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Mr. Terence Eng  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: General Order (GO) 112-F Gas Inspection of PG&E’s Bay Area East and Stan Pac (Transmission)

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to the Safety and Enforcement Division’s (SED) Inspection Findings (Summary), dated October 13, 2023, stemming from the 2023 SED inspection of PG&E’s Bay Area East and Stan Pac Transmission records and facilities conducted September 11 to September 29, 2023.

For clarity, each of the items identified in the Summary will be repeated followed by PG&E’s response.

**I. Unsatisfactory Results**

No Preliminary Findings.

**II. Concerns**

**Concern 1: Time-Dependent Threats: Atmospheric Corrosion (TD.ATM)**

(1) Question Is pipe that is exposed to atmospheric corrosion protected?

References 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192.481(d))

Assets Covered Bay Area East Transmission (Bay Area East)

Issue Summary SED made the following observations during the field visits:

(1) SED observed that a segment of exposed pipe, Span (EQ ID # 44823727), had no coating. PG&E mentioned that an *Other Corrective Work* (OCW) # 124741971 was issued and a copy of the notification was provided. Please provide a status update.

(2) SED observed that coating was disbonded on one side at the air-soil interaction of Span (EQ ID # 43161602). Please take remedial measures and provide an update.

(3) SED observed that the pipe segment, Span (EQ ID # 43164708), had rust, two burn marks, and needed to be checked for link seals (seals at the intersection of pipe and bridge abutment). Please examine, take remedial measures, and provide an update.

**Response to Concern 1:**

(1) EQ#44823727 – PG&E has created a notification of Other Corrective Work (OCW # 124741971 as mentioned above) and is working on correcting this issue.

- (2) EQ#43161602 – The remediation of this issue has been added to PG&E work order 45815467 for completion.
- (3) EQ#43164708 – The remediation of this issue has been added to PG&E work order 46047457 for completion.

**Concerns 2-3: Time-Dependent Threats: External Corrosion – CP Monitoring (TD.CPMONITOR)**

(2) Question	Are impressed current sources properly maintained and are they functioning properly?
References	192.465(b)
Assets Covered	Bay Area East Transmission (Bay Area East)
Issue Summary	During SED’s field visit, the rectifier EQ 44817948 (Old EQ 42711824) had a reading of zero amperes. PG&E created a CWF (Corrective Work Form) to address the issue. Please provide an update.
(3) Question	Do records adequately document actions taken to correct any identified deficiencies in corrosion control?
References	192.491(c) (192.465(d))
Assets Covered	Bay Area East Transmission (Bay Area East)
Issue Summary	PG&E provided spreadsheet BA_E# 16 CPA Down report. Several CPAs have been down for more than 200 days, for example, EQ IDs 125442184, 124598552, 124800143 and others. SED requested a status update which was provided (BA_E#61). PG&E should continue to work on these diligently to resolve the issues and provide a progress update.

**Response to Concerns 2 and 3:**

- (2) EQ#44817948 (Old EQ#42711824) - Other Corrective Work (OCW) #127149878 was created to address the rectifier issue during the SED field visit, and the OCW was completed on October 11, 2023. The rectifier is now working properly.
- (3) The EQ IDs mentioned above are troubleshoot notification numbers.
  - Troubleshoot Notification 125442184 – The CPA down mentioned above was due to a PG&E electric transformer blowout. The PG&E gas organization is currently collaborating with the PG&E electric organization to resolve this issue.
  - Troubleshoot Notification 124598552 – PG&E has corrected and tested the cathodic protection on this line and it now complies with 100 mV polarization.
  - Troubleshoot Notification 124800143 – PG&E created Other Corrective Work (OCW) 124800143 and replaced the rectifier to mitigate this issue.
  - PG&E is working on correcting other down CPAs within this area and will update SED in the future.

**Concerns 4-5: Time-Dependent Threats: External Corrosion - Cathodic Protection (TD.CP)**

- (4) Question Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?
- References 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))
- Assets Covered Bay Area East Transmission (Bay Area East)
- Issue Summary SED observed pipe and casing pipe-to-soil reads at various locations in East Bay, Mission, and Diablo Divisions. For EQ ID 41397509, the read for the pipe was -1623 mV and the casing was -1010 mV, indicating a contact. PG&E should investigate and remediate.
- (5) Question Do records indicate the location of all corrosion control items listed in §192.491(a)?
- References 192.491(a) (192.491(b), 192.491(c))
- Assets Covered Bay Area East Transmission (Bay Area East)
- Issue Summary During SED’s field visit in Diablo Division, PG&E personnel were unable to locate ETS 42737025. PG&E reported that the coordinates for this equipment are not available in SAP. It is important that coordinates/location of all assets be available for PG&E personnel to locate and perform regular maintenance. PG&E later reported that the actual coordinates are approximately [REDACTED] and a Request for Work (RW) notification # 127134468 was created to add LAT/LONG to SAP. Please provide an update.

**Response to Concerns 4 and 5:**

- (4) EQ#41397509 – PG&E has created notification 127409477 to track the remediation of this issue. PG&E suspects an electrolytic couple to be the cause, however, PG&E is in the process of performing further testing to complete this corrective action.
- (5) EQ#42737025 – As mentioned above, PG&E has created a Request for Work (RW 127134468) and is in the process of correcting Latitude and Longitude information in SAP.

Please contact [REDACTED] for any questions you may have regarding this response.

Sincerely,



Kristina Castrence  
Director, Gas Regulatory and Risk

- cc: Dennis Lee, SED  
Claudia Almengor, SED  
Kai Chung, SED  
Sikandar Khatri, SED  
[REDACTED], PG&E  
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