

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 7, 2024

GI-2024-02-PGE-29-11

Ms. Christine Cowsert
Senior 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 Welding and Joining

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) reviewed Pacific Gas & Electric Company's (PG&E) response letter dated May 1, 2024, for the findings identified during the General Order (GO) 112-F inspection of PG&E's Welding and Joining which was conducted from February 5 to February 16, 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 is attached.

This letter serves as the official closure of the 2024 GO 112-F inspection of PG&E's Welding and Joining. 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 Kai Cheung at (415) 940-8836 or by email at Kai.Cheung@cpuc.ca.gov.

Sincerely,

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

Enclosure: Summary of Inspection Findings

cc:

Kristina Castrence, PG&E
Frances Yee, PG&E
Barbara Patterson, PG&E Gas Regulatory Compliance
Terence Eng, SED
Claudia Almengor, SED

Summary of Inspection Findings

Dates of Inspection: 2/5/2024 – 2/16/2024

Operator: PACIFIC GAS & ELECTRIC CO (PG&E)

Operator ID: 15007 (PG&E, primary)

Inspection Systems: Welding and Joining

Assets (Unit IDs) with results in this report: Main Office, Specialized Inspections (86283)

System Type: GT and GD

Lead Inspector: Kai Cheung

Operator Representative: Barbara Patterson

I. Unsatisfactory Results

Design and Construction: Plastic Pipe Construction (DC.PLASTIC)

(1) Question 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))

Assets Covered Welding and Joining Specialized Audit (Distribution) (GD Welding Joining)

Issue Summary 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..."

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.

Between 09/07/2023 - 11/7/2023, employee STW8 performed the following plastic joining tasks on PM 35314539:

- OQ-2111 PE Stab fitting
- OQ-2109 Electrofusion Saddle fitting
- OQ-2108 Electrofusion Coupling

STW8 did not possess the relevant Operator Qualifications (OQs) when performing these tasks.

Therefore, SED finds PG&E in violation of §192.285(a) for allowing an unqualified person to make joints on plastic pipelines.

PG&E's 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.

SED's Conclusion

SED has reviewed PG&E's response and all the attachments provided. SED recognizes that the “person in charge” signed on the GSR may not necessarily be the qualified person making the plastic joint. However, the GSR could not identify which qualified person performed the joining as PG&E stated in the response that “the GSR documentation does not provide that level of detail”.

Title 49 CFR §192.807(a)(1) states, “*Qualification records shall include: Identification of qualified individual(s).*” Therefore, PG&E's record do not sufficiently comply with §192.807(a)(1) by not identifying the qualified pipe joiner.

SED has opted not to impose a fine or penalty since the violation did not create any hazardous conditions for the public or utility employees. However, PG&E should update their procedure to require documenting which personnel performed plastic joining as well as other covered tasks. Please update SED when the remediation work is completed.

II. Concerns

No Concerns.