

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 28, 2018

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

GI-2017-12-PGE-06-02C

Re: SED's closure letter for the 2017 General Order 112-F Inspection of PG&E's Central Coast Division

Dear Mr. Singh:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas & Electric Company's (PG&E) response letter dated February 16, 2018 for the findings identified during the General Order (GO) 112-F Inspection of PG&E's Central Coast Division (Division) on December 4 - December 8, 2017.

A summary of the inspection findings documented by SED, PG&E's response to our findings, and SED's evaluation of PG&E's response to each item is attached to this closure letter.

This letter serves as the official closure of the 2017 GO 112-F Inspection of the Central Coast Division facilities and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or formal proceeding.

If you have any questions, please contact James Zhang at (415) 603-1310 or by email at [James.Zhang@cpuc.ca.gov](mailto:James.Zhang@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

cc: Mike Bradley, PG&E Compliance  
Susie Richmond, PG&E Gas Regulatory Compliance  
Aimee Cauguiran, SED  
Kelly Dolcini, SED

## 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 Central Coast 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 all 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

Topic	# of Non-compliance	Finding(s)	Corrective Action to Close Findings	Completion Date
Leak Survey Distribution (2015)	1	Not Following Company Procedures Facilities on Map do not appear to be surveyed. Map 3751 B02	Map was corrected to show actual survey area, which was not reflected with colored outline. No missed survey.	5/1/2015
Leak Survey Transmission (2015)	5	Non Compliance with Internal Requirements Late Semi-Annual Leak Surveys	Surveys completed 1 – 2 days late	6/3/15 6/3/15 6/2/15 6/2/15 6/2/15
Leak Repair (2015)	17	Not Following Company Procedures Sketches missing or missing dimensions	Added all necessary information to sketches, and where sketches were missing, downloaded in correct folder of SAP.	1/8/2016
Leak Repair (2016)	1	Not Following Company Procedures Late Leak Repair. Leak # 7610202931	CAP#: 113884492 After a Grade 3 recheck in December of 2015 it was upgraded to a grade 2+. Due 3/2/2016 Repaired 47 days late.	4/18/2016
	4	Non-Compliance with Company Procedures Incorrectly sized EFV's installed:	CAP 7032424 Replaced EFV's with correctly sized EFV's	9/28/17 9/27/17 9/27/17 9/27/17
Instrument Calibrations (2014)	5	(CP) Missed Calibrations: Calibration Records missing to verify	The VC-1 used to do the calibrations was removed from the yards. Mechanics	12/31/2014

		DPM's were calibrated in 2014	used Multi-meters when unit was not in calibration.	
Operator Qualifications	1	Not Following Company Standards: During a Locate and Mark OQ assessment, it was found that a contractor did not have the adequate qualifications (OQ) to be performing Locate and Mark Activities	CAP#: 7008581 Employee was removed from program until qualification could be obtained	10/13/2015
Transmission Patrols (2015 & 2016)	68	Not Following Company Procedures: TD-4412P-07 Pipeline locations were identified as having vegetative cover over the ROW, which obscures observation by aerial patrol. Therefore, to supplement the ongoing monthly aerial patrols, ground patrols are also performed on a quarterly basis in accordance with utility procedure TD-4412P-07, "Patrolling Gas Pipelines" Not ground patrolled within 4.5 months.	Most of the sites have already been ground patrolled for this quarter, albeit after the 4.5 month deadline. The other sites are being patrolled as soon as possible (See CAP 7039765 for the short term/long term tasks for description captured in CAP 7035569)	3/10/2017
Distribution Patrols (AC/Slide) (2015 & 2016)	1	Not Following Company Procedure: AC inspection not performed on Exposed piping	Remove piping inside the security valve box and replace box with curb valve using frame and cover as delineated on drawing under PM 31245420	6/1/2016

**PG&E's Response:**

There are no pending actions from the Central Coast internal review summary findings.

**SED's Conclusion:**

SED has opted not to impose a fine or penalty since PG&E did not create any hazardous condition for the public or utility employees.

## B. SED Findings

There were no findings of probable violation during this inspection.

## **II. Areas of Concern/ Observations/ Recommendations:**

1. During field inspection, SED noted several gas facilities shown with incorrect house numbers on the following Gas Distribution Plat Maps:
  - 3753-D04
  - 3751-B03
  - 3900-A05

PG&E procedure TD-4110P-03 Rev: 2 Performing and Documenting Leak Survey, Section 3.3 states in part: "...Perform the following steps, as map discrepancies (e.g., new or unmapped facility) are identified in the field:

1. Perform a leak survey on the facility.
2. Generate a Form TD-4460P-11-F01 AND corrective action program (CAP) item in accordance with Utility Procedure TD-4460P-11, "Gas Map Corrections."

Please provide SED with an update and documentation showing actions taken to correct the map discrepancies observed during the field inspection.

## **PG&E's Response:**

PG&E created 3 CAPs to address each of the mapping corrections. The CAPs are listed below:

1. 3753-D04 – CAP 114069619, which has been completed and closed out on 12/22/17.
2. 3751-B03 – CAP 114083122, which has been completed and closed out on 12/22/17.
3. 3900-A05 – CAP 114105979, which has been completed and closed out on 12/22/17.

## **SED's Conclusion:**

SED has reviewed PG&E's response and acknowledges that the corrective actions articulated by PG&E sufficiently address SED's concern. SED may opt to review corrections made to the records and conduct field verifications, if necessary.

2. During SED's field inspection, the following were observed:
  - a) Vegetation  
697 Carr Ave, Aromas  
Inaccessible to meter shut off valve due to vegetation
  - b) Leak  
650 Carr Ave, Aromas  
A leak was found on meter set along the thread – customer side
  - c) Leak  
310 Harvest Dr. Watsonville

A leak was found on meter set at valve tank

- d) Leak  
345 Harvest Dr. Watsonville  
A leak was found on meter set at nipple on the valve – customer side
- e) Meter protection post  
123 Marine View Ave, Davenport  
A knocked over meter protection post at the address above
- f) Leak  
4 Broadway Street, King City  
Two leaks was found on meter set along the union

Please provide SED with an update on actions taken by PG&E to address the observations above.

**PG&E's Response:**

PG&E created AOCs for the following observations a, b, c, d & f with anticipated completion dates by end of Q2. See attachment "AOC Report". PG&E has corrected the meter protection post at 123 Marine View Ave, Davenport. The attached photo show the remediation is now complete.

**SED's Conclusion:**

SED has reviewed PG&E's response and acknowledges that the corrective actions articulated by PG&E sufficiently address SED's concern. SED may opt to review all repair records and conduct field verifications of the remediation if necessary.