

City Council

Mike Anderson, Mayor Susan Candell, Vice Mayor Steven Bliss, Council Member Cameron Burks, Council Member Teresa Gerringer, Council Member

February 3, 2020

California Public Utilities Commission ATTN: Marybel Batjer, President 505 Van Ness Avenue San Francisco, CA 94102

Re: Unwillingness of PG&E to engage with Lafayette Representatives on Gas Pipeline Safety Concerns

## Dear Ms.Batjer:

You may not be aware that over the past few years, many concerns about the safety of the gas utility infrastructure in our community have been presented to PG&E in meetings between representatives from PG&E, the CPUC, City staff and a group of residents known as the Gas Safety Task Force (GSTF). For months, these stakeholders have been in discussions on a variety of topics focused on ensuring safe operations and maintenance of gas utility infrastructure in Lafayette. However, recently, PG&E has become unwilling to meet and much less cooperative or forthcoming with information about its plans to address these safety concerns. PG&E's disdain for the community's concerns was demonstrated last October when a Senior Manager of Customer Experience instructed staff to not respond to requests for information from the GSTF. PG&E's reluctance to continue its dialog is quite alarming to the City Council as the safety of our community is our highest priority and we find such inaction to be negligent and unacceptable given not only the identified risks, but also the unknown hazards. We know that safety is a value we share with the CPUC and request that your agency require PG&E to continue its participation and to provide requested information regarding safety risks of the gas pipelines in Lafayette.

The City Council truly appreciates the CPUC's previous support and collaboration in this effort; in particular, the recent audit performed by the CPUC that led to the resolution of multiple violations. However, there are still many unaddressed concerns brought forward by the Gas Safety Task Force, which were formally presented to the City Council at a November 25, 2019 meeting. We respectfully request the CPUC's help in attaining a pledge and concrete actions from PG&E to continue the dialogue and to provide information around the following areas of concern:

- A commitment from PG&E to reengage and regularly meet with the CPUC, GTSF and City to improve transparency and communication with the residents of Lafayette.
- Recalculate and verify High Consequence Areas (HCAs) in Lafayette to consider residential
  density, wildfire risk (Tier 2 and Tier 3), and high-risk areas not currently considered as HCAs,
  such as the Girl Scout Camp and the Lafayette Christian Church.

- To provide a comprehensive safety review for all transmission pipelines in the City, many of which are approaching 50 years or more in service:
  - Schedule and perform pipeline integrity testing, including review of welds, pipes, and supports, assess material soundness of exposed pipelines subjected to wildfire temperatures, verify appropriate pressures for the age and condition of pipelines.
  - Provide the GSTF and City with pipeline assessments with thorough documentation.
  - Assess the potential for damage to pipelines, including underground root damage, trees overhanging exposed pipeline spans, the presence of wells, and other safety risks.
  - Furnish emergency response plans for pipeline failure or accidental rupture.
- Regarding the construction of the new regulator station at Andreasen Drive:
  - o Provide the rationale for the need of a new regulator station at this location.
  - Provide plans for construction of the regulator station and verify the mitigation strategy for potential for flooding at this site.
  - Confirm installation of automated shut-off valves at this regulator station and plans for these valves at other locations in the community.
- Provide public notice for safety hazards, such as the Spring Hill Road anomaly:
  - O PG&E performed and in-line-inspection of transmission line 191-B and found an anomaly and proceeded with performing repairs without notifying the City or the public of the anomaly and the associated risks. This is extremely disconcerting as the line in question is within a half mile of a Spring Hill Elementary and less than a mile from Acalanes High School, which enrolls over 1,300 youth from the area. PG&E should provide notice of anomalies and work to correct the issues to local entities so we can be prepared to respond in the case any issues arise.

The City Council believes that all of these items are critical to the safety and well-being of our community. We are very aware of the fact that PG&E's continued unresponsiveness will only increase the risks facing Lafayette over time. We thank the CPUC and urge PG&E to engage with the Lafayette City Council, the Gas Safety Task Force, and community stakeholders in addressing these concerns to move forward together.

Thank you for the review and consideration of this request.

Most Sincerely,

Mike Anderson

Mayor

CC: Gavin Newsom, Governor, State of California

(CC cont'd on next page)

Liane M. Randolph, Commissioner, California Public Utilities Commission
Martha Guzman Aceves, Commissioner, California Public Utilities Commission
Clifford Rechtschaffen, Commissioner, California Public Utilities Commission
Genevieve Shiroma, Commissioner, California Public Utilities Commission
Lee Palmer, Deputy Director, CPUC – Safety & Enforcement Division
William D. Johnson, CEO and President, Pacific Gas & Electric
Julie M. Kane, Chief Ethics and Compliance Officer, Pacific Gas & Electric
John R. Simon, Executive Vice President on Law, Strategy, and Policy, Pacific Gas & Electric
Jason P. Wells, Executive Vice President and Chief Financial Officer, Pacific Gas & Electric
Janet C. Loduca, General Counsel, Pacific Gas & Electric