

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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September 11, 2024

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

GI-2024-06-PGE-73-01ABC

SUBJECT: SED's Inspection/Closure letter for the General Order (GO) 112-F Inspection of PG&E's Transmission Northern Area

Dear Mr. Austin:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), James Zhang, Anthony Phu, Fariha Mir, Henry Chen, Victor Muller, Kai Cheung and Julian Cornell conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Northern Area (Burney District including Burney and Tionesta Compressor Station, North Valley Division, Willows District including Gerber and Delevan Compressor Station, Meridian District, Sierra Division and Sacramento Division) from June 24 through August 02, 2024. The inspection included a review of Northern Area's records for the period of 2021 through 2023, as well as a representative field sample of Northern Area's facilities. SED staff also reviewed Northern Area'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 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 concern during the inspection. This letter serves as the official closure of the 2024 (GO) 112-F Inspection of PG&E's Transmission Northern Area.

If you have any questions, please contact James Zhang at (415) 603-1310 or by email at james.zhang@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng".

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

Enclosure: Post-Inspection Written Findings

cc: Frances Yee, PG&E Gas Regulatory Compliance
Kristina Castrence, PG&E Gas Regulatory Compliance
Jaime Hidalgo, PG&E Gas Regulatory Compliance

Post-Inspection Written Findings

Date of Transmittal: 08/02/2024

Dates of Inspection: 06/24/2024 – 08/02/2024

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: GT

Assets (Unit IDs) with results in this report: PGE Transmission Northern Area (86284)

System Type: GT

Inspection Name: 2024 PG&E Transmission Northern Area

Lead Inspector: James Zhang

Operator Representative: Jaime Hidalgo

Concerns

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

Question Title, ID Cathodic Protection 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(a), 192.463(b), 192.463(c), Part 192, Appendix D)

Assets Covered PGE Transmission Northern Area (Northern Area)

Issue Summary PG&E's Utility Procedure: TD-4181P-203 (Publication Date:12/31/21, Effective Date:1/1/2022, Rev:0), Section 1.3 states: "Ensure that all transmission pipelines, gathering pipelines, and storage well casings meet or exceed the -850 mV instant OFF criterion wherever possible, to align with industry best practices as recommended by AMPP (Association for Materials Protection and Performance)."

During field observation, SED noted that the following read points had low Cathodic Protection (CP) issues (i.e. less negative than -850mV):

Equipment (ETS)	Current (Pipe-to-Soil) Read	Last (Pipe-to-Soil) Read
44931981	-777mV (Instant Off) on 8/1/2024	-854mV (Instant Off) on 8/16/2023
44932546	-594mV (Instant Off) on 8/1/2024	-856mV (Instant Off) on 11/16/2023

SED recommends PG&E to remediate low CP issues before the next inspection cycle.

PG&E's Response:

PG&E recognizes this concern and has taken the following actions:

On 8/2/2024, PG&E provided response below:

Regarding the concern, troubleshoot notifications have been created. If the reads are still down when the mechanic takes the readings for these troubleshoots, a successive corrective will be automatically generated.

Notification: 129326795; PM: 46288614; EQ# 44931981

Notification: 129326796; PM: 46288615; EQ#: 44932546

On 9/10/2024, PG&E provided updates below:

For EQ# 44931981, the instant off read was -923mV on 8/6/2024, with notification #129198574.

For EQ#: 44932546, the instant off read was -901mV on 8/8/2024, with notification #129198602.

SED's Conclusion:

SED has reviewed PG&E's response and accepted the corrective actions.