PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

December 17, 2024

Mr. Austin Hastings GI-2024-10-PGE-13-01ABC
Vice President, Gas Engineering Pacific Gas and Electric Company
Gas Transmission and Distribution Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

SUBJECT: General Order (GO) 112-F Gas Inspection of PG&E's Sacramento Division

Dear Mr. Hastings:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) Dylan Glass, Victor Muller, Mohammad Noureddine, Humna Afzel, and Jason McMillan conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Sacramento Division (Division) from 10/21/2024 – 11/01/2024. The inspection included a remote review of the Division's operation and maintenance records for the years 2020 through 2023 (inclusive), and a field inspection of a representative sample of the Division's facilities. SED staff also reviewed the Division's operator qualification records, which included a field observation of randomly selected individuals performing covered tasks.

SED's findings are noted in the Post-Inspection Written Preliminary Findings (Summary) which is enclosed with this letter. The Summary reflects only those records and pipeline facilities that SED inspected. SED discovered two (2) concerns during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the concerns noted in the Summary.

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

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

Enclosure: Post-Inspection Written Preliminary Findings

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

Post-Inspection Written Preliminary Findings

Dates of Inspection: 10/21/2024 – 11/01/2024

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Gas 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: Paul Camarena

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 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, Code of Regulations (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 initiated a system-wide self-report for the bolt thread engagement issue with Corrective Action Program (CAP) #126221073 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 that PG&E send verification that regulator stations sites DR-B43 and A-37 have been included into the existing program.

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.