

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 2, 2021

GI-2021-03-PGE-29-09

Ms. Christine Cowsert, VP  
Gas Asset Management and System Operations  
6121 Bollinger Canyon Road  
San Ramon, CA 94583

SUBJECT: Closure Letter for General Order (GO) 112-F Gas Inspection of PG&E's Distribution Integrity Management Program (DIMP) – Follow up and review of DIMP Projects

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas & Electric Company's (PG&E) response letter dated May 21, 2021 for the findings identified during the General Order 112-F inspection of PG&E's Distribution Integrity Management Program (DIMP). The inspection was conducted between March 1-5 and 8-12, 2021.

Included is SED's evaluation of PG&E's response taken for identified Areas of Concern/ Recommendations.

This letter serves as the official closure of the 2021 GO 112-F Inspection of PG&E's Distribution Integrity Management Program (DIMP).

Thank you for your cooperation in this inspection. If you have any questions, please contact Sikandar Khatri at (415) 703-2565 or by email at [Sikandar.Khatri@cpuc.ca.gov](mailto:Sikandar.Khatri@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 Preliminary Findings

cc: Susie Richmond, PG&E  
Vincent Tanguay, PG&E  
Mahmoud Intably, SED  
Terence Eng, SED

# Post-Inspection Written Preliminary Findings

**Dates of Inspection:** March 1-5 and 8-12, 2021

**Operator:** PACIFIC GAS & ELECTRIC CO

**Operator ID:** 15007 (primary)

**Inspection Systems:** Distribution

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

**System Type:** GD

**Inspection Name:** PG&E DIMP Inspection - 2021

**Lead Inspector:** Sikandar Khatri

**Operator Representative:** Paul Camarena

## Unsatisfactory Results

*No Preliminary Findings.*

## Concerns

### Design and Construction : Construction (DC.CO)

(1) Question 5. Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285?

References 192.285(d) (192.285(a), 192.285(b), 192.285(c), 192.807(a), 192.807(b))

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

Issue Summary During SED's DIMP inspection in 2017, it was pointed out that PG&E should document names of joiners for each plastic joint made, for example on documents like GSR (Gas Service Record) or As-Builts or elsewhere. During this inspection, it was observed that some of GSRs had a 'red stamp' that lists names of joiners/welders and others as applicable (for example, GSRs for PM # 31125322). However, GSRs for some other projects did not have this 'red stamp'. Therefore, until PG&E comes up with other alternative, it should use the 'red stamp' approach for GSRs/As-Builts to document the names of joiners/welders, as applicable.

**PG&E's Response:**

Joiner information is currently an optional field in GSRs, found in page 2 of the GSR template, TD-9500P-14-F01 (lower left hand corner, "connections" section). If the joiner info is provided, the crew is given guidance per GSR Instructions Job Aid, TD-9500P-14-JA01 (page 18). A copy of a GSR and associated job aid are attached. As stated in our 2017 DIMP audit response letter, PG&E believes that a successful implementation of pipe joiner tracking will require a technology solution on a mobile platform that allows the capture of this data in near real time and in a digital format that is query-able for joiner tracking and traceability. PG&E is still determining the best technology solution to capture this information.

**SED's Conclusion:**

SED appreciates PG&E's effort for including the optional field for capturing joiner information in GSR. As stated in PG&E's response, it is still working on finding the digital solution for including the joiner and joint information for tracking and traceability since 2017. Therefore, SED suggests that the current instructions for completing this field as an "optional" field be changed to "required" field until the digital solution is implemented. This will be followed up in the next SED Inspection.

## **Gas Distribution Integrity Management : Identify Threats (GDIM.TH)**

(2) Question 4. In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline?

References 192.1007(b)

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

Issue Summary PG&E is aware of the fact of sulfur deposition in filters at regulating stations which has also been observed by SED staff during a number of inspections. PG&E has procedures to handle this once the sulfur deposits are found, however, PG&E DIMP team should investigate it as a potential threat. Therefore, PG&E DIMP team should collect existing information/data, investigate for the causes and devise mitigation measures for the same.

**PG&E's Response:**

PG&E recognizes CPUC's concern and recommendation regarding sulfur deposition in filters and regulating stations. We will monitor this issue as possible threat to our system as per our existing threat monitoring procedure, detailed in Attachment G of the DIMP manual. This stipulates that DIMP will conduct quarterly review of data sources such as PHMSA bulletins, NSTB Accident Reports, Material Problem Reports, etc. to monitor for new threats.

**SED's Conclusion:**

SED appreciates that PG&E will monitor sulfur deposition as a threat to the system. While, PG&E will be reviewing outside sources, it is already known that this issue exists in the PG&E system. Therefore SED suggests that all past information in PG&E system on this issue be analyzed to determine the root cause and remediation, in addition to future monitoring. This will be followed up in the next SED Inspection.