

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 22, 2023

GI-2023-05-PGE-12-02ABC

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

SUBJECT: SED's Closure Letter for General Order 112-F Gas Inspection of PG&E's North Valley Division

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) reviewed Pacific Gas & Electric's (PG&E) response letter dated August 4, 2023 for the findings identified during the General Order 112-F inspection of PG&E North Valley Division from May 15th to 26th, 2023.

A summary of the inspection findings documented by the SED, PG&E's response to our findings, and SED's evaluation of PG&E's response taken for each identified Violation and Area of Concern and Recommendation is attached.

This letter serves as the official closure for this portion of the 2023 GO 112-F Inspection of PG&E North Valley Division and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. If you have any questions, please contact Anthony Phu at (916) 531-1016 or by email at ANH@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Findings

cc: Susie Richmond, PG&E Gas Regulatory Compliance
Glen Allen, PG&E Gas Regulatory Compliance
Kristina Castrence, PG&E
Frances Yee, PG&E
Terence Eng, SED
Jason McMillan, SED
Claudia Almengor, SED

Post-Inspection Written Findings

Dates of Inspection: 05/15/2023 – 05/26/2023

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: North Valley Division

Assets (Unit IDs) with results in this report: North Valley Division (86279)

System Type: GD

Inspection Name: 2023 PG&E North Valley Division Comprehensive

Lead Inspector: Anthony Phu

Operator Representative: Glen Allen

Unsatisfactory Results

No Preliminary Findings.

Concerns

A. Pipeline Field Inspection : Pipeline Inspection (Field) (FR.FIELDPIPE)

Question Title, ID Rectifier or other Impressed Current Sources, TD.CPMONITOR.CURRENTTEST.O

Question 17. Do field observations confirm impressed current sources are properly maintained and are functioning properly?

References 192.465(b)

Assets Covered North Valley Division (86279 (12))

Issue Summary PG&E performs a detailed check once each calendar year on their "Pedestal Mount Rectifier Test and Site Evaluation" form. Per TD-4181P-301 Rectifier Maintenance and Adjustment, part of the process of checking the rectifiers is to measure the ground rod resistance of the AC disconnect to verify integrity and continuity of the grounding system. Table 2 "Rectifier Safety Hazard Examples" of this procedure lists ground rod resistance greater than 25 Ohms as a safety hazard requiring remediation.

SED observed 2 rectifiers with high ground resistance:

1. Equipment #42705170. SED found ground resistance of 41.3 Ohms
2. Equipment #44409574. SED found ground resistance of 28.4 Ohms

SED recommends that PG&E bring the ground resistance of these rectifiers under 25 Ohms.

PG&E's Response Following the two ground resistance readings greater than 25 Ohms, "Next Step" remedies provided in the second column of Table 2 of TD-4181P-301 (see Att#01) were completed for both rectifiers, confirming potential safety hazards are adequately mitigated. Both rectifiers were verified to have an existing second ground rod installed, and the integrity and continuity of grounding connections were inspected, cleaned, and tightened as needed. A summary is outlined in the table below:

EQ#	OHMS (SED INSP.)	SAP NOTIFICATION#	OHMS (SUBSEQUENT)	ATTACHMENT
42705170	~41 Ohms	126252303	23 Ohms	Att#02
44409574	~28 Ohms	126259144	28 Ohms	Att#03

SED's Conclusion SED has reviewed PG&E's response and attached remediation evidence and accepts the corrective actions that have been implemented. No further action is necessary.