Pacific Gas and Electric Company

Kristina Castrence
Sr. Director, Gas Regulatory & Risk
6121 Bollinger Canyon Road
San Ramon, CA 94583
Phone: (415) 407-1152
Email: Kristina.Castrence@pge.com

January 07, 2025

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 Gas Inspection of PG&E's San Jose 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 December 09, 2024, stemming from the 2024 SED inspection of PG&E's San Jose Division conducted from September 30, 2024 to October 11, 2024.

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

Unsatisfactory Result #1: Facilities and Storage : Facilities General (FS.FG)

Question Title, ID	Vault Inspection, FS.FG.VAULTINSPECT.O
Question	4. Are inspections of selected vaults with internal volume =200 cubic feet (5.66 cubic meters) housing pressure regulating/limiting equipment adequate?
References	192.749(a) (192.749(b), 192.749(c), 192.749(d))
Assets Covered	San Jose Division (85401 (8))
Issue Summary	During the field inspection of gas facilities, SED observed the in-vault regulator station number DR H-89. The monitor vault is greater than 200 cubic feet, but there is no ventilation system within the vault. Title 49, Code of Regulations (49 CFR) §192.749(a) states, "Each vault housing pressure regulating and pressure limiting equipment and having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more, must be inspected at intervals not exceeding 15 months, but at least once each calendar year, to determine that it is in good physical condition and adequately ventilated." 49 CFR §192.749(c) states, "The ventilating equipment must also be inspected to determine that it is functioning properly." PG&E is in violation of 49 CFR §192.749(c) as the monitor vault for DR H-89 has no ventilation.

Response to Unsatisfactory Result #1:

PG&E agrees with the SED's finding that PG&E is in violation of Title 49 CFR §192.749, as this vault was found to have an internal volume greater than 200 cubic feet without ventilation. PG&E created corrective notification #129669722 during the inspection for this finding to have a vent installed in this vault. See attachment "Att01_Corrective Notification_129669722."

Unsatisfactory Result #2: Maintenance and Operations : Gas Pipeline Maintenance (MO.GM)

Question Title, ID	Abandonment or Deactivation of Pipeline and Facilities, MO.GM.ABANDONPIPE.R
Question	2. Do records indicate pipelines and facilities were abandoned or deactivated in accordance with requirements?
References	192.709(c) (192.727(a), 192.727(b), 192.727(c), 192.727(d), 192.727(e), 192.727(f), 192.727(g))
Assets Covered	San Jose Division (85401 (8))
Issue Summary	SED reviewed a random sampling of abandonment projects provided by PG&E. SED reviewed the records of project number PM35130010 which replaced 321 feet of 3-inch wrought main. From the records provided, there was not any evidence that the pipeline was purged per 49 CFR §192.727(b). 49 CFR §192.709(c) states, "A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer." PG&E did not make a record of the purging of the deactivated main, which is a Maintenance activity in subpart M, and PG&E is in violation of 49 CFR §192.709(c).

Response to Unsatisfactory Result #2:

PG&E respectfully disagrees with SED's finding that PG&E is in violation of Title 49 CFR §192.709(c).

Completion of the purge pursuant to 49 CFR §192.727(b) was recorded in the approved Work Clearance Document (WCD). See attachment "Att02_WCD 80102499" showing "Purge Per A-38" in the Sequence of Operations (see pages 9 & 10) for Opern No. 3 (i.e., SAP Step No. 30) and Opern No. 8 (i.e., SAP Step No. 80).

Completion of each operational step outlined in WCD#80102499 is documented within our SAP system in conjunction with key communication steps documented within our Gas Logging System (GLS). See attachment "Att03_Screenshots of GLS & SAP(WCD#80102499)."

The SAP and GLS screenshots show that all SAP Steps within WCD#80102499 were completed on March 19, 2020, including those related to purging (i.e., No. 30 at approximately 11:30 and No. 80 at approximately 15:30).

Because 49 CFR §192.709 specifies applicability to just transmission lines, PG&E would like to clarify that WCD#80102499 did not involve transmission assets, just the one segment of distribution main. Furthermore, this abandonment did not involve a patrol, survey, inspection, or test required by our O&M Manual.

Unsatisfactory Result #3: Time-Dependent Threats : External Corrosion - CP Monitoring (TD.CPMONITOR)

Question Title, ID	Interference Currents, TD.CPMONITOR.INTFRCURRENT.R
Question	21. Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?
References	192.491(c) (192.473(a))
Assets Covered	San Jose Division (85401 (8))
Issue Summary	49 CFR §192.473(a) states, " Each operator whose pipeline system is subjected to stray currents shall have in effect a continuing program to minimize the detrimental effects of such currents."

This item is regarding PG&E's response to SJ#49: Minimizing Stray Currents.

PG&E explained in their email:

"PG&E's CP monitoring is the heart of our (any operator's) interference program. PG&E doesn't have a dedicated mitigation program for the Distribution System, but that's only because we have not found widespread problems to mitigate. PG&E's corrosion mechanics are trained / qualified to recognize Abnormal Operating Conditions and react accordingly. The issues are found during routine monitoring and escalated to the Corrosion Engineering team for further evaluation and mitigation (as required)."

Since interference currents are known to exist on PG&E's transmission lines, GSRB staff believes that PG&E should develop a program for the distribution pipeline within the zone of influence of BART defined by PG&E for transmission pipelines.

Response to Unsatisfactory Result #3:

PG&E appreciates the comment from the SED, but respectfully disagrees that we are in violation of 49 CFR §192.473(a). As provided in our referenced response, the distribution CP monitoring is the heart of the interference program and findings that indicate possible influence from foreign operators (including BART) are to be sent to corrosion engineering for support per Utility Procedure TD-4181P-101, Section 5.5.

DC Interference consideration is provided for the design and operation of cathodic protection systems in Section 5.2. See attachment "Att09_TD-4181P-101 Rev 1f."

PG&E is also considering expanding the distribution interference guidance provided in this Utility Procedure to include a stand-alone DC Interference program to include non-maintenance-based testing in the next rate case submission.

Concern #1: 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	San Jose Division (85401 (8))

Issue Summary: While PG&E was testing a low pressure relief valve, EQ#41241400, it was noted that there was tape wrap coming away from the pipe in the vault. In addition to potential atmospheric corrosion, the pipe could also be subject to water intrusion into the tape wrap if the vault filled up with water. This could hold water in place if there are holidays on the coating of the pipe and cause atmospheric corrosion; further, no pipe is holiday free.

49 CFR §192.481(b) states, "During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water."

SED recommends PG&E to re-coat the pipe and provide an update.

Response to Concern #1:

PG&E agrees that there was some disbonding of the pipe wrap material during the field inspection of a low pressure relief valve at the LPSR F20 Humboldt & Vine station. PG&E created corrective notification #129677243 during the inspection for this concern to remediate the pipe wrap. See attachment "Att04_Corrective Notification_129677243."

Concern #2: Time-Dependent Threats : External Corrosion - CP Monitoring (TD.CPMONITOR)

Question Title, ID	Rectifier or other Impressed Current Sources, TD.CPMONITOR.CURRENTTEST.O
Question	8. Do field observations confirm impressed current sources are properly maintained and are functioning properly?
References	192.465(b)
Assets Covered	San Jose Division (85401 (8))
Issue Summary	In the field, SED observed PG&E technicians use a voltage measuring tool that had passed the calibration date while performing maintenance on rectifier EQ#41242506. After SED asked to verify the calibration date, SED requested the tool be switched for one that was within the proper calibrated date. SED requests that PG&E communicate their policies and procedures regarding calibration of multimeters to technicians, and incorporate the policies and procedures into existing regular trainings. SED observed a rectifier (equipment ID 44341486) that is located between two driveways where it could be impacted by a vehicle. SED recommends PG&E install some form of physical damage protection in front of EQ# 44341486.

Response to Concern #2:

PG&E regrets any misunderstanding that occurred by having two instruments on site during the demonstration of a rectifier reading, with one of them having an expired calibration. The meter in question has not been used for any operations or maintenance work.

This meter was sent out for calibration and now has a due date of December 19, 2026. See attached calibration report "Att05_Calibration Report- Meter 50670049."

In addition, a refresher tailboard was held with the crew to discuss this concern and review the importance of ensuring the current calibration of their instruments. See attached tailboard "Att06_Meter Calibration Tailboard."

To address rectifier EQ# 44341486 that is located between two driveways, PG&E has created corrective notification #129817271 to install safety bollards at this location. See attachment "Att07_Corrective Notification 129817271."

Concern #3: Time-Dependent Threats : Internal Corrosion - Preventive Measures (TD.ICP)

Question Title, ID	Repair of Internally Corroded Pipe, TD.ICP.REPAIRINT.R
Question	12. Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?
References	192.491(c) (192.487, 192.489)
Assets Covered	San Jose Division (85401 (8))
Issue Summary	SED reviewed the A-forms for leak numbers 121721802 and 121722496 (DR 72). The records indicate that the cause of the leaks was internal corrosion although the pipe at both locations are Polyethylene (PE). Additionally, the PG&E personnel provided images of one of the pipes, which showed external corrosion of the riser, not internal corrosion. The PG&E personnel did not document the repair or replacement of externally corroded pipes correctly.

SED is concerned that incorrect documentation of the type and effect of corrosion can impact the repair of pipe, especially if the pipe is included in a widespread remediation program, like DIMP.

SED recommends PG&E to implement a refresher course or training to properly train employees to identify the correct corrosion and to fill the A-forms correctly.

Response to Concern #3:

To address this concern and prevent future reoccurrence of errors on forms, a tailboard was conducted with the crew to discuss this concern and to review the importance of filling out the A-form document accurately. See attachment "Att08_A-form accuracy tailboard."

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

Sincerely,

Kristina Castrence
Sr. Director, Gas Regulatory and Risk
Gas Engineering

cc: Claudia Almengor, CPUC
Dennis Lee, CPUC
[redacted] PG&E
[redacted] PG&E
Andrea Garcia, CPUC