

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



GI-2024-08-PGE-29-08

November 21, 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&E's Transmission Integrity Management Program

Dear Mr. Hastings:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Paul Penney, Randy Feinberg and Wai-Yin Chan conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Transmission Integrity Management Program (TIMP). The inspection took place between August 5, 2024 through September 13, 2024. The inspection included a review of the system wide records for the period of 2020 through 2023.

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 procedures and records and that SED inspected during the inspection. SED discovered four (4) probable violations and three (3) 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 Paul Penney at 415-601-6785 or by email at paul.penney@cpuc.ca.gov.

Sincerely,

Dennis Lee
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Preliminary Findings

cc: Brian Stout, PG&E
Kristina Castrence, PG&E
Frances Yee, PG&E
Terence Eng, SED
Claudia Almengor, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 8-5-24→8-9-24; 8-12-24→8-16-24; and 9-9-24→9-13-24

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Entire Transmission System

Assets (Unit IDs) with results in this report: All TIMP Assets in PGEs System ()

System Type: GT

Inspection Name: 2024 PG&E TIMP Inspection

Lead Inspector: Paul Penney

Operator Representative: Glen Allen, et All

Unsatisfactory Results

Assessment and Repair : Internal Corrosion Direct Assessment (ICDA) (AR.IC)

Question Title, ID Post-Assessment Evaluation and Monitoring, AR.IC.ICDAPOSTASSESS.R

Question 9. Do records demonstrate that the operator assessed the effectiveness of the ICDA process?

References 192.947(g) (192.927(c)(4)(i), 192.927(c)(4)(ii), 192.927(c)(4)(iii)(A), 192.477)

Assets Covered All TIMP Assets in PGEs System (TIMPAssets)

Issue Summary Title 49 Code of Federal Regulations (CFR) §192.927(c)(4)(i) states, in part:

"An evaluation of the effectiveness of ICDA as an assessment method for addressing internal corrosion and determining whether a covered segment should be reassessed at more frequent intervals than those specified in § 192.939. An operator must carry out this evaluation within 1 year of conducting an ICDA;"

SED reviewed ICDA projects' Report L – ICDA Performance and Effectiveness for the following projects: IC20-121, IC20-138, IC21-111A and IC21-124. SED found that two assessments were late in evaluating the effectiveness. They are IC21-111A and IC21-124. Both Report L dates were beyond the year requirements.

SED finds PG&E in violation for Title 49 CFR §192.927(c)(4)(i) for failing to conduct the evaluation within 1 year of conducting an ICDA.

Assessment and Repair : Stress Corrosion Cracking Direct Assessment (SCCDA) (AR.SCC)

Question Title, ID Qualification of Operator Personnel Who Evaluate SCCDA Results, AR.SCC.SCCDAREVQUAL.R

Question 17. Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results, are qualified for the tasks they perform?

References 192.947(e) (192.915(a), 192.915(b))

Assets Covered All TIMP Assets in PGEs System (TIMPAssets)

Issue Summary Title 49 CFR §192.947(e) states, in part:

"Documents that demonstrate personnel have the required training, including a description of the training program, in accordance with § 192.915;"

Title 49 CFR §192.915(b) states, in part:

"Persons who carry out assessments and evaluate assessment results. The integrity management program must provide criteria for the qualification of any person—

(1) Who conducts an integrity assessment allowed under this subpart; or

(2) Who reviews and analyzes the results from an integrity assessment and evaluation; or

(3) Who makes decisions on actions to be taken based on these assessments."

PG&E's Utilities Procedure TD-4810S Rev 3a effective 7/1/2020 states, in part:

"The TIMP roles identified in Table 1 are required to complete training on an annual basis. Employees new to TIMP are required to complete training within 1 year of placement in the position. Training records are found on the PG&E intranet under My Learning, and maybe supplemented with additional electronic and hard copy materials."

SED requested the TIMP training records for 2020. PG&E was unable to provide the records. PG&E provided the following response (ref. attachment 1):

"There are no electronic training records for the 2020 calendar year that I am able to find. Typically, past trainings were done in person and usually only contained a physical paper sign-in roster sheet that cannot be located. Knowledge checks weren't always done in the past and this may likely be the case for this year."

SED finds PG&E in violation for Title 49 CFR §192.947(e) for failing to document training records that demonstrate personnel have the required training, including a description of the training program.

SED also reviewed TIMP training records from 2021-2023. SED identified inconsistent grading criteria with no procedure that provided the method of delivery, content or grading (ref attachment 1). This resulted in inconsistencies in the evaluation of personnel without a concise method for evaluating assessment results.

SED finds PG&E in violation for Title 49 CFR §192.915(b) for failing to provide for the qualification of any person who conducts an integrity assessment, who reviews and analyze the results from an integrity assessment and evaluation, and who makes decisions on actions to be taken based on these assessments.

Assessment and Repair : In-Line Inspection (Smart Pigs) (AR.IL)

Question Title, ID Integrity Assessments that were Not Performed as Scheduled or Within Required Timeframes, AR.IL.ILIDELAY.R

Question 15. Do records indicate that the performance of integrity assessments has been delayed and integrity assessment delays have been justified?

References 192.947(d) (192.909(a), 192.909(b), 192.943(a), 192.943(b), 190.341, 192.18)

Assets Covered All TIMP Assets in PGEs System (TIMPAssets)

Issue Summary Title 49 CFR §192.605(a) states, in part:

"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's Gas Transmission Integrity Management Program Utility Standard TD-4810S Rev. 4, Effective Date: 09/15/2021, Paragraph 8.1.4 states, in part:

"...Covered pipeline segments that have been found to require an integrity assessment for axial SCC must be scheduled for an assessment within 5 years of the identification date, not to exceed the 7-year reassessment interval for the covered segment prescribed in 49 CFR §192.939."

SED reviewed PG&E Project ID: I-521B & Project ID:581B of Line 300B & identified the following non-conformance:

The Risk & Threat Assessment Data provided (ref. DR#41 - SCC21-300B Risk and Threat Data.xlsx) identified SCC_HpH & SCC_NN_Axial_Threat as 'moderate' & 'strong', respectively on 4/29/2013. This record also included assessment due dates of 12/31/2021 for both HpH_Axial_SCC_Assessment_Due_Date & NN_Axial_SCC_Assessment_Due_Date.

Integrity Management Exception Report MoC #1077 F03 Exception Report (DR#53) dated 6/13/2022 was created to change the SCC re-assessment interval from 5 years for 'Strong' threats & 7 years for 'Moderate' threats per TD-4810S 'Gas Transmission Management Program' Rev 4 Effective date 09/15/2021 to 10 years per Title 49 CFR §192.921(f).

SED finds PG&E in violation of Title 49 CFR §192.605(a) prior to the submission of MoC #1077 (as it was submitted after the violation) for not completing the prescribed assessment within PG&E's 5-year requirement per PG&E "Gas Transmission Integrity Management Program Utility Standard TD-4810S Rev. 4, Effective Date: 09/15/2021, Paragraph 8.1.4.

Concerns

Assessment and Repair : In-Line Inspection (Smart Pigs) (AR.IL)

Question Title, ID In-Line Inspection, AR.IL.ILCORR.R

Question 20. Do records demonstrate that required actions are being taken to address significant corrosion threats identified during in-line inspections?

References 192.933 (192.917(e)(5))

Assets Covered All TIMP Assets in PGEs System (TIMPAssets)

Issue Summary Based on PG&E's data request responses to DR #72, DR #98, DR #105 and DR #115, SED **recommends** that PG&E develop a summary Form identifying if PG&E found similar segments per **Title 49 CFR §192.917(e)(5)** and the definition in PG&E's process. Also, PG&E should list those similar segments if applicable. This recommendation is to facilitate PG&E's own record keeping about this requirement and SED's auditing of the Title 49 CFR §192.917(e)(5) requirement in code.

Integrity Management : High Consequence Areas (IM.HC)

Question Title, ID IM High Consequence Areas - HCA Identification, IM.HC.HCAID.P

Question 1. Does the process include the methods defined in 192.903 High Consequence Area (Method 1) and/or 192.903 High Consequence Area (Method 2) to be applied to each pipeline for the identification of high consequence areas?

References 192.905(a)

Assets Covered All TIMP Assets in PGEs System (TIMPAssets)

Issue Summary SED reviewed PG&E's Utility Procedure TD-4127P-05 "Criteria for Identifying Moderate and High Consequence Areas" and found that the list of High Consequence Area (HCA) determination codes in this procedure was not used in PG&E's records. The following list is the set of HCA determination codes in table 2 of TD-4127P-05:

- Code A: Qualifies as HCA, based on structure count of 20 or more structures intended for human occupancy within the HCA
- Code B: Qualifies as HCA, based on Method 1 analysis per GO 112-F
- Code I: Qualifies as HCA, based on identified site OR identified site and 20 or more structures

However, based on PG&E's response to SED's data request number 50, the following list is the set of HCA determination codes used in PG&E's records:

- Code A: HCA due to 20+ structures
- Code B: HCA due to 20+ structures AND an ID site
- Code C: HCA due to Method 1
- Code I: HCA due to identified site

According to PG&E, Utility Procedure TD-4127P-05 will be updated to reflect the set of HCA determination codes used in its records. Please provide SED with an **update** on the status of this change in PG&E's response letter.

Integrity Management : Quality Assurance (IM.QA)

Question Title, ID Invoking Non-Mandatory Statements in Standards, IM.QA.IMNONMANDT.P

Question 2. Does the process include requirements that non-mandatory requirements (e.g., "should" statements) from industry standards or other documents invoked by Subpart O (e.g., ASME B31.8S-2004 and NACE SP0502-2010) be addressed by an appropriate approach?

References 192.7(a)

Assets Covered All TIMP Assets in PGEs System (TIMPAssets)

Issue Summary DR#28- PG&E to verify TIMP standards treat "should" statements from industry standards as mandatory unless PG&E has a justification for not doing so. PG&E showed that the requirement is in the ECDA process TD-4810P-90 under definitions but no proof it's in all the other industry standards incorporated by reference into Part 192 where "**should**" statements are included. Nor are there any general statements stating "**should**" statements shall be followed for all standards.

Please provide an update on how PG&E meets this requirement.