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May 31, 2024

Mr. Terence Eng
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: General Order 112-F Gas Inspection of PG&E's Diablo Division

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to the Safety and Enforcement Division's (SED) Post-Inspection Written Preliminary Findings (Summary) received May 1, 2024, stemming from the 2024 SED inspection of PG&E's Diablo Division distribution pipeline assets conducted March 18 to March 29, 2024.

For clarity, each of the items identified in the Summary will be repeated, followed by PG&E's response.

Unsatisfactory Result #1: ROW Markers, Patrols, Leakage Survey and Monitoring (MO.RW)

Question Title, ID	Distribution Patrolling, MO.RW.DISTPATROL.R (also presented in: PD.RW)
Question Text	9. Do records indicate distribution patrolling was conducted as required?
References	192.603(b) (192.721(a), 192.721(b))
Issue Summary	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... "

SED reviewed distribution patrol records for 2020-2023 and noted a distribution main pipeline segments with site ID DIA_17 was not patrolled within the minimum frequencies. DIA_17 is an exposed Main near span on an eroded stream bank. It was patrolled once in 2021, on 4/4/21. The next recorded patrol was the following calendar year on 2/27/22. PG&E failed to conduct one patrol between these dates. 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).

Response to Unsatisfactory Result #1:

PG&E was unable to verify one distribution patrol for DIA_17 during the 2021 calendar year. In the subsequent years, distribution patrol requirements have been timely completed without any new notable observations. PG&E completed the installation of new main on January 8, 2024 and deactivated/abandoned in place the exposed old main (PM 35443032) on April 19, 2024.

CAP 128089476 was created to review and enhance the patrols process as part of our ongoing efforts to improve patrolling operations.

Concern #1: Gas Pipeline Maintenance (MO.GM)

Question Title, ID	Valve Maintenance Distribution Lines, MO.GM.DISTVALVEINSPECT.O
Question Text	8. Is proper inspection being performed for each distribution system valve that might be required in an emergency, and prompt remedial action to correct any valves found inoperable?
References	192.747(a) (192.747(b))
Issue Summary	PG&E and GSRB staff could not find a curb valve that was chosen for field examination by GSRB staff. The identifier is: CV-DI281 at [REDACTED] in Oakley.

GSRB wanted to check that this valve was operable; it was pulled from the electronic emergency valve spreadsheet provided from PG&E as part of the pre-audit data request. However, the valve could not be found by either PG&E or GSRB staff when we were out at the location at [REDACTED]. It had apparently been buried.

Please provide an update for finding the valve and operating it.

Response to Concern #1:

Curb valve CV-DI281 at [REDACTED] in Oakley was not found during the SED inspection due to it being slightly buried and behind a locked gate. Upon further inspection two days later, PG&E was able to access the gate, locate the valve, and confirm the value is fully operational. See Attachment #1 for the location map and photos of the valve.

Concern #2: Gas Pipeline Overpressure Protection (MO.GMOPP)

Question Title, ID	Pressure Limiting and Regulating Stations Inspection and Testing, MO.GMOPP.PRESSREGTEST.O
Question	5. Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?
References	192.739(a) (192.739(b))
Issue Summary	SED went to district regulator station DR A02 to observe an "A"-type regulatory maintenance inspection. SED observed the pilot control piping frozen. Upon inspection, it was determined by PG&E staff that an O-ring was doubled up on one of the pilots.

Please identify PG&E's remedial actions to prevent future recurrence.

Response to Concern #2:

The "Maintenance of Regulator Stations (Non-HPR, HPR) and Farm Tap Sets Field Guide" will be revised to add a step and caution for field coworkers to remove all old O-rings before replacing them with new O-rings. See Attachment #2 for the field guide mark-up.

Please contact [REDACTED] for any questions you may have regarding this response.

Sincerely,



Kristina Castrence
Sr. Director, Gas Regulatory and Risk
Gas Engineering
Pacific Gas and Electric Company

cc: Claudia Almengor, CPUC
Dennis Lee, CPUC
Jason McMillan, CPUC
Paul Penney, CPUC
[REDACTED] PG&E

Attachments:

Attachment 1 - Curb valve CV-DI281
Attachment 2 - Field Guide Mark-Up