

Unanswered PG&E Pipeline Safety Concerns in Lafayette

When PG&E and the Lafayette City Council signed a Community Pipeline Safety Initiative (CPSI) agreement in March to remove trees, residents questioned the rationale behind the agreement as well as the state of the aging pipeline. Residents assume PG&E safely operates the 11 miles of natural gas pipeline that run through the community, but this is the same company whose lapse in safety protocols caused the severity of the 2010 gas pipeline incident in San Bruno. We have serious concerns.

Per records of the past 12 years from the Pipeline and Hazardous Materials Safety Administration (PHMSA), a division of the national Department of Transportation, PG&E has the *worst safety incident record in the nation among the top 40 largest utility companies*.¹ Disturbingly, the number of PG&E safety incidents since the San Bruno tragedy are trending, on average, in the wrong direction:

PG&E System-Wide Incidents Statistics 2006-2017 YTD (6530 mi pipeline)

Year	Total Incidents	Fatalities	Injuries	Property Damage
2006	2		1	\$358,350
2007	3			\$667,500
2008	2			\$114,300
2009	5			\$1,847,000
2010	4	8	51	\$558,590,512
2011	5			\$5,569,000
2012	4			\$1,050,710
2013	4			\$1,045,457
2014	9			\$9,550,814
2015	8	2	13	\$5,574,404
2016	6			\$2,052,778
2017 thru Aug	6		1	\$875,749
Totals	57	10	66	\$587,296,574

**Yearly Average Incidents: 3
Damage: \$746,788**

**Yearly Average Incidents: 6
Damage: \$4,140,527**

Source: PHMSA website¹

Recently, PG&E provided residents with “Pipeline Information for the City of Lafayette.” This report includes details of the gas transmission pipelines, describes PG&E’s approach to pipeline maintenance, and notes new projects. **Data from PG&E’s report and CPSI documentation compel Save Lafayette Trees (SLT) to call attention to the following, significant pipeline safety concerns in Lafayette:**

- *Segments of Lafayette’s pipelines have not been inspected/tested for 34 years, and none of Lafayette’s 11 miles of aging pipeline can be tested by in-line inspection (ILI) technology, recommended by federal and state regulatory agencies, to be the best method for assessing internal and external condition of pipelines.*
 - According to PG&E, Lafayette’s oldest pipeline has not been tested in any manner since 1983; all pipeline segments remain untested by ILI, and most remain untested by direct assessment (segments are dug up to inspect)

¹ Based on PHMSA data at <https://primis.phmsa.dot.gov/comm/reports/operator/Operatorlist.html#>

- By state law, pipeline containing vintage fabrication and construction threats should be prioritized for replacement especially in areas of erosion, liquefaction, and populated areas, like Lafayette. All five gas pipelines have segments at least 63 years old.
 - The oldest pipeline, containing segments from 1947, runs through Lafayette creek and trail neighborhoods as well as the recent landslide area on St. Mary’s road. This 80 year old pipeline is not identified or prioritized for vintage pipeline replacement.
- *NO automated shutoff or remote-control valves exist on Lafayette pipelines.* These valves can be critical for saving life and property should a leak or rupture occur in our city.
- Per PG&E, there are over 40 instances of pipeline burial depth (soil coverage) less than 36”, the regulatory standard. *Only one segment, listed as having 1+ foot of cover, yet directly exposed to the elements for 10+ years and reported to PG&E over 6 years ago, might be fixed.*
- PG&E claims to visually inspect pipeline quarterly but *hasn’t produced historical patrolling records.*
- PG&E plans to remove trees along hillsides where they note possibility of *further erosion hazards.*
- *Third-party dig-ins are the leading cause of damage to PG&E’s gas pipelines in Lafayette (13 incidents in 2016) yet PG&E has surprisingly not proposed a proactive solution to mitigate this risk.*

Save Lafayette Trees believes **PG&E should be prioritizing and implementing safety programs advised by regulatory agencies before starting the CPSI tree removal program.** PG&E is unwilling to publicly share scientific methodology for tree selection and there is no corresponding regulatory necessity for tree removal. After extensive research and review of the information provided by PG&E, SLT concludes:

- **Our community does not have adequate assurance of safe gas pipeline operation.**
- Data in the report seems to indicate there may be more segments of the pipeline that should be identified for safety upgrades to comply with state and federal regulations.
- Recently identified projects are insufficient, band-aid “fixes” that defer wider implementation of system-wide upgrades that could assure future pipeline safety.
- PG&E has no holistic plan for the upgrade of aging gas pipelines in Lafayette – safety projects should be considered in synergy to maximize resource and cost efficiencies and pipeline viability.
- PG&E is prioritizing the CPSI tree removal program, which has no statistical evidence for improving pipeline safety or reducing risks, over pipeline safety upgrades advised by regulatory authorities after the gas pipeline incident in San Bruno. These authorities include PHMSA, the National Transportation Safety Board, and the California Public Utilities Commission (CPUC).

We have corresponded with the CPUC and they are currently investigating our safety issues. We are hopeful PG&E will be held accountable to regulatory standards and community concerns. We are also asking elected officials to hold PG&E accountable to these same issues.

A lack of a holistic safety plan undermines PG&E’s vision of being the “safest, most reliable gas company in the nation” and their goal of building trust with the customers and communities they serve. Furthermore, **PG&E’s record as the worst-in-the-nation large gas operator suggests a corporate culture unable to effectively prioritize and implement safety programs.** We are still waiting for PG&E’s collaboration with our community in creating a path to pipeline safety and building trust in Lafayette.

More detailed information as to our position, research, references, and importantly, ways to help us achieve our goals of saving trees and ensuring pipeline safety, can be found on our website at: **www.SaveLafayetteTrees.org**.