

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 9, 2026

GI-2025-06-PGE-29-08

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: SED's Closure Letter for General Order 112-F Gas Inspection of PG&E's Transmission Integrity Management Program (TIMP)

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 November 20, 2025, for the findings identified during the General Order (GO) 112-F inspection of PG&E's TIMP, which was conducted during the week of June 21 to June 25, 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 Concern is attached.

This letter serves as the official closure of the 2025 GO 112-F inspection of PG&E's TIMP and 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 Paul Penney at (415) 703-1817 or by email at paul.penney@cpuc.ca.gov.

Sincerely,

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc:



PG&E

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Terence Eng, GSRB

Kai Cheung, GSRB

Claudia Almengor, GSRB

Concern #1: Integrity Management: Preventive and Mitigative Measures (IM.PM)

Question Title, ID P&M Measures - Corrosion, IM.PM.PMCORR.P

Question 16. Does the process adequately account for taking required actions to address significant corrosion threats?

References 192.933 (192.917(e)(5))

Assets Covered All Transmission Assets in the System (AllTransAssets)

Issue Summary PG&E Procedure TD-4810S, Section 11.5 does not include the definition of "Similar Segment" that PG&E transmitted previously in their response to a previous inspection finding. Please provide an update on when this will be added.

192.917(e)(5) requires:

*(5) Corrosion. If an operator identifies corrosion on a covered pipeline segment that could adversely affect the integrity of the line (conditions specified in § 192.933), the operator must evaluate and remediate, as necessary, all pipeline segments (both covered and non-covered) with similar material coating and environmental characteristics. An operator must establish a schedule for evaluating and remediating, as necessary, **the similar segments** (emphasis added) that is consistent with the operator's established operating and maintenance procedures under Part 192 for testing and repair.*

The term "similar segments" is not defined in Part 192. PG&E has taken this to mean segments on the same transmission line. As a result, SED staff requested PG&E to make this definition explicit in their procedures. PG&E responded to that previous finding that they had created a Corrective Action Plan (CAP), which has yet to be implemented. Please provide an update on PG&E's progress implementing the CAP.

PG&E's Response to Concern #1:

PG&E has updated its procedure "Threat Identification" TD-4810P-16 Revision 4e Published September 15, 2025, Section 5.1 (a) to include a comprehensive definition of "similar segments". Please see the referenced section in "Attachment_1_Threat_Identification_TD-4810P-16_R4e.pdf" for the detailed definition.

SED's Conclusion for Concern #1:

PG&E's detailed response adequately addresses this concern.

Concern #2: 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 Transmission Assets in the System (AllTransAssets)

Issue Summary This requirement is related to documents incorporated by reference into Part 192, which are identified in 192.7 (What documents are incorporated by reference partly or wholly in this part). These industry standards or other documents often have "should" statements in the standard. PHMSA believes these "should" statements be treated as mandatory unless an operator has a justification for not following them.

PG&E's response from the 2024 SED TIMP inspection stated:

This item is documented in PG&E's Corrective Action Program issue 129556542 with a targeted completion date of February 28, 2025. Utility Procedure TD-4127P-05 will be updated to reflect the HCA determination codes used in the records.

Please provide an update on PG&E's progress implementing CAP#129556542.

Response to Concern #2:

PG&E has completed a third-party contract to perform an analysis and comparison of all "should" statements in ASME B31.8S – 2018 with PG&E standards and procedures. This comparison identified six instances where updates to procedures/processes were recommended to address "should" statements in ASME B31.8S. Please see "Attachment_2_ASME_Should_Statement_Report.pdf" published June 19, 2025, for report details. PG&E has created Corrective Action Program (CAP) # 129556542, Action 5 to initiate steps towards updating procedures to incorporate "should" statements. This action was completed on June 23, 2025. This included updates to procedures TD-4810P-29, TD-4820S, TD-4810P-16, TD-4810P-01. The updated standards are currently in the final draft phase and will be published by January 10, 2026

SED's Conclusion for Concern #1:

PG&E's response adequately addresses this concern.