

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 12, 2025

GI-2024-10-PGE-13-01ABC

Mr. Austin Hastings
Vice President, Gas Engineering Pacific Gas and Electric Company
Gas Transmission and Distribution Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

SUBJECT: SED's Closure Letter for General Order 112-F Gas Inspection of PG&E's Sacramento Division

Dear Mr. Hastings:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas & Electric Company's (PG&E) response letter dated January 15, 2025 for the findings identified during the General Order (GO) 112-F inspection of PG&E's Sacramento Division (Division) which was conducted from October 21 through November 1, 2024.

A summary of the inspection findings documented by SED, PG&E's response to our findings, and SED's evaluation of PG&E's response taken for each identified Violation and Area of Concern is attached.

This letter serves as the official closure of the 2024 GO 112-F inspection of PG&E's Sacramento Division and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

If you have any questions, please contact Dylan Glass at (279) 202-4396 or by email at dylan.glass@cpuc.ca.gov.

Sincerely,

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc: Jaime Hidalgo, PG&E Gas Regulatory Compliance
Brian Stout, PG&E Gas Regulatory Compliance
Frances Yee, PG&E
Terence Eng SED
Jason McMillan, SED
Claudia Almengor, SED

Post-Inspection Written Findings

Dates of Inspection: 10/21/2024 – 11/1/2024

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Distribution

Assets (Unit IDs) with results in this report: Sacramento Division (85399)

System Type: GD

Inspection Name: PG&E Sacramento Division

Lead Inspector: Dylan Glass

Operator Representative: Jaime Hidalgo

Unsatisfactory Results

No Findings.

Concerns

Design and Construction : Design of Pipe Components (DC.DPC)

Question Title, ID Flanges and Flange Accessories, DC.DPC.FLANGE.O

Question 2. Do flanges and flange accessories meet the requirements of 192.147?

References 192.141 (192.147(a), 192.147(b), 192.147(c))

Assets Covered Sacramento Division (85399 (13))

Issue Summary SED team conducted field inspections at regulator station A-37 near Kirkby Way and Gilman Way, in North Highlands, on 10/29/2024 and found multiple flanges with stud bolts that did not extend completely through the nut.

Title 49 CFR §192.147(a) states, "Each flange or flange accessory (other than cast iron) must meet the minimum requirements of ASME/ANSI B 16.5 and MSS SP-44 (incorporated by reference, see §192.7), or the equivalent."

American Society of Mechanical Engineers (ASME) / American National Standards Institute (ANSI) B 16.5, section 6.10.2 states, "6.10.2 Bolt Lengths. Stud bolt lengths, including the height of two heavy hexagon nuts, are shown as dimension L in Tables 7, 10, 13, 15, 17, 19, and 21 (Tables F7, F10, F13, F15, F17, F19, and F21 of Annex F). The tabulated stud bolt length L does not include the height of end points. An end point is defined as an unthreaded length, such as a chamfer, which extends beyond the thread. The method of calculating bolt lengths is explained in Annex D. The tabulated bolt lengths are reference dimensions. Users may select other bolting lengths."

ASME B16.5-2003 Annex D requires that bolt length be calculated to include the length of the necessary nuts needed to connect the flange, plus the minimum flange thickness, plus the gasket thickness, plus the appropriate thickness tolerances.

Additionally, PG&E Gas Design Standard B-45.4: Flange Bolt-Tightening Sequence and Torque Values, section 2.1(E) states, "Bolts/studs must be fully engaged and extend completely through the nut, with a recommended minimum of one thread exposed. Any excess thread protruding beyond the nut face should be minimized with a recommendation, not to exceed ½ beyond nut face."

PG&E has already initiated a system wide self-report for the bolt thread engagement issue with Corrective Action Program (CAP) #126221073 having been created on 5/24/23. The bolt thread engagement issue was also included on the Q2 Internal Review Summary of Findings (IRSF) report which was submitted to SED on 7/13/23. PG&E also created a work order for corrective action to be done on regulator station DR-B43 on the same date.
SED requests PG&E to send proof of these sites being put into the program.

PG&E's Response PG&E agrees with this concern as it relates to Regulator Station A-37. Regulator Station A-37 was visited on October 27, 2024 by the SED inspectors. Multiple flanges were found to have insufficient thread engagement. Regulator Station A-37 has been added to Corrective Action Program (CAP) #126221073. PM #46443017 has been created to address the thread engagement issue. PG&E anticipates completing this task in Q1 of 2025.
PG&E respectfully disagrees with this concern as it relates to Regulator Station DR-B43. There is no such station in the Sacramento Division. Subsequent to the inspection, PG&E Regulatory Compliance personnel and the SED lead for the 2024 Sacramento Division's Inspection discussed the issue and agreed that this concern is incorrect since Regulator Station DR-B43 does not apply to the Sacramento Division. As such, the concern for Regulator Station DR-B43 should be dismissed.

SED's Conclusion SED has reviewed the response from PG&E and believes that PG&E has taken appropriate corrective action to address the concerns found at regulator station A-37.
SED was informed of the actions taken for regulator station DR-B43, which are being addressed separately.

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 Sacramento Division (85399 (13))

Issue Summary During the field portion of this inspection, SED observed a number of pipe-to-soil potential reads that did not meet PG&E's acceptance criteria. Deficiencies were discovered at the following equipment numbers:
Isolated steel risers:
42653741, -897 mV
45203141, -450 mV
ETS:
42024380, -684 mV
42014024, -684 mV
44393822, -792 mV
42017801, -847 mV
Prior to the end of the inspection, PG&E provided a list of corrective notifications for each of the deficiencies identified above. Please inform SED of the corrective actions taken.

PG&E's Response PG&E agrees with this concern. As SED mentions, corrective notifications for each of the equipment numbers referenced have been created. Remediation will occur in accordance with §192.465 External corrosion control: Monitoring and remediation, (d) which states "Remedial action must be completed promptly, but no later than the earliest of the following: prior to the next inspection or test interval required by this section; within 1 year, not to exceed 15 months, of the inspection or test that identified the deficiency; or as soon as practicable, not to exceed 6 months, after obtaining any necessary permits."

SED's Conclusion SED has reviewed the response from PG&E and understands that PG&E has plans for the remediation of the forementioned locations. SED requests that PG&E provide proof of completion once the concerns have been addressed.