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July 17, 2017

Mr. Ken Bruno
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: State of California – Public Utilities Commission
General Order 112 Audit – PG&E's Burney District

Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the CPUC conducted a General Order 112 audit of PG&E's Burney District from May 8th to May 12th, 2017. On June 27th, 2017, the SED submitted their audit report, identifying findings. Attached is PG&E's response to the CPUC audit report.

Please contact Mike Lang at (209) 601-9853 [or malsd@pge.com](mailto:malsd@pge.com) for any questions you may have regarding this response.

Sincerely,

/S/
Mike Bradley

Attachments

cc: Alin Podoreanu, CPUC
Aimee Cauquiran, CPUC
Dennis Lee, CPUC
Terence Eng, CPUC
Susie Richmond, PG&E

2017 Burney District CPUC Audit Responses

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
NOV - PG&E's Internal Review 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.	As noted in SED's inspection report, the corrective actions have already been completed and provided to SED.	n/a
AOC	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.	The Tionesta and Burney Compressor Stations now have Gas Emergency Response Plan (GERP) flash drives in each office. In the event of an emergency, on site personnel can now use this flash drive to quickly access the Emergency Response Plan.	n/a
AOC	2	<p>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.</p> <p>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.</p>	The Sr Emergency Preparedness Coordinator has scheduled the 2017 North Valley Division OEC Exercise (which includes Burney District) for October 12, 2017. Pacific Power and Light will receive invitations for this exercise and all future exercises.	n/a
AOC	3	<p>Title 49 CFR §192.463 External corrosion control: Cathodic protection states in part:</p> <p>“(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.”</p> <p>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.</p>	These low reads were due to damage to the ground bed caused by the Station rebuild that is currently ongoing. These valves will be removed as part of the K-2 compressor replacement work, and the ground bed will be replaced. This work is estimated for completion in Q1 of 2018.	n/a