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Mr. Terence Eng, P.E.
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 Inspection of PG&E's Welding and Joining

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to the Safety and Enforcement Division's (SED) Summary of Inspection Findings (Summary) dated April 3, 2024, stemming from the 2024 SED inspection of PG&E's welding and joining program conducted February 05, 2024, to February 16, 2024. The inspection included a review of transmission and distribution welding and joining procedures, records for the period of 2020 through 2023, as well as PG&E's welding and joining operator qualifications process and records.

For clarity, the single finding identified in the Summary related to qualification of personnel making plastic pipe joints on distribution pipelines will be repeated followed by PG&E's response.

Unsatisfactory Result #1: Design and Construction: Plastic Pipe Construction (DC.PLASTIC)

Question Title, ID	Plastic Pipe - Qualifying Personnel to Make Joints, DC.PLASTIC.PLASTICJOINTQUAL.R
Question Text	17. Do records indicate persons making joints in plastic pipelines are qualified in accordance with §192.285?
References	192.285(d) (192.285(a), 192.285(b), 192.285(c), 192.285(e), 192.807(a), 192.807(b))
Issue Summary	<p>Title 49 CFR Part 192.285(a) states, "No person may make a plastic pipe joint unless that person has been qualified under the applicable joining procedure..."</p> <p>During SED's records review of plastic joining (job number PM 35314539), PG&E allowed one employee to perform plastic joining without relevant qualifications at the time of joining.</p> <p>Between 09/07/2023 - 11/7/2023, employee STW8 performed the following plastic joining tasks on PM 35314539:</p> <ul style="list-style-type: none"> • OQ-2111 PE Stab fitting • OQ-2109 Electrofusion Saddle fitting • OQ-2108 Electrofusion Coupling <p>STW8 did not possess the relevant Operator Qualifications (OQs) when performing these tasks.</p> <p>Therefore, SED finds PG&E in violation of §192.285(a) for allowing an unqualified person to make joints on plastic pipelines.</p>

Response to Unsatisfactory Result #1:

PG&E disagrees the Gas Service Records (GSRs) reviewed for job number PM 35314539 show that plastic joints were made by a person lacking qualifications in accordance with 49 CFR §192.285. PG&E's guidance on GSRs is provided within the Technical Document (TD) series of 9500P-14, including:

- TD-9500P-14 - Gas Service Records ([Att-01](#))
- TD-9500P-14-F01 – GSR form ([Att-02](#))

Please note that procedure TD-9500P-14 introduces the term “person in charge” in section 2.3 and defines it as:

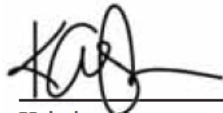
Person in charge: The PG&E employee or contractor who is responsible for verifying field work is completed in accordance with all PG&E guidance documents. This is typically the foreman or inspector.

The direction of section 2.3 in TD-9500P-14 is for the person in charge to ensure work was completed in accordance with PG&E guidance documents, then complete and sign-off on the fields requiring their signature or printed name. The required fields to be signed off by the person in charge are the Install #1 and Install #2 portions of the GSR form TD-9500P-14-F01. The PG&E employee or contractor fulfilling the person in charge role and responsible for the sign-off of the install portion of the GSR form would not necessarily be the person making the plastic joints but would ensure all work was completed in accordance with PG&E guidance documents. Note other means to identify which qualified person completed a polyethylene (PE) pipeline connection is contained within PG&E guidance (see section 4.3 of TD-4170S, provided as [Att-03](#)), but the GSR documentation does not provide that level of detail.

In conclusion, when the employee with LanID STW8 signed off the Install portion of the GSR forms for job number PM 35314539, they were not verifying that they had made a plastic joint on the pipeline, but rather that as the person in charge for the project they ensured that the work completed was in accordance with all PG&E guidance documents, including operator qualification requirements.

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

Sincerely,



Kristina Castrence
Sr. Director, Gas Regulatory and Risk

cc: Dennis Lee, CPUC
Joel Tran, CPUC
Claudia Almengor, CPUC
Kai Cheung, CPUC
[REDACTED] PG&E

Attachments:

Att-01_TD-9500P-14 (Rev-1f) Gas Service Records_CONF.pdf
Att-02_TD-9500P-14-F01 (Rev-2c) Gas Service Record (GSR).pdf
Att-03_TD-4170S (Rev-1g) Plastic Pipeline Design, Construction, Maintenance, and Operations Requirements_CONF.pdf