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December 15, 2023

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 North Bay Division

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 November 15, 2023, stemming from the 2023 SED inspection of North Bay Division records and facilities conducted from July 24 to August 4, 2023.

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

I. Unsatisfactory Results

Unsatisfactory Result 1: Maintenance and Operations: ROW Markers, Patrols, Leakage Survey and Monitoring (MO.RW)

Question Title, ID Distribution Patrolling, MO.RW.DISTPATROL. R (also presented in: PD.RW)

Question 9. Do records indicate distribution patrolling was conducted as required?

References 192.603(b) (192.721(a), 192.721(b))

Assets Covered North Bay Division (86278 (11))

Issue Summary 1). PG&E procedure TD-4412P-07 (Rev. 8b, eff. 09/17/2020) Section 3 "Patrolling" states in part:

Section 3.1 Frequency of Patrol

- 1. "Perform patrols at the required frequencies. Refer to Table 1 for minimum frequency requirements....."

Table 1 of this procedure lists patrol frequencies for facilities outside of business districts as "semiannually" (at least twice each calendar year, not to exceed 7.5 months to the date)

- 2). G.O. 112-F Reference Title 49 Code of Federal Regulations (49 CFR), Part 192 §192.721(b)(2) states in part:

"(b) Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled:

(2) Outside business districts, at intervals not exceeding 7 1/2 months, but at least twice each calendar year....."

3). In addition, G.O. 112-F Reference Title 49 CFR, Part 192 Section 192.605(a) states in part:

"Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.....".

SED reviewed distribution patrol records for 2018-2022 and noted distribution main pipeline segments located in five (5) Site IDs outside of Business Districts were not patrolled within the minimum frequencies.

The pipeline segments located in the following Site IDs (ref. NB#05 – Distribution Pipeline Patrols (2018-2022).xlsx) were not patrolled within the compliance windows:

- a) NB_06 was patrolled once in 2021, on 4/8/21. The next recorded patrol was the following calendar year on 2/27/22. PG&E failed to conduct one patrol between these dates.
- b) NB_07 was patrolled once in 2021, on 4/1/21. The next recorded patrol was the following calendar year on 2/27/22. PG&E failed to conduct one patrol between these dates.
- c) NB_08 was patrolled once in 2021, on 4/8/21. The next recorded patrol was the following calendar year on 2/27/22. PG&E failed to conduct one patrol between these dates.
- d) NB_28 was patrolled once in 2020, on 2/23/20. This site was not patrolled between 2/23/20 and 12/31/22. PG&E failed to complete five patrols between these dates.
- e) NB_30 was patrolled twice in 2020, on 3/11/20 & 10/15/20. The next recorded patrol was 2 calendar years later 11/19/22. PG&E failed to complete three patrols between 10/15/20 and 11/19/22.

Therefore, SED finds that PG&E is in probable violation of G.O. 112-F Reference Title 49 CFR, Part 192 Sections 192.721(b)(2) and 192.605(a).

Response to Unsatisfactory Result 1:

PG&E agrees with SED that patrols for **NB_06**, **NB_07**, and **NB_08** were missed between April 2021 and February 2022. PG&E will continue to enhance its processes as part of its ongoing efforts to improve patrolling operations.

PG&E records indicate that **NB_28** was identified for distribution patrol for a short duration due to an exposed gas main in the area. The exposed main was replaced under PG&E project # 35020100 and completed on 01/20/2020. Therefore, no further patrol was required.

PG&E records indicate that **NB_30** was identified for distribution patrol for a short duration due to an exposed gas main in the area. The exposed main was replaced under PG&E project # 31013144 and completed on 12/31/2020. Therefore, no further patrols were required. However, this location was *mistakenly* brought back to PG&E's patrolling schedule and PG&E patrolled this location on 11/19/2022. This location does not require patrolling.

II. Concerns

Concern 1: (TD.ATM) Design and Construction: Meters, Service Regulators, and Service Lines (DC. METERREGSVC)

Question Title, ID	Customer Meters and Regulator Location, DC. METERREGSVC.CUSTOMETERREGLOC.O
Question	1. Are meters and service regulators being located consistent with the requirements of 192.353?
References	192.351 (192.353(a), 192.353(b), 192.353(c), 192.353(d))
Assets Covered	North Bay Division (86278 (11))
Issue Summary	Title 49 Code of Federal Regulations Section §192.353(a) states: "(a) Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be anticipated." The meter-set at [REDACTED] Vallejo (for ETS point 44421296) is located along a newly expanded driveway and did not have protection from vehicular traffic. SED recommends PG&E evaluate the risk of vehicular traffic damage and install appropriate meter protection barrier at this location.

Response to Concern 1:

PG&E has created Work Order # 45917333 to assess this location for appropriate meter protection from vehicular traffic.

Concern 2: Time-Dependent Threats: Atmospheric Corrosion (TD.ATM)

Question Title, ID	Atmospheric Corrosion Monitoring, TD.ATM.ATMCORRODEINSP.O
Question	5. Do field observations indicate that pipe exposed to atmospheric corrosion is properly coated?
References	192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192.481(d))
Assets Covered	North Bay Division (86278 (11))
Issue Summary	PG&E Procedure TD-4188S (revision 1, effective date 01/01/2017) Section 4 "Mitigation" states: "The mitigation timeline of atmospheric corrosion-related abnormal operating conditions (AOCs) found during monitoring must not exceed thirty-nine months from the date of the AOC identification, except assets that meet requirements in Section 1.4." On September 5, 2020, PG&E noted that Span 45046990 had coating & pitting issues (Notification 119862401). During field inspection on 8/3/2023, SED's staff observed that PG&E has remediated the coating & pitting issues on the Span 45046990. PG&E's identification of the Abnormal Operating Condition (AOC) is approaching 35 months and counting. SED recommends that PG&E remediate the AOC before 12/5/2023.

Response to Concern 2:

PG&E completed the above-mentioned remediation work for EQ#45046990 under Work Order # 35461312. The work order was closed on September 4, 2023.

Concern 3: Time-Dependent Threats: External Corrosion - CP Monitoring (TD.CPMONITOR)

Question Title, ID	Cathodic Protection Monitoring Criteria, TD.CPMONITOR.MONITORCRITERIA.O
Question	3. Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?
References	192.465(a) (192.463(b), 192.463(c), 192.463(a))
Assets Covered	North Bay Division (86278 (11))
Issue Summary	<p>PG&E Procedure TD-4181S (revision 3, effective date 05/24/2023) Section 7 "Cathodic Protection Monitoring" states in part:</p> <p>“7.4 Isolated Steel Monitoring.</p> <p>3. To ensure facilities are protected until the next monitoring cycle, a drivable anode must be installed if the P/S potentials are less negative than -900 mV with reference to a copper-copper sulfate electrode, with CP current applied.”</p> <p>Title 49 Code of Federal Regulations Part 192 §192.463(a) states in part:</p> <p>“Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in appendix D of this part.”</p> <p>SED found three isolated steel services (10%ers) and one cathodic protection area (CPA) to have insufficient cathodic protection levels per PG&E TD-4181S Sections 7.4 and 49 CFR §192.463(a), as indicated below.</p> <p>10%ers:</p> <ul style="list-style-type: none">a) 41305160 in Vallejo: -613mVb) 45356953 in Napa: -100mVc) 42824329 in San Rafael: -880mV <p>CPA:</p> <p>985-31 in San Rafael: -400mV</p> <p>SED requests that PG&E provide an update on its remediation efforts to address these low pipe-to-soil potentials before the next inspection period.</p>

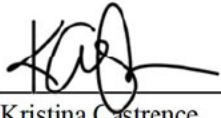
Response to Concern 3:

- a) EQ#41305160 – PG&E has created a notification of Other Corrective Work (OCW # 127549692) and is working on correcting this issue.
- b) EQ#45356953 – PG&E has created a notification of Other Corrective Work (OCW # 127549693) and is working on correcting this issue.
- c) EQ#42824329 – The issue has been remediated and the most recent read taken on August 11, 2023, was -1068 mV.

The low read issue on CPA 985-31 has been remediated, and the most recent read taken on October 26, 2023, was -950 mV.

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
Nicholas Peno, SED
Molla Mohammad Ali, SED
Kristina Castrence, PG&E

[REDACTED]