

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 1, 2024

Ms. Christine Cowsert, VP
Gas Asset Management and System Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

GI-2024-03-PGE-02-02ABC

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

Dear Ms. Cowsert:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Wai Yin (Franky) Chan, Paul Penney, Andrea Garcia Ruvalcaba, and Fariha Mir conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Diablo Division (Division) from March 18 to 29, 2024. The inspection included a review of the Division's records for the period of 2020 through 2023, as well as a representative field sample of the Division's facilities. SED staff also reviewed the Division's operator qualification (OQ) records, which included 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 particular records and pipeline facilities that SED inspected during the inspection. SED discovered one violation and two 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 violations and concerns noted in the Summary.

If you have any questions, please contact Wai Yin (Franky) Chan at (415) 471-4306 or by email at wai-yin.chan@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Terence Eng", is written over a horizontal line.

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Preliminary Findings

cc: Susie Richmond, PG&E Gas Regulatory Compliance
Frances Yee, PG&E
Kristina Castrence, PG&E
Izzat Taha, PG&E Gas Regulatory Compliance
Claudia Almengor, SED
Dennis Lee, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 3/18/2024 – 3/29/2024

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Diablo Division

Assets (Unit IDs) with results in this report: Diablo Division (85405)

System Type: GD

Inspection Name: 2024 Comp Std 15007 PG&E Diablo Division CPUC GD CA

Lead Inspector: Wai-Yin Chan

Operator Representative: Izzat Taha, Mark Montoya, Paul Camarena, Jaime Hidalgo, Justin Leany

Unsatisfactory Results

Maintenance and Operations : ROW Markers, Patrols, Leakage Survey and Monitoring (MO.RW)

1. Question Title, Distribution Patrolling, MO.RW.DISTPATROL.R (also presented in: PD.RW)
ID

Question 9. Do records indicate distribution patrolling was conducted as required?

References 192.603(b) (192.721(a), 192.721(b))

Assets Covered Diablo Division (85405 (2))

Issue Summary G.O. 112-F Reference Title 49 Code of Federal Regulations (49 CFR), Part 192, §192.721(b)(2) states in part:

"(b) Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled:

(2) Outside business districts, at intervals not exceeding 7 1/2 months, but at least twice each calendar year....."

SED reviewed PG&E's distribution patrol records for 2020-2023 and noted a distribution main pipeline segment with site ID DIA_17 was not patrolled by PG&E within the minimum frequencies. DIA_17 is an exposed Main near span on an eroded stream bank. PG&E patrolled DIA_17 once in 2021, on 4/4/21. The next recorded patrol was the following calendar year on 2/27/22. PG&E failed to conduct patrols at intervals not exceeding 7 1/2 months. Therefore, SED finds that PG&E is in probable violation of G.O. 112-F Reference Title 49 CFR, Part 192, Section 192.721(b)(2).

Concerns

Maintenance and Operations : Gas Pipeline Maintenance (MO.GM)

1. Question Title, Valve Maintenance Distribution Lines, MO.GM.DISTVALVEINSPECT.O
ID

Question 8. Is proper inspection being performed for each distribution system valve that might be required in an emergency, and prompt remedial action to correct any valves found inoperable?

References 192.747(a) (192.747(b))

Assets Covered Diablo Division (85405 (2))

Issue Summary PG&E and GSRB staff could not find a curb valve that was chosen for field examination by GSRB staff. The identifier is: CV-DI281 at [REDACTED] in Oakley.

GSRB wanted to check that this valve was operable; it was pulled from the electronic emergency valve spreadsheet provided from PG&E as part of the pre-audit data request. However, the valve could not be found by either PG&E or GSRB staff when we were out at the location at [REDACTED]. It had apparently been buried.

Please provide an update for finding the valve and operating it.

Maintenance and Operations : Gas Pipeline Overpressure Protection (MO.GMOPP)

2. Question Title, Pressure Limiting and Regulating Stations Inspection and Testing, MO.GMOPP.PRESSREGTEST.O
ID

Question 5. Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?

References 192.739(a) (192.739(b))

Assets Covered Diablo Division (85405 (2))

Issue Summary SED went to district regulator station DR A02 to observe an "A"-type regulator maintenance inspection. SED observed the pilot control piping frozen. Upon inspection, it was determined by PG&E staff that an O-ring was doubled up on one of the pilots.

Please identify PG&E's remedial actions to prevent future recurrence.