505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

July 28, 2023

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

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

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

Dear Ms. Cowsert:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Anthony Phu, Paul Penney, and Dylan Glass conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) North Valley Division (Division) from May 15 to 26, 2023. The inspection included a review of PG&E's records for the period of 2019 through 2022, as well as a representative field sample of PG&E facilities. SED staff also reviewed personnels' Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED found one (1) concern during the inspection, which is described in the Post-Inspection Written Preliminary Findings (Summary) enclosed with this letter. The Summary reflects only those particular records and pipeline facilities that SED inspected.

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 Anthony Phu at (916) 531-1016 or by email at anthony.phu@cpuc.ca.gov.

Sincerely,

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

Enclosure: Post-Inspection Written Preliminary Findings

cc: Susie Richmond, PG&E Gas Regulatory Compliance Glen Allen, PG&E Gas Regulatory Compliance Dennis Lee, CPUC Gas Safety and Reliability Branch Jason McMillan, CPUC Gas Safety and Reliability Branch Claudia Almengor, CPUC Gas Safety and Reliability Branch



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Post-Inspection Written Preliminary 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

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.