

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 4, 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-2025-07-PGE-29-14

SUBJECT: SED's Closure Letter for General Order (GO) 112-F Gas Inspection of PG&E Damage Prevention Program

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 August 27, 2025, for the findings identified during the General Order 112-F inspection of PG&E Damage Prevention Program which was conducted from July 7 to 11, 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 Violation and Area of Concern is attached.

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

Thank you for your cooperation in this inspection. If you have any questions, please contact James Zhang at (415) 603-1310 or by email at james.zhang@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

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

Enclosure: Post-Inspection Written Findings

cc:

[REDACTED] – PG&E
Claudia Almengor, Terence Eng, & James Zhang – SED

Post-Inspection Written Findings

Dates of Inspection: 07/07/2025 – 07/11/2025

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: GT & GD

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

System Type: GT & GD

Inspection Name: 2025 PG&E Damage Prevention Program

Lead Inspector: James Zhang

Operator Representative: [REDACTED]

Unsatisfactory Results

Public Awareness and Damage Prevention : Damage Prevention (PD.DP)

Question Title, ID Damage Prevention Program, PD.DP.PDPROGRAM.R

Question 7. Does the damage prevention program meet minimum requirements specified in 192.614(c)?

References 192.614(c)

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

Issue Summary Title 49 CFR Part 192.614 (c)(6) states in part, "...Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:

(i) The inspection must be done as frequently as necessary during and after the activities to verify the integrity of the pipeline; and

(ii) In the case of blasting, any inspection must include leakage surveys."

SED reviewed PG&E's stand-by inspection records and found there were no records documenting leak surveys conducted as part of stand-by inspections to confirm the integrity of its gas facilities during and after blasting by third party excavators on two separate occasions (6/23/2023 at 2275 Iron Point Rd in Folsom and 8/28/2024 at 639 W Clay St in Stockton). PG&E also confirms there are no leak survey records for the two blasting events referenced. Therefore, PG&E is in violation of Title 49 CFR Part 192.614 (c)(6) for failing to conduct leakage surveys to confirm the integrity of its gas facilities during and after blasting by third party excavators.

PG&E's Response:

PG&E agrees with the finding. In the cases SED identified, engineers were notified as required, but the Leak Survey group was not informed per TD-4110P-01 "Leak Survey Process". To prevent this, guidance will be distributed to facility engineers stressing notification of Leak Survey for all blasting events, and TD-5811P-301 "Performing Standby" will be updated to instruct standby inspectors to initiate leakage surveys. Additionally, an electronic control in the PG&E Locate App will ensure PG&E Leak Survey personnel are alerted for 811 tickets with confirmed blasting activities. CAP 131634061 was generated to track the action item to closure.

SED's Conclusion:

SED has reviewed PG&E's response and accepts the corrective action. SED has decided not to impose a fine or penalty at this moment. SED will review the records of the corrective action during future inspections.

Concerns

Public Awareness and Damage Prevention : Damage Prevention (PD.DP)

Question Title, ID Documented Damage Prevention Program - TPD, PD.DP.TPD.P

Question 4. Does the process specify how reports of Third-Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?

References 192.614(c)(1)

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

Issue Summary In response to a SED data request, PG&E stated that for Third Party Damages (TPD), in-person notifications are sent to the responsible excavators. This is covered in PG&E Procedure TD-5100P-10, step 6.5.1.

SED recommends that when third party damages occur, PG&E should check that the responsible excavator is already on the mailing list. If not, the excavator should be added to the mailing list. This requirement should be added in the appropriate procedure(s).

PG&E's Response:

PG&E agrees with the recommendation. PG&E's Public Awareness Program Administrator will periodically review the baseline excavator mailing list, preferably quarterly but at least annually, and will add any excavator that damages PG&E underground gas pipelines, as needed, to ensure the list is up to date. This step will be formally included in TD-5801S, "Pipeline Public Awareness Program" in CAP 131634068 was generated to track the action item to closure.

SED's Conclusion:

SED has reviewed PG&E's response and acknowledges the proposed corrective actions plan articulated by PG&E. SED will review the records of the corrective action during future inspections.