

July 18, 2023

Mr. Terence Eng
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 East Bay Division (Distribution)

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to the Safety and Enforcement Division's (SED) Summary of Inspection Findings (Summary), dated June 19, 2023, stemming from the 2023 SED inspection of PG&E's East Bay Division distribution records and facilities conducted May 1, 2023, to May 12, 2023.

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 Text	9. Do records indicate distribution patrolling was conducted as required?
References	192.603(b) (192.721(a), 192.721(b))
Issue Summary	During SED's review of PG&E East Bay Division's distribution patrolling records, PG&E provided a list of " <i>distribution main mileage within earthquake fault uncertainty zones, including fault crossings</i> ". PG&E has not evaluated the areas surrounding these mains for identifying potential patrolling locations. Title 49 Code of Federal Regulations (CFR), §192.721(b) states in part, " <i>Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled ...</i> ". Therefore, PG&E is in violation of Title 49 CFR §192.721(b) for failing to patrol its mains per Title 49 CFR §192.721(b). PG&E shall evaluate/survey the locations listed to identify potential patrolling locations and conduct patrols in accordance with §192.721(b), as needed.

Response to Unsatisfactory Result 1:

PG&E utilizes a Dynamic Automated Seismic Hazard (DASH) system to detect when seismic activity has occurred and which locations within the system require patrolling and damage assessments. This includes not only the fault zones but other locations that may have sustained damage. Traditional observational based patrolling does not detect change accurately enough to identify small fault displacements known as aseismic "fault creep." PG&E is reviewing its pipe performance in fault zones and determining if a more effective monitoring methodology is available.

Concern #1: Time-Dependent Threats: External Corrosion - CP Monitoring (TD. CPMONITOR)

Question Title, ID	Correction of Corrosion Control Deficiencies, TD. CPMONITOR.DEFICIENCY. R
Question Text	13. Do records adequately document actions taken to correct any identified deficiencies in corrosion control?
References	192.491(c) (192.465(d))

Issue Summary PG&E provided Cathodic Protection Area, "CPA Down" list which included assets with pipe-to-soil potential readings issues. According to PG&E, 364 assets are down, some of which are down for over 300 days. Three assets are still down after more than 887 days (such as Notification numbers 119956533, 119956583 and 119956770), some of which PG&E plans to remediate later this year. PG&E should address all CPA down assets as soon as possible and submit an updated status report.

Response to Concern #1:

PG&E corrected the above mentioned down Cathodic Protection Area (CPA) assets under the PG&E Other Corrective Work (OCW) category. Please see details below.

Notification Number 119956533

OCW 125979346 was created to correct this CPA being down, and the read for this isolated main is **-930 mv** (within standards for protection).

Notification Number 119956583

OCW 125983223 was created to correct this CPA being down, and the read for this isolated main is **-1088 mv** (within standards for protection).

Notification Number 119956770

OCW 122242104 was created to correct this CPA being down. This location includes multiple reads. The reads were taken in 2022 and were all within standards of protection. See table below.

<i>Equipment Number</i>	<i>Read</i>	<i>Read Date</i>	<i>Equipment Number</i>	<i>Read</i>	<i>Read Date</i>
44295176	-1128	5/31/2022	42722476	-1302	5/31/2022
44295177	-868	5/31/2022	42051090	-1138	5/31/2022
44295178	-1078	5/31/2022	42722477	-960	5/31/2022
44295179	-1205	5/31/2022	42722478	-915	5/31/2022
44454123	-975	5/31/2022	42722479	-1228	5/31/2022
42051059	-1382	5/31/2022	42722480	-1255	5/31/2022
42722475	-888	5/31/2022	42722481	-1388	5/31/2022
42051155	-1075	5/31/2022	42722482	-965	5/31/2022

PG&E is in the process of addressing the remainder of the 364 assets mentioned above as part of the Cathodic Protection Investigation (CPI) project by end of 2023. Please note that the status of the CPI project is also communicated to SED through a bi-annual "PG&E Self-Identified Non-Compliance Notification - Corrosion Update Letter." The most recent update was provided to SED on April 14, 2023.

Please contact Sajjad Azhar at (415) 418-9046 or slat@pge.com for any questions you may have regarding this response.

Sincerely,

/s/ Frances Yee

Sr. Manager, Regulatory Compliance and Reporting,
Gas Engineering

- cc: Dennis Lee, SED
- Joel Tran, SED
- Sikandar Khatri, SED
- Jessica Nicolas, SED
- Aleksandr Fastovich, SED
- Kristina Castrence, PG&E
- Frances Yee, PG&E
- Susie Richmond, PG&E