

## Change Control (Management of Change)

### SUMMARY

This utility standard describes the structure and requirements of the Pacific Gas and Electric Company (PG&E or Company) system for gas operations change control (Management of Change) to mitigate safety, health, and environmental risks.

Level of Use: Informational Use

### TARGET AUDIENCE

All gas operations personnel.

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### REQUIREMENTS

#### 1 Objective

- 1.1 This utility standard outlines requirements for managing change. For the purposes of the change control program, a “change” is an activity that results in a difference between the current state and a future state by addition, modification, or substitution of processes, equipment, facilities, personnel, or procedures.
- 1.2 Change control aims to achieve the following goals:
  - Help improve safety for personnel and the public
  - Safeguard property and assets
  - Ensure regulatory compliance
  - Mitigate environmental impacts

#### 2 Scope

- 2.1 Changes that affect the PG&E gas system should be identified, reviewed, approved, and documented as follows:
  1. Establish, implement, or follow guidance documents to manage change.
  2. Properly identify and document changes to the following items:
    - Operations and maintenance
    - Assets
    - Guidance documents
    - Organizational structure
    - Suppliers/contractors
    - Tools and equipment

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### 3 Process Overview

- 3.1 A change control system is based on the following process safety criteria for managing risks:
1. A recognition of a need for change.
  2. An evaluation of the hazards associated with the change.
  3. A decision about whether to allow the change to be made.
  4. Operational readiness before change is implemented.
  5. An assessment of effectiveness of the change.

### 4 Roles and Responsibilities

- 4.1 Directors of groups that approve applicable changes (e.g., engineering; sourcing; and codes and standards) should provide resources to support the approval, documentation, and retention requirements.
- 4.2 Change coordinators ensure the change control process is followed.
- 4.3 Change initiators propose a change or identify that a change is necessary.
- 4.4 Change owners manage a change through the change control process. The change owner has the ultimate responsibility for the change.

### 5 Recordkeeping

- 5.1 Each gas operations line of business is responsible for documenting change control and storing documentation per [Utility Standard TD-4016S, "Gas Operations Records and Information Management."](#) Retain change control documentation per Company Record Retention Schedule.

**END of Requirements**

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### DEFINITIONS

**Approver(s):** The person who reviews and approves the preliminary impact assessment, the implementation plan, communication plan, Process Hazard Analysis (PHA) (if necessary), and the change in general.

**Change:** An activity that results in a difference between the current state and a future state by addition, modification, or substitution of processes, equipment, facilities, personnel, or procedures.

**Change control:** A process for evaluating and controlling modifications to facilities, operations, procedures, equipment, organization, or design activities prior to implementation, to ensure that no new hazards are introduced and that the risk of existing hazards is not increased unknowingly. Change control is referred to industry wide as “Management of Change.”

**Change coordinator:** The person who ensures that the change control process is followed.

**Change initiator:** The person who proposes a change or identifies that a change is necessary.

**Change owner:** The person who manages a change through the change control process. The change owner has the ultimate responsibility for the change.

### IMPLEMENTATION RESPONSIBILITIES

Codes, standards, and training personnel publish the guidance document and post it to the Technical Information Library (TIL).

Each department responsible for the various change types (i.e., procedural, tools and equipment, field modification, contractor, organizational) needs to begin implementing the requirements of this standard.

### GOVERNING DOCUMENT

[Utility Policy TD-03, “Responsible Care® Policy \(RC14001®\)”](#)

### COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

[Code of Federal Regulations \(CFR\) Title 49, Transportation, Part 192—Transportation of Natural and other Gas by Pipeline: Minimum Federal Safety Standards, Section \(§\) 192.911, “What are the elements of an integrity management program?”](#)

[49 CFR §192.1007, “What are the required elements of an integrity management plan?”](#)

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### REFERENCE DOCUMENTS

#### Developmental References:

American Petroleum Institute (API) 1173 Management of Change (MOC) 8.4

American Society of Mechanical Engineers (ASME) B31.8s Management of Change Plan (2.4.4) and 11

Center for Chemical Process Safety (CCPS), an AIChE Industry Technology Alliance, Guidelines for the Management of Change for Process Safety, Wiley-Interscience, New York

[Code of Federal Regulations \(CFR\) Title 29, Labor, Part 1910—Occupational Safety and Health Standards, §1910.119\(i\), “Pre-startup safety review”](#)

[29 CFR §1910.119\(l\), “Management of change”](#)

[49 CFR §192.631, “Control room management”](#)

[CFR Title 49, Transportation, Part 195—Transportation of Hazardous Liquids by Pipeline, §195.446, “Control Room Management”](#)

International Organization for Standardization (ISO) 55001:2014 Asset management—Management systems—Requirements

Publicly Available Specification (PAS) 55-2:2008 Asset Management Part 2: Guidelines for the application of PAS 55-1

Responsible Care (RC) International Standards Organization (ISO) 14001

[Utility Policy TD-01, “Gas Asset Management”](#)

#### Supplemental References:

[Utility Procedure TD-4001P-01, “Gas Guidance Document Development and Update Process”](#)

[Utility Procedure TD-4001P-02, “Gas Guidance Document Review and Update”](#)

[Utility Procedure TD-4001P-04, “Gas Product and Supplier Approval”](#)

[Utility Procedure TD-4001P-07, “Processing Requests for Waivers of Compliance from Gas Guidance Documents”](#)

[Utility Procedure TD-4014P-01, “Field Change Control Process for Gas Transmission and Distribution”](#)

[Utility Procedure TD-4014P-02, “Change Control Process for Contractors Performing High Risk Activities for Gas Operations”](#)

[Utility Procedure TD-4436P-04, “Gas System Operations CRM—Management of Pipeline Changes”](#)

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### REFERENCE DOCUMENTS (continued)

#### Supplemental References (continued):

[Utility Standard TD-4001S, "Gas Guidance Document Process"](#)

[Utility Standard TD-4006S, "Process Safety Requirements"](#)

[Utility Standard TD-4016S, "Gas Operations Records and Information Management"](#)

### APPENDICES

NA

### ATTACHMENTS

NA

### DOCUMENT REVISION

This document supersedes Utility Standard TD-4014S, "Management of Change for the Gas Asset System", Revision 2, issued 10/2014.

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### REVISION NOTES

| Where?   | What Changed?   |
|--|---|
| Entire standard                                      | Complete rewrite.   |
| Form TD-4014S-F01, "Management of Change (MOC) Form" | This form has been replaced by new <a href="#">Form TD-4014P-01-F01, "Field Change Control Form"</a> and new <a href="#">Form TD-4014P-02-F01, "Sourcing Change Control Form"</a> |