

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 19, 2023

GI-2023-05-PGE-01-02ABC

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

SUBJECT: General Order (GO) 112-F Gas Inspection of PG&E's East Bay Division (Distribution)

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) East Bay Division (Distribution). The inspection took place between May 1-5 and May 8-12, 2023. The inspection included a review of the Division's records for the period of 2018 through 2022, as well as a representative field sample of the Division's facilities. SED staff also reviewed the Division's operator qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records that SED inspected during the inspection. SED's findings include one violation and one concern.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the concerns noted in the Summary.

If you have any questions, please contact Sikandar Khatri at (415) 703-2565 or by email at Sikandar.Khatri@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng".

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

Enclosure: Summary of Inspection Findings

cc: Susie Richmond, PG&E
Claudia Almengor, SED
Dennis Lee, SED

Summary of Inspection Findings (Summary)

Dates of Inspection: May 1-5 and 8-12, 2023

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Gas Distribution

Assets (Unit IDs) with results in this report: PG&E East Bay Division (86274)

System Type: GD

Inspection Name: 2023 PG&E East Bay Division Inspection

Lead Inspector: Sikandar Khatri

Operator Representative: Sajjad Azhar

Unsatisfactory Results

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 PG&E East Bay Division (East Bay Division)

Issue Summary During SED's review of PG&E East Bay Division's distribution patrolling records, PG&E provided a list of "*distribution main mileage within earthquake fault uncertainty zones, including fault crossings*". 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, "*Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled ...*".

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.

Concerns

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

Question Title, ID Correction of Corrosion Control Deficiencies, TD.CPMONITOR.DEFICIENCY.R

Question 13. Do records adequately document actions taken to correct any identified deficiencies in corrosion control?

References 192.491(c) (192.465(d))

Assets Covered PG&E East Bay Division (East Bay Division)

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.