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NATIONAL TRANSPORTATION SAFETY BOARD

Washington, D.C.

INTERVIEW OF SUNIL KUMAR SHORI, PG&E
(JAN-5-2011)

(37 Pages)

UNITED STATES OF AMERICA

NATIONAL TRANSPORTATION SAFETY BOARD

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Investigation of:

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PACIFIC GAS & ELECTRIC COMPANY

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SEPTEMBER 9, 2010 ACCIDENT

* Docket No.: DCA-10-MB-008

SAN BRUNO, CALIFORNIA

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Interview of: SUNIL KUMAR SHORI

Marriott Hotel
San Francisco Airport
1800 Bayshore Highway
Burlingame, California 94010

Wednesday,
January 5, 2011

The above-captioned matter convened, pursuant to
notice.

BEFORE: RAVINDRA CHHATRE
Investigator-in-Charge

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1 MR. CHHATRE: Who have you chosen?

2 MR. SHORI: And I've chosen Mr. Pat Berdge, who is
3 counsel with the California Public Utilities Commission.

4 MR. CHHATRE: Thank you for that. Now I'd like to go
5 around the room and have each person introduce themselves. Please
6 state your name, spelling of your name, title, that organization
7 that you represent, business email and phone number, starting with
8 the City.

9 MR. CALDWELL: Geoff Caldwell, City of San Bruno.
10 Information is on the card provided.

11 MR. DAUBIN: Brian Daubin, PG&E. Information is on the
12 card provided.

13 MR. FASSETT: Bob Fassett, PG&E. Information is on the
14 card provided.

15 MS. JACKSON: Connie Jackson, City of San Bruno, and my
16 information is on the card.

17 MR. FABRY: Klara Fabry, City of San Bruno, and the
18 information is on the card provided.

19 Mr. KATCHMAR: Peter Katchmar, United States Department
20 of Transportation, Pipeline Hazardous Materials Safety
21 Administration, and information is on the business card I
22 provided.

23 MR. GUNTHER: Karl Gunther, NTSB, Operations Group
24 Chair, karl.gunther@ntsb.gov. Phone (202) 314-6478.

25 MS. MAZZANTI: Debbie Mazzanti, IBEW, Local 1245. My

1 information is on the card.

2 MR. SPERRY: Joshua Sperry, ESC, Local 20. My
3 information is on the card.

4 MR. NICHOLSON: Matthew Nicholson, NTSB, spelled M-a-t-
5 t-h-e-w, N-i-c-h-o-l-s-o-n. matthew.nicholson@ntsb.gov.

6 MR. CHHATRE: Ravindra Chhatre. I'm with NTSB. My
7 email is ravindra.chhatre@ntsb.gov. Phone is (202) 314-6644.

8 MR. NARVELL: Rick Narvell, Human Performance Group
9 Chair, NTSB, Washington, D.C. Phone is (202) 314-6422. Email is
10 narvelr@ntsb.gov.

11 MR. BERDGE: Patrick Berdge, Public Utilities
12 Commission, staff counsel, and contact information is on the card
13 provided.

14 MR. CHHATRE: Thank you so much. You want to go first?

15 MR. GUNTHER: Yeah.

16 INTERVIEW OF SUNIL KUMAR SHORI

17 BY MR. GUNTHER:

18 Q. Could you please give me your job title?

19 A. I'm a utilities engineer with the Utilities Safety and
20 Reliability Branch.

21 Q. And what are your duties?

22 A. We do gas investigations, gas audits, gas incident
23 investigations, inquiries of the public, small operator audits,
24 assisting other departments in the Commission if they have
25 questions related to pipelines or gas regulations. I've also done

1 electrical work in the years past. Right now most of my work is
2 confined to gas matters.

3 Q. Could you discuss -- did you conduct the last audit of
4 Integrity Management of PG&E?

5 A. I was one of four staff that conducted that, yes.

6 Q. Could you discuss the findings of the audit and the
7 resolution to date?

8 A. The findings of the audit are numerous and we provided
9 copies of those. As far as resolution, we received PG&E's
10 response, I believe, December the 16th. We're reviewing that in
11 terms of how we'll proceed on that, so resolution-wise there's
12 nothing decided in terms of where we stand on that response.

13 Q. Did you find any major problems, anything really would
14 stand out?

15 A. Not anything that would generally be a major problem.
16 There's record-keeping issues. There's process issues in terms of
17 application of ECDA. There's some locations indicated where
18 certain items should have been treated maybe as an immediate and
19 dug, and then there's certain issues noted to PG&E's exception
20 process for basically deviating from their own internal standards
21 or processes, but we didn't find any major problems on any
22 particular lines. And again, because of the audit process, it
23 looking at -- it's a problematic audit, with review of various
24 records.

25 Q. With your problem you found on record keeping, was it a

1 problem of accuracy or was it a problem of false data or --

2 A. I'm not sure I would say false data. It's certain
3 processes, either not complying with the protocol, or where we
4 believe certain areas need to be maybe beefed up or certain things
5 added to make the procedures that are part of the IM process more
6 compliant with what the regulations would require.

7 Q. Were you involved in an audit of Rancho Cordova?

8 A. I assisted in that in regard to that incident
9 investigation.

10 Q. And were the problems corrected to your satisfaction?

11 A. Again, I assisted in that in the beginning. I'm not the
12 engineer on that at this stage, so I'm not sure if I would be the
13 one to have to resolve this.

14 MR. GUNTHER: Okay. No more questions.

15 MR. CALDWELL: City of San Bruno, Geoff Caldwell. No
16 questions at this time.

17 MR. DAUBIN: No questions.

18 MR. FASSETT: Bob Fassett, PG&E.

19 BY MR. FASSETT:

20 Q. Are there any regulations that you are aware of that
21 prevents an operator from using the procedure of external
22 corrosion, direct assessment, to assess for the threat of external
23 corrosion on a pipeline?

24 A. If that's a threat it's being assessed for, it could be
25 used.

1 Q. A pipeline could be assessed for more than one threat;
2 is that correct?

3 A. It could.

4 MR. CALDWELL: Thank you.

5 MS. JACKSON: No questions.

6 MS. FABRY: Klara Fabry.

7 BY MS. FABRY:

8 Q. Sunil, during the last audit was there or did you find
9 any deficiency in the emergency response portion of the program?

10 A. The IM audit is generally not focusing on the emergency
11 response aspects of it. That would be more part of the Operation
12 Maintenance Emergency type audit, where we would be looking at the
13 emergency plans and our response. There is an aspect of the IM
14 that requires the operator to look at the evaluation of automated
15 valves, and that could, I guess, be construed as part of emergency
16 response, but as far as the operations end of the response to an
17 emergency, that's really not the scope of the IM audit.

18 Q. Was any operation, maintenance and emergency procedure
19 audit done for PG&E in the last few years?

20 A. We do an operation maintenance emergency audit basically
21 of the overall plan of the company once a year. We would do also,
22 as part of our division audits or district audits, there is
23 specific emergency parts that are particular to perhaps a division
24 or a district, and by district it is generally transmission.
25 Division is distribution pressure. Those kinds of plans would

1 basically encompass that are things more particular to that, you
2 know, the scope of that particular unit. That includes phone
3 numbers, maybe equipment, certain stock of pipeline facilities, so
4 we would look at that portion of it during that type of an audit.
5 We would look at perhaps the emergency plan from the overall OM&E
6 audit, and then you could also look at certain parts of those
7 plans during certain incident investigations.

8 Q. This is a yearly audit was done in 2010 then?

9 A. Yes, I believe it was.

10 Q. And do you recall any deficiency pointed out at the end
11 of that audit, in that area?

12 A. Again, a deficiency is a very, very broad term for us,
13 because a deficiency could be a records issue. It could be -- a
14 suggestion, for example, could be that there's something meets
15 compliance but we would like to see it maybe be a little more
16 robust or stronger. So deficiency is a very broad term, but to
17 say did we find issues, we could find records issues. We could
18 find perhaps operator qualification issues. We could find as part
19 of a field audit certain facilities that either don't work the way
20 they're supposed to. We could find deficiencies perhaps where
21 cathodic protection levels are low, when you go to the field.

22 So a lot of different things can be grouped or
23 encompassed -- could encompass what is a deficiency that you could
24 find on an audit.

25 MS. FABRY: Thank you.

1 MR. KATCHMAR: Peter Katchmar, DOT. Just a follow-up on
2 that last question.

3 Q. Did you find any major deficiencies on your last OM&E
4 audit?

5 UNIDENTIFIED SPEAKER: Off the record.

6 MR. CHHATRE: Off the record.

7 (Off the record.)

8 MR. CHHATRE: Back on the record.

9 MR. KATCHMAR: Peter Katchmar again.

10 BY MR. KATCHMAR:

11 Q. After your audits what are the subsequent actions that
12 the PUC has available to them?

13 A. Well, in this particular case with the OM&E and -- we
14 would issue a letter with our findings in terms of whatever items
15 either that could be in noncompliance or an area of concern, and
16 then there's a follow-up as occurred with the IM. We would review
17 that and if there's further recourse or further discussions, that
18 could take place then.

19 Q. All right. Thank you. How many different types of
20 audits does the PUC perform?

21 A. We have operation, maintenance and emergency audit,
22 which we would do once a year. We have divisional audits,
23 district audits, which we perform on some set frequency. We could
24 do an operative qualification audits, which is a centralized view
25 of the operator's OQ program. We do drug audits, drug and alcohol

1 testing type audits. I believe we still do welding and -- I'm
2 losing track of myself. There's various -- IMP is one audit, and
3 going forward as a public awareness program requirements kick in.
4 Basically the public awareness program has been in place.
5 Operators do reviews of it and we plan on going forward on some
6 frequency to do a review of that, so that would be a new type of
7 audit for us.

8 Q. All right. Can you tell me how many Integrity
9 Management audits you have done on PG&E?

10 A. We've done one in 2010 and we did one in 2004. At the
11 end of the -- yes.

12 UNIDENTIFIED SPEAKER: Off the record.

13 MR. CHHATRE: Off the record.

14 (Off the record.)

15 MR. CHHATRE: Back on the record.

16 MR. SHORI: One in 2005. Basically we treated that one
17 generally as a training. It was early stages of the IM program
18 and we were developing our IM process and programs, but we did
19 leave a summary of findings, which I believe PG&E has provided a
20 response to in a previous data response.

21 BY MR. KATCHMAR:

22 Q. Did you actually perform the audit?

23 A. Yes, I did.

24 Q. Now, were you there at the audit?

25 A. Yes.

1 Q. Okay. Who actually performed the audit?

2 A. Well, we had assistance from Jeff Gilliam, and then
3 there were four auditors from the PUC.

4 Q. Okay. So who did Jeff Gilliam work for?

5 A. He works for PHMSA.

6 Q. Okay. And for the record, his name is spelled J-e-f-f,
7 first name. Last name Gilliam, G-i-l-l-i-a-m. Correct me if I am
8 wrong, but was that your first experience with the Integrity
9 Management audits?

10 A. That was the very first Integrity Management audit.

11 Q. For you?

12 A. Yes.

13 Q. Okay.

14 A. I mean, for our group.

15 Q. For your organization/.

16 A. Yes.

17 Q. Your group, okay. So would it be safe to characterize
18 that as a training?

19 A. It was.

20 Q. On-the-job training type experience for you?

21 A. It was. We had a lot of research we wanted to do
22 following that, plus we had an additional class training that we
23 wanted to take beyond that.

24 Q. Okay. Were there any issues identified from that?

25 A. There were a couple issues related to the use of a wall

1 thickness -- excuse me, as far as how 80 percent wall loss was
2 treated and whether or not the program to determine loss,
3 remaining loss strength, could be used. That was resolved during
4 the audit. There was issues about some buffers and some
5 additional issues that could have existed and that was resolved
6 during the audit.

7 Q. Was there anything specific to Line 132?

8 A. There was one location where there's some question in
9 terms of whether or not a dig needed to have taken place, and PG&E
10 presented a paper on that and in terms of why the dig didn't need
11 to take place, and this was, I believe, mile point thirty-eight,
12 something or other.

13 Q. Okay. Could you talk a few minutes about the difference
14 between what you were calling an OM&E audit, which is operations,
15 maintenance and emergency response audit, as opposed to an
16 Integrity Management audit?

17 A. Operation, maintenance and emergency is referring to
18 basically all of 192, 49 CFR, 192. Subpart O is part of 192 as
19 far as the IM portion of it, but there's all kinds of other
20 aspects of 49 CFR, 192 in regard to operators maintaining records,
21 how they maintain their equipment, their frequencies on which they
22 maintain the equipment, emergency plan, so it's -- IMP is part of
23 192 but then there's other parts of 49 CFR, 192. That would be
24 operations, maintenance, emergency.

25 Q. How large is the inspection form for an OM&E audit?

1 A. Probably about ten pages, 12 pages, I think, if you
2 don't include the field portion of the current inspection form.

3 Q. Okay. And would it be safe to say that it's a more
4 prescriptive type audit?

5 A. It's looking for particulars, yes.

6 Q. Okay. Such as when the code requires, if you have a
7 rectifier that you have to look at it six times a year, not to
8 exceed two-and-a-half months, that's pretty prescriptive.

9 A. Yes, it is.

10 UNIDENTIFIED SPEAKER: Off the record.

11 MR. KATCHMAR: Okay.

12 (Off the record.)

13 MR. CHHATRE: Back on the record.

14 BY MR. KATCHMAR:

15 Q. Okay. I can't remember exactly where I was, but what I
16 was trying to ask you is the difference between an OM&E audit and
17 an Integrity Management audit, and I think the last question I
18 asked was about the size of the inspection form, and you said
19 maybe ten pages, ten to 12 pages. And then how -- the next
20 question would be then how large is the Integrity Management?

21 A. I believe it's 168 pages.

22 Q. One hundred and sixty-eight pages?

23 A. Maybe one eight-six, one sixty-eight, somewhere around
24 there.

25 Q. Right, but it's just a lot more, okay. All right. And

1 having done some of these, was the first inspection more of a
2 process review, being that it was early on, maybe operators might
3 not have implemented a whole lot of their Integrity Management
4 program at the time?

5 A. It was a process review. It was a bit of a training for
6 us, and we did want to take one additional class, classes, related
7 to it, following them.

8 Q. Okay. On your second inspection can you talk about --
9 compare and contrast the first one to the second one.

10 A. I think it's a great deal more in terms of what we've
11 advanced to in terms of what we know, in terms of our knowledge,
12 in terms of our understanding of the overall process. I think
13 everyone involved in the process, we've improved and learned a lot
14 more.

15 Q. Okay. Were there any findings of note from that second
16 audit?

17 A. I think there's numerous -- as far as a note, I mean, we
18 could --

19 Q. Anything that you'd like to put on the record?

20 A. I think there's just a lot of issues that we're still
21 resolving, so --

22 Q. Okay. Do you have cause to know how PG&E set their MAOP
23 for Line 132?

24 A. I know now that it's based on pre-1970, but that's -- I
25 know that now as a part of this investigation.

1 Q. Is that an acceptable methodology?

2 A. Yes, it is.

3 MR. KATCHMAR: Okay. I think that's it for me for now.

4 Thank you.

5 MR. GUNTHER: No questions.

6 MS. MAZZANTI: No questions.

7 MR. SPERRY: No questions for me.

8 MR. NICHOLSON: No questions at this time.

9 MR. CHHATRE: Ravi Chhatre, NTSB. Just a couple of
10 questions.

11 BY MR. CHHATRE:

12 Q. Have you done, besides Integrity Management audits, what
13 other audits you have performed for PG&E system in the past?

14 A. I think I've done the whole gamut. I've done OM&E.
15 I've done district distribution, many of them several times over.
16 Operator qualification. I may have done drug and alcohol testing.
17 I've done it.

18 Q. So are you able to say that you are familiar with the
19 system?

20 A. I am familiar with the system. After so many years you
21 do learn some of the standards. You do learn some of the things,
22 yes. I would say yes.

23 Q. Can you very briefly give me an overview of your
24 Integrity Management program for CPUC?

25 A. Briefly I would say we've got, again, various staff that

1 are coming along. We've gone some staff that are still taking
2 their classes and we're still -- we're getting to the point we're
3 taking our courses and we know a lot more of what the rule
4 requires and the clarifications, having gone through the various
5 reference standards and the FAQ's at this stage. So I would say
6 our understanding of the process, the understanding of the
7 requirements is much, much stronger now than it would have been
8 three, four, five years ago.

9 Q. Just for the record can you tell us when the IM program
10 became effective in California?

11 A. The IM program became effective in California at the
12 same time as it became effective nationally. Our 112(e) adopts
13 192 rules and so 12-17-2004, I believe, is when operators were
14 required to have their baseline assessment programs in place, and
15 that would have been the same date for California.

16 Q. You said 2004 operators were required to submit their
17 baseline plan?

18 A. I'm not sure -- not necessarily to submit it but have it
19 in place, have it.

20 Q. In place, okay. Were they required to submit it to CPUC
21 before they implement that for your review?

22 A. I don't recall that being the case. I don't recall that
23 being the case.

24 Q. And when was the program supposed to be implemented in
25 full by CPUC?

1 A. I think we've been implementing it in full as we're
2 going along, as I think we're getting -- now we're defining our
3 frequencies, we're defining the procedures and policies, so at
4 this stage we're basically getting on to the point that we're
5 going to be doing all our audits.

6 Q. And does that require a baseline assessment by each of
7 the operator in California?

8 A. I think the baseline assessment is an evolving process.
9 It has certain assessments are done and completed and the baseline
10 assessment generally would evolve, as well, so I think it's kind
11 of a moving process.

12 Q. Can you very briefly tell us the ranking that the PCU
13 uses for the risk ranking for the, I guess, taking actions on a
14 priority basis versus no priority?

15 A. I think that's a very broad --

16 Q. Okay. The whole IM program is risk ranking, is it not?

17 A. To prioritize things and to -- yes, to make certain
18 decisions.

19 Q. Right. And to do that an operator needs to do some
20 baseline assessment of their system.

21 A. Right.

22 Q. Has PG&E completed its baseline assessment?

23 A. Yes, they have.

24 Q. They have. Have we got something from CPUC about their
25 ranking of the pipeline system for transmission?

1 A. I don't think we require anything to be submitted. I
2 think it's maintained and it's viewable, but I think things would
3 be changing so often that we'd be getting updates, I think, a lot.
4 I mean, so I don't think we have any requirement that they submit
5 it.

6 Q. My last question, was Line 132 identified as a high risk
7 transmission line that -- or high priority line for the -- any
8 action that PG&E wanted to take?

9 A. Our audit didn't find anything in particular on 132. I
10 think the only item maybe we had was an error with a record entry.

11 Q. Okay.

12 A. That was corrected during the audit, so other than that
13 there was nothing else issued particular to 132.

14 Q. Are there any common issues with various operators in IM
15 audits that stand out that every operator had this issue that's
16 common in deficiencies, if you would? Corrective action --

17 A. I think records issues would be the commonality because
18 you could have one operator could have areas of certain records
19 they're deficient in and another one could have areas in another
20 area, you know, same records but in a different area. You know,
21 there's that and I mean as far as commonalties there's always some
22 -- and that's kind of a confusing question in and of itself. You
23 could have, for example, both of them be in violation of the same
24 particular protocol, but for different reasons, so I think to say
25 a commonality is kind of a broad item.

1 MR. CHHATRE: I have no further questions.

2 MR. NARVELL: Rick Narvell from NTSB. Just a
3 clarification.

4 BY MR. NARVELL:

5 Q. We had a number of acronyms this morning that have been
6 explained as we've gone along here, but there's one that has not
7 that you used and that's FAQ. Does that stand for frequently
8 asked questions or something else?

9 A. No, it stands for frequently asked questions.

10 MR. NARVELL: Thank you. That's all I have.

11 MR. CHHATRE: Any follow-up questions?

12 MS. FABRY: Klara Fabry.

13 BY MS. FABRY:

14 Q. You were part of the OME audit in 2010. Based on your
15 knowledge of the response of PG&E response to -- on September 9.
16 Your assessment -- what would be your assessment of if the
17 procedure was followed during the September 9?

18 A. I think, like everyone else in this room, I really can't
19 give an answer on that, simply because I still need to piece
20 together, as we've done through the interviews in terms of who was
21 called, what time they showed up, where they went. We've gotten
22 so much information to piece together, which I have honestly not
23 had an opportunity to sit back and -- I mean, we have timelines
24 that have been provided that indicate what was done when, but to
25 correlate all that information together, it still requires time

1 for me.

2 As far as, you know, in placement of the valves, you
3 know, the placement of the valves meets code, the valves that were
4 operated. As far as the response times, I think, again,
5 personally it's one of those things that some folks would just
6 consider, no matter what response it was, it wasn't fast enough.
7 And so I think I just need to look at the records a little more
8 before I could say that something wasn't reasonable. And I'm not
9 sure if that answers your question, but I think as far as getting
10 to the situation, with the impediments involved, with all the
11 process going on, the response obviously occurred but I don't know
12 how one quantifies and says well, 30 minutes is not acceptable but
13 20 minutes would be, so I think it's not one of those quantifiable
14 things, but we need to do more investigation just to determine
15 some of those things.

16 Q. Just to clarify, my question was focused more not
17 necessarily the outcome, but the real-time response was, but more
18 process-driven response, how effective the process was, knowing
19 that some of the responses were more on a volunteer basis. My
20 question was focused on how effective the process, included in the
21 OME plan, was.

22 A. Honestly, I am not sure I can answer that at this stage.
23 As far as what I did see, and again I was at the incident site the
24 night of the event, there was several aspects of it. One was
25 isolating the location. And then there was also the entire

1 process of controlling flow from other sources that were going
2 into it, so by the time I got there by that point, there were a
3 lot of folks there. They had the maps out. They were looking to
4 see what further things they needed to do to, you know, basically
5 continue further isolating the situation.

6 As far as the response, we're still evaluating the time
7 tables and the recordings and everything else we've gotten to see,
8 you know, who was getting contacted, and I think right now I don't
9 have an official position in terms of, you know, the formal
10 response.

11 MR. CHHATRE: Go ahead.

12 MS. JACKSON: Connie Jackson, City of San Bruno.

13 BY MS. JACKSON:

14 Q. Sunil, could you understand the responses that you've
15 just given, my interest is in separate and apart from the
16 investigative activities that are occurring through this
17 investigation to which you are PUC's party representative. What
18 actions or investigation, if any, or audit compliance standard --
19 compliance review occurs through the PUC, is there any?

20 A. It is and that's the whole -- we have our separate
21 investigation. The NTSB has their investigation. The NTSB, my
22 understanding of it, is not -- they don't issue fines. They don't
23 issue violations. They don't issue a lot of those things which
24 would be considered, was a particular regulation not complied
25 with? You know, they've got their basic rule is to identify what

1 caused the item and perhaps put out recommendations and advisories
2 to address that, and it's for other folks to then take those and
3 act on them.

4 From the Commission's end, there may have been
5 violations of certain things, of certain codes that would then
6 require the Commission to take action in regard to that violation.
7 General Rule 112(e) is what covers PG&E, like other intrastate gas
8 operators, and so the Commission does have the jurisdiction for
9 the enforcement of those regulations.

10 So that investigation would look at perhaps non-
11 compliances with 112(e), that generally then adopts 192, so that
12 would be our portion of it, and then there's other aspects of our
13 investigation. There's a lot of complaints from folks about in
14 regard to smelling gas. "I've called PG&E so many times and they
15 never show up," so there's all kinds of those issues that the
16 Commission is also looking at. And so in essence those are the
17 site investigations. As far as any violations that the Commission
18 believes existed, those would have to go through a Commission OII
19 type process to further issue sanctions or violations or fines.

20 So that would come out of those kinds of investigations
21 that is different than what would come out of the NTSB
22 investigation.

23 Q. And just to be clear, my question, though I didn't
24 specify, was specific to the emergency response and standards that
25 might pertain -- to which you would be auditing in your OM&E

1 audit, and your response, I assume, was to my unspecified
2 clarifications.

3 A. The response would be is there is going to be
4 recommendations that come out of the NTSB but before that happens
5 nothing precludes us from coming up with recommendations of our
6 own that we could put into effect. They may be more stringent or
7 more, you know, even than what comes out of the NTSB, and those
8 could perhaps, if we were finding issues with a response being
9 inadequate, perhaps more drills taking place, perhaps -- we've all
10 seen the different legislation being proposed in regard to whether
11 or not the cities and the fire departments are going to be given
12 access to operate valves. There's all kinds of concerns and
13 issues with that, so all those things are being looked at.
14 They're all, you know, on the table, but those are still being
15 kind of decided on forwarding terms of where a lot of those things
16 -- and because each one of those actions really needs to be seen
17 in context. What looks good to a layperson is not necessarily the
18 approach to take simply because on some of these valves, if you
19 operate incorrectly, you go left instead of going right, and it
20 breaks off, you've got a far worse situation to deal with.

21 There's a whole aspect of qualification. There's a big
22 set of regulations on the gas side in terms of staff that perform
23 various tasks on a pipeline being qualified, understanding what
24 they're doing, being tested on some frequency. Doing that for
25 everybody outside of a company, how do you entail that, how do you

1 maintain the fact that everybody knows what they're doing?

2 So there's all these good ideas that are being put
3 forth, but we need to, I think, evaluate it from the perspective
4 of it's a good idea, but how could we implement it in a realistic
5 setting where we don't end up creating a worse situation by doing
6 that? And at the same time meeting the needs of the folks, cities
7 in particular that are now being identified? And that's all part
8 of the Commission's side.

9 Q. Just two additional questions. Are there any
10 regulations or standards, and again on the OM&E side, are there
11 any standards or requirements that specify, for example, the
12 desired amount of time to -- once notified, to show up, a gas line
13 in an emergency situation. Is there any type of standard that to
14 which the operator needs to have the procedures in the facilities
15 in place in order to meet that standard, in a real-time emergency?

16 A. I don't -- again, 192 doesn't really get specific on
17 that now. I'm not even sure of an industry standard or industry.
18 There may be some sort of a benchmarking. I think each situation
19 can be so unique as to if you were to mandate somebody has to be
20 there in ten minutes and they can't get in ten minutes, without
21 jeopardizing their own safety, you know, how do you deal with
22 that? I know there's a lot of concern from folks in regard to
23 that. If that means more automated valves on situations, that may
24 be the course, but I think as far as staffing levels or some way
25 of assuring that things can be done, it will be looked at. I

1 think it's a given, it's how can we make that happen, but at the
2 same time I think realizing that in a realistic world, same kind
3 of situations are encountered. If you have somebody dispatched to
4 go to an event, but if the traffic just will not let them get
5 through it, what do we do? How do we fault that individual for
6 not getting to the thing?

7 Q. Just one last question. Just as context to the city, as
8 an example, is responsible for maintenance of an emergency plan
9 and the execution of a plan in a disaster situation. Part of
10 those requirements are the preparation of an after-action report
11 or an evaluation of the incident and the response, and there are
12 several different -- there are several different categories of
13 those types of reports that are required. Is there a similar type
14 of after-action or incident review that the operator is required
15 to provide to the PUC?

16 A. They're not necessarily provided to the PUC. I mean, we
17 can request them certainly, but the way we would review them, as
18 part of the audit, you are looking at -- when you're looking at
19 the emergency response, every year the operator is required to do
20 a review, and that could mean that they make up a drill, you know,
21 such and such valve is broken, the bridge is out, how do we
22 respond to that? How do we do it? And maybe go through the mock
23 steps.

24 The other is to take an event, a natural event that
25 occurred, and identify what went right, what went wrong. You

1 know, sometimes it could be a good way of identifying where
2 certain communications don't work.

3 I don't want to take too much time but I recall one good
4 example of an individual going to a corner and saying there's a
5 gas leak, I smell a very, very strong gas leak on the corner of
6 such and such. The dispatcher would not -- would not take that
7 call, and I won't name which operator, but would not take the call
8 because you weren't giving a street address and the indication or
9 the training had been, you have to give me a street address, and
10 so there was a little bit of a disconnect there that got quickly
11 identified to the point that, listen, you've got to take the call,
12 even if there is no street address available, and so that kind of
13 prevented a potential problem in the future.

14 So a lot of these, we review these, and in terms of are
15 they being done adequately -- we've always encouraged operators to
16 make them as stringent as possible. You know, the tougher you
17 make it and the more stringent you make it, the better you're
18 going to, you know, identify problems and if you just make it
19 simple for going through the steps to say we did it, it doesn't
20 really get you value.

21 So we do look to those. We do ask questions in terms of
22 who attended and when folks aren't attending, I'm sure PG&E will
23 attest, we've noted that those folks then need to be brought in
24 and redone.

25 MS. JACKSON: Thank you.

1 MS. FABRY: Klara Fabry, just a clarifying question.

2 BY MS. FABRY:

3 Q. I am assuming that the emergency portion of the OME part
4 includes not just impending response but also communication with
5 the incident command center, depending on the type of emergency.

6 A. There's a whole set of guidelines when it gets to that.
7 Once I call the incident command center, ICC, so there's a whole
8 volume for when it gets to those four levels, but then again,
9 within the smaller context of it, within the divisions and the
10 districts, you're going to have their own plans that they're
11 keeping, so it all starts with an event being at the lowest level
12 and then escalating and then the whole process in terms of how do
13 you go through that? All those phone numbers, the steps, the
14 procedures, those are all reviewed.

15 Q. I'm taking from your response that it's including that
16 emergency plan, how to communicate and how to share information
17 with the external partners in the incident command center?

18 A. There's that and then there's also public awareness
19 program. There's a whole specific requirement for the utilities
20 to go out and make themselves liaison with cities and counties and
21 make that process available.

22 MR. FASSETT: Thank you.

23 MR. SHORI: May I ask something? Can I ask a question?
24 Off the record can I ask a question?

25 MR. CHHATRE: Off the record.

1 (Off the record.)

2 MR. CHHATRE: Back on line. You were asking questions.

3 MS. JACKSON: I have no questions.

4 MR. KATCHMAR: Peter Katchmar, US DOT.

5 BY MR. KATCHMAR:

6 Q. Sunil, can you talk a little bit about the reasons for
7 not shutting the gas off at Milpitas station, because that's where
8 the feed is for Line 132, 101 and 109? So why didn't PG&E just
9 shut that gas off there.

10 MR. BERDGE: Off the record. You're asking him to
11 speculate on what PG&E would do.

12 (Off the record.)

13 MR. CHHATRE: Back on the record.

14 BY MR. KATCHMAR:

15 Q. As soon as PG&E identified the fact of where the actual
16 release was, do you have an opinion as to why they did not shut
17 the gas off immediately at Milpitas station?

18 A. I do not. I mean, there's thousands of customers plus
19 the impact on the line, would just simply keep heating, so I think
20 that the inconvenience and losing thousands and thousands of
21 customers and a relight involved would be massive.

22 Q. Thank you. Could you discuss -- it has come up before
23 on these audits, and I'm not sure if it was the Integrity
24 Management audit of 2005 or the last one that was in 2010, but
25 I've heard the term preordained ECDA. Could you discuss that

1 issue or finding or whatever you want to call it?

2 A. It was I think more referring to the fact, it's the tool
3 selection and the way the tools are being selected. I'd have to
4 look --

5 Q. The tools, you mean the close interval survey or the
6 assessment methods?

7 A. It's just basically the tool selection for ECDA and just
8 -- I think it was referring to the tool selection, that they're
9 pre-ordained, you're generally doing it.

10 Q. What do you mean by tool selection?

11 A. The indirect tools.

12 Q. What are they selecting to do that?

13 A. I'd have to read the passage again, I think, to refresh
14 my memory in terms of what the issue was but -- the rule requires
15 you to select particular tools to perform the ECDA, and I think
16 the issue there was that rather than have different tools, it just
17 seemed to be that the same tools are being selected.

18 Q. Did PG&E issue an enforcement action or letter or
19 whatever you call it after the 2010 inspection to PG&E, IMP
20 inspection?

21 A. No, at that stage we issued our findings and then we've
22 gotten the response, and that's where it is. There hasn't been
23 anything further than reviewing the response from the company.

24 Q. Okay. But you did issue some enforcement action or --

25 A. Right. We issued our findings to them.

1 Q. Okay. Did you issue one after the 2005 audit?

2 A. No. What we provided there was the summary from the
3 three weeks compilation of the findings, but there wasn't a letter
4 issued.

5 Q. Why not?

6 A. We felt we wanted to get a little more training, take
7 our IOI class, and redo the audit at some point.

8 Q. Okay. You say you gave those issues or findings to
9 PG&E?

10 A. Yes, we did.

11 Q. Did you follow up on any of those?

12 A. Several were resolved during the audit. There was some
13 follow-up and then several were noted as updates were provided by
14 the company in terms of that they were addressing many of those
15 findings.

16 MR. KATCHMAR: Thank you. That's it.

17 MR. CHHATRE: Bob?

18 MR. FASSETT: No questions.

19 MS. MAZZANTI: Debbie Mazzanti, IBEW, 1245.

20 BY MS. MAZZANTI:

21 Q. Several times in these interviews, not just this
22 session, but the session that we had in September, the issue of
23 the response time has come up and several people have been asked
24 the question, "Did you get a call from someone to report?" So my
25 question is from a procedural perspective, would it be your

1 opinion when putting together an OM&E or any kind of an emergency
2 response procedure, would it be in your opinion better for someone
3 to wait to get a phone call than to hear something, a natural
4 disaster, a firestorm, a bridge collapsing, an earthquake, an
5 explosion, that people get in their vehicles immediately and start
6 towards the place of the emergency? Is it better to sit and wait
7 for someone to call me to respond to that or would it be your
8 opinion that the integrity of that entity, whether it's the police
9 department, the fire department, whatever that is, that by their
10 own integrity they immediately start towards that emergency?

11 A. I think this is kind of asking for personal opinion,
12 which I'm willing to give, but it's strictly is a personal
13 opinion. We need to have in the regulation some sort of
14 coordination that there's a process for receiving and identifying
15 calls, so if somebody calls in and says, "I smell gas," there has
16 to be a process for identifying it, sending a person to it, and
17 getting it addressed. If somebody happens to live near where
18 there's an incident occurring and they take their job personally
19 and they make the effort to go and help, you certainly couldn't
20 fault that, but there has to be coordination in the process, and
21 that's what the rule requires of the operators, that they have a
22 process in place for receiving and identifying situations and then
23 dispatching folks to it. Nothing precludes, and personally I
24 would, you know, if somebody could have assisted or is there and
25 wants to go assist, that would be a good thing to do. I mean, why

1 not?

2 Q. So from a CPUC perspective, do you know whether or not
3 PG&E has an emergency response procedure or do they have -- do you
4 know if PG&E has any kind of a procedure that when there is a
5 natural disaster, when there is something that's beyond just the
6 gas leak that someone standing on the corner calls about, are you
7 aware of any kind of procedure that PG&E has had where people
8 already know that if there is an incident, they are to immediately
9 respond? Rather than it's just been because you live close to the
10 neighborhood? Do you have any idea if PG&E has any kind of a
11 program that their employees are already trained to say that if
12 there is something, you get to your nearest facility?

13 A. I'm not aware of it.

14 Q. Okay.

15 A. I do know that, again, what's required by the code in
16 terms of receiving it and identifying it, but as far as saying
17 you're expected to go do this, I'm not aware of that.

18 MS. MAZZANTI: Okay. No further questions.

19 MR. SPERRY: No questions.

20 MR. NICHOLSON: No questions.

21 MR. CHHATRE: No questions. With that, thank you so
22 much for your time, Sunil. We are off the record.

23 (Whereupon, the interview was concluded.)

24

25

CERTIFICATE

This is to certify that the attached proceeding before the
NATIONAL TRANSPORTATION SAFETY BOARD

IN THE MATTER OF: PACIFIC GAS & ELECTRIC COMPANY
 SEPTEMBER 9, 2010 ACCIDENT
 SAN BRUNO, CALIFORNIA
 Interview of Sunil Kumar Shori

DOCKET NUMBER: DCA-10-MB-008

PLACE: Burlingame, California

DATE: January 5, 2011

was held according to the record, and that this is the original,
complete, true and accurate transcript which has been compared to
the recording accomplished at the hearing.

Sandra K. Ledford
Transcriber