

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 10, 2017

Mr. Sumeet Singh, Vice President
Pacific Gas and Electric Company
Gas Asset and Risk Management
6111 Bollinger Canyon Road, Room 4590-D
San Ramon, CA 94583

GI-2016-10-PGE14-02B

SUBJECT: General Order 112 Gas Inspection of PG&E's Sierra Division

Dear Mr. Singh:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112 inspection of Pacific Gas & Electric Company's (PG&E) Sierra Division (Division) on October 10-14, 2016.¹ The inspection included a review of the Division's records for the period of 2013-2015, as well as a representative field sample of the Division's facilities in Roseville, and Marysville. SED staff also reviewed the Division's operator qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records and pipeline facilities that SED inspected during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the violations and observations noted in the Summary.

If you have any questions, please contact Mohammad Ali by phone at (916) 928-2109 or by email at ma5@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

cc: Mike Bradley, PG&E Gas Regulatory Support
Susie Richmond, PG&E Gas Regulatory Support

¹ General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.

SUMMARY OF INSPECTION FINDINGS

I. Probable Violations

A. PG&E's Internal Audit Findings

Prior to the start of the inspection, PG&E provided SED its findings from the internal review it conducted of Sierra Division (Division). Some of PG&E's internal review findings are violations of PG&E's standards, and are therefore violations of Title 49 Code of Federal Regulations (CFR), §192.13(c) or §192.605(a). SED is aware that PG&E corrected some of its findings prior to SED's inspection. Table 1 lists all of the violations from PG&E's internal review.

Table 1: PG&E's Internal Review

| Code Section | # of Non-Compliance | Finding Description | Corrective Action | Remediation Date |
|--------------|---------------------|--|---|------------------|
| 192.605(a) | 1 | Missed B inspection for Regulator Station MRB - 77 | B inspection had been scheduled incorrectly. The inspection was completed on 5/20/2016 | 05/20/2016 |
| | 1 | Missed B inspection for Regulator Station GD.STA.DIST.00960 | Inspection work ticket printed out but employee performed A inspection instead on 3/15/2016. B inspection was completed on 06/30/2015 | 06/30/2016 |
| | 1 | Maintenance not fully complete. The new fire valve MRB-18 was paved over by Yuba City and could not be located. | T&D excavated black top for V-1 access. A corrective notification was made to complete permanent repair to valve box | Pending |
| | 22 | Pressure relief device review missing/not in folder for the following stations: 1. HPR A05, 2. HPR PB11, 3. HPR C63, 4. HPR 5., HPR MG07, 6. HPR A06, 7. DR C38, 8. DR B39, 9. HPR C012, 10. HPR A09, 11. HPR MG08, 12. HPR MG02, 13. HPR R604, 14. HPR R221, 15. HPR B80, 16.HPR R218, 17. HPR R215, 18. HPR R21, 19. HPR PB04, 20. HPR PB10, 21. HPR MG11, 22. HPR R101. | All Capacity Relief forms were added to binders. | 06/30/2016 |
| | 4 | Missed mandatory maintenance of 4 Marysville valves: i) V-3.52, Railroad Ave, ii) V-A Railroad Ave, iii) V-B Railroad Ave, iv)V-25, 99 & Hull Rd. | Valves were maintained on 9/25/2015, Maintenance plans were added to SAP. CAP created to correct missed maintenance and track completion of tasks | 12/31/2015 |

| | | | |
|---|--|---|------------|
| 2 | Stub installed and never used, project to remove stub was not completed within compliance period per TD-9500P 16. Discovered date:11/20/13 | Order # 31037363 created to track project status. Stub was removed on 7/6/15. All Mappings were completed on 8/4/15 to reflect New As-built | 12/31/2015 |
|---|--|---|------------|

B. SED Findings

None.

II. Areas of Concern/ Observations/ Recommendations

1. During SED’s records review, SED observed that in Regulator Station # 78 of Marysville a 3-inch valve was replaced by a 2-inch valve in 2014. The recorded comments made by the crew were general, such as removed/replaced/deleted, but made no mention of the size change. SED recommends that the Division make comments more specific and include vital information such as size changes.
2. During SED’s records review, SED observed that in Regulator Station # 87 of Marysville the size of Fire valve V-1 was designated as 4” on the valve card. During SED’s inspection, SED discovered that the actual size of the valve was ¾”. The Division later corrected the valve size on the card.
3. During SED’s records review, SED observed that in Regulator station #R-445 (Loomis Regulator Station-Roseville), valves V-235 & V-238 were listed as plug valves. PG&E maintained the valves on 8/13/2016 without lubricating. When asked, PG&E explained that these valves were maintained on 8/13/2016 but the crew’s grease gun was damaged and the valves could not be lubricated. The crew did not document any record indicating that they would need to return to lubricate the valves. The Division lubricated the valves on 10/12/2016 after the condition was discovered during SED’s inspection. SED recommends that the Division document and follow up on any pending corrective actions.