

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 13, 2025

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

GI-2025-01-PGE-29-03

SUBJECT: General Order (GO) 112-F Inspection of PG&E's Gas Transmission and Distribution Pipelines Operations, Maintenance and Emergency plans (Updates).

Dear Mr. Hastings:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) reviewed Pacific Gas & Electric Company's (PG&E) response letter dated April 17, 2025, that addressed the concerns identified during General Order 112-F inspection of updates to PG&E's Operations and Maintenance plans, and Emergency plans. SED conducted the inspection from January 6 through January 10, 2025.

Attached is a summary of SED's inspection findings, PG&E's responses to SED's findings, and SED's evaluation of PG&E's responses to the finding.

This letter serves as official closure of the 2025 Operations and Maintenance plans, and Emergency plans inspection.

Thank you for your cooperation in this inspection. If you have any questions, please contact Matthew Shaffer at (916) 969-9334 or by email at Matthew.Shaffer@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthewson Epuna".

Matthewson Epuna
Program & Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Preliminary Findings

cc: [REDACTED], PG&E Gas Regulatory Compliance
[REDACTED], PG&E Gas Regulatory Compliance
[REDACTED], PG&E
Terence Eng, SED
Claudia Almengor, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 01/06/2025 – 01/10/2025

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Gas Transmission – Operation and Maintenance and Emergency Plan

Assets (Unit IDs) with results in this report: Main Office (Specialized Inspections) (86283)

System Type: GT

Inspection Name: PG&E O&M & ER Transmission

Lead Inspector: Matthew Shaffer

Operator Representative: [REDACTED]

Unsatisfactory Results

Emergency Preparedness and Response : Failure & Incident Investigation (EP.FII)

Question Title, ID Incident RMV Analysis, EP.FII.INCIDENTRMVANALYSIS.P

Question 2. For incidents that involve an RMV, does the operator's procedures require a post-incident analysis of all the factors that may have impacted the release volume and consequences of the release and identify and implement operators and maintenance measures to minimize future incidents?

References 192.617(a) (192.617(c))

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

Issue Summary PG&E has procedures that address post-incident analysis (TD-4810P-26, GOV-6102P-09, GOV-6102P-10) but the procedures do not address incidents specifically involving Rupture-Mitigation Valves (RMVs) as required by 192.617(c). Therefore, PG&E is in probable violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section §192.617(c) for failure to establish a procedure to require a post-incident analysis, for incidents that involve an RMV, pursuant to the requirements of Section 192.617(c).

PG&E's Response to PG&E's Rupture Mitigation Valve (RMV) guidance for post-incident analysis can be found in Utility Unsatisfactory Result #1: Standard TD-4810S, Section 11. The standard includes a post-incident review of the risk analysis for all operational matters that could affect all rupture mitigation processes and procedures. TD-4810S is provided as Attachment 1.

In addition, Utility Procedure TD-4815P-01, "Valve Automation Prioritization Process," Sections 2.5 and 2.6 includes the various factors that impact the site selection and operation of the

RMVs, including swiftness of leak detection, rate of potential gas release, type of gas being transported, operating pressure, the rate of potential release, pipeline elevation profile, potential for ignition, and location of nearest response personnel. TD-4815P-01 is provided as Attachment 2.

PG&E will also amend our Operations and Maintenance manual by early 2026 to include an analysis of all relevant factors impacting the release volume and consequences.

SED's Conclusion: SED has reviewed PG&E's response and accepts the corrective actions that it has articulated. SED will review your program changes during future inspections.

Question Title, ID Incident Summary, EP.FII.INCIDENTSUMMARY.P

Question 3. For incidents that involve an RMV, does the operator's procedures require an incident summary?

References 192.617(a) (192.617(d))

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

Issue Summary PG&E has procedures that address post-incident analysis (TD-4810P-26, GOV-6102P-09, GOV-6102P-10) but the procedures do not address incidents specifically involving RMVs as required by 192.617(d). Therefore, PG&E is in probable violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section §192.617(d) for its failure to establish a procedure that requires an incident summary, for incidents that involve an RMV.

PG&E's Response to PG&E's Utility Procedures GOV-6102P-09 "SIF ACE Cause Evaluation (SIF ACE)," GOV-6102P-10 "SIF Unsatisfactory Result #2: Root Cause Evaluation (SIF RCE), GOV-6102P-12 "Root Cause Evaluation (RCE) and GOV-6102P-13 "ACE Cause Evaluation (ACE)" require the use of a template that includes an overview of the incident. The template includes an "Event Description" field as well as fields to summarize the conclusions, root or apparent causes, and the relevant corrective actions.

SED's Conclusion: SED has reviewed PG&E's response and accepts the corrective actions that it has articulated. SED will review your program changes during future inspections.

Question Title, ID Failure RMV Analysis, EP.FII.FAILURERMVANALYSIS.P

Question 6. For failures that involve an RMV, do the operator's procedures require a post-failure analysis and the identification and implementation of operations and maintenance measures to minimize future failures?

References 192.617(c)

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

Issue Summary PG&E has procedures that address post-incident analysis (TD-4810P-26, GOV-6102P-09, GOV-6102P-10) but the procedures do not require a post-failure analysis for failures specifically involving RMVs as required by 192.617(c). Therefore, PG&E is in probable violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section §192.617(c) for failure to establish a procedure to require a post-failure analysis and the identification and implementation of operations and maintenance measures to minimize future failures pursuant to the requirements of Section 192.617(c).

PG&E's Response to PG&E's RMV-specific guidance for post-failure analysis can be found in Utility Procedure TD-4815P-01, Unsatisfactory Result #3: "Valve Automation Prioritization Process," Sections 2.5 and 2.6, and includes the various factors that impact the site selection and operation of the RMVs. GOV-6102P-09 "SIF ACE Cause Evaluation (SIF ACE)," GOV-6102P-10 "SIF Root Cause Evaluation (SIF RCE), GOV-6102P-12 "Root Cause Evaluation (RCE) and GOV-6102P-13 "ACE Cause Evaluation (ACE)" all require post failure analysis and have requirements to establish corrective actions. See Attachments 1 and 3-6 for the above referenced guidance documents.

Using these enterprise-wide established processes for analysis and tracking corrective actions after an incident ensures a robust investigation with well-established reviews and safeguards, improves visibility and management of change than a process designed for a single type of rare event.

PG&E will also amend our Operations and Maintenance manual by early 2026 to include a requirement for a post-failure analysis for failures that involve an RMV.

SED's Conclusion: SED has reviewed PG&E's response and accepts the corrective actions that it has articulated. SED will review your program changes during future inspections.

Question Title, ID Failure Summary, EP.FII.FAILURESUMMARY.P

Question 7. For failures that involve an RMV, does the operator's procedures require a failure summary?

References 192.617(d)

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

Issue Summary PG&E has procedures that address post-incident analysis (TD-4810P-26, GOV-6102P-09, GOV-6102P-10) but the procedures do not address failures specifically involving RMVs as required by 192.617(d).

Therefore, PG&E is in probable violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section §192.617(d) for failure to establish a procedure to require a failure summary for failures that involve an RMV.

Response to PG&E's Utility Procedures GOV-6102P-09 "SIF ACE Cause Evaluation (SIF ACE)," GOV-6102P-10 "SIF Unsatisfactory Result #4: Root Cause Evaluation (SIF RCE), GOV-6102P-12 "Root Cause Evaluation (RCE) and GOV-6102P-13 "ACE Cause Evaluation (ACE)" use a template that includes an overview of the incident. The template includes an "Event Description" field as well as fields to summarize the conclusions, root or apparent causes, and the relevant corrective actions. See Attachment 3-6 for the above referenced guidance documents and Attachment 7 for an example of the template.

PG&E will also amend our Operations and Maintenance manual by early 2026 to include a requirement for a written summary of incidents that involve an RMV, augmenting the summaries that are required in the templates by our GOV-6102 procedures.

SED's Conclusion: SED has reviewed PG&E's response and accepts the corrective actions that it has articulated. SED will review your program changes during future inspections.

Concerns

No Preliminary Concerns.

Post-Inspection Written Preliminary Findings

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System Type: GD

Inspection Name: PG&E O&M & ER Distribution

Lead Inspector: Matthew Shaffer

Operator Representative: [REDACTED]

Unsatisfactory Results

No Preliminary Findings.

Concerns

No Preliminary Concerns.