

August 7, 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 Distribution Integrity Management Program (DIMP)

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to the Safety and Enforcement Division's (SED) Summary of Inspection Findings (Summary) received July 14, 2025, stemming from the SED inspection of PG&E's Distribution Integrity Management Program (DIMP), conducted May 19 to May 23, 2025.

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

Concern #1: Gas Distribution Integrity Management : Identify Threats (GDIM.TH)

Question Title, ID Identify Threats - Threats Considered, GDIM.RA.THREATCATEGORIES.P

Question 4. In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline?

References 192.1007(b)

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary SED reviewed PG&E's utility procedure TD-4850P-01, Rev. 6, Section 5.2, which states that threats are categorized into eight general categories to align with 49 CFR 192 Subpart P.

SED observed that the sub-threats identified by PG&E under "Incorrect Operations" do not align with the guidance provided in the "ANSI/GPTC Z380.1, Guide for Gas Transmission, Distribution, and Gathering Piping Systems". PG&E should revisit sub-threat categorization for "Incorrect Operations" using the aforementioned Guide as one of the sources.

Response to Concern #1:

PG&E is in the process of evaluating sub-threat categorizations for "Incorrect Operations" with respect to the "ANSI/GPTC Z380.1, Guide for Gas Transmission, Distribution, and Gathering Piping Systems". PG&E has created Corrective Action Program (CAP) # 131503826 to track our progress. It is planned to be completed by the end of 2025.

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
Sikandar Khatri, CPUC
Mike Kerans, PG&E
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