

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 27, 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-2025-06-PGE-29-08

SUBJECT: General Order (GO) 112-F Inspection of PG&E's Gas Transmission Integrity Management Program (TIMP) - Focused Inspection

Dear Mr. Hastings:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Paul Penney, Kai Cheung and Sikandar Khatri conducted a General Order (GO) 112-F Gas Transmission Integrity Management Program (TIMP) focused inspection from June 21, 2025, through June 25, 2025. The inspection included a review of procedures and records for High Consequence Areas (HCAs), Risk Assessment, Baseline Assessment, Continual Evaluation, Preventative and Mitigative measures, and Quality Assurance.

SED staff identified two concerns, noted in the Post-Inspection Written Preliminary Findings (Summary).

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the concerns noted in the Summary. If you have any questions, please contact Paul Penney at (414) 601-6785 or by email at Paul.Penney@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng".

Terence Eng, P.E.
Program Manager
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
[REDACTED] PG&E
Dennis Lee, SED
Paul Penney, SED
Claudia Almengor, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: June 21-25, 2025

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: All Transmission Assets

Assets (Unit IDs) with results in this report: All Transmission Assets in the System

System Type: GT

Inspection Name: (2025) PG&E TIMP Audit, Focused

Lead Inspector: Paul Penney

Operator Representative: [REDACTED] and Team

Unsatisfactory Results

No Preliminary Findings.

Concerns

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.

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.