine potential extent of affected area. • Check pressure at various locations to verify extent of condition. • Take immediate action to make system safe and lower operating pressure to below MAOP-S. • Determine if further pressure reduction is required to continue to safely operate system, or if system shutdown and isolation is required. • Determine area to be leak surveyed and implement leak survey and repairs, as needed. Consult with DIMP for distribution system OP and TIMP for transmission system OP. • For low pressure distribution systems, determine need to inspect customer appliances in affected area. Depending on extent of OP event, leak survey entire LP system for damage. • For transmission systems, conduct an Engineering Critical Analysis. • Determine need to perform DOT Drug and Alcohol Testing.
Over-Pressurization of Transmission Or Distribution System (cont.)	**Notify | Coordinate** • Notify GCC immediately. Gas Control to determine if incident meets reporting criteria. • Coordinate with appropriate local gas Distribution or Transmission Engineering, Integrity Management, Gas System planning Departments, and GPOM for repair consultation and determination of extent of condition, as needed). • Notify and coordinate continuously with any activated emergency centers. • Input preliminary event information and updated OP metrics in the CAP database.
	Consider • Perform follow-up actions as necessary, which may include inspection of customer regulation, metering, and/or appliances. • Perform follow-up leak survey and repair, as necessary. • Identify and evaluate need for any replacement or repair of equipment or pipeline, as necessary. • Review recent pipeline or station clearance work for human error or procedural gaps.
	Reference Documents • Utility Standard TD-4444S, “Gas Control Emergency Response” • Utility Procedure TD-4441P-04, “Emergency Clearances for Gas Distribution Facilities “ • Utility Procedure TD-4110P-09, “Leak Grading and Response” • Utility Standard TD-4125S, “Maximum Allowable Operating Pressure Requirements” • Utility Standard TD-4540S, “Gas Pressure Regulation Maintenance Requirements for Self-Operated and Pilot-Operated Regulators” • Utility Standard TD-4545S, “Control Valve System Maintenance” • Utility Procedure TD-4125P-07, “Establishing Set Points on Regulators and Overpressure Protection Devices” • Utility Procedure TD-4413P-02, “Reporting Safety-Related Conditions, Strength Test

Incident	Specifics
	Failures, Over-Pressure Events, and Encroachments” • Utility Procedure TD-4413P-04, “Drug and Alcohol Testing for Gas Incidents” • Utility Procedure TD-6100P-06, “Gas Pressure Investigation” • Utility Procedure TD-4911P-02, “Immediate Actions After an Over-Pressure Event”
Impact to Gas Riser/Meter (e.g. Vehicle Impact)	**Assess | Minimize Hazards** • Assess/Determine if gas is burning. • Determine if the fire should be extinguished or allowed to burn. • Determine if the electrical system is co-located with the gas system. • Determine if the electrical system is damaged.
	Notify | Coordinate • Complete Emergency Notifications listed in Response Aid A.
	Consider • Close service, curb, or control valve with plugs, clamps, stoppers, pipe squeezer, or other equipment. • If valve is closed, determine how many customers will lose service.
	Reference Documents • Utility Procedure TD-6100P-02, “Gas Leak and Odor Investigations” • Utility Procedure TD-4570P-01, “Emergency Response to an Odorant Spill or Release” • Utility Procedure TD-4470P-01, “Gas Crew Tracking Process for Gas Leak or Odor Investigation”
Water in Low-Pressure System	**Assess | Minimize Hazards** Assess and Determine possible source of the water in the low-pressure system.
	Notify | Coordinate • Complete Emergency Notifications listed in Response Aid A. • Notify Gas Control and ensure that GPOM, Gas System Planning, and Local Engineering (DPM&E) are notified. • Notify and coordinate with Mapping for maps for field personnel. • Notify and coordinate continuously with any activated emergency centers. • Notify and Coordinate with Field Services through Gas Dispatch. • Notify LNG/CNG group for support as needed. • When situation is mitigated and work is completed, notify Gas Control Center so it can provide a close-out communication. • Notify outside utilities or city agencies if their facilities are the source of water into the gas system.
	Consider • Take pressure reads at multiple locations to identify areas impacted by “under pressure.” • Confirm that Gas Leak is not causing the problem. • Shut off the gas, if appropriate. • Monitor the perimeter of the water intrusion as the extent of the intrusion may expand

Incident	Specifics
Water in Low-Pressure System (cont.)	with time and necessitate expanding the shut-in. • Contact local water supply municipality to check for known leaks or activities in the area. • Obtain gas plats, regulation station data sheets, and map of affected customers. • Conduct systematic inspection for cause of condition, including a review of corrosion records for known or suspected subsurface contacts, review recent leak history, as well as clearances in the area impacted. • Previous water instruction events in the area and the actions taken to remedy. • Work with GSP and/or the GDCC to develop an isolation plan using Emergency Shutdown Zones and/or other resources. • Dispatch field personnel to assigned area with procedures, maps, and equipment. • Maintain a check-in/check-out plan. • Execute isolation plan and close customer riser valves. • Make repairs to affected system or equipment, as needed. • Develop purge plan to purge water from system in coordination with GDCC. Restore service to customers. • Use of drips may be necessary to capture water. These may be at the main or meter set.
	Reference Documents • Gas Design Standard (GDS) A-38, “Purging Gas Facilities” • Utility Procedure TD-4413P-01, “Reporting of Gas Events” • Utility Procedure TD-4413P-02, “Reporting Safety-Related Conditions, Strength Test Failures, Over-Pressure Events, and Encroachments” • Utility Procedure TD-4441P-04, “Emergency Clearances for Gas Distribution Facilities” • Utility Procedure TD-6100P-02, “Gas Leak and Odor Investigations”
Compressor Station Fire	**Assess | Minimize Hazards** • Activate Emergency Shut Down (ESD) if operational and safe to do so. There will be multiple ESD activation stations throughout the compressor station; choose the ESD activation station that can safely be accessed. • Assess if Gas is accumulating or burning. • Assign an individual qualified to identify facility-specific threats to escort firefighters on site. • Notify the Area Superintendent.
	Notify | Coordinate • Complete Emergency Notifications listed in Response Aid A. • Notify and coordinate continuously with any activated emergency centers.
	Consider • Work with local first responders to determine if fire should be extinguished or allowed to burn.
	Reference Documents • Utility Standard TD-4110S, “Gas Leak Survey and Detection Program” • Utility Procedure TD-6100P-03, “Major Gas Event Response: Fire, Explosion, and Gas Pipeline Rupture”

Incident	Specifics
Gas Storage Facility Fire or Uncontrolled Release of Gas from Storage Well **Gas Storage Facility Fire or Uncontrolled Release of Gas from Storage Well (cont.)**	**Assess | Minimize Hazards** • Activate Emergency Shut Down (ESD) if operational and safe to do so. There will be multiple ESD activation stations throughout the compressor station; choose the ESD activation station that can safely be accessed. • Determine if gas facilities were damaged, gas is burning, or if any subsurface fluids are being produced/released because of the fire or uncontrolled release of gas from storage well. • Coordinate all actions with the Well Control Tactical Considerations document.
	Notify | Coordinate • Complete Emergency Notifications listed in Response Aid A and Well Control Tactical Considerations document (Chapter 4 – Emergency Contacts). • Notify and coordinate continuously with any activated emergency centers. • Work through Emergency Center and/or Gas Control to ensure notification to Wild Well Control (281) 784-4700.
	Consider • Work with local first responders and Wild Well Control to determine if fire should be extinguished or allowed to burn. • For Well Blowout, ensure that Optical Gas Imaging (OGI) Procedures are implemented to obtain daily video footage of leak according to the timeline established and published to public site. • Reference the Well Control Tactical Considerations document for support.
	Reference Documents • Utility Standard TD-4110S, “Gas Leak Survey and Detection Program” • Utility Procedure TD-6100P-03, “Major Gas Event Response: Fire, Explosion, and Gas Pipeline Rupture” • Well Control Tactical Considerations
Wildland Fire **Wildland Fire (cont.)**	**Assess | Minimize Hazards** • Assess and determine a safe path for egress then safely evacuate people to a safe distance from the effected facilities / area. • Account for local PG&E personnel and resources. • Refer to the *CERP* for planned actions within gas operations.
	Notify | Coordinate • Notify and coordinate continuously with any activated emergency centers.
	Consider • Work with local first responders (FD/LE) to determine if fire should be extinguished or allowed to burn. • Determine what gas facilities are threatened, damaged, or burning and if they are causing explosions. • Obtain gas plats, regulation station data sheets. • Identify shutdown zones on plat maps. • Assign personnel to specific coverage areas. • Isolate major damage areas. Implement shut in plan in coordination with Gas Control

Incident	Specifics
	and Emergency Center (OEC, GEC, and EOC). • For main shutdowns, use Emergency Zone Valves Book. • Execute isolation plan and close customer riser valves. • Make repairs to affected system or equipment, as needed. • Develop purge plan to purge air from system. • Restore service to customers.
	Reference Documents • *CERP* • Utility Standard TD-4110S, "Gas Leak Survey and Detection Program" • Utility Procedure TD-4911P-01, "Gas Distribution Wildfire Response" • Utility Procedure TD-6100P-03, "Major Gas Event Response: Fire, Explosion, and Gas Pipeline Rupture" • Utility Procedure TD-6100P-10, "Gas Outage and Restoration"

Cybersecurity Incident
 	
Cybersecurity Incident (cont.)
	Assess | Minimize Hazards
	• Monitor your system and infrastructure for any abnormal conditions. Some examples of a potential cybersecurity attack include but are not limited to the following:
	  ○ System-wide failures in SCADA, such as many SCADA servers and networks failing at the same time.
	  ○ Multiple incidents at different locations, for example Automatic 574. Moore Shutoff Valve/Remote Control Valve (ASV/RCV), failing at the same time.
	  ○ Random failures, such as several reliable pressure readings becoming invalid without scheduled clearance.
	  ○ Other business application failures. If the attack is not against SCADA, the same process applies. Assess and establish the amount of lost or damaged data.
	  ○ Antivirus alerts or malware outbreak observed on workstations
	  ○ Unusual or unexpected behavior of computing systems and software, including HMIs, SCADA, connected field devices, or other.
	• Assess the expected impact to system safety and reliability if malicious control of equipment were to occur. If equipment has an increased risk of affecting safety and/or reliability,
	  ○ Disconnect the equipment from the network as soon as it is safe to do so or implement other risk mitigation measures.
	  ○ Request Cybersecurity assistance in the review and assessment of the impacted systems.
	• Assess and verify data integrity.
	• Ask personnel if they have clicked on any links or downloaded any attachments sent to them in email.
	• Secure data logs offline for possible forensic investigation

	Notify | Coordinate • Contact the **Security Hotline at 1-800-691-0410** to report the issues in detail for initial intake. • Security will determine whether additional resources will be required (e.g., the Security Intelligence Operations Center [SIOC]). • If a cybersecurity event is confirmed then consider using tech down procedures and coordinating next steps with the incident lead (e.g., the SIOC or other organization leading the response). • Notify and coordinate continuously with any activated emergency centers.

Incident	Specifics
Cybersecurity Event (cont.)	**Consider** • Revert to proper tech down procedures (e.g., manually opening or closing valves) until data can be verified. Coordinate with all affected internal and external agencies that you are moving to manual and that they should adjust accordingly (e.g., coordinate use of manual recording methods with Dispatch). • Work with incident lead, (e.g., SIOC, and/or the ITCC communications team to warn the appropriate personnel that their systems may have been compromised and they should pay particular attention to any changes in data. • Instruct direct report staff to monitor and report any issues. Have them gather specific details and prepare a report for the incident lead (e.g. SIOC or other activated emergency centers (the appropriate control center will provide instructions). • Develop a chronology of the event to assist the incident lead (e.g. SIOC or other activated emergency centers) in evaluating the incident. • Appoint affected and knowledgeable staff to assist the incident lead (e.g. SIOC or other activated emergency centers) in the investigation. • Assign a liaison to update the incident lead (e.g., SIOC or other activated emergency centers) as employees report possible causes. • Assign a liaison as representative in the GEC and other emergency centers as needed. • When a threat is validated, evaluate the impact on your operations and take the appropriate measures to mitigate any hazards. • Use data logs to enter data held during the incident. • Determine if incident is reportable and make internal and regulatory notifications within the specified time limits. Refer to EMER-3102M, *Cybersecurity Annex to the Company Emergency Response Plan* and make reports in accordance with local procedures. • Once system and data integrity are restored, return to automated operations.
	Reference Documents • EMER-3102M, *Cybersecurity Annex to the Company Emergency Response Plan* • Utility Standard TD-4050S, “Security Standard for Gas Operations” • Utility Standard TD-1202S, “PG&E CIP-002 BES Cyber Systems Identification and Classification” • Utility Standard TD-1203S, “CIP-003 PG&E Cyber Security Management Controls Standard” • Utility Standard TD-1204S, “PG&E CIP-004: Cyber Security - Personnel & Training” • Utility Standard TD-1205S, “PG&E CIP-005 Cyber Security- Electronic Security Perimeters(s)” • Utility Standard TD-1207S, “PG&E CIP-007: Cyber Security - System Security Management” • Utility Standard TD-1208S, “PG&E CIP-008: Critical Cyber Asset Incident Response”
LNG/CNG Equipment Alarm Response	**Assess | Minimize Hazards** • Report to site and contact designated LNG/CNG personnel. ○ Contact Gas Dispatch and request notifications to LNG/CNG On-Call (925) 244-4CNG / (925) 244-4264 . • Look for fire and/or smoke, listen for venting equipment, and smell for indication of gas leaks. • If needed, activate Emergency Shut Down (ESD), if operational and safe to do so. There will be multiple ESD pushbuttons throughout site; choose an ESD pushbutton that can be safety accessed. • Determine if the site is safe to approach.

Incident	Specifics
LNG/CNG Equipment Alarm Response (cont.)	• Look for injured victims in the area if there was a catastrophic release of gas or equipment failure. • Look for visual damage in and around site (i.e. CNG Station or Mobile/Portable LNG/CNG Equipment).
	Notify | Coordinate • Notify and coordinate with designated LNG/CNG personnel. • Notify 911 to address any immediate public and company safety concerns. • Standby and act as Incident Commander until LNG/CNG personnel arrives onsite. LNG/CNG personnel will assume command as soon as they arrive onsite. • If there are no safety issues and upon agreement between LNG/CNG personnel and Gas Service Representative (GSR) that an LNG/CNG technician will arrive to assist or already present to assist, GSR will be released and can report back to Gas Dispatch that IR is closed.

	Consider
	• Portable CNG equipment is stored between 2,400 PSIG – 3,600 PSIG.
	  ○ Stored CNG is a limited source so it will eventually vent to atmospheric pressure in event of gas leak.
	  ○ Stay clear of any venting activity as the gas may exit at extremely high velocity through the equipment pressure relief valves or leak points.
	  ○ Keep all bystanders at least 50 feet away until LNG/CNG personnel arrive onsite.
	• CNG Station has a potential operating pressure of 4,500 psig.
	  ○ Stored CNG is a limited source so it will eventually vent to atmospheric pressure in event of gas leak.
	  ○ Stay clear of any venting activity as the gas may exit at extremely high velocity through the equipment pressure relief valves or leak points.
	  ○ Keep all bystanders at least100 feet away until LNG/CNG personnel arrive onsite.
	  ○ CNG Station can have equipment with multiple pressure relief valves. Stay clear of vent pipes/valves where and when gas can potentially vent.

	Reference Documents • LCNG-4552P-31, “Hazardous Material Trailer Transportation Incident Response and Recovery Procedure” • LCNG-4552P-37, “Station Emergency Response Procedure”

Appendix C. Incident Command System Resources for Gas

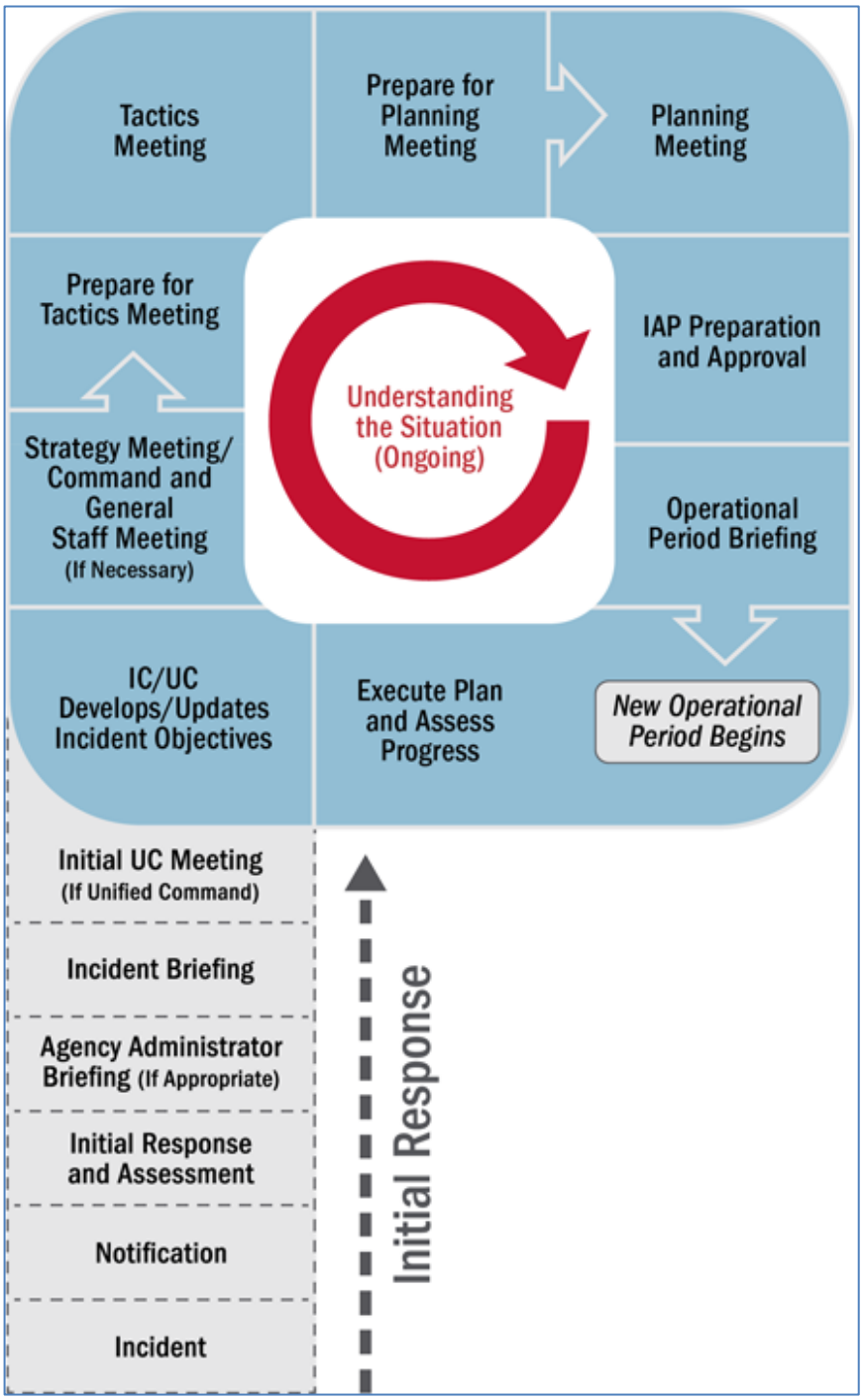
Appendix C of this Gas Emergency Response Plan presents an introduction to the Incident Command System (ICS) along with specific components for use by emergency response personnel within Gas Operations.

C.1 ICS Resources for Gas Index

C.2 ICS Planning "P" Process

The Planning "P" (**Figure 6-2**) is a guide to the process and steps involved in planning for an incident. Effective planning provides the foundation for successful mitigation of incidents.

Figure 6-2: ICS Planning "P" Process



The leg of the “P” describes the initial response period. Once the incident begins, the steps are Notifications, Initial Response and Assessment, Incident Briefing, and Initial Incident Command (IC)/Unified Command (UC) meeting. At the top of the leg of the “P” is the beginning of the first operational planning period cycle.

There are five primary phases of the planning process that are generally the same regardless of the type and complexity of the incident. The IC on simple incidents must develop and communicate a simple plan through oral briefings. During a short-term response, less than one operational period, or one that can be handled by local resources, the IC should document this plan with an ICS Form 201 – Incident Briefing). Incidents that are more complex require a more time-consuming planning process, and a written Incident Action Plan (IAP) prepared by an entire Incident Management Team (IMT).

1. Understand the Situation: This first phase involves gathering, recording, analyzing, and displaying a clear and accurate picture of the incident evolving now.
2. Establish Incident Objectives and Strategy: The second phase involves determining an effective strategy, as well as formulating and prioritizing the incident objectives. The strategy and objectives must consider alternative strategies.
3. Develop the Plan. The third phase involves determining the tactical direction and the specific resources needed for implementing the strategy for one operational period. Prior to formal planning meetings, each member of the Command and General Staff is responsible for gathering necessary information so that together, they can successfully develop the plan.
4. Prepare and Disseminate the Plan: The fourth phase involves preparing the plan in a format that is appropriate for the size and complexity of the incident. For initial response, this will likely be notes for an oral briefing and oral assignments or orders. For incidents with multiple operational periods, more formal written IAPs are necessary.
5. Execute, Evaluate, and Revise the Plan: The fifth phase of this cyclical process is to execute and evaluate the plan to ensure success. The command team must regularly compare planned progress with actual progress. Adjustments in the plan can then be made as new information emerges, or conditions change, or adjustments can be implemented in the IAP for the next operational period.

Throughout the planning process there are 5 primary briefings and meetings that take place. The agendas for these meetings are located at the GERP Intranet site under the Response Resources Toolkit.

The Initial Operations Briefing

An operations briefing is an opportunity for all agencies to report out on what is currently known about the incident and the status. Operations Briefings may occur more than once during an operational period and the frequency is determined by the Incident Commander and applicable Emergency Center Commanders.

Objectives Meeting

The Objectives meeting is held to review and develop incident objectives to guide the emergency response and recovery operations.

Command and General Staff Meeting

This meeting is designed to follow the Objectives meeting and is the opportunity for the Commander to share the incident objectives with the full emergency center staff to provide direction, receive input, and ensure cohesiveness.

Tactics Meeting

This meeting is where it will be determined how objectives will be accomplished. Multiple strategies may be discussed. Specific response activities are decided during this meeting. It is appropriate to debate the best approach during this meeting. Determining resources is very important at this meeting as well (what do we need, when could we get it, and how does this affect our timelines). Need to ensure that the participants of this meeting come prepared.

Planning Meeting

The purpose of the Planning Meeting is to review and approve the established plan (Objectives, Tactics, Resources), document, and share the plan.

C.3 ICS Form 202 – Incident Objectives and the SMART Model

Incident Objectives are developed to guide and direct emergency response and recovery operations. It is important to prioritize incident objectives and consider alternative strategies. PG&E follows the "SMART" method to determine incident objectives. The ICS Form 202 may be used to document objectives and is available at the GERP Intranet site under the Response Resources Toolkit.

Developing **SMART** Objectives:

Specific

Do you have enough detail? Is the meaning clear?

Measurable

How will you measure success?

How will you quantify or verify that you have achieved the objective?

Action **O**riented

Is an action verb used to describe expected accomplishments?

Realistic

Is the objective realistic given the constraints?

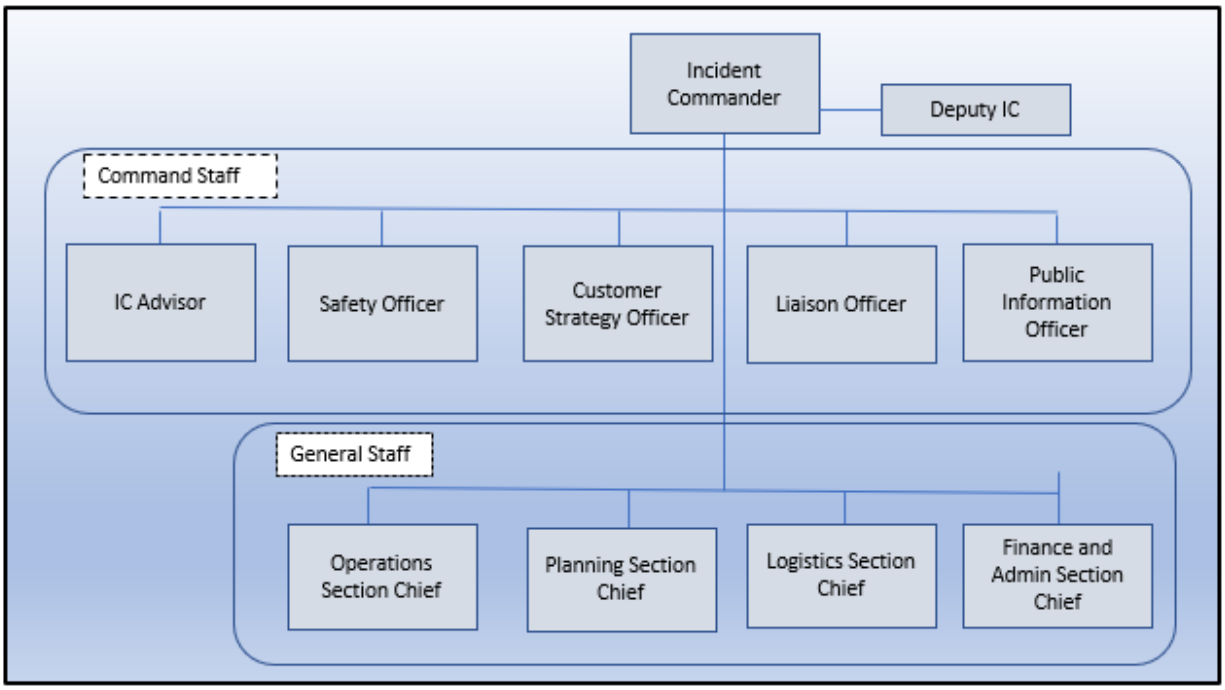
Time **S**ensitive

Is the completion date clearly stated? Are interim deadlines set?

C.4 ICS Form 207 – Incident Organization Chart

The Organization Chart or structure within Gas Emergency Centers follow the Incident Command Structure (**Figure 6-3**) as defined in the *CERP*. An Organization Chart or Structure will be posted in all emergency centers and may use the ICS form 207. The ICS form 207 is available on the GERP intranet site under the Response Resources Toolkit.

Figure 6-3: ICS Organization Chart



When operating under the ICS model, IMT structure is divided into two parts: The Command Staff and the General Staff.

The Command Staff is led by the Incident Commander (IC) and includes the Legal Officer, Safety Officer (SO), IC Advisor, Public Information Officer (PIO), Customer Strategy Officer (CSO), and Liaison Officer (LNO).

- Incident Commander: Leads and makes decisions. Serves as a key player in determining overall objectives.
- Deputy Incident Commander: Has the same authority as the IC, and acts as the IC in their absence. Helps the IC with responsibilities and tasks (e.g., Operations).
- Liaison Officer: Primarily responsible for being the point of contact for representatives of government agencies, non-governmental organizations, and/or private entities. Informs the IC which agencies are represented. Ensures agencies receive complete, accurate, and consistent incident information.
- Customer Strategy Officer: Serves as an advocate for customers by providing updates to customers, addressing customer issues, and communicating high priority outage concerns to the Emergency Center team. Maintains a positive relationship with the customers. Ensures customers receive complete, accurate, and consistent incident information.

- Public Information Officer: Provides strategic communication counsel to the IC. The PIO has oversight of the Public Information Office, which develops all Command Staff internal and external communications strategy and messaging during an (continued) emergency, obtains IC approval of all public information, and ensures all information being shared with external audiences is timely, accurate, and consistent.
- IC Advisor: Provides guidance on the PG&E ICS structure and protocol during an emergency activation.
- Safety Officer: Monitors safety conditions in the field and Emergency Centers, advises the IC on all matters relating to operational safety, develops measures and messages for improving safety and health awareness of all assigned personnel, tracks work-related injuries, and performs investigations as necessary.
- Legal Officer (as needed): Provides advice and counsel on legal matters related to the incident, reviews media releases and public information, monitors compliance with regulatory and reporting processes, develops and communicates the document retention plan, and assists in incident investigations.

The General Staff includes the Operations, Planning & Intelligence, Logistics, and Finance & Administration Sections, each led by a Chief.

- Operations: Directs the execution of IAPs to implement the assessment and restoration strategy and achieve the incident objectives set by the IC.
- Planning: Collects, evaluates, and displays incident intelligence and information; prepares IAPs, long-range plans, and contingency plans; gathers situational intelligence, compiles plans for demobilization, maintains incident documentation, and tracks assigned incident resources.
- Logistics: Provides support needs for the incident, such as ordering resources; provides facilities, transportation, supplies, equipment maintenance, and fuel; food service; communications; hotel/berthing support; and medical services for incident personnel.
- Finance and Administration: Provides charging guidelines, communicates the appropriate field orders to capture time and expense to those responding, ensures sufficient funds are available to pay our vendors and employees, provides cost analysis and forecasting for the incident, notifies our insurance carriers about the incident, and tracks potential claims for compensation for injury or damage to life or property.

C.5 ICS Form 211 – Incident Check-in List and ICS Form 221 – Demobilization Check-out

The Resource Unit will establish and oversee the check-in/out function at designated incident locations and Emergency Centers. Maintaining the status of all checked-in personnel is vital for tracking resources and is essential for personnel safety, accountability, and fiscal control. The Resources Unit maintains the ICS Form 211 – Incident Check-in List throughout the incident to ensure accountability of all personnel. The ICS Form 211 – Demobilization Check-out is given to the Documentation Unit at the end of each day of the operation at each Emergency Center and stored with incident documents.

Personnel must check-in upon arrival to any PG&E reporting location (this may be an Emergency Center, Service Center, Base Camp, Staging Area, or Micro Site) using the ICS 211. Once checked-in on the ICS-211 personnel should report to their Supervisor or Emergency Lead for assignments. All personnel are required to receive a safety briefing before commencement of work. To check out personnel should receive a safety debriefing and demobilization debriefing using ICS Form 221. Personnel must also sign out on the ICS 211 of the emergency location or Emergency Center. The ICS forms 211 and 221 are available on the GERP intranet site under the Response Resources Toolkit.

C.6 ICS Form 214 – Activity Log

All activated Emergency Center staff should initiate and maintain an ICS Form 214). A Unit Log will be started for each separate emergency incident requiring activation. The ICS Form 214 is available on the GERP intranet site under the Response Resources Toolkit.

This Unit Log for everyone will be initiated upon arrival at the Emergency Center and will record the date and time of key activities, decisions, and contacts made. All entries should be dated and timed, and the log should be signed by the individual at the conclusion of each shift in the EOC/GEC and OEC. If a Unit Log is not used, all original notes should be collected in place of said Unit Log. All logs and original notes can be given to the Documentation Unit.

C.7 ICS Form 230 – Meeting Schedule

A Meeting Schedule should be posted in all Emergency Centers and may use the ICS form 230 to keep all staff informed of what meetings/briefings are taking place, where, what time, and who may need to attend. The ICS form 230 is available at the GERP website under Response Resources

Appendix D. **Mutual Assistance Agreements and Memorandum of Understanding**

D.1 Mutual Assistance Agreements

A Mutual Assistance Agreement or MAA is an arrangement between two or more companies such that each will assist the other in the event of a disaster, typically by sharing company resources. PG&E has Mutual Assistance Agreements with the American Gas Association (AGA), the California Utilities Emergency Association, and the Western Energy Institute. For Mutual Assistance resources, refer to the GERP Intranet Website, under the Toolkit section.

D.2 Mutual Assistance Agreements Index

D.2.1 American Gas Association

PG&E is signatory to the Master Operations Assistance Agreement with the American Gas Association (AGA). The AGA offers its members (utilities, transmission, and manufacturers/suppliers/service providers) a voluntary, no-fee mutual assistance program designed to suit the wide variation of needs of its member companies across the United States and Canada. The program is based on a coalition of AGA member companies, which agree to a set of baseline provisions that govern mutual assistance. The member companies agree to populate and maintain the AGA Mutual Assistance Database with company-specific emergency contact information, field capabilities, and other key resources available for mutual assistance.

The purpose of the AGA program is to supplement local, state, and regional mutual assistance programs, and it is intended for those unprecedented manmade or natural disasters requiring the dedication of response, recovery, and restoration resources outside the limits of existing mutual aid programs. In times of need, the AGA database can be searched for resources that potentially meet current emergency needs, and an AGA Request For Assistance (RFA) form (the binding contract between Requesting and Responding Companies) can be submitted to the AGA website.

Contact Information

The company contact for the AGA Master Operations Assistance Agreement is:

Jeff Briggs, Acting Emergency Response Manager
Emergency Preparedness and Response (EP&R)

Email: Jx2m@pge.com

Phone: **(916) 396-9491**

D.2.2 California Utilities Emergency Association

In the event of a major emergency where PG&E's resources (vehicles, equipment, materials, and tools) are inadequate, the CUEA Mutual Assistance Agreement may be called upon. It is PG&E's policy to maintain mutual assistance agreements through the California Utilities Emergency Association (CUEA). The CUEA facilitates the coordination of the transfer of equipment, personnel, and materials between signatory utility companies of the agreement during an emergency. CUEA membership gives PG&E access to State response resources, with the ability to coordinate additional resources from much of the western United States. The CUEA would typically be contacted by the EOC/GEC Cal OES Liaison during a Level 3, 4, or 5 emergencies.

Contact Information

Don Boland (CUEA)

Phone: **(916) 845-8518**

http://www.cueainc.com/

D.2.3 Western Region Mutual Assistance Agreement

PG&E is a custodial member of the Western Energy Institute (WEI) in the administration of the Western Region Mutual Assistance Agreement (WRMAA). The agreement was developed based on the CUEA Mutual Assistance Agreement and provides for support in the form of expertise and information for emergencies that occur within and outside of the state of California.

Contact Information:

http://www.westernenergy.org/default.htm

Appendix E. External Resources (Non-Gas Operations Resources)

Appendix E presents information on external resources (any resource not found within Gas Operations – i.e., other PG&E Lines of Business, External Agencies (Law, Fire, Utilities, etc.) that may be needed in the event of a gas incident or emergency, and which are not covered in depth in other portions of the GERP. The information may be a phone number, a hyperlink to a website, a link to a document on a SharePoint site, or other data. Information provided in this Appendix is listed in the Index below.

E.1 External Resources (Non-Gas Operations Resources) Index

E.2 Environmental

For environmental emergencies after work hours, personnel should call the **24-Hour Environmental Emergency Hotline at 1-800-874-4043**, to be put in contact with the on-call EFS.

The EFS may contact appropriate Safety and other PG&E employees and first responders to aid in identifying the substance(s) released and determine the appropriate level of Personal Protective Equipment (PPE) needed. The EFS will also manage the notification(s) of the release to the appropriate internal and external parties, using PG&E requirements for notification and distribution.

Environmental http://pgeweb/sharedservices/environmental/Pages/24-HourEnvironmentalEmergencyHotline.aspx .

Finding your Environmental Field Specialist (EFS) using list.

Environmental Guidance Documents in the Guidance Document Library.

E.3 Safety

Safety Officers support employees access the following information:

Safety Department Helpline:

- **(415) 973-8700 (external)**
- **223-8700 (internal)**

Select from the following options:

- Option 1, **Safety Incident Notification Line,** available 24 hours a day: To report an employee/contractor fatality, serious injury or illness; an electrical contact or flash requiring medical treatment, transport by emergency service or ambulance, or any contact or inquiry by California Occupational Safety and Health Administration (Cal/OSHA) personnel. **This 24/7 option is intended for emergencies or urgent safety issues that need to be addressed immediately.**
- Option 2, available M-F, 7:30 a.m. to 4:30 p.m.: For worker's compensation inquiries, claim information, PG&E Medical Provider Network, requests for Cal/OSHA 300 logs or any other administrative assistance.
- Option 5, available M-F, 7:00 a.m. to 4:00 p.m.: To speak to the Bloodborne Pathogen Unit
- Option 1: Information on the Supervisor's Checklist or to leave a message
- For questions on disposal procedures refer Exhibit C: Regulated Biohazardous Waste Disposal Process
- For information regarding Protective Equipment refer to Exhibit A
- Option 2: To speak directly to the Bloodborne Pathogen Unit or to leave a message
- Option 6, For physician or medical providers inquiring about Worker’s Compensation claims billing

To report an incident or injury involving non-PG&E and/or damage to equipment or vehicles, contact:

Law Claims Helpline:

- **(415) 973-8000 (external)**
- **223-8000 (internal)**

If you experience a work-related incident, you should first notify your supervisor and then call the 24/7 Nurse Report Line.

- 24/7 Nurse Report Line: **(888) 449-7787**
- 24/7 Nurse Report Line website
- Safety website: http://pgeweb/sharedservices/safety
- Code of Safe Practices (CSP) located in Safety Toolkit
- Safety and Health Guidance Documents in the Guidance Document Library

E.4 Public Affairs

Public Affairs representatives are liaisons between PG&E and the county and city officials affected during a gas emergency. There are Regional as well as Special Project Public Affairs representatives. Public Affairs implemented an On-Call Emergency Response process, which allows a 24/7 response coverage to its local operations; provides updates and communication to local elected and other key stakeholders, whenever needed; predictable scheduling for the Gas IMT and provides predictable staffing plans for Emergency Preparedness Coordinators (EPCs).

Under the existing process, Public Affairs may use one or more of eight dedicated EOC response teams (Alpha, Bravo, Charlie, Delta, Echo, Foxtrot, Golf, and Hotel) that rotate duties throughout the year. One team is always on duty. The on-call process is for after-hours and weekends. During the regular workday, Public Affairs reps handle emergency response duties for their respective areas. Personnel changes occurring for a particular shift (due to vacation, etc.) trigger email notifications to all members of the Public Affairs team experiencing the change.

Additionally, the EOC and IMT On-Call database is updated with these changes.

The Public Affairs Emergency Response SharePoint site is at this link and includes a link to the Regional Liaison contact list.

E.5 External Agency Contacts– Governmental (Federal, State, Local), Railroads/Utilities

This section presents contact information for federal, state, and local agencies and other external contacts that might be involved during an emergency involving PG&E's gas transmission and distribution system. In an emergency, gas incident management personnel can use **Table 6-1** this Appendix to contact the appropriate federal, state, or local agency, or other external reporting contacts. Should an emergency take place in your immediate vicinity, dial 9-1-1 for the local Emergency Services Dispatch Center.

Note that if you are calling from a cellular phone, your call may be handled by a California Highway Patrol (CHP) Dispatch center out of the immediate area. You should be prepared to give them the specific location of the emergency. If you are calling remotely to advice of an emergency, dial the 10-digit direct-dial emergency number given in **Table 6-1** for the area of the emergency. For all other calls, contact the non-emergency 10-digit direct-dial number.

All the numbers on **Table 6-1** should be monitored and answered 24 hours per day, 7 days per week.

Table 6-1: Federal and State Reporting Contacts

Agency	Emergency Number	Non-emergency Number	Comments
FEDERAL			
Department of Defense (DOD)	719-556-4030	719-556-4030	If a base in CA is impacted by PG&E gas lines, call base directly if you have contact number. Numbers listed here go to 24/7 line at DOD's Northern Command (Petersen AFB) who will notify impacted base.
Federal Bureau of Investigations (FBI)	NA	916-746-7000 415-553-7400	Sacramento Office San Francisco Office
National Response Center (NRC)	800-424-8802	800-424-8802	Calling the NRC will pass information to the following agencies: • Department of Transportation (DOT) • Environmental Protection Agency (EPA) • United States Coast Guard (USCG)
United States Coast Guard District Eleven (USCG D 11) Command Center	510-437-3701	510-437-3701 415-399-3530 (Bay Area specifically)	USCG D 11 encompasses the entire state of California.
RAILROADS AND UTILITIES			
Burlington Northern Santa Fe (BNSF)	800-832-5452	800- 832-5452	–
Union Pacific Railroad Dispatch (UP)	888-877-7267	800 848-8715	AMTRAK runs on BNSF or UP rails in the state of California; therefore, call BNSF or UP to alert AMTRAK
East Bay Municipal Utilities District (EBMUD)	866-403-2683	866-403-2683	–
Sacramento Municipal Utilities District (SMUD)	888-456-7683	888-456-7683	–
Southern California Edison	626-302-1212	626-302-1212	–

Agency	Emergency Number	Non-emergency Number	Comments
(SCE)			
STATE			
California Utilities Emergency Association (CUEA)	916-845-8911 State Warning Center	916-845-8517 Office 916-717-7570 Cell	Ask for Don Boland or the on- duty CUEA representative
CAL FIRE	9-1-1	916-845-8680	Sacramento Command Center
California Highway Patrol (CHP) General	9-1-1	800-835-5247	–
CHP Golden Gate Division	9-1-1	707-641-8300	–
CHP Monterey	831-796-2160	831-796-2168	–
CHP Valley (Sacramento)	916-861-1330	916-861-1300	–
CHP Valley (Stockton)	209-943-8675	209-943-8600	–
CHP Ukiah	707-467-4012	707-467-4000	–
California Public Utilities Commission (CPUC)	800-235-1076	800-235-1076 (For electric and gas incident reporting)	–
California Transportation (Caltrans)	Contact CHP for area impacted	–	–
California Warning Center	800-852-7550	916-845-8911	–
COUNTIES/OPERATIONAL AREAS			
Alameda County	925-462-1212	510-667-7721 510-667-7776	Dublin Sherriff Dispatch Manager
Alpine County	530-694-2231, “0”	530-694-2231	–
Amador County	209-223-6513	209-223-6500	Sherriff
Butte County	530-538-7322	530-538-7322	Sherriff
Calaveras County	209-754-6753	209-754-6500	Sherriff
Colusa County	530-458-0200	530-458-0200	Sherriff
Contra Costa	925-646-2441	925-646-2441	Sherriff

Agency	Emergency Number	Non-emergency Number	Comments
County			
Del Norte County	707-464-4191, #0	707-464-4191, #6	Sherriff
El Dorado County	530-647-5250	530-647-5221	CAL FIRE Dispatch
Fresno County	559-488-3111 Dispatch	559-488-3111	Sherriff
Glenn County	530-865-1122	530-865-1122	Sherriff
Humboldt County	707-445-7251, “0”	707-445-7251 (Press “8” for immediate assistance)	Sherriff
Imperial County	760-339-6312 Dispatch	760-339-6312	Sherriff
Inyo County	760-878-0383, “4”	760-878-0383	Sherriff
Kern County	661-861-3110	661-861-3110	Sherriff
King County	559-584-9276	559-584-9276	Sherriff
Lake County	707-263-8655	707-263-2690	–
Lassen County	530-257-6121	530-257-6121	–
Los Angeles County	323-262-211 Dispatch	323-881-6183 (for LA County Fire and Rescue Dispatch) 323-881-2455	–
Madera County	559-675-7770	559-675-7770	–
Marin County	Fire/EMS: 415-472-0911 Law: 415-479-2311	Fire/EMS: 415-472-0911 Law: 415-479-2311	–
Mariposa County	209-966-3614	209-966-3614	–
Mendocino County	707-463-4086	707-463-4086	–
Merced County	209-383-7483	209-385-7445	–
Modoc County	530-233-4410	530-233-4416	–
Mono County	760-932-7549, #7	760-932-7549, #7	–
Monterey County	831-755-5111	831-755-5111	–
Napa County	707-253-0911	707-253-4451	–

Agency	Emergency Number	Non-emergency Number	Comments
Nevada County	530-265-7880	530-265-1471	–
Orange County	714-538-3501	714-538-3501	–
Placer County	530-886-5375	530-889-7800 (Sheriff's office)	–
Plumas County	530-283-6300	530-283-6300	–
Riverside County	951-684-0911	951-776-1099, #5	–
Sacramento County	916-874-5128	916-874-5128	–
San Benito County	831-636-4080 #1	831-636-4080	–
San Bernardino County	760-956-5001	760-956-5001 #1	–
San Diego County	858-565-5200	858-565-5200	–
San Francisco County	415-553-8090	415-553-0123	–
San Joaquin County	209-468-4400, "0"	209-468-4400	–
San Luis Obispo County	805-543-7082	805-781-4550	–
San Mateo County	650-363-4911	650-363-4911	–
Santa Barbara County	805-683-2724	805-683-2724	–
Santa Clara County	408-299-3233	408-299-2311	–
Santa Cruz County	831-471-1170	831-471-1121	–
Shasta County	530-245-6000, #0	530-245-6000, #2	–
Sierra County	530-289-3700	530-289-3700	–
Siskiyou County	530-841-2900	530-841-2900	–
Solano County	707-421-7090	707-421-7090	–
Sonoma County	707-565-2121	707-565-2121	–
Stanislaus County	209-552-2468 (Press 1 for English, and then) for Dispatch) 209-552-2474	209-552-3911	Emergency Numbers are County and City (Modesto), respectively

Agency	Emergency Number	Non-emergency Number	Comments
	(Direct Number for Fire Dispatch)		
Sutter County	530-822-7307, “0”	530-822-7307	–
Tehama County	530-527-9111	530-529-7900	–
Trinity County	530-623-8126	530-623-8126	–
Tulare County	559-733-6218	559-733-6218	–
Tuolumne County	209-533-5815	209-533-5815	–
Ventura County	805-654-9511	805-654-9511	–
Yolo County	530-666-6612	530-666-8282	–
Yuba County	530-749-7909	530-749-7302	–

E.6 CPUC/DOT Required Notifications/Testing

This section summarizes PG&E's notification and reporting requirements for gas incidents, safety-related incidents, and periodic reports as required by applicable regulatory agencies, most notably the California Public Utilities Commission (CPUC) and the U.S. Department of Transportation (DOT). Providing timely notification and reporting of incidents consistent with regulatory guidelines helps ensure prompt response and engagement of regulatory agencies. Additionally, meeting regulatory deadlines ensures compliance with the law and PG&E policy.

All Gas Transmission and Distribution (T&D), Gas Maintenance and Construction (M&C), Engineering, and Customer Field Services (CFS) personnel should refer to Utility Standard TD-4413S, "Gas Event Reporting Requirements" for further information.

Gas Operations personnel can use this section as a guide:

1. To identify situations that may require regulatory notification
2. To determine notification deadlines.

E.6.1 CPUC/DOT Reportable Gas Incidents

Utility Procedure TD-4413P-01, “Reporting of Gas Events” identifies the incidents that require notification to the CPUC and DOT within specified timeframes.

The required information for incidents that require notification to the CPUC, and DOT will be compiled by the District/Division Incident Commander(s) and relayed to a Gas Engineering on-call person via Gas Control. The on-call person is responsible for filing the requisite reports. If the incident fits reportable criteria, the CPUC File No. 420, “Report of Gas Leak or Interruption must be used (in addition to the Incident Report).

The initial status report from Gas Control will include the information listed below:

- Time of occurrence
- Nature of problem
- Line number
- Pressure status
- Current system status and plans*

The initial status report from District/Divisions will include the information listed below. The information marked with an asterisk (*) will be provided in subsequent reports.

- Type of incident
- Line number and location (mile point or cross streets)
- If, how and when situation isolated or made safe
- Number and type of injuries*
- Number and geographic boundaries of evacuations*
- Extent and type of any property damage*
- Status of incident (line blowing, fires, etc.) *
- Type and number of crews on-scene*
- External agencies on-scene (e.g., police, fire, etc.)
- CAP

The Corrective Action Program (CAP) was established to accomplish the following objectives:

- Capture incidents (events that have already happened) and potential incidents (events that haven’t happened but pose a risk).
- Analyze incidents and potential risks, and then recommend corrective actions to reinstate capability and/or prevent recurrence.
- Recommend preventive actions to prevent occurrence in the first place.
- Assess effectiveness, monitor trends, and communicate results on a continuous basis.

In addition, for all CPUC-reportable and complex events, the responsible department supervisor, lead investigator, or superintendent must ensure that an incident critique is conducted with all of

the involved departments, as required by Utility Procedure TD-4413P-01, "Reporting of Gas Events"

Copies of the Gas Event Reporting Requirements Standards and Procedures referenced in this section, with select Attachments and the CPUC File No. 420, “Report of Gas Leak or Interruption.”

E.6.2 DOT Drug and Alcohol Testing – Post Accident

Post-accident drug and alcohol tests are performed on employees whose performance cannot be completely discounted as a contributing factor to an accident (an accident is defined as a DOT reportable incident). It is important to conduct post-accident drug and alcohol testing of all potentially involved personnel despite uncertainty about the circumstances of the accident.

The need for this testing is covered in 49 CFR Part 199, "Drug and Alcohol Testing," and strongly emphasized in the Advisory Bulletin ADB-2012-02 issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA) on February 23, 2012, "Pipeline Safety: Post Accident Drug and Alcohol Testing."

Utility Procedure TD-4413P-04, "Determining the Scope of Drug and Alcohol Testing for Gas-Related Events," specifically addresses post-accident testing (PAT) for drugs and alcohol. Utility Standard TRAN-2005S, "Drug and Alcohol Testing Requirements Standard," gives further information on requirements for personnel who are subject to drug and alcohol testing. Supporting documents for the Standard are PG&E's DOT Drug and Alcohol Misuse Prevention Plan and the PG&E's Drug-Free Workplace Program DOT Controlled Substance and Alcohol Testing Program Employee Policy and Handbook (Rev. 1/13). Both documents are located on the company DOT Drug and Alcohol Testing Program website. The Plan, Handbook, Standard, and Procedure give greater detail and guidance on PG&E's DOT drug and alcohol testing process.

When is testing required?

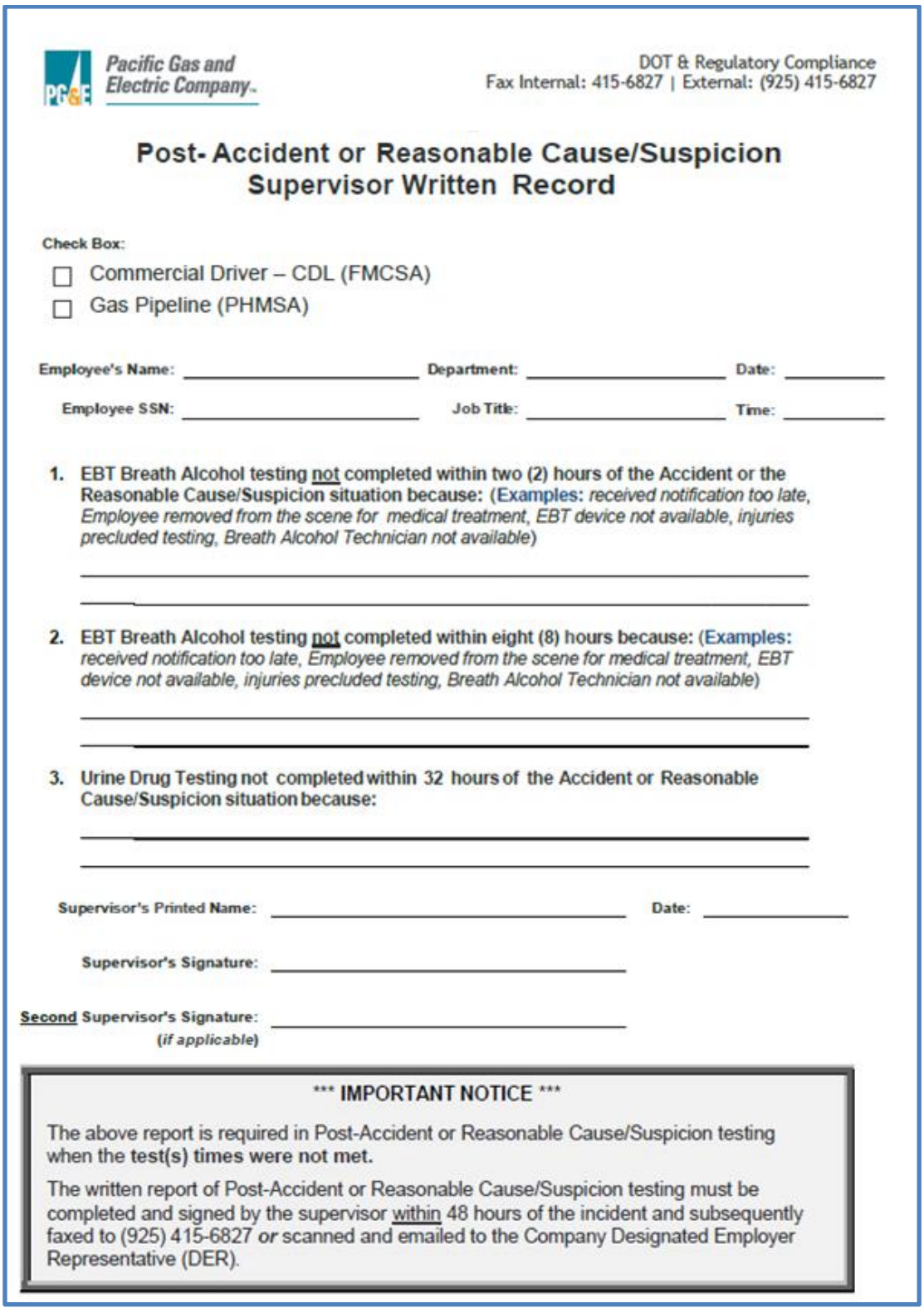
Post-accident testing (PAT) is required when an employee's or PG&E contractor's performance cannot be completely discounted as a contributing factor to an accident (an accident is defined as a DOT reportable incident).

For such incidents, DOT drug and alcohol testing are required for all parties involved at the time of the incident/accident. Alcohol testing is required within 2 hours of the incident/accident, but not to exceed 8 hours afterward.

Drug testing must be completed no later than 32 hours after the accident/incident. If the alcohol test is not completed within the first 2 hours, and exceeds 8 hours, or a urine drug screen was not conducted within 32 hours, the reason must be documented on the Post-Accident or Reasonable Cause/Suspicion Supervisor Written Record form, shown in **Figure 6-4**.

Utility Procedure TD-4413P-04, "Drug and Alcohol Testing for Gas-Related Events," provides guidance on required drug and alcohol testing for DOT reportable incidents. Utility Procedure TD-4413P-04, in conjunction with the Handbook and Plan, provides more guidance on the PAT process, including implementation of the testing.

Figure 6-4: Post-Accident or Reasonable Cause/Suspicion – Supervisor Written Record



Pacific Gas and Electric Company

DOT & Regulatory Compliance
Fax Internal: 415-6827 | External: (925) 415-6827

Post- Accident or Reasonable Cause/Suspicion Supervisor Written Record

Check Box:

☐ Commercial Driver – CDL (FMCSA)
☐ Gas Pipeline (PHMSA)

Employee's Name: _____ Department: _____ Date: _____

Employee SSN: _____ Job Title: _____ Time: _____

1. EBT Breath Alcohol testing not completed within two (2) hours of the Accident or the Reasonable Cause/Suspicion situation because: (Examples: *received notification too late, Employee removed from the scene for medical treatment, EBT device not available, injuries precluded testing, Breath Alcohol Technician not available*)

_____

_____

2. EBT Breath Alcohol testing not completed within eight (8) hours because: (Examples: *received notification too late, Employee removed from the scene for medical treatment, EBT device not available, injuries precluded testing, Breath Alcohol Technician not available*)

_____

_____

3. Urine Drug Testing not completed within 32 hours of the Accident or Reasonable Cause/Suspicion situation because:

_____

_____

Supervisor's Printed Name: _____ Date: _____

Supervisor's Signature: _____

Second Supervisor's Signature: _____
(*if applicable*)

*** IMPORTANT NOTICE ***

The above report is required in Post-Accident or Reasonable Cause/Suspicion testing when the test(s) times were not met.

The written report of Post-Accident or Reasonable Cause/Suspicion testing must be completed and signed by the supervisor within 48 hours of the incident and subsequently faxed to (925) 415-6827 *or* scanned and emailed to the Company Designated Employer Representative (DER).

EXHIBIT H

Gas Dispatch and Scheduling Handling 911 Calls - Emergency Response

SUMMARY

This utility procedure describes how Pacific Gas and Electric Company (PG&E or Company) work and resource (W&R) gas dispatch personnel handle 911 emergency response calls for both Gas Dispatch and W&R electric dispatch centers, as well as instructions for gas W&R dispatchers who handle emergency conditions reported by outside agencies (e.g., fire, police, Office of Emergency Services [OES]) and PG&E personnel.

Level of Use: Informational Use

TARGET AUDIENCE

- W&R gas dispatch personnel (including Powerline)
- Field services and gas control personnel (for information only)

SAFETY

Potential hazards associated with gas dispatch and scheduling work include ergonomic risks from general office activity.

BEFORE YOU START

Successfully complete the dispatcher-in-training (DIT) program or (if currently in the DIT program) work under the direction of fully-trained gas W&R dispatchers, relief gas dispatchers, or supervisors.

Gas Dispatch and Scheduling Handling 911 Calls - Emergency Response

TABLE OF CONTENTS

Gas Dispatch and Scheduling Handling 911 Calls - Emergency Response

PROCEDURE STEPS

1 General Information

1.1 This utility procedure covers the following 911 emergency response work practices:

- Process for handling 911 calls to the PG&E emergency line (1-888-743-4911)
- Definitions of gas event (or incident) levels, as shown in the *Gas Emergency Response Plan (GERP)*
- Overview of the W&R gas dispatch sequencing plan for taking 911 calls for gas and electric emergencies
- Gas W&R dispatcher responsibilities for processing 911 calls for electric emergencies

NOTE

W&R gas dispatch and scheduling is staffed 24 hours a day, 7 days a week. Gas dispatchers use the field automation system (FAS) dispatch application to execute the plan and manage the daily changes set forth by the gas schedulers and distribution coordinators. W&R gas dispatch uses the FAS dispatch application to dispatch work to gas field personnel.

1.2 Definitions of incident levels are as follows:

1. Level 1 Incident: Routine
    - Involves a relatively small number of customers, similar to those managed during routine operations.
    - Local resources are sufficient to respond.
    - Does not require activating an emergency center.
    - W&R gas dispatch operations personnel handle all 911 calls.
    - Does **not** require additional PG&E dispatch resources to handle increased call volumes, though anticipated major storms may require pre-arranged increased staffing levels.

Gas Dispatch and Scheduling Handling 911 Calls - Emergency Response

1.2 (continued)

2. Level 2 Incident: Elevated

- A pending potential incident or a local emergency that requires more than a routine operations response.
- PG&E resources are mainly local, but resources may need to move within the region.
- May have increased media/external interest.
- Though the operations emergency center (OEC) is normally not staffed, emergency personnel are in communication and can activate the OEC.

(1) Scheduling plans for W&R gas dispatch operations can accommodate continuous 911 coverage until normal operation resumes.

3. Level 3 Incident: Serious

- Involves many customers.
- PG&E resources mainly move within the region but may need to move between regions.
- May have increased media/external interest and potential reputational risk.
- OEC(s) are activated; regional emergency center (REC) and emergency operations center (EOC) activation is possible.
- Scheduling plans for W&R gas dispatch operations can accommodate continuous 911 coverage until normal operation resumes.

4. Level 4 Incident: Severe

- Indicates an escalating incident involving company impact or extended multiple emergency incidents that impact many customers.
- PG&E resources move between regions, general contractors are used, and mutual aid may be needed.
- May have considerable media/external interest and potential reputational risk.
- OEC(s), REC(s), and EOC are activated.

1.2 (continued)

- Incident Support Team (IST) activation is possible.
- The scheduling plans for W&R gas dispatch operations involve all hands, including emergency overtime staffing to accommodate continuous 911 coverage until normal operation resumes.

5. Level 5 Incident: Catastrophic

- Includes multiple emergency incidents, impacts many customers, has significant cost, and involves significant infrastructure risk/damage.
- Affects the company and its ability to conduct business operations.
- Full mobilization of company resources is needed to respond, and mutual aid resources are needed.
- May have extensive media/external interest and potential reputational risk.
- OEC(s), REC(s), EOC, and IST are activated.
- The scheduling plans for W&R gas dispatch operations involve all hands, including emergency overtime staffing to accommodate continuous 911 coverage until normal operation resumes.

2 Overview of Gas Dispatch Operations

2.1 This overview includes the sequencing plan for taking 911 calls for gas emergencies and electric emergencies (see Figure 1).

2.2 The following steps describe the 911 call process flow:

1. Agency calls the toll-free PG&E emergency number.
2. Caller hears a message stating that the toll-free number is only for 911 agencies.

NOTE

Powerline is a dedicated team of dispatchers concentrating on effectively and efficiently processing 911 emergency and is available from 6 a.m. to 6 p.m., Monday through Friday, and 8 a.m. to 6 p.m., Saturday and Sunday.

3. From 6 a.m. to 6 p.m., Monday through Friday and 8 a.m. to 6 p.m. on weekends, the phone system routes the call to the Powerline dispatch group (see Section 5).

Gas Dispatch and Scheduling Handling 911 Calls - Emergency Response

2.2 (continued)

4. During Powerline's off hours, the phone system routes the call to a gas dispatcher, who routes the call to the appropriate area dispatcher.

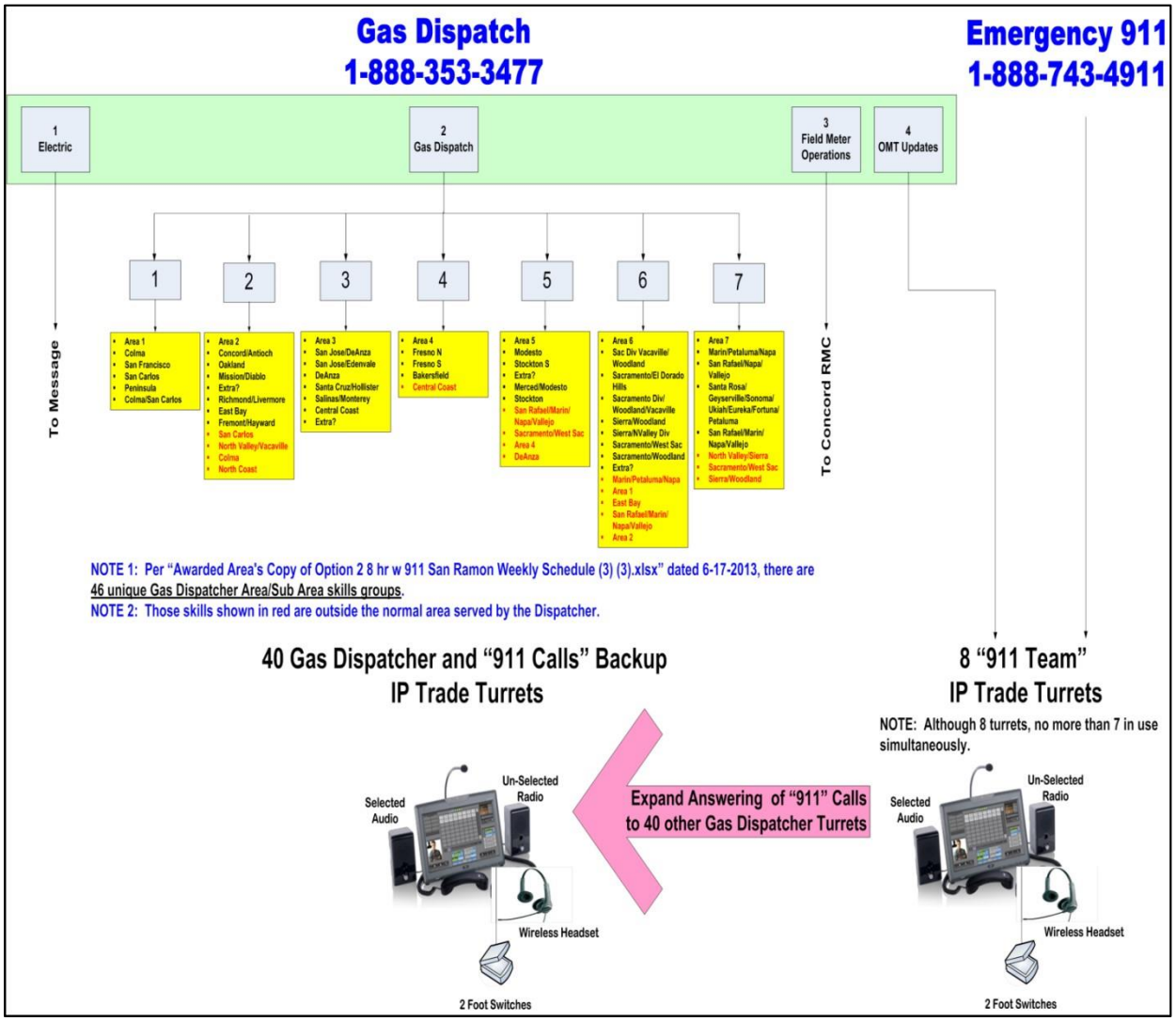


Figure 1. Illustration of 911 Call Flow in Bishop Ranch

2.3 W&R gas dispatch supervisors receive the 911 call report monthly (see Figure 2). Upon review, the W&R gas dispatch supervisor conducts quality assurance (QA) reviews on all missed calls and evaluates statistical results on call handling performance.

2.3 (continued)

Connect Date	Connect Time	Calling Number	Dialed Number	RTN	Minutes	Minutes (seconds)	Call Disposition Code
05/04	9:13	8056814100	8887434911	8057849549	0:01:27	87	0
05/04	13:02	8055439642	8887434911	8057849549	0:00:57	57	0
05/05	13:53	8055439642	8887434911	8057849549			33
05/05	13:58	8055479331	8887434911	8057849549	0:00:48	48	0
05/07	14:51	8058014740	8887434911	8057849549	0:01:44	104	0
05/10	6:21	8055420732	8887434911	8057849549	0:01:00	60	0
05/10	13:34	8056814100	8887434911	8057849549	0:01:16	76	0
05/14	6:12	8056814100	8887434911	8057849549			33
05/14	6:14	8056814100	8887434911	8057849549	0:01:03	63	0
05/14	14:59	8055439642	8887434911	8057849549	0:01:38	98	0
05/17	7:47	8054735103	8887434911	8057849549	0:01:25	85	0
05/24	13:35	8055439642	8887434911	8057849549	0:00:48	48	0
05/26	8:40	8054615090	8887434911	8057849549	0:02:12	132	0
Total					**0:14:18**		

Call Disposition Codes:
0 = Complete
31 = Busy / RNA
32 = RNA 2-4
33 = RNA > 4
50 = Retry
80 = Nwk Cond
NAB = Network Abandoned (caller gets into the system and somewhere along the prompter they hang up)

Figure 2. Sample 911 Call Report

2.4 The 911 call report provides the call time, duration, outcome, and number from which the call was initiated.

2.5 Numerical codes in the call disposition code column on the far right of the 911 call report indicate the following information:

- Call was successful (Code 0)
- Caller was unable to reach a Company representative (“ring no answer,” Code 33 and Code 34)
- Caller received a courtesy message that all lines were busy (Code 50)

Gas Dispatch and Scheduling Handling 911 Calls - Emergency Response

3 911 – Contingency Staffing Plans

3.1 Staff scheduling follows a local Relief Service Operator Agreement. If additional dispatchers are needed, W&R gas dispatch follows local callout 212 list. Staffing may be prearranged as well.

3.2 IF the gas dispatchers need additional resources,

THEN:

1. W&R electric dispatch may be asked to assist with handling 911 calls.

2. W&R gas dispatch supervisor calls work force management personnel at Company line 777 7278 to enable W&R electric dispatch to pick up 911 calls.

3.3 911 calls received by call centers:

1. Call center personnel receiving 911 calls prepare trouble reports and field orders (FO) in the customer care and billing (CC&B) system.

NOTE

W&R electric dispatch personnel handle 911 agencies' electric emergency referrals for calls taken from the call center.

2. IF the agency needs information or wants to be referred to the local emergency response coordinator,

   THEN call center personnel contact the appropriate dispatch center—W&R electric dispatch for electric emergencies and W&R gas dispatch for gas emergencies.

4 Answering a 911 Agency Call

4.1 Gas and Powerline dispatchers perform the following steps when answering 911 agency calls, per Attachment 1, "911 Script."

1. Answer the call by saying, "PG&E Emergency."

2. Obtain all the appropriate information as needed to complete a field order or trouble report in CC&B.

3. Obtain as much information as possible by asking questions and requesting basic information as required by the 911 call script:

   a. Name of calling agency

   b. Date and time

Gas Dispatch and Scheduling Handling 911 Calls - Emergency Response

4.1 (continued)

c. Detailed description of incident reported

d. Whether emergency is gas, electric, or both

(1) IF the 911 agency call is for a structure fire and the account in CC&B clearly covers both gas and electric,

THEN gas dispatcher creates both gas and electric immediate response field orders even if the request is for only one or the other.

e. Location of incident and nearest city and cross streets, especially for unknown addresses

f. Reporting agency's contact information

g. Reporting agency's incident or log number

h. Reporting agency's status: en route, on site, or standing by

i. Estimated time of arrival (ETA) with confirmation of arrival callback requested

j. Any issues related to access, injury, hazard, or safety

4. IF the 911 call is for an electric utility emergency,

THEN the dispatcher must:

- Create CC&B field order or trouble reports.
- Call W&R electric dispatch at 1-866-411-4743, and inform them of the type of emergency and whether the 911 agencies have requested an ETA callback.

4.2 Gas and Powerline dispatchers perform the following steps when answering a request for a cancellation from a 911 agency:

1. State the affected address in the system to avoid any confusion.

2. Gas W&R dispatcher documents the reason for the cancellation of commodity(s)

a. Gas W&R dispatcher updates the trouble report (TR) or field order (FO) with the reason for the cancellation.

4.2 (continued)

NOTE

Gas FO personnel will be dispatched to validate a request, regardless of the outside agency requesting a cancellation.

3. Gas W&R dispatcher updates TR or FO personnel with the following information:

   a. Time the request was received by Powerline dispatchers.

   b. The reason for the cancellation (i.e., telephone wire, rather than an electric line).

   c. Callback number to address any additional questions.

4. Ringdown to the respective parties requiring updated information for the outside 911 agency's request for cancellation.

   a. Ringdown to the area electric or gas dispatcher.

   b. Provide the affected address for the cancellation request.

   c. Advise as to the reason for the cancellation.

   d. Confirm by using 3-way communication.

5 Handling Gas Emergencies

5.1 During normal Level 1 conditions, emergency calls are routed directly to Powerline dispatchers, though gas dispatchers receive emergency calls during non-Powerline hours.

1. Powerline dispatchers assist in the emergency process by:

   a. Helping with immediate response ringdown (calls routed to additional numbers during an increase in call volume) by checking addresses of unknown premises, cross streets, and notes.

   b. Creating field orders for 911 agencies.

   c. Creating and updating records in the gas event management tool (EMT, discussed further in Step 6.4 for customer service representative-generated or 911-generated field orders, including:

      - Dig-in
      - Exposed line

Gas Dispatch and Scheduling Handling 911 Calls - Emergency Response

5.1 (continued)

- Structure fire
- Major gas leaks
- Vehicle impact
- Explosion, which requires advising W&R electric dispatch of condition
- Carbon monoxide investigation, which must be confirmed by 911 agency or PG&E personnel
- High/low gas pressure, which must be confirmed by 911 agency or PG&E personnel

NOTE

Gas W&R dispatchers manage events per Utility Procedure TD-6100P-03, “Major Gas Event Response: Fire, Explosion, and Gas Pipeline Rupture.”

d. Noting “EMT LAN ID” in the Dispatcher Remarks field on the immediate response field order, requiring EMT to inform gas dispatcher that an EMT record is being created.

e. Notifying operations, maintenance and construction (OM&C) supervisor as necessary.

f. Marking field order with EMT number.

g. Updating gas service representative (GSR) information from original field order.

h. Updating OM&C crews, when requested.

i. Communicating requests for responses from leak survey personnel and OM&C.

j. Notifying PG&E media personnel and the law and claims (LAW) group as needed, and recording notifications in EMT.

2. IF Powerline dispatch is non-operational (after 6 p.m.) or an increase in 911 call volume occurs,

THEN:

a. All necessary available gas dispatchers receive 911 calls directly.

b. Gas dispatchers create and dispatch the emergency response field orders to gas field personnel.

Gas Dispatch and Scheduling Handling 911 Calls - Emergency Response

5.1 (continued)

3. Gas dispatchers update EMT records whenever they:
   - Receive any of the call types listed in Step 5.1.1
   - Perform ETA callbacks to any 911 agencies
   - Create EMT records for direct calls from GSRs or leak survey personnel during non-Powerline hours
   - Receive any information from the field that necessitates an update
   - Notify media or law-claims personnel
4. Each dispatcher must complete all received calls by initiating or updating the EMT record. Calls must not be transferred, and the caller must not be requested to call back.
5. Each dispatcher must create EMT records whenever the following incident types are confirmed, and PG&E personnel make a request for an EMT record:
   - Hospitalization
   - Evacuation
   - Material failure
   - Pipeline rupture
   - Area odor affecting 20 or more premises
   - Grade 1 leak
   - Any crew response for an unintentional release of gas
6. An EMT record is not required for:
   - GSR valve changes
   - Requests for gas pipeline operations and maintenance (GPOM) personnel
   - Requests for locate and mark personnel

5.2 IF an area is in a Level 2 or greater event,

THEN gas dispatchers may receive calls outside their local area concerning a gas emergency. Whenever this occurs, they perform the following steps:

1. Create field order in CC&B and select Priority 10 (immediate response).

2. Provide 911 personnel with the ETA, if available or inform them that PG&E dispatch will call them back after the ETA is confirmed.

3. Complete or close the 911 call.

4. Some situations require that the gas emergency be handed off to the area dispatcher because the area dispatcher controls local resources. Whenever handing off an emergency order, perform the following steps:

   a. Ensure that the receiving dispatcher has the emergency agency contact information for the ETA agency callback.

   b. IF CC&B is down,

      THEN create an FAS “order entry” gas emergency service request for dispatching.

6 Gas Emergency Notification Requirements

6.1 Gas dispatchers perform the following steps:

1. For all potential Department of Transportation (DOT) or California Public Utilities Commission (CPUC) reportable incidents (refer to Utility Procedure TD-4413P-01 “Reporting of Gas Events”), contact on-shift communications specialist or gas control center personnel at (925) 244-4317.

2. If requested, make emergency notifications to organizations such as 911, safety, law and claims, government relations, media, or corporate security as shown in Attachment 2, “Emergency Notification Requirements by Incidents.”

6.2 Dispatch operations may receive calls for the following types of events:

- Fatality, injury, or illness
- Property or equipment damage
- Significant subsurface damage
- Hazardous condition

Gas Dispatch and Scheduling Handling 911 Calls - Emergency Response

6.2 (continued)

- Company vehicle damage
- Environmental spill or release
- Major media events
- Customer or public safety complaint

6.3 Follow all emergency notification requirements detailed in the EMT W&R gas dispatch guidelines per Attachment 3, “Event Management Tool Guidelines.”

6.4 Document the event in EMT.

NOTE

EMT is a notification tool for gas events that meet the gas emergency notification requirements and a tracking tool for gas field personnel who respond to same-day hazardous gas events.

1. For information about how to create, manage, and close work orders, refer to Attachment 3 and Attachment 4, “EMT Flowchart and Notification Details.”

2. See Figure 3 for an example of the EMT Incident Report Order Detail entry form.

6.4 (continued)

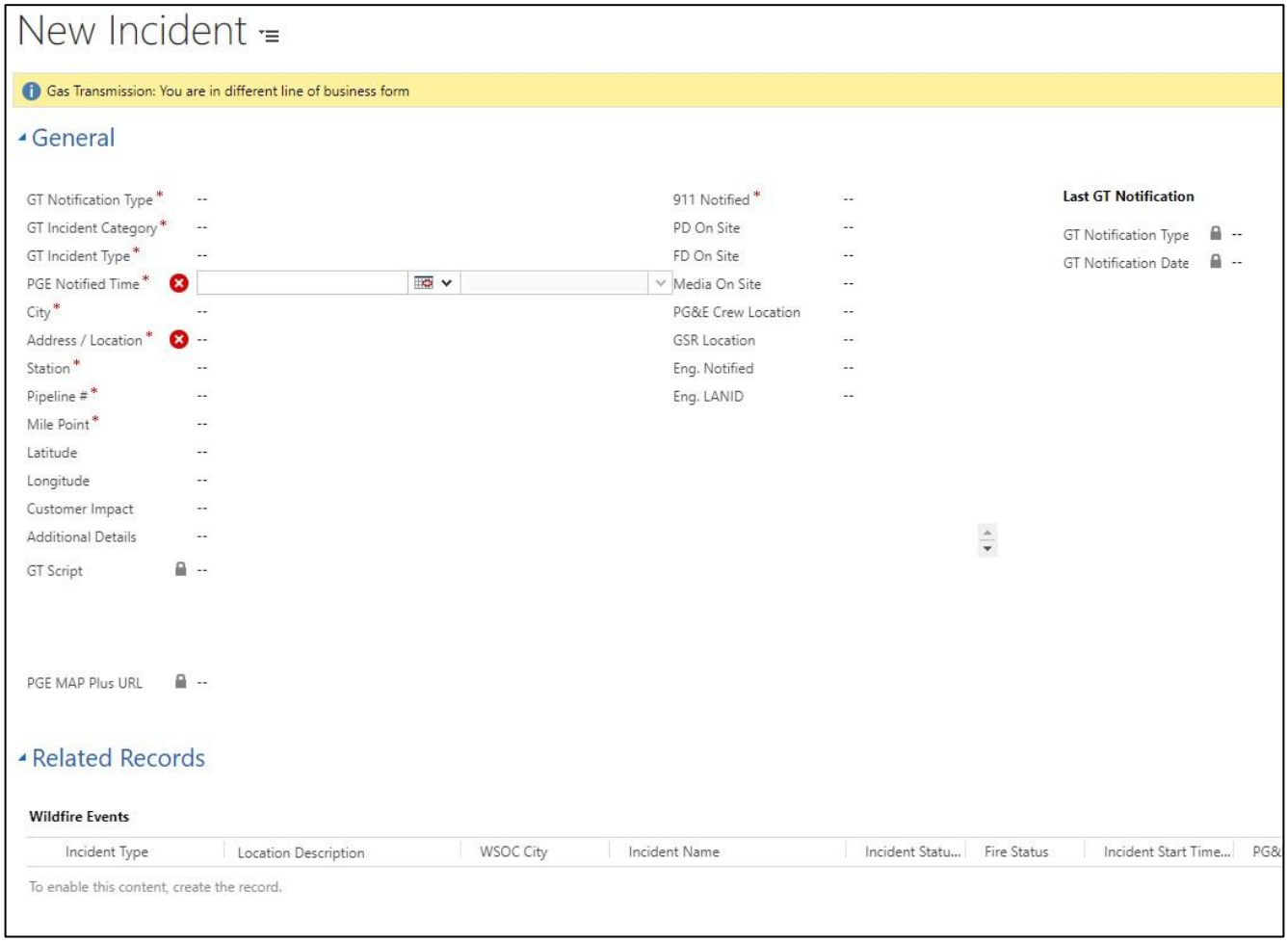


Figure 3. EMT Incident Form

7 Handling Electric Emergencies

7.1 W&R gas dispatch creates either a field order or a trouble report for the electric emergency.

1. IF there is an agency standing by,

   THEN create the trouble report in CC&B and note agency standing by on the trouble report to enable W&R electric dispatch or storm rooms to prioritize these orders per Job Aid TD-6700P-03-JA01, “Creating Trouble Reports in Customer Care & Billing (CC&B).”

2. IF the 911 agency is not standing by, but is requesting an ETA,

   THEN create the trouble report in CC&B, select **None** from the 911 Agency drop-down list, and type “ETA callback required” in the **Comments** field.

3. W&R gas dispatch calls W&R electric dispatch and informs them of the type of emergency and if the 911 agency requested an ETA callback.

4. If requested, W&R electric dispatch calls the 911 agency back with the ETA.

7.2 W&R gas dispatch checks the status of an electric emergency.

1. Use the Outage Information System (OIS) application to determine whether there is an incident or hazard report related to the present emergency. Use the information, shown in Figure 4 to help answer the agency’s questions.

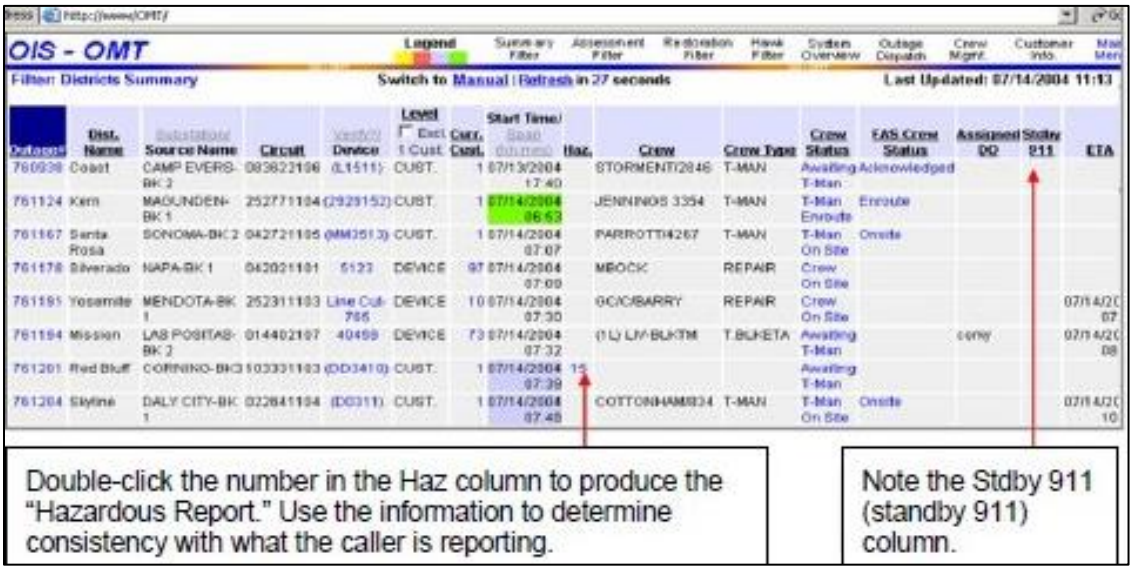


Figure 4. OIS Districts Summary

Gas Dispatch and Scheduling Handling 911 Calls - Emergency Response

7.2 (continued)

2. IF unable to obtain an ETA,

   THEN do either of the following:

   a. Offer the agency the option to be transferred to W&R electric dispatch. If the agency requests a transfer, perform a warm call transfer to W&R electric dispatch, which involves placing the caller on hold and introducing the caller to the next dispatcher before transferring the call.

   b. Have W&R electric dispatcher call the agency back with the ETA.

7.3 During Level 1–2 incidents, gas W&R dispatcher applies the 911 call-handling process for electric-related events as follows:

1. Whenever necessary, obtain information from the Outage Information System Outage Management Tool (OIS-OMT). Provide the information to the emergency agency concerning questions on area outages, ETA, and estimated time of return (ETOR).

2. Gather information from the reporting agency, per the 911 call script (Step 4.1.3).

3. In CC&B, create a trouble report or edit an existing trouble report by adding detail such as location or address information.

4. Notify gas W&R electric dispatcher and request an ETA callback to the agency, if requested.

NOTE

The main page in OIS-OMT shows whether a division OEC is open. The OEC may establish a 911 standby handling desk.

7.4 During Level 3–5 incidents, the gas dispatcher is responsible for the following:

1. Check whether an area is in a Level 3 or greater event by opening the main page of the OMT to see whether the division's OEC is open, that is indicated by a dot on the map in that particular division as shown in Figure 5.

   a. IF the OEC is open,

      THEN perform the following steps:

      (1) Gather information from agency per the 911 call script per Step 4.1.3.

      (2) In CC&B, create a trouble report or edit an existing trouble report by adding detail such as location or address information.

7.4 (continued)

(3) Call the W&R electric dispatch-assigned 911 desk number or call the area desk if no W&R electric dispatch-assigned callback is provided.

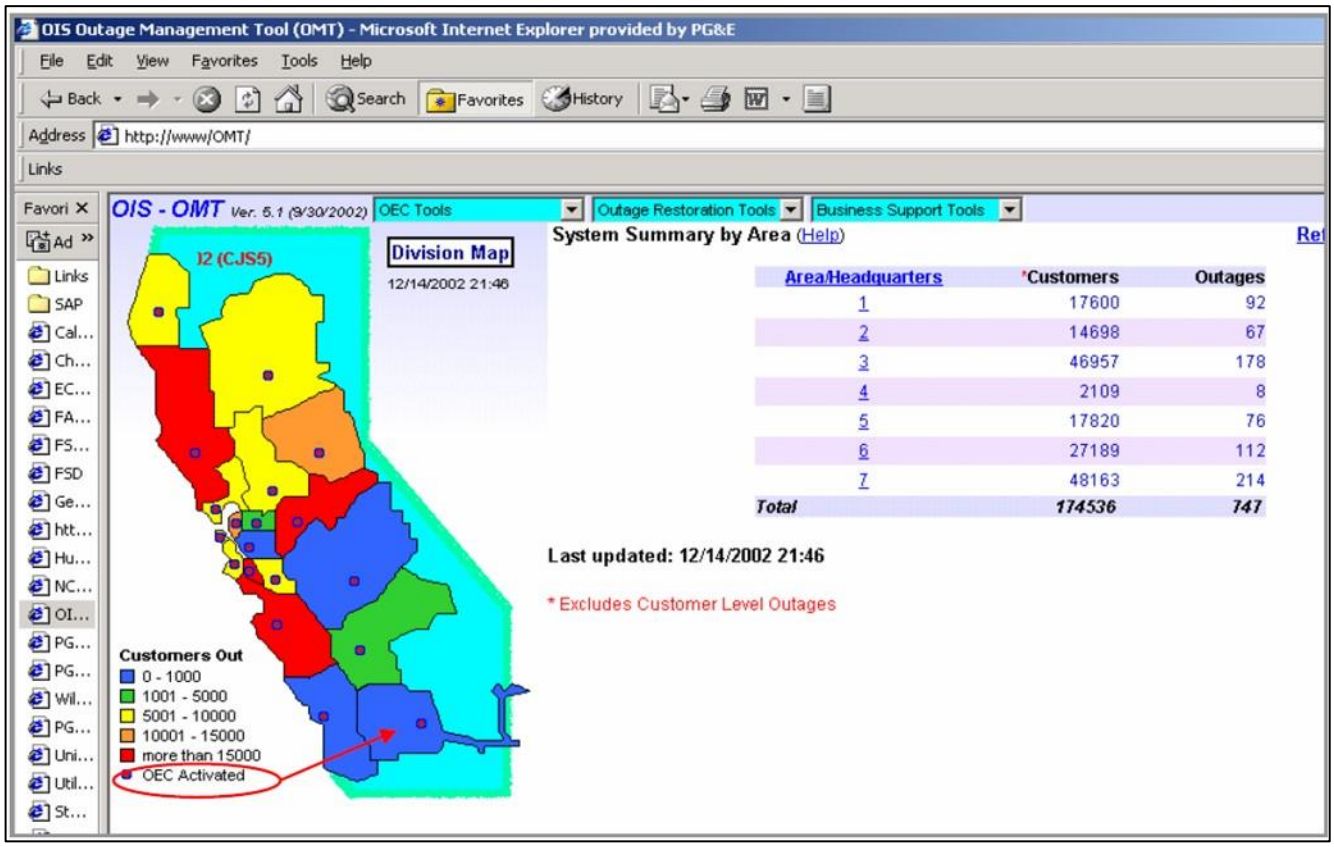


Figure 5. Outage Management Tool Main Page – System Summary by Area

2. Determine which areas are experiencing a Level 3–5 incident when receiving an out-of-area call, and when the present area is experiencing no problems or emergencies, by performing the following steps:

   a. Determine the area or headquarters from which the 911 caller is calling.

   b. Go to the main page of the OMT.

3. From the **Business Support Tools** menu, select **OEC Activation Status**.

   a. The system displays the **OEC Activation Status** page, which shows any open OECs and whether a standby handling desk has been activated. The red oval and arrow highlighted in Figure 5 denotes that the OEC is activated.

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7.4 (continued)

4. Click on the area headquarters for a listing of all outages in a geographic area. The following information is noted:

   - OIS outage number
   - Outage locations
   - Total customers affected
   - ETOR

7.5 Create trouble reports during tech-down for Level 1–5 incidents.

7.6 IF an agency calls to cancel its request,

THEN W&R gas dispatch notifies W&R electric dispatch of the cancellation per Section 9.

NOTE

Electric control center operations (ECCO) operators make the initial call to the Company's CPUC hotline when they are notified of an electric incident. The numbers are Company internal 8-223-2782 or outside (415) 973-2782.

7.7 During CPUC-reportable and DOT-reportable electric incidents, dispatcher responsibilities are as follows:

1. IF receiving a call or "immediate response" (IR) electric field order,

   THEN gas W&R dispatcher coordinates with W&R electric dispatch when notified by emergency response agencies of an electrical incident.

   a. Gas dispatcher creates the emergency field order (FO) or trouble report.

   b. Contact W&R electric dispatcher to notify them of the emergency.

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8 Field Metering Operations (FMO) Dispatch

NOTE

Electric emergency field orders that require an electric meter technician to respond are issued by FMO dispatch, which operates Monday through Friday, 6 a.m. to 6 p.m., and Saturday, 6 a.m. to 4 p.m.

Dispatching field orders received after normal working hours that require an electric meter technician is the responsibility of W&R gas dispatch and scheduling personnel. W&R gas dispatch supervisors monitor FMO emergency work during non-operational hours.

8.1 During FMO dispatch operational hours, personnel respond as follows:

1. Gas W&R dispatcher creates a Priority 10 emergency field order in CC&B and notifies FMO dispatch of the order.

2. FMO dispatcher issues the field order to the electric meter technician and provides an ETA to the requesting agency, if requested.

8.2 During FMO dispatch non-operational hours, personnel respond as follows:

1. Gas W&R dispatcher creates a Priority 10 emergency field order in CC&B and contacts the appropriate Electric Meter Tech supervisor noted in the Technician Resource and Calendar Tool (TRAC) for technician callout.

8.3 IF an agency calls to cancel its request,

THEN gas W&R dispatcher notifies FMO dispatch personnel (see Section 9 for additional information).

9 Canceling an Agency's Request

9.1 IF an agency calls to cancel its request,

THEN W&R gas dispatch performs the following:

1. Notify the responding field personnel of the agency request to cancel.

2. Use Utility Procedure TD-6700P-01, "Gas Dispatch and Scheduling Overall Operating Responsibilities," Attachment 1, "Dispatcher Remarks," to look up a reason code.

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10 Handling Non-Agency Calls

10.1 IF receiving a call that is not an emergency or is made by an unauthorized caller,

THEN gas dispatchers perform the following steps:

1. IF the subject of the call involves an imminent hazard to life or property,

   THEN do the following:

   a. Respond as if the call were from an emergency agency.

   b. Create a trouble report or a field order.

2. IF the subject of the call is not an imminent emergency,

   THEN do the following:

   a. Explain to the caller that the phone line is used only for emergencies reported by 911 agencies, such as police departments, fire departments, or the California Highway Patrol.

   b. Provide the PG&E Contact Center number (1-800-743-5000) to the caller.

11 Dispatcher Responsibilities During Potential Reportable Gas Incidents

NOTE

CPUC and DOT reportable gas incidents are defined in Utility Procedure TD-4413P-01.

11.1 Per Utility Procedure TD-6700P-02, “Gas Dispatch and Scheduling Procedure for Priority Zero Gas Field Orders,” gas W&R dispatchers are responsible to dispatch field personnel to the location of a potential reportable gas incident, when notified.

1. Monitor personnel response.

   a. IF notified by the field personnel that traffic delays or road closures are likely to prevent a timely immediate response (IR),

      THEN contact the closest law enforcement dispatch to request emergency response assistance (escort) for field employees. State, “PG&E is requesting police escort for a serious gas leak.”

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11.2 Create a work order in EMT per Attachment 3, Attachment 4, and Utility Procedure TD-4470P-01, “Gas Crew Tracking Process for Gas Leak or Odor Investigation.”

11.3 Notify field service supervisor, gas operations and maintenance crews (OM&C) supervisor, and dispatch supervisor.

11.4 IF requested by the on-scene responding personnel to assist them in reporting,

THEN notify the gas control center personnel at (925) 244-4317.

12 High- or Low-Gas Pressure Events

12.1 High or low gas-pressure events include the following scenarios:

- Overpressure or under-pressure events
- Exceedance of maximum allowable operating pressure (MAOP)
- Underpressure conditions caused by the failure of any pressure controlling device or any other unplanned event other than excavation-related damage, resulting in any part of the gas pipeline system losing service or being shutdown

12.2 Dispatcher responsibilities during reportable high- or low-pressure gas events include:

1. IF gas control center personnel call,

   THEN dispatch field personnel to the gas incident location. Gas control center personnel will take responsibility for the EMT for the event. W&R gas dispatch personnel will continue to dispatch all FOs to responding field personnel for the event.

   a. After receiving the findings, gas field personnel notify gas control center personnel and the field service supervisor.

   b. Gas control personnel contact gas W&R dispatch personnel and complete the following steps:

      (1) Advises gas dispatch communication specialist (or after-hours gas dispatcher) to enter appropriate information.

      (2) Gas control or gas dispatch personnel must then make all required notifications.

   c. Gas W&R dispatcher creates an incident in EMT per Attachment 3 and Attachment 4.

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13 Reported and Confirmed Area Gas Odor Complaints

13.1 Gas W&R dispatcher responsibilities during reported and confirmed gas odor complaints (per Attachment 5, “Area Odor Guideline”) are as follows:

1. IF 10 or more FOs create an EM event,

   THEN Gas Control Center takes over/handles event.

2. Notify WFM call routing at Company number 8-777-7278 or outside number (916) 923-7278.

3. After the source of the area odor has been identified, notify WFM call routing of the source.

   a. IF the confirmed area odor is a PG&E gas release,

      THEN dispatcher creates or updates the event in EMT, per Attachment 3 and Attachment 4.

14 Injuries to Others

14.1 IF a situation involves injuries to others,

THEN gas W&R dispatchers perform the following tasks:

1. Complete the steps listed in Section 11 if a gas explosion, asphyxiation, carbon monoxide (CO) poisoning, or burn incident occurs.

2. Notify W&R electric dispatch personnel and complete the steps listed in Section 7 if an electrical contact occurs.

3. Refer to Attachment 2 if a third party is injured.

14.2 Contact W&R electric dispatch personnel for any incidents involving possible polychlorinated biphenyls (PCB) spills or leaks.

END of Instructions

Gas Dispatch and Scheduling Handling 911 Calls - Emergency Response

DEFINITIONS

Dispatchers: Any personnel in W&R gas dispatch and scheduling, M&C, FMO dispatch center, or W&R electric dispatch responsible for dispatching field orders to field personnel through FAS.

Employee injuries: Injuries to Company personnel resulting from accidents requiring medical attention, resulting in a disabling injury, or creating the potential for a disabling injury.

Field personnel: Any field services or field metering services personnel who receive and complete field orders through the FAS mobile application.

Field order: An order created in CC&B and downloaded to FAS.

Injuries to others: Injuries to third parties where Company facilities are involved. Certain types of incidents, such as explosions, asphyxiations, burns, and electrical contacts that result in medical treatment to third parties, require specific responses.

IMPLEMENTATION RESPONSIBILITIES

The supervisors responsible for dispatch and scheduling will ensure that personnel who perform dispatch and scheduling work are trained and knowledgeable about this utility procedure and process changes.

GOVERNING DOCUMENT

Utility Standard TD-6700S, “Gas Dispatch and Scheduling Operating Practices”

COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

Records and Information Management:

Information or records generated by this procedure must be managed per the Enterprise Records and Information (ERIM) program Policy, Standards and Enterprise Records Retention Schedule (ERRS). Refer GOV-7101S, “Enterprise Records and Information Management Standard” and related standards. Management of records includes, but is not limited to:

- Integrity
- Storage
- Retention and Disposition
- Classification and Protection

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REFERENCE DOCUMENTS

Developmental References:

Gas Emergency Response Plan (GERP)

Utility Procedure TD-6700P-04, “Gas Dispatch and Scheduling – Handling Emergency Conditions Reported by Outside Agencies”

Supplemental References:

Utility Procedure TD-4413P-01, “Reporting of Gas Events”

Utility Procedure TD-4470P-01, “Gas Crew Tracking Process for Gas Leak or Odor Investigation”

Utility Procedure TD-6100P-03, “Major Gas Event Response: Fire, Explosion, and Gas Pipeline Rupture”

Utility Procedure TD-6700P-01, “Gas Dispatch and Scheduling Overall Operating Responsibilities,” Attachment 1, “Dispatcher Remarks”

Utility Procedure TD-6700P-02, “Gas Dispatch and Scheduling Procedure for Priority Zero Gas Field Orders”

APPENDICES

NA

ATTACHMENTS

Attachment 1, “911 Script”

Attachment 2, “Emergency Notification Requirements by Incidents”

Attachment 3, “Event Management Tool Guidelines”

Attachment 4, “EMT Flowchart and Notification Details”

Attachment 5, “Area Odor Guideline.”

Job Aid TD-6700P-03-JA01, “Creating Trouble Reports in Customer Care & Billing (CC&B)”

DOCUMENT RECISION

TD-6700P-03, “Gas Dispatch and Scheduling Handling 911 Calls – Emergency Response,” 05/15/2019, Rev. 2

Gas Dispatch and Scheduling Handling 911 Calls - Emergency Response

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REVISION NOTES

Where?	What Changed?
Step 4.2	New step providing guidance to gas and Powerline dispatchers when answering a request for a cancellation from a 911 agency (per Attachment 1, “911 Script”).
Step 5.1.1d	Added Note directing that event management must be implemented per Utility Procedure TD-6100P-03, “Major Gas Event Response: Fire, Explosion, and Gas Pipeline Rupture.”
Step 6.6	Updated Figure 3, “EMT Incident Form.”
Step 11.1	Rewrote Step 11.1 to be a step statement instead of an “IF/THEN” statement: “11.1 Per Utility Procedure TD-6700P-02, “Gas Dispatch and Scheduling Procedure for Priority Zero Gas Field Orders,” gas W&R dispatchers are responsible to dispatch field personnel to the location of a potential reportable gas incident, when notified.”
Attachment 3	• Added a table of contents • Reformatted entire attachment to reflect same numbering, section, and step hierarchy as used in procedure. • Added new Step 2.4.s to detail steps to take when gas leaks reported by PG&E employees detected on third-party facilities.