

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 27, 2017

GI-2017-05-PGE19-01C-15

Mr. Sumeet Singh, Vice President  
Pacific Gas and Electric Company  
Portfolio Management & Engineering  
6111 Bollinger Canyon Road, Office #4590-D  
San Ramon, CA 94583

SUBJECT: General Order 112 Inspection of PG&amp;E's Burney District

Dear Mr. Singh:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112<sup>1</sup> inspection of Pacific Gas and Electric Company's (PG&E) Burney District (District) from May 8 through May 12, 2017. The inspection included a review of District records for the period of January 1, 2013 through December 31, 2016. A representative sample of PG&E facilities and right-of-way were also inspected including Burney and Tionesta compressor stations.

A Summary of Inspection Findings (Summary), which contains probable violations and areas of concerns and recommendations identified by SED staff, is included as an attachment to this letter.

Please provide a written response indicating the measures taken by PG&E to address the probable violations and areas of concerns and recommendations within 30 days from the date of this letter.

If you have any questions, please contact Alin Podoreanu at (916) 928-2552 or by email at [alin.podoreanu@cpuc.ca.gov](mailto:alin.podoreanu@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 Regulatory Compliance  
Susie Richmond, PG&E Regulatory Compliance  
Glen Allen, PG&E Regulatory Compliance

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

## **SUMMARY OF INSPECTION FINDINGS**

### **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 the District. Some of the internal review findings are violations of PG&E's operations and maintenance standards, and are therefore violations of Title 49 Code of Federal Regulations. Table 1 lists PG&E's internal findings.

**Table 1:** Burney District Internal Review Findings

<b>Topic</b>	<b>Code Section</b>	<b>Finding</b>	<b>Instances</b>	<b>Completion Date</b>
Valves	192.605(a)	Valve V-40 in Burney Compressor Station - maintenance was not documented on form TD-4430P-04 (Gas Valve Maintenance Record - Service History) prior to January, 2017, but was instead documented in PLM or SAP.	1	4/11/2017
Corrosion	192.465(a)	2016 reads for ETS points were read beyond the compliance window.	2	9/14/2016
Equipment	192.13(c)	4 pipe locators and 2 combustible gas indicators had instances where the calibration verification exceeded 45 days between checks.	6	4/24/2017
Maintenance	192.605(a)	Filters in gas supply racks were not replaced in 2016 per TD-4545P-10, but were instead inspected during regular maintenance.	25	5/3/2017

### **B. Probable Violations**

None

### **C. Areas of Concern and Recommendations**

1. During the field inspection at the Tionesta Compressor Station, SED asked PG&E personnel to demonstrate how they access the Gas Emergency Response Plan. The process included accessing the PG&E intranet and waiting for the Gas Emergency Response Plan (GERP) to download

before accessing the manual. SED recommends that PG&E store a hard-copy of the GERP at the compressor station for immediate access.

2. PHMSA Advisory Bulletin ADB-05-03 advises natural gas pipeline operators of the need to preplan for coordinated responses to pipeline emergencies with owners of electric and other utilities located near the pipeline right of way. During the inspection at the Tionesta Compressor Station SED observed electrical transmission power lines in close proximity to the compressor station. PG&E explained that the power lines are operated by Pacific Power and Light. The documentation reviewed by SED did not indicate PG&E included Pacific Power and Light in emergency response liaison efforts. SED recommends that PG&E preplan with Pacific Power and Light regarding potential hazards that could result from the proximity of the power lines to the compressor station, include them in emergency response liaison activities and invite them to future exercises at the compressor station.

3. Title 49 CFR §192.463 External corrosion control: Cathodic protection states in part:

*“(a) Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in appendix D of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.”*

During the inspection at the Burney Compressor Station, district personnel found low pipe to soil potentials of -822mV at Valve C and -720 mV at Valve 2. These reads are out of tolerance with the -850 mV criteria.