

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 3, 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: 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) conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) welding and joining program from February 5 to February 16, 2024. The inspection included a review of PG&E's transmission and distribution welding and joining procedures, records for the period of 2020 through 2023, as well as welding and joining personnel qualification process proctored by PG&E at their Sacramento yard and Winter training center. SED staff also reviewed PG&E's operator qualification (OQ) records.

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 (1) unsatisfactory result 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 Kai Cheung at (415) 940-8836 or by email at Kai.Cheung@cpuc.ca.gov.

Sincerely,

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosure: Post-Inspection Written Preliminary Findings

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

Post-Inspection Written Preliminary 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: GD and GT

Lead Inspector: Kai Cheung

Operator Representative: Barbara Patterson

I. Unsatisfactory Results

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

Question Title, ID	Plastic Pipe - Qualifying Personnel to Make Joints, DC.PLASTIC.PLASTICJOINTQUAL.R
Question	17. 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.

II. Concerns

No Preliminary Concerns.