

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 18, 2023

GI-2023-02-PGE-76-01ABC

Christine Cowsert
Senior Vice President, Gas Engineering
Pacific Gas and Electric Company
6121 Bollinger Canyon Road
San Ramon, CA 94583

SUBJECT: General Order 112-F Inspection of PG&E's Bay Area South Transmission Area

Dear Ms. Cowsert:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Paul Penney, Hengyao Chen (Henry) and Yi Yang (Rocky) conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Bay Area South Transmission Area audit February 27-March 3, 2023, March 6-10, 2023, and March 13-17, 2023. The inspection included a review of records related to the Bay Area South Transmission Area system and field inspections in the South Bay areas of Hollister, Salinas, and San Jose, including adjacent areas in the South Bay.

SED's findings are noted in the Post-Inspection Written Preliminary Findings (Summary) which is enclosed with this letter. The Summary reflects only those records and pipeline facilities that SED inspected during the inspection. SED found two violations and three concerns. Please respond to these violations and concerns within 30 days of receiving this letter.

If you have any questions, please contact Paul Penney at (415) 703-1817 or by email at Paul.Penney@cpuc.ca.gov.

Sincerely,

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc: Susie Richmond (Susie.Richmond@pge.com), PG&E, Regulatory Compliance Manager
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Post-Inspection Written Preliminary Findings

Dates of Inspection: February 27—March 3, 2023, March 6-10, 2023, and March 13-17, 2023

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Bay Area South Transmission System, including Hollister, San Jose, Salinas and surrounding areas

Assets (Unit IDs) with results in this report: All Bay Area South Transmission Assets

System Type: GT

Inspection Name: (2023) PG&E Bay Area South Transmission Audit

Lead Inspector: Paul Penney

Operator Representatives: Paul Camarena, Sajjad Sazar, Mark Montoya, Barbara Patterson and Susie Richmond

Unsatisfactory Results

Facilities and Storage : Facilities General (FS.FG)

1. Question Title, Vault Inspection, FS.FG.VAULTINSPECT.R (also presented in: MO.GM)
ID

Question 4. Do records document the adequacy of inspections of all vaults having an internal volume =200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?

References 192.709(c) (192.749(a), 192.749(b), 192.749(c), 192.749(d))

Assets Covered All South Bay Transmission Assets (Bay Area South Trans)

Issue Summary Title 49, Code of Federal Regulations (49 CFR) 192.749(a) requires a vault with a volume of greater than 200 cubic feet to be inspected once each calendar year, not to exceed 15 months. PG&E violated this code section in the one case listed below.

PG&E performed an inspection of a vault with equipment #42760472 on 6/26/20 and subsequently on 10/15/21, more than 15 months later. Between 2020 and 2021, PG&E violated 192.749(a) for failure to conduct a vault inspection at this vault at least once each calendar year, not to exceed 15 months.

Maintenance and Operations : Gas Pipeline Maintenance (MO.GM)

2. Question Title, Valve Maintenance Transmission Lines, MO.GM.VALVEINSPECT.O
ID

Question 11. Are field inspection and partial operation of transmission line valves adequate?

References 192.745(a) (192.745(b))

Assets Covered All South Bay Transmission Assets (Bay Area South Trans)

Issue Summary 1. During the field visit of PG&E's Bay Area South Transmission facilities, SED found the lack of bolt and nut thread engagement on the flanges:

- One of the bolts on valve V-C at Bannister Station.
- One of the bolts on valve V-D at Bloomfield Station.

According to 49 CFR 192.13(c), "... Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part."

Under PG&E Standard B-45.4, Section 2.1, Part E, "Bolts/studs must be fully engaged and extend completely through their nuts, with a recommended minimum of two threads exposed, as long as the bolt/stud does not extend beyond 1/2 inch (in.) from the nut face."

Therefore, PG&E is in violation of 49 CFR 192.13(c) for not following its own procedure, Standard B-45.4, Section 2.1, Part E. PG&E shall ensure the bolts and nuts on the flanges are fully engaged to maintain their designed strength. Please provide an update on the corrective actions that have been or will be taken.

2. SED visited the Tully Station in San Jose. SED found multiple vaults missing bolt locks for the top cover including V-15, V-16, SCADA-E, SCADA-D, AE-T, QW, R, and CZ.

In a response on March 16, 2023, PG&E stated that all bolt locks for the vaults were installed and they provided the proof of the vault covers (pictures).

Therefore, PG&E is in violation of 49 CFR 192.13(c) for not following its own procedure, Standard B-45.4, Section 2.1, Part E. PG&E should make sure all vaults that contain transmission valves and important gas equipment are locked to prevent unauthorized access to them.

Concerns

Maintenance and Operations : Gas Pipeline Abnormal Operations (MO.GOABNORMAL)

1. Question Title, Abnormal Operations Review, MO.GOABNORMAL.ABNORMALREVIEW.R
ID

Question 6. Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?

References 192.605(a) (192.605(c)(4))

Assets Covered All South Bay Transmission Assets (Bay Area South Trans)

Issue Summary **49 CFR 192.603(b) states:** "Each operator shall keep records necessary to administer the procedures established under § 192.605."

49 CFR 192.605(c) states in part:

"(c) Abnormal operation. For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:...

(4) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found."[Underline Added]

The spreadsheet from DR #95 (Bay Area South AOC) showed five (5) Abnormal Operating Conditions (AOCs), with description of each AOC and lessons learned along with a review. However, it is unclear from the spreadsheet whether PG&E proposed or implemented corrective or remedial actions. Therefore, for each of the five AOCs identified, please identify if corrective actions were identified and implemented.

Maintenance and Operations : Gas Pipeline Class Location (MO.GOCLASS)

2. Question Title, Change in Class Location Required Study, MO.GOCLASS.CLASSLOCATESTUDY.R
ID

Question 2. Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?

References 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))

Assets Covered All South Bay Transmission Assets (Bay Area South Trans)

Issue Summary PG&E provided the required class location study in pdfs and Excel spreadsheets.

For pipeline segments where the class has changed, resulting in an MAOP that is too high for the current higher class, SED seeks to determine if PG&E has undertaken remedial actions to assure the MAOP is commensurate with the current class location for the segments identified in the Data Request (DR) below.

DR: Regarding the required class location study from 2020-2022, please list all line segments from DR #56 on L-300A and L-300B where the MAOP is not commensurate with the current class location. Also, please identify what PG&E has done or plans to do to bring the pipeline MAOP into alignment with each line segment's class location to the extent known by PG&E (i.e., replace pipe, lower pressure, etc.).

Maintenance and Operations : Gas Pipeline Overpressure Protection (MO.GMOPP)

3. Question Title, Pressure Limiting and Regulating Stations Inspection and Testing, MO.GMOPP.PRESSREGTEST.R
ID

Question 6. Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?

References 192.709(c) (192.739(a), 192.739(b))

Assets Covered All South Bay Transmission Assets (Bay Area South Trans)

Issue Summary For the Reg station J80 located at Cole Rd & Anzar Rd, the station maintenance record showed that the left run was set as the lead run (370 psi) and the set pressure was not changed in the 2020 or 2021 inspection. PG&E later confirmed in DR#71 that the technician did switch the runs in 2021, but the lead and lag regulator set points were incorrectly documented on the station maintenance form, so the lead and lag run as left pressures appeared to be the same. Although the supervisor reviewed and signed the maintenance form in 2020 and 2021, the apparent mistake was not caught.

PG&E should take precautions to accurately document maintenance records. Supervisors should review the record thoroughly before signing the record.