

President Michael Picker
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
- VIA EMAIL -

August 15, 2018

Dear President Picker,

I understand Lafayette City Council has notified you of resident questions regarding PG&E gas pipeline safety and has invited you to a meeting in which PG&E has been asked to answer these concerns. This meeting has been scheduled for Sept. 10, 2018 in Lafayette and I am writing to reiterate the importance to residents of the presence of a CPUC representative at the meeting. I am also asking, with all due respect to Lafayette City Council, that we may be a party to any CPUC pre-meeting planned with Council members.

I have been in correspondence with various divisions of the CPUC over the past year because of resident concerns with safe operation and maintenance of PG&E gas pipelines in our community. Most recently, my husband Michael Dawson, Dave Kusters, and I had the opportunity to meet with Mr. Ken Bruno and Mr. Terence Eng of the Safety Enforcement Division. It is primarily our efforts over the past year and a half to get straightforward answers from PG&E that has helped persuade City Council to bring the matter to a public meeting.

Our concerns began with the "Community Pipeline Safety Initiative" (CPSI) agreement the city of Lafayette made with PG&E in March of 2017. Pipeline safety claims against trees were not verified and no alternative risk mitigation possibilities were considered before the agreement was signed. Our small group formed a non-profit, Save Lafayette Trees, and with petition support of almost 3000 residents and financial support of over 100 community members, we sued the city of Lafayette and PG&E in June 2017. PG&E is paying legal costs for the city of Lafayette. The case is currently in appellate court.

We do not doubt the integrity of our City Council in their efforts to promote public safety. We are, however, concerned that administrative as well as legal formalities the City is compelled to comply with, as well as the fiscal relationship between the City and PG&E, may not allow the most direct and forthright representation of resident concerns for PG&E accountability to pipeline safety. I hope this gives context to our request to be present at meetings you may have with Council members, or equal opportunity to meet otherwise.

Prior to the CPSI, we trusted that PG&E operated and maintained pipelines in Lafayette in a safe manner. That trust has steadily diminished. On a pipeline walk in May of last year, we saw untended, exposed pipeline; trees targeted for removal on steep slopes, prone to landslide, with no soil integrity restoration plans; PG&E land rep inability to point out where pipeline might lay as it crossed under creek bed; etc. A subsequent PG&E report further validated our wariness – i.e. no ILI testing in the city; no strength testing on one line for over 35 years; 13 dig-in incidents in 2016, over half with valid USA tickets; no remote gas shut-off valves in Lafayette let alone the extended Lamorinda community.

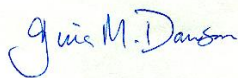
We have many unanswered concerns for PG&E's care for the aging pipeline system and community safety in Lafayette. Mass pre-emptive tree removal to facilitate first responder access after a pipeline incident seems an ill-prioritized safety protection measure. We do not know of any pipeline safety law mandating tree removal. We do know PG&E was criminally indicted for failing to abide by pipeline safety law in the past. To the furthest extent possible, we want to ensure that all lawful pipeline safety measures are in place and prioritized before a discretionary maintenance standard, *which may increase risk to pipeline integrity*, is considered.

We are glad and grateful Mr. Bruno has committed the SED to conduct an audit this month in Lafayette. We hope the Sept. 10 meeting does not impact full investigation of PG&E safe operation and maintenance practices and record finding in Lafayette in any way.

We believe CPUC representation at the meeting may be helpful in establishing a balanced range of community safety stakeholders. CPUC representative/s might help educate residents and City Council as to community safety risk assessment (general safety risks PUC prioritizes for compliance with state and federal safety standards), how the agency validates PG&E compliance, and holds PG&E accountable to safe operations and maintenance of utilities in Lafayette. A CPUC representative might also inform the community as to what ways residents and ratepayers might work with the agency and utility in ensuring community safety while preserving private and municipal rights and values.

We hope the planned Sept. 10th meeting is a well-used opportunity for citizens and safety stakeholders to begin constructive, mutually informative relationships that lead to optimal community and pipeline safety. To that end, we respectfully request CPUC presence at the meeting and would greatly appreciate a "pre-meeting" with you, and any CPUC representative that might participate in the Sept. meeting, if you agree your agency can aid our community. I can be reached at 650-520-0497 or at gdawson@gmail.com. Thank you for your consideration.

Respectfully,

A handwritten signature in blue ink that reads "Gina M. Dawson". The signature is written in a cursive style and is placed on a light yellow rectangular background.

Gina Dawson
Save Lafayette Trees
711 Los Palos Dr., Lafayette, CA 94549

cc: Elizaveta Malashenko, Ken Bruno, Dennis Lee, Terence Eng, Joel Tran – SED, CPUC
Christopher Parkes – Office of the Safety Advocate
Nat Skinner – Office of Ratepayer Advocates, CPUC
Alison Brown – Public Advisor, CPUC
Vice Mayor Cam Burks, City of Lafayette
Lafayette City Council