

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 19, 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

SUBJECT: General Order 112-F Gas Inspection of PG&E's Central Coast Division

Dear Mr. Singh:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Central Coast Division (Division) on December 4 - December 8, 2017. The inspection included a review of the Division's records for the period of 2013 through 2016, as well as a representative field sample of the Division's facilities in various cities. 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 James Zhang at (415) 603-1310 or by email at James.Zhang@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 Compliance
Susie Richmond, PG&E Gas Regulatory Compliance
Dennis Lee, SED
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

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.

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.