

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 17, 2023

GI-2023-09-PGE-90-01ABC

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 Bay Area East Transmission Area and Standard Pacific Gas Line

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) reviewed Pacific Gas & Electric Company's (PG&E) response letter dated November 10, 2023, for the findings identified during the General Order (GO) 112-F inspection of PG&E's Bay Area East Transmission Area (Bay Area East) and Standard Pacific Gas Line Inc. (StanPac) which was conducted from September 11 to September 29, 2023.

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

This letter serves as the official closure of the 2023 GO 112-F inspection of PG&E's Bay Area East and StanPac. Any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

If you have any questions, please contact Kai Cheung at (415) 940-8836 or by email at Kai.Cheung@cpuc.ca.gov.

Sincerely,

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

Dennis Lee, P.E.  
Program & Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Enclosure: Summary of Inspection Findings

cc: Susie Richmond, PG&E Gas Regulatory Compliance  
Kristina Castrence, PG&E  
Frances Yee, PG&E  
Sajjad Azhar, PG&E Gas Regulatory Compliance  
Terence Eng, SED  
Claudia Almengor, SED

# Summary of Inspection Findings

**Dates of Inspection:** 09/11/2023 – 09/29/2023

**Operator:** PACIFIC GAS & ELECTRIC CO (PG&E) and STANDARD PACIFIC GAS LINE (StanPac)

**Operator ID:** 15007 (PG&E, primary) and 18608 (StanPac by PG&E)

**Inspection Systems:** Bay Area East Transmission and StanPac

**Assets (Unit IDs) with results in this report:** Bay Area East (86285) and StanPac (88672)

**System Type:** GT

**Lead Inspector:** Kai Cheung

**Operator Representative:** Sajjad Azhar

## I. Unsatisfactory Results

**No Preliminary Findings.**

## II. Concerns

### 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.

**PG&E’s 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.

**SED’s Conclusion**

SED determined that the corrective action taken by PG&E sufficiently addresses SED’s concern. Please update SED when these corrective actions are completed.

**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.

**PG&E’s Response to Concern 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.

**SED’s Conclusion**

SED determined that the corrective action taken by PG&E sufficiently addresses SED’s concern.

(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.

### **PG&E's Response to Concern 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.

### **SED's Conclusion**

SED determined that the corrective action taken by PG&E sufficiently addresses SED's concern. Please update SED when corrections of Notification #125442184 and other down CPAs within this area are completed.

## **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.

### **PG&E's Response to Concern 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.

### **SED's Conclusion**

SED determined that the ongoing corrective action taken by PG&E sufficiently addresses SED's concern. Please update SED when correction of Notification #127409477 is completed.

- (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.

**PG&E's Response to Concern 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.

**SED's Conclusion**

SED determined that the ongoing corrective action taken by PG&E sufficiently addresses SED's concern. Please update SED when Request for Work (RW 127134468) is completed.