

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 15, 2023

GI-2023-07-PGE-11-02ABC

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

Dear Ms. Cowsert:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Nicholas Peno, Anthony Phu and Jessica Nicolas conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) North Bay Division (Division) on July 24 – July 28, 2023, and July 31 – August 4, 2023. The inspection included a review of the Division's records for the period of 2019 through 2022, as well as a representative field sample of the Division's facilities. SED staff also reviewed the Division's operator qualification (OQ) records, which included field observation of randomly selected individuals performing covered tasks.

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 discovered one (1) probable violation and three (3) concerns during the inspection.

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

If you have any questions, please contact Nicholas Peno at (916) 214-4269 or by email at nicholas.peno@cpuc.ca.gov.

Sincerely,

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

Enclosure: Post-Inspection Written Preliminary Findings

cc: Susie Richmond, PGE, Kristina Castrence, PG&E, Frances Yee, PG&E, Sajjad Azhar, PG&E, Mohammad Ali, SED/GSRB, Nicholas Peno, SED/GSRB, Claudia Almengor, SED/GSRB

Post-Inspection Written Preliminary Findings

Date of Briefing: 08/04/2023

Dates of Inspection: 7/24/2023 – 7/28/2023, 7/31/23 – 8/4/2023

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: North Bay Division

Assets (Unit IDs) with results in this report: North Bay Division (86278)

System Type: GD

Inspection Name: 2023 PG&E North Bay Division

Lead Inspector: Nicholas Peno

Operator Representative: Sajjad Azhar

Unsatisfactory Result:

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 North Bay Division (86278 (11))

Issue Summary

1). PG&E procedure TD-4412P-07 (Rev. 8b, eff. 09/17/2020) Section 3 "Patrolling" states in part:

Section 3.1 Frequency of Patrol

1. *"Perform patrols at the required frequencies. Refer to Table 1 for minimum frequency requirements....."*

Table 1 of this procedure lists patrol frequencies for facilities outside of business districts as "semiannually" (at least twice each calendar year, not to exceed 7.5 months to the date)

2). G.O. 112-F Reference Title 49 Code of Federal Regulations (49 CFR), Part 192 §192.721(b)(2) states in part:

"(b) Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled:

(2) Outside business districts, at intervals not exceeding 7 1/2 months, but at least twice each calendar year....."

3). In addition, G.O. 112-F Reference Title 49 CFR, Part 192 Section 192.605(a) states in part:

"Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response....."

SED reviewed distribution patrol records for 2018-2022 and noted distribution main pipeline segments located in five (5) Site IDs outside of Business Districts were not patrolled within the minimum frequencies.

The pipeline segments located in the following Site IDs (ref. NB#05 – Distribution Pipeline Patrols (2018-2022).xlsx) were not patrolled within the compliance windows:

- a) NB_06 was patrolled once in 2021, on 4/8/21. The next recorded patrol was the following calendar year on 2/27/22. PG&E failed to conduct one patrol between these dates.
- b) NB_07 was patrolled once in 2021, on 4/1/21. The next recorded patrol was the following calendar year on 2/27/22. PG&E failed to conduct one patrol between these dates.
- c) NB_08 was patrolled once in 2021, on 4/8/21. The next recorded patrol was the following calendar year on 2/27/22. PG&E failed to conduct one patrol between these dates.
- d) NB_28 was patrolled once in 2020, on 2/23/20. This site was not patrolled between 2/23/20 and 12/31/22. PG&E failed to complete five patrols between these dates.
- e) NB_30 was patrolled twice in 2020, on 3/11/20 & 10/15/20. The next recorded patrol was 2 calendar years later 11/19/22. PG&E failed to complete three patrols between 10/15/20 and 11/19/22.

Therefore, SED finds that PG&E is in probable violation of G.O. 112-F Reference Title 49 CFR, Part 192 Sections 192.721(b)(2) and 192.605(a).

Concerns:

Design and Construction: Meters, Service Regulators, and Service Lines (DC. METERREGSVC)

Question Title, ID Customer Meters and Regulator Location, DC.
METERREGSVC.CUSTOMETERREGLOC.O

Question 1. Are meters and service regulators being located consistent with the requirements of 192.353?

References 192.351 (192.353(a), 192.353(b), 192.353(c), 192.353(d))

Assets Covered North Bay Division (86278 (11))

Issue Summary Title 49 Code of Federal Regulations Section §192.353(a) states:

"(a) Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be anticipated."

The meter-set at [REDACTED], Vallejo (for ETS point 44421296) is located along a newly expanded driveway and did not have protection from vehicular traffic.

SED recommends PG&E evaluate the risk of vehicular traffic damage and install appropriate meter protection barrier at this location.

Time-Dependent Threats: Atmospheric Corrosion (TD.ATM)

Question Title, ID Atmospheric Corrosion Monitoring, TD.ATM.ATMCORRODEINSP.O

Question 5. Do field observations indicate that pipe exposed to atmospheric corrosion is properly coated?

References 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192.481(d))

Assets Covered North Bay Division (86278 (11))

Issue Summary PG&E Procedure TD-4188S (revision 1, effective date 01/01/2017) Section 4 "Mitigation" states:

"The mitigation timeline of atmospheric corrosion-related abnormal operating conditions (AOCs) found during monitoring must not exceed thirty-nine months from the date of the AOC identification, except assets that meet requirements in Section 1.4."

On September 5, 2020, PG&E noted that Span 45046990 had coating & pitting issues (Notification 119862401). During field inspection on 8/3/2023, SED's staff observed that PG&E has remediated the coating & pitting issues on the Span 45046990. PG&E's identification of the Abnormal Operating Condition (AOC) is approaching 35 months and counting.

SED recommends that PG&E remediate the AOC before 12/5/2023.

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

Question Title, ID Cathodic Protection Monitoring Criteria, TD.CPMONITOR.MONITORCRITERIA.O

Question 3. Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?

References 192.465(a) (192.463(b), 192.463(c), 192.463(a))

Assets Covered North Bay Division (86278 (11))

Issue Summary PG&E Procedure TD-4181S (revision 3, effective date 05/24/2023) Section 7 "Cathodic Protection Monitoring" states in part:

“7.4 Isolated Steel Monitoring.

3. To ensure facilities are protected until the next monitoring cycle, a drivable anode must be installed if the P/S potentials are less negative than -900 mV with reference to a copper-copper sulfate electrode, with CP current applied.”

Title 49 Code of Federal Regulations Part 192 §192.463(a) states in part:

“Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in appendix D of this part.”

SED found three isolated steel services (10%ers) and one cathodic protection area (CPA) to have insufficient cathodic protection levels per PG&E TD-4181S Sections 7.4 and 49 CFR §192.463(a), as indicated below.

10%ers:

- a) 41305160 in Vallejo: -613mV
- b) 45356953 in Napa: -100mV
- c) 42824329 in San Rafael: -880mV

CPA:

985-31 in San Rafael: -400mV

SED requests that PG&E provide an update on its remediation efforts to address these low pipe-to-soil potentials before the next inspection period.