

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 27, 2025

GI-2025-04-PGE-03-02ABC

Mr. Austin Hastings
Vice President, Gas Engineering
Pacific Gas and Electric Company
6121 Bollinger Canyon Road
San Ramon, CA 94583

SUBJECT: SED's Closure Letter for General Order 112-F Gas Inspection of PG&E's Mission Division

Dear Mr. Hastings:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas & Electric Company's (PG&E) response letter dated June 11, 2025, for the findings identified during the General Order (GO) 112-F inspection of PG&E's Mission Division (Division) which was conducted from April 7 to April 18, 2025.

A summary of the inspection findings documented by SED, PG&E's response to our findings, and SED's evaluation of PG&E's response taken for each identified Area of Concern is attached.

This letter serves as the official closure of the 2025 GO 112-F inspection of PG&E's Mission Division. Any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

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: [REDACTED], PG&E Gas Regulatory Compliance
[REDACTED], PG&E Gas Regulatory Compliance
[REDACTED], PG&E Gas Regulatory Compliance
[REDACTED], PG&E Gas Regulatory Compliance
Dennis Lee, SED
Claudia Almengor, SED

Summary of Inspection Findings

Dates of Inspection: 04/07/2025 – 04/18/2025

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Assets (Unit IDs) with results in this report: Mission Division (86275)

Inspection Scope: Comprehensive Standard Gas Distribution

Inspection Period: 2022 – 2024

Lead Inspector: Kai Cheung

Operator Representative: [REDACTED]

I. Unsatisfactory Results

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.

PG&E’s 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.

SED’s Conclusion SED has reviewed the response and the attachment provided by PG&E and has decided not to impose a fine or penalty at this moment. SED recognizes that these notifications were for troubleshooting purposes only and therefore PG&E did not take any readings. PG&E either removed or repaired each piece of equipment before they performed the closeout notification and documented the readings.

II. Concerns

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

Question Title, ID Customer Meters and Regulator Protection, DC.METERREGSVC.CUSTMETERREGPROT.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).

PG&E's 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.

SED's Conclusion SED determined that the corrective action proposed by PG&E should sufficiently address SED's concern. SED plans to field-observe this remedial work. SED requests PG&E to notify SED once the work date is confirmed so SED can organize a field visit.

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.

PG&E's 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.

SED's Conclusion SED determined that the corrective action taken by PG&E sufficiently addresses SED's concern. SED requests PG&E to update SED when the corrective action is completed.

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 35 Oakes Blvd, San Leandro
- -720mV at 478 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.

PG&E's 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.

SED's Conclusion SED determined that the corrective action taken by PG&E sufficiently addresses SED's concern. SED requests PG&E to update SED when the corrective action is completed.

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.

PG&E's 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.

SED's Conclusion SED determined that the corrective action proposed by PG&E should sufficiently address SED's concern. SED plans to field-observe this remedial work. SED requests PG&E to update SED once the work date is confirmed so SED can organize a field visit.