



Mike Kerans
Sr. Director, Gas Regulatory & Risk
6121 Bollinger Canyon Road
San Ramon, CA 94583
Phone: (415) 265-6623
Email: Mike.Kerans@pge.com

June 12, 2025

Mr. Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: General Order (G.O.) 112-F Gas Inspection of Pacific Gas and Electric's Mission Division

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to the Safety and Enforcement Division's (SED) Post-Inspection Written Preliminary Findings (Summary) received May 13, 2025, stemming from the SED inspection of PG&E's Mission Division, conducted April 7 to April 18, 2025.

For clarity, each of the items identified in the Summary will be repeated, followed by PG&E's response.

Unsatisfactory Result #1: Time-Dependent Threats: External Corrosion - CP Monitoring (TD.CPMONITOR)

Question Title, ID Cathodic Protection Monitoring, TD.CPMONITOR.TEST.R

Question 5. Do records adequately document cathodic protection monitoring tests have occurred as required?

References 192.491(c) (192.465(a))

Assets Covered Mission Division (Mission)

Issue Summary Title 49 CFR §192.491(c) states, "Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist."

SED reviewed separately protected steel pipelines (10%er) inspection records and noted that PG&E conducted inspections but did not document readings or notes for the equipment in the table below. PG&E could not provide documentation explaining why there were no readings during the inspection.

Equipment	Notification	Tech Inspected On	Notes on PR	Read (mV)
44790771	120821845	4/15/2021		
44795397	121350096	5/18/2021		
45004417	120426900	8/19/2021		
45065645	120773524	12/8/2021		
45287307	123974452	5/10/2023		
45340984	124794746	9/9/2023		
45340986	124792699	4/27/2023		
45341011	124794174	10/19/2023		
45341011	127311245	1/25/2024		
45346576	127302253	8/19/2024		
45403812	125817913	11/28/2023		
45553676	128016631	5/30/2024		
45617440	129020902	8/30/2024		
41293802	120948176	12/8/2021		

Based on the information gathered, SED found PG&E in violation of Title 49 CFR §192.491(c) for not maintaining records in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist.

Response to Unsatisfactory Result #1:

PG&E records are maintained in sufficient detail to demonstrate the adequacy of corrosion control measures. PG&E acknowledges the above list of equipment previously provided and subsequent response during the inspection may have lacked complete explanation (partially due to very late request from SED during the inspection). However, PG&E has all the information in SAP that documents the actions taken to demonstrate adequate cathodic protection. Please see "**Attachment 1.pdf**" for the chronological history of detailed SAP notes for each of the listed equipment numbers.

Concern #1: Design and Construction: Meters, Service Regulators, and Service Lines (DC.METERREGSVC)

Question Title, ID Customer Meters and Regulator Protection, DC.METERREGSVC.CUSTOMETERREGPROT.O

Question 2. 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 Mission Division (Mission)

Issue Summary During field observation on April 15, 2025, SED identified a service regulator which was housed inside an enclosure without adequate ventilation at [REDACTED] Sylvian Circle, San Leandro.

PG&E should consider remediating the service regulator to ensure that gas from the regulator vent can escape freely into the atmosphere as specified in Title 49 CFR §192.355(b)(2).

Response to Concern #1:

PG&E has assigned this task to its estimating team for field verification under **Notification # 131144797**. If an encroachment is confirmed, a work order number will be created to address

this issue within the required six months. PG&E can update SED on the resolution of this concern once complete.

Concern #2: Maintenance and Operations: Gas Pipeline Maintenance (MO.GM)

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

Question 7. 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 Mission Division (Mission)

Issue Summary On April 15, 2025, SED field observed that emergency valve V-B62 was paved over and inoperable. PG&E created a corrective notification (#130880149) for this paved-over issue. Please provide SED an update on PG&E's remedial actions.

Response to Concern #2:

As mentioned above, PG&E has created **Notification # 130880149** to address this issue. PG&E is still in the process of completing this work. PG&E can update SED on the resolution of this concern once complete.

Concern #3: Time-Dependent Threats: External Corrosion - CP Monitoring (TD.CPMONITOR)

Question Title, ID Cathodic Protection Monitoring 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(b), 192.463(c), 192.463(a))

Assets Covered Mission Division (Mission)

Issue Summary During the field inspection on April 15, 2025, SED observed the following low reads:

- -759mV at [REDACTED] Oakes Blvd, San Leandro
- -720mV at [REDACTED] Bancroft Ave, San Leandro

PG&E should promptly correct the above low reads as required by Title 49 CFR §192.465(d). Please provide SED an update on PG&E's remedial actions.

Response to Concern #3:

PG&E has created a work order (**Notification # 131109073**) to correct this issue. PG&E is still in the process of completing this work. PG&E can update SED on the resolution of this concern once complete.

Concern #4: Time-Dependent Threats: External Corrosion - Cathodic Protection (TD.CP)

Question Title, ID Isolation from Other Metallic Structures, TD.CP.ELECISOLATE.O

Question 12. Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?

References 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))

Assets Covered Mission Division (Mission)

Issue Summary During field observation on April 15, 2025, SED observed a casing (equipment # 44741816) with pipe-to-soil read of -1390mV and case-to-soil read of -1230mV, which indicated a possible casing short.

PG&E should electrically isolate the pipeline from the metallic casing as required by Title 49 CFR §192.467(c). Please provide SED an update on PG&E's remedial actions.

Response to Concern #4:

PG&E has created a work order (**Notification # 131296338**) to correct this issue, and the work has not been completed yet. PG&E can update SED on the resolution of this concern once complete.

Please contact [REDACTED] for any questions you may have regarding this response.

Sincerely,

/s/ Mike Kerans
Mike Kerans
Sr. Director, Gas Regulatory and Risk
Gas Engineering

cc: Claudia Almengor, CPUC
Dennis Lee, CPUC
Joel Tran, CPUC
Kai Cheung, CPUC
Mike Kerans, PG&E
[REDACTED] PG&E
[REDACTED] E