

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



GI-2024-08-PGE-17-01ABC

October 17, 2024

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: General Order (GO) 112-F Gas Inspection of PG&amp;E's Stockton Division

Dear Mr. Hastings:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Aleksandr Fastovich, Hengyao Chen (Henry), Anthony Phu, and Jessica Nicolas conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Stockton Division (Division) on August 19 – August 30, 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 six (6) probable violations and four (4) 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 Aleksandr Fastovich. at (628) 217-1976 or by email at [aleksandr.fastovich@cpuc.ca.gov](mailto:aleksandr.fastovich@cpuc.ca.gov).

Sincerely,

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

Enclosure: Post-Inspection Written Preliminary Findings

cc: Sajjad Azhar, PG&E Gas Regulatory Compliance  
Kristina Castrence, PG&E Gas Regulatory Compliance  
Frances Yee, PG&E Gas Regulatory Compliance  
Dennis Lee, SED  
Claudia Almengor, SED

# Post-Inspection Written Preliminary Findings

**Dates of Inspection:** 8/19/2024-8/23/2024, 8/26/2024-8/30/2024

**Operator:** PACIFIC GAS & ELECTRIC CO

**Operator ID:** 15007 (primary)

**Inspection Systems:** Distribution

**Assets (Unit IDs) with results in this report:** Stockton Division (85403)

**System Type:** GD

**Inspection Name:** PG&E Stockton Division Audit

**Lead Inspector:** Aleksandr Fastovich

**Operator Representative:** Sajjad Azhar

## Unsatisfactory Results

### Records : Corrosion Control (PRR.CORROSION)

<b>Question Title, ID</b>	<b>Cathodic Protection Monitoring, TD.CPMONITOR.TEST.R</b>
<b>Question</b>	<b>8. Do records adequately document cathodic protection monitoring tests have occurred as required?</b>
<b>References</b>	192.491(c) (192.465(a))
<b>Assets Covered</b>	Stockton Division (SDA)
<b>Issue Summary</b>	<p>Title 49 CFR §192.465(a) states, in part:</p> <p><i>"Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of § 192.463."</i></p> <p>PG&amp;E's Utility Standard: TD-4181S (Publication Date: 09/19/2018, Effective Date:10/01/2018, Rev. 2) Subsection 7.2(1)(a) states:</p> <p><i>"Monitoring frequency: For transmission, distribution, gas gathering, and gas storage pipelines, P/S (pipe-to-soil) monitoring tests must be conducted at least once each calendar year, but with intervals not exceeding 15 months to the date, per 49 CFR §192.465(a)."</i></p>

SED reviewed "Monitoring Points Master" list which included annual inspections of their electrolysis test stations (ETS) for 2020-2023. SED found that an ETS (Equipment #42647901) missed inspections in 2020 and 2021. PG&E inspected the ETS on 01/14/2019, with a successive inspection occurring on 06/29/2022. PG&E confirmed that Equipment #42647901 was not inspected in 2020 and 2021. PG&E submitted CAP #129428585 on 08/23/2024 during the inspection.

SED finds PG&E in violation of Title 49 CFR §192.465(a) for failing to conduct pipe-to-soil monitoring tests on Equipment #42647901 at least once each calendar year, with intervals not exceeding 15 months to the date.

<b>Question Title, ID</b>	<b>Atmospheric Corrosion Monitoring, TD.ATM.ATMCORRODEINSP.R</b>
<b>Question</b>	<b>23. Do records document inspection of aboveground pipe for atmospheric corrosion?</b>
References	192.491(c) (192.481(a), 192.481(b), 192.481(c), 192.481(d))
Assets Covered	Stockton Division (SDA)
Issue Summary	Title 49 CFR §192.605(a) states: <i>"Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."</i>

PG&E Utility Standard: TS-4188S (Publication Date: 02/17/2016 Effective Date: 01/01/2017 Rev. 1) Section 4.1 states:  
*"The mitigation timeline of atmospheric corrosion-related abnormal operating conditions (AOCs) found during monitoring must not exceed thirty-nine months from the date of the AOC identification, except assets that meet requirements in Section 1.4"*

SED reviewed PG&E's "AC Span Inspection" list which included atmospheric corrosion inspections of their spans for 2020-2023. SED found that Equipment #44463618 had abnormal operating conditions (AOC) that were not remediated before the next inspection cycle. On 06/20/2018, PG&E observed light surface rust and major coating issues (no coating) on Air-to-Soil transition #2. PG&E reinspected the span on 06/22/2021, observing light surface rust and major coating issues on Air-to-Soil transition #2 and Main Piping Span. Repairs began on 02/16/2024 and were completed 03/05/2024 (Order #44884331), totaling sixty-eight (68) months from the date of AOC identification.

SED finds PG&E in violation of Title 49 CFR §192.605(a) for failing to follow their procedure TD-4188S to remediate AOCs on Equipment

#44463618 within thirty-nine (39) months from the date of AOC identification.

## Records : Operations And Maintenance (PRR.OM)

Question Title, ID	Pressure Limiting and Regulating Stations Inspection and Testing, MO.GMOPP.PRESSREGTEST.R
Question	23. Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?
References	192.709(c) (192.739(a), 192.739(b))
Assets Covered	Stockton Division (SDA)
Issue Summary	Title 49 CFR §192.605(a) states in part "(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."

PG&E Utility Procedure TD-4540P-01 (Publication Date:4/15/2020, Effective Date:4/15/2020, Rev:2a), section 4.1. states in part *"5. Review data sheets during each inspection AND update as needed. 6. Review all station operating diagrams associated with the station (MET/GIS, maintenance folder copy, vault/station copy) during each inspection to ensure accuracy and consistency AND update as needed."*

SED reviewed the below selected regulator station maintenance binders and noted the PG&E's performed/inspected the regulator station maintenance intervals as specified by §192.739(a); however, SED found that operating diagrams (O.D.) and data sheets are either outdated or had incorrect information (e.g. vault dimension, operating set pressure, and inlet or outlet fire valves).

Binder	Location	Document(s) with incorrect information
ST-HP-10	Alpine & Allston	Data sheet
ST-HP-24	Navy E/O Fresno	Data Sheet
ST-HP-55	Alpine Ave & El Pinal DR	Data sheet
ST-HP-53	French Camp E/O Small	Data Sheet
ST-HP-66	██████████ & Oak Grove	Data Sheet
ST-HP-65	Carlin E/O Crocker	Data Sheet
ST-HP-09	Hammer Lane/Pacific	Data Sheet
ST-HP-57	Miner & D	Data Sheet
LO-HP-03	Kile Rd & W.P.R.R	Data sheet
LO-HP-15	████████████████████	Data Sheet
MA-HP-04	Walnut N/O Yosemite	1.Operating Diagram

		2.Data sheet
MA-HP-06	Almondwood Rd W/O Union RD	Data sheet
MA-HP-17	Industrial/First RIPON	Data sheet
MA-HP-48	Louise And Bizzibe	Operating Diagram
MA-HP-50	Atherton AND Airport	Data sheet

During the field inspections, SED found on-site operating diagrams (O.D.) and data sheets for regulator stations and a relief valve with the same issue:

<b>Binder</b>	<b>Location</b>	<b>Document(s) with incorrect information</b>
TY-HP-72	Naglee Rd & Grant Line Rd	Data Sheet
ST-HP-10	ALPINE & ALLSTON	Operating Diagram
MA-HP-42	JACK TONE & JENNIFER	Operating Diagram
MA-HP-17	FIRST & INDUSTRIAL	1.Data sheet 2.Operating Diagram
LPSR-12	REGULATOR R-1 RELIEF VALVE	Operating Diagram

SED determined that PG&E's field personnel did not properly review and update regulator station data sheets and operating diagrams consistently to ensure accuracy between 2020 and 2023; therefore, PG&E is in violation of Title 49 CFR §192.605(a) for failing to follow its own Utility Procedure TD-4540P-01 to properly review and update data sheets and operating diagrams.

As of 8/30/24, PG&E remediated the five operating diagrams listed above via email confirmation. Please provide an update on the remaining items.

<b>Question Title, ID</b>	<b>Vault Inspection, FS.FG.VAULTINSPECT.R</b>
<b>Question</b>	<b>26. Do records document the adequacy of inspections of all vaults having an internal volume =200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?</b>
References	192.709(c) (192.749(a), 192.749(b), 192.749(c), 192.749(d))
Assets Covered	Stockton Division (SDA)
Issue Summary	Title 49 CFR §192.605(a) states in part, <i>"General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."</i>  Utility Procedure TD-4540P-01 "Maintenance of Regulator Stations (Non-HPR, HPR) and Farm Tap Sets" (Publication Date:01/26/2023, Effective Date:01/26/23, Rev:2c), Section 5 requires field personnel to check for

combustible gases per Utility Procedure TD-4414P-10 before entering any pit or vault.

Utility Procedure TD-4414P-10 - "Gas Operations Entry Into Other Confined Spaces" (Publication Date: 08/18/2021 Effective Date: 08/31/2021 Rev: 0a), Section 3.1 states in part:

*"Before opening the Other Confined Spaces (OCS), all personnel on site perform a job site tailboard briefing per Utility Procedure TD-4414P-01, "Tailboard Briefing and Job Site Safety Analysis (JSSA) for Gas Operations," with specific attention to confined space hazard assessment"*

Section 5.1 states

*"At a minimum, air monitoring results must be recorded before initial entry and before re-entry if all entrants have exited the space."*

Utility Procedure TD-4414P-01 - "Tailboard Briefing and Job Site Safety Analysis (JSSA) for Gas Operations" (Publication Date: 11/15/2017, Effective Date: 03/01/2018, Rev: 0), Section 5.2 states:

*"Retain Record per the Record Retention Schedule*

- 1. The JSSA is a Group-B as-build record."*

Section 4.2 states:

*"Record initial air testing results on Form TD-4414P-10-F01."*

SED reviewed a set of selected records (see below) and found that PG&E is missing the Job Site Safety Analysis (JSSA) form and Other Confined Spaces (OCS) (TD-4414P-10-F01) form.

Binder	Location	Document(s)	Missing Records Year(s)
<b>Stockton</b>			
ST-HP-09	Hammer Lane/Pacific	OCS Form	From 2021 to 2022
ST-HP-10	Alpine & Allston	OCS Form	2021 and 2023
ST-HP-20	Harrison & Scotts	OCS Form	From 2020 to 2022
ST-HP-24	Navy E/O Fresno	OCS Form	From 2021 to 2023
ST-HP-25	Fresno & Sonora	OCS Form	From 2021 to 2022
ST-HP-40	Carpenter & HWY 99	OCS Form	2021 and 2023

ST-HP-53	French Camp E/O Small	OCS Form	From 2021 to 2023
ST-HP-57	Miner & D	OCS Form	2021
ST-HP-62	Arata Rd / Baldwin Rd	OCS Form	From 2021 to 2023
ST-HP-61	Swain & West Ln	OCS Form	From 2021 to 2023
ST-HP-66	██████████ & Oak Grove	OCS Form	From 2021 to 2023

### **Lodi**

<b>Binder</b>	<b>Location</b>	<b>Document(s)</b>	<b>Missing Records Year(s)</b>
LO-HP-01	Franklin HWY & Thornton Rd	OCS Form	From 2021 to 2023
LO-HP-04	Hutchins/Elm	OCS Form	From 2021 to 2023
LO-HP-07	Sargent & Wpr	OCS Form	2021
LO-HP-11	Turner/Lower Sacramento	OCS Form	2021
LO-HP-21	Lockeford St / Ham Ln	OCS Form	2021
LO-HP-24	Lockeford & Cluff	OCS Form	From 2021 to 2023
LO-HP-25	Cherokee & Pioneer	OCS Form	2021
LO-HP-31	N/S HWY 12 & 800' E/O LOCKEFORD	OCS Form	From 2020 to 2023
LO-HP-45	Eight Mile W/O HWY 99	OCS Form	From 2020 to 2023

### **Manteca**

<b>Binder</b>	<b>Location</b>	<b>Document(s)</b>	<b>Missing Records Year(s)</b>
MA-HP-04	Walnut N/O Yosemite	OCS Form	From 2020 to 2022
MA-HP-17	Industrial/First RIPON	OCS Form	From 2020 to 2023
MA-HP-42	Jennifer & Jacktone Rd RIPON	(a) OCS Form (b) JSSA Form	(a) From 2020 to 2023 (b) From 2020 to 2023

MA-HP-33	Louise & Line [REDACTED] [REDACTED]	(a) OCS Form (b) JSSA Form	(a) From 2020 to 2022 (b) From 2020 to 2023
MA-HP-48	Louise And Bizzibe	(a) OCS Form (b) JSSA Form	(a) 2020 and 2021 (b) 2020 and 2021
MA-HP-47	Mckinley Rd N/O Roth Rd	(a) OCS Form (b) JSSA Form	(a) 2020 and 2021 (b) 2020 and 2021
MA-HP-45	Airport Way S/O Yosemite Ave	(a) OCS Form (b) JSSA Form	(a) From 2020 to 2022 (b) From 2020 to 2022
MA-HP-44	Airport/Lathrop	(a) OCS Form (b) JSSA Form	(a) From 2020 to 2023 (b) From 2020 to 2023
MA-HP-50	Atherton AND Airport	(a) OCS Form (b) JSSA Form	(a) 2020 and 2021 (b) 2020 and 2021

After reviewing the record retention schedule (GOV-7101S, Attachment 1) and PG&E procedures as listed above, SED determined that PG&E did not perform the required activities including checking and recording initial air test on the OCS form and performing a job site tailboard briefing before entering a vault as PG&E couldn't provide any missing records. In addition, PG&E did not properly retain its JSSA records, as required by their record retention schedule.

Therefore, PG&E is in violation of Title 49 CFR §192.605(a), by failing to follow its own Utility Procedures TD-4540P-01, TD-4414P-10, and TD-4414P-01 for conducting operation and maintenance activities as well as failing to follow its own Standard GOV-7101S for retaining JSSA records permanently.

## **Pipeline Field Inspection : Pipeline Inspection (Field) (FR.FIELDPIPE)**

<b>Question Title, ID</b>	<b>Flanges and Flange Accessories, DC.DPC.FLANGE.O</b>
<b>Question</b>	<b>2. Do flanges and flange accessories meet the requirements of 192.147?</b>
References	192.141 (192.147(a), 192.147(b), 192.147(c))
Assets Covered	Stockton Division (SDA)
Issue Summary	<p>Title 49 CFR §192.605(a) states,  <i>"Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."</i></p> <p>PG&amp;E's Standard B-45.4 (Publication Date:3/10/2023, Effective Date:3/10/2023 Rev.0e), Section 2.1, Part E, states,  <i>"Bolts/studs must be fully engaged and extend completely through their nuts, with a recommended minimum of two threads exposed, as long as the bolt/stud does not extend beyond 1/2 inch (in.) from the nut face."</i></p> <p>During field inspection at the intersection of W Alpine Ave and Allston Way, SED witnessed bolts not fully engaged at the fire valve V2. Similar conditions were found at the relief valve at the intersection of E Main Street and S Broadway Ave. Therefore, PG&amp;E is in violation of Title 49 CFR §192.605(a) for failing to follow its standard B-45.4 by not installing bolts and nuts properly to maintain their designed strength.</p> <p>As of 8/30/24, PG&amp;E created notification tickets and PM numbers for the two locations:</p> <ol style="list-style-type: none"> <li>1. District Regulator Station, ST-HP-10 Alpine &amp; Allston Notification#129459319 and PM#46306830</li> <li>2. LPSR S13 RELIEF VALVE RV-1 (Equipment#42566045) Notification#129459420 and PM#46306831</li> </ol> <p>SED determined that PG&amp;E's response was adequate and no further written response is required.</p>

<b>Question Title, ID</b>	<b>Placement of ROW Markers, MO.RW.ROWMARKER.O</b>
<b>Question</b>	<b>36. Are line markers placed and maintained as required?</b>
References	192.707(a) (192.707(b), 192.707(d), CGA Best Practices, v4.0, Practice 2-5, CGA Best Practices, v4.0, Practice 4-20)
Assets Covered	Stockton Division (SDA)
Issue Summary	<p>Title 49 CFR § 192.707(a) states:  <i>"Buried pipelines. Except as provided in paragraph (b) of this section, a line marker must be placed and maintained as close as practical over each buried main and transmission line:</i>  <i>(1) At each crossing of a public road and railroad; and</i></p>

*(2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference."*

On 8/28/24, SED observed an emergency valve (EQ#41400630) and found that the required line markers were missing for transmission Line: L-108. SED determined that PG&E is in violation of 192.707(a) by failing to place and maintain the line marker for buried transmission pipelines.

As of 8/30/24, PG&E created a notification ticket#129459595 and PM#46306834 to install line markers. SED requests PG&E to provide records of completion once they become available.

## Concerns

### Pipeline Field Inspection : Pipeline Inspection (Field) (FR.FIELDPIPE)

Question Title, ID	Customer Meters and Regulator Protection, DC.METERREGSVC.CUSTOMETERREGPROT.O
Question	5. Are meters and service regulators being protected from damage consistent with the requirements of 192.355?
References	192.351 (192.355(a), 192.355(b), 192.355(c))
Assets Covered	Stockton Division (SDA)
Issue Summary	<p>On 8/29/24, SED observed a qualified PG&amp;E leak survey personnel perform an annual and 5-year leak survey on plat map number#3113-J3. The leak surveyor discovered five abnormal operating conditions (AOCs) as follows:</p> <ol style="list-style-type: none"><li>1. A minor leak at customer meter at [REDACTED] Tracy, CA 95377;</li><li>2. A missing regulator venting screen of customer meter at [REDACTED] [REDACTED] Tracy, CA 95377;</li><li>3. A minor leak at gas riser of customer meter at [REDACTED] [REDACTED] Tracy, CA 95377;</li><li>4. A missing regulator venting screen of customer meter at [REDACTED] [REDACTED] Tracy, CA 95377;</li><li>5. A missing regulator venting screen of customer meter at [REDACTED] [REDACTED] Tracy, CA 95377</li></ol> <p>SED requests that PG&amp;E provide an update after completing any corrective actions.</p>

Question Title, ID	Cathodic Protection Monitoring Criteria, TD.CPMONITOR.MONITORCRITERIA.O
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**Question** 16. 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** Stockton Division (SDA)

**Issue Summary** During field observation of cathodic protection facilities, SED noted the following read points to be low:

Isolated Steel Services

Equipment	Reading
45202426	-682mV
45104056	-695mV

ETS

Equipment	Reading
44180732	-596mV

SED requests that PG&E provide any corrective actions taken to remediate the low pipe-to-soil potential readings and ensure these test points are within compliance.

**Question Title, ID** Atmospheric Corrosion Monitoring, TD.ATM.ATMCORRODEINSP.O

**Question** 27. Do field observations indicate that pipe exposed to atmospheric corrosion is properly coated?

**References** 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192.481(d))

**Assets Covered** Stockton Division (SDA)

**Issue Summary** On 8/27/2024 – 8/28/2024, SED observed regulator station maintenance and found atmospheric corrosion and coating issues on the following equipment:

1. Regulator Station TY-HP-72
2. Regulator Station MA-HP-17
3. Relief Valve RV-1 at LPSR-13

On 8/30/2024, PG&E provided corrective action tickets for the above:

1. OCW#129453013, PM 47128185
2. OCW#129453893, PM 47128191
3. OCW#129459313, PM 47128217

SED requests that PG&E report any corrective actions taken to remediate the atmospheric corrosion issues.

**Records : Operations And Maintenance (PRR.OM)**

<b>Question Title, ID</b>	<b>Pressure Limiting and Regulating Stations Inspection and Testing, MO.GMOPP.PRESSREGTEST.R</b>
<b>Question</b>	<b>23. Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?</b>
<b>References</b>	192.709(c) (192.739(a), 192.739(b))
<b>Assets Covered</b>	Stockton Division (SDA)
<b>Issue Summary</b>	SED reviewed a selection of regulator station maintenance records and found that PG&E did not record the maintenance results on the latest revision of their form (TD-4540P-01-F02). A new revision with an effective date of 1/23/2023 was available but PG&E continued to use a previous revision for 2023 maintenance.

PG&E recorded regulator station maintenance on outdated forms for the following:

<b>Binder</b>	<b>Location</b>	<b>Dates</b>
ST-HP-70	Matthews E/O Wolfe	10/11/23
LO-HP-01	Franklin HWY & Thornton Rd	6/13/23
LO-HP-04	Hutchins/Elm	1/23/23 and 1/12/24
LO-HP-07	Sargent & Wpr	2/7/23
LO-HP-15		3/10/23
LO-HP-11	Turner/Lower Sacramento	3/22/23
L-10		4/11/23
LO-HP-21	Lockeford St / Ham Ln	6/13/23
LO-HP-25	Cherokee & Pioneer	3/7/23
LO-HP-41	HWY 88 & ATKINS RD	5/10/24
LO-HP-31	N/S HWY 12 & 800' E/O LOCKEFORD	5/12/23
LO-HP-48	Eight Mile Rd & Micke Grove Park	6/12/23
MA-HP-04	Walnut N/O Yosemite	2/2/23
MA-HP-42	Jennifer & Jack Tone Rd RIPON	5/8/23
MA-HP-33	Louise & Line	4/12/23
MA-HP-31	Alice & West Ripon Rd	10/23/23
MA-HP-20	Stanislaus River & HWY99	10/26/23
MA-HP-47	Mckinley Rd N/O Roth Rd	1/23/23 and 1/23/24
MA-HP-45	Airport Way S/O Yosemite Ave	1/26/23 and 2/1/24
MA-HP-44	Airport/Lathrop	6/8/23
MA-HP-56	River Island PKWY N/O Water ST	3/7/23

SED recommends that PG&E update its relevant procedure(s), follow management of change procedures such as holding a meeting on any updates

or changes, and conduct a periodic review and quality check of the records to ensure accuracy.