

2017 De Anza Division Audit Findings and Responses

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
PG&E's Internal Review Findings	1	<p>Prior to the start of the inspection, PG&E provided SED its findings from the internal review it conducted of the Division. Some of PG&E's internal review findings are violations of PG&E's operations and maintenance standards, and are therefore violations of Title 49 Code of Federal Regulations (CFR), §192.605(a). Table 1 lists PG&E's internal findings. SED is aware that PG&E corrected some of its findings prior to SED's audit. Please provide SED an update on the item that is still pending corrective action.</p>	<p>Attached, please find attachment 1 – "De Anza Division Internal Review". The one item which was pending corrective action, valve 3410-F8B, has been completed. The valve, which had been paved over, was uncovered and maintenance performed on 6/30/2017. Attached, please find attachment 2 – "Valve 3410-F8B Maintenance Record". Included in the attachment is a photograph of the uncovered valve. A hard copy of this documentation had previously been provided to the CPUC on 6/30/17 as completed data request #93.</p>	<p>Atch 1_ De Anza Division Internal Review_CONF.pdf Atch 2_ Valve 3410-F8B Maintenance Record.pdf</p>
NOV	1	<p>Title 49 CFR §192.481(a) states: "Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:" At least once every 3 calendar years, but with intervals not exceeding 39 months</p> <p>After reviewing the Division's corrosion control records, SED found that the Division did not complete 5,940 meter inspections for evidence of atmospheric corrosion within a frequency of 39 months. PG&E's inspectors documented a number of meter sets as inaccessible ("CGI" or "can't get in") in their 2015 and 2016 inspection records. As of June 30, 2017, there were still 5,940 meter inspections shown as incomplete without evidence of them being inspected within the 39 months prior to June 30, 2017. Therefore, PG&E is in violation of Title 49 CFR §192.481(a) for its failure to inspect 5,940 meter sets for evidence of atmospheric corrosion once every 3 calendar years, but with intervals not exceeding 39 months</p>	<p>Attached, please find attachment 3 - "AMP Status for De Anza 2015 2016 CGIs". Per the revised spreadsheet, there are a total of 5,331 meters in the De Anza Division which have not met the inspection requirement of once every 3 calendar years, but with intervals not exceeding 39 months due to the locations being CGI (Can't Get In). PG&E recognizes that this is a system wide issue and has instituted a recovery plan under our Corrective Action Program (CAP 7001726). Attached, please find attachment 4 - "AC-CGI Priority & Recovery Plan".</p> <p>To prevent reoccurrence and ensure compliance, starting in 2014, PG&E has incorporated an electronic system to track AC inspections by date and time, so that inspections are performed within the 3 year, not to exceed 39 month compliance requirement. This includes utilizing electronic mobile tablets to record inspection results, rather than manually tracking the inspections on plat maps.</p> <p>During AC inspections, each meter is inspected by a qualified inspector utilizing an electronic mobile tablet. If the meter set and/or riser is determined to be a severe condition, then the result is loaded into AMP to be completed by Field Services Gas Service Representatives (GSR) before the next scheduled compliance date. When a "Can't Get In" (CGI) is encountered for AC inspections, the qualified inspector records the meter/riser as a CGI in his or her tablet device and continues to the next meter. The CGIs are exported from the AC Inspection database and uploaded into the AMP database for PG&E's Field Services GSR to perform the AC inspections. If the GSRs are unsuccessful, the AC CGI will go into the CGI tracker and appropriate steps are followed.</p> <p>The CGI lead or designated lead for that division will review all the new CGI's in the "To Be Reviewed" status and reads the GSR comments for each Field Order. A determination is made weather the CGI is a Legitimate CGI or Non-Legitimate CGI. If the job is deemed to be a Legitimate CGI i.e. Dog, locked gate, inside home, then that job will go to the "Ready For Processing" status which means it is ready for the letter process. The letter process is a potential 3 letter approach. Letter 1 is simply asking the customer if we could have access to the Gas Meter to perform meter maintenance. If this letter is not successful then letter 2 is sent. Letter 2 is a little stronger language asking for access. If letter 2 is not successful than a third letter is sent. Letter 3 is much stronger language stating we are not given access this could lead to service interruption up to an including the service being cut-off in the street. If the job is deemed to be a non-legitimate CGI i.e. to allow GSR on property, obstruction blocking the meter, non-usable tee, or anything prohibiting the GSR from changing the meter that is not a Legitimate CGI reason, the job will then go in the re-issue status and get re-fielded for another GSR visit.</p> <p>Attached, please find the current atmospheric corrosion meter set procedure, attachment 5 - "Utility Procedure TD-4188P-01 Rev 1a".</p>	<p>Atch 3_AMP Status for De Anza 2015 2016 CGIs_CONF.xlsx Atch 4_AC-CGI Priority & Recovery Plan.docx Atch 5_TD-4188P-01 Rev 1a.pdf</p>
NOV	2	<p>Title 49 CFR §192.187 states: "Each underground vault or closed top pit containing either a pressure regulating or reducing station, or a pressure limiting or relieving station, must be sealed, vented or ventilated, as follows:" a) When the internal volume exceeds 200 cubic feet (5.7 cubic meters)"</p> <p>During the field visit of a pressure limiting station B-34 located at Whisman & Middlefield Road in Mountain View, SED observed that both vaults, including a combination of working and monitoring regulators, did not have adequate ventilation.</p> <p>Therefore, PG&E is in violation of Title 49 CFR §192.187 (a) for its failure to provide adequate ventilation in the vaults.</p>	<p>A project to install vents at Reg Station B-34 is in progress. A FIMP scoping document has been created and project number 42817846 to install the vents has been approved and funded. The project is currently awaiting scheduling. A completion date of 2nd quarter 2018 is estimated. Attached, please find attachment 6 - "CM-14965".</p>	<p>Atch 6_CM-14965.pdf</p>
NOV	3	<p>Title 49 CFR §192.605(a) states in part: "Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities" PG&E's procedure TD-4801S, Service Replacement Criteria, states, " 2.1 For the following gas service asset types and conditions, replace service during initial response to a leak, scheduled leak repairs, and reconstruction projects:</p> <ul style="list-style-type: none"> • All copper services..." <p>While reviewing the leak repair records, SED found that leak #110583940 on Alford Ave, Los Altos had been on a copper service. PG&E repaired the leak on 10/23/2015.</p> <p>However, the Division had not yet replaced or scheduled for the replacement of the copper service as of June 26th 2017. Therefore, PG&E is in violation of Title 49 CFR §192.605(a) for failing to replace or schedule for the replacement of the copper service identified as required by PG&E's procedure.</p>	<p>The address for this service is actually supposed to be 1585 Holt Ave in Los Altos (not Alford Ave). A clerical error occurred and the address was mistakenly recorded as 1621 Alford Ave in the notification and order address fields. Alford Ave is the cross street and the service comes off of Alford Ave. The address of the home (the service address) is actually 1585 Holt. Attached, please find attachment 7 - "GSR Leak 110583940" which indicated in the As-Built section that the service address is 1585 Holt Ave. However, due to the clerical error with the address, a order was not generated to replace this copper service at 1585 Holt Ave.</p> <p>On 6/28/17 order 31334338 was generated to replace this copper service at 1585 Holt Ave. The replacement is currently scheduled for 9/20/17. Attached, please find attachment 8 - "Order 31334338".</p>	<p>Atch 7_GSR Leak 110583940_CONF.pdf Atch 8_Order 31334338_CONF.pdf</p>

2017 De Anza Division Audit Findings and Responses

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
AOC	1	<p>During SED's field visit of a leak survey on Plat Map 3349-I2, PG&E identified 8 leaks along Appletree Lane, Mountain View.</p> <p>Please provide an update on the status of corrective measures taken or planned as of this date.</p>	<p>The two above ground riser thread leaks were repaired by the local Maintenance and Construction crew on 7/14/2017. Attached, please find attachments 9 and 10 - "Order 43057075 1824 Appletree" and "Order 43057076 1835 Appletree".</p> <p>The six meter set leaks have been repaired by Gas Field Services. Attached, please find attachments 11 through 16 "Order_Info 1811, 1819, 1832, 1848, 1872, 1875 Appletree".</p>	<p>Atch 9_Order 43057075 1824 Appletree_CONF.pdf Atch 10_Order 43057076 1835 Appletree_CONF.pdf Atch 11_Order_Info 1811 Appletree_CONF.pdf Atch 12_Order_Info 1819 Appletree_CONF.pdf Atch 12_Order_Info 1832 Appletree_CONF.pdf Atch 14_Order_Info 1848 Appletree_CONF.pdf Atch 15_Order_Info 1872 Appletree_CONF.pdf Atch 16_Order_Info 1875 Appletree_CONF.pdf</p>
AOC	2	<p>During the SED's field observation, PG&E could not achieve lockup at the two working or one monitoring regulators at station B-34, Mountain View. Later, PG&E rebuilt all three regulators and provided a pressure record of the next day.</p> <p>Please provide the cause of the multiple instances of failure to lockup and PG&E's measures to prevent recurrence.</p>	<p>On 6/29/17, a B inspection was performed on the two working and one monitor regulators at Station B-34 (Whisman Station). Attached, please find attachment 17 - "B-34 Maintenance Record". The cause of the failure of the regulators to lock up was due to debris in the system caused from recent pigging operations on L-132 which occurred approximately between February of 2016 and June of 2017. Attached, please find attachments 18 and 19 - "Regulator Debris 1" and "Regulator Debris 2" showing the debris on the rubber boots. On several occasions during the pigging operations, the station filters were removed and an external filter was installed at this station. Attached, please find attachment 20 - "External Filter". Each time this was performed, newly welded pipe on the outlet of the filter was connected directly to the regulators. This pipe contained scale and slag as a result of the welding that was introduced into the station each time the external filter was installed. This buildup on the boots did not allow for a full lock-up of the regulators. Prior to this, the station has had no prior history of lock-up problems.</p> <p>CAP 113147645 was created and assigned to the ILI team to investigate methods to prevent this issue from reoccurring at this station and others during pigging operations where external filters are installed.</p>	<p>Atch 17_B-34 Maintenance Record_CONF.pdf Atch 18_Regulator Debris 1.jpg Atch 19_Regulator Debris 2.jpg Atch 20_External Filter.jpg</p>
AOC	3	<p>During records review of valve maintenance, SED found that on January 13, 2016, PG&E had identified valve number 3411-E1B, a Critical Main Distribution Valve, as being inoperable. An Alternate Method of Control (AMC) was implemented on June 3, 2016 which combined Emergency Shutdown Distribution (ESD) Zones DA-17 and DA-19. On May 4, 2016 valve number 3410-F8B was discovered to be inoperable and an AMC was implemented on June 6, 2016 which combined ESD DA-4, DA-17, and DA-19. SED is concerned that when valve 3411-E1B was made operable again that the AMC for valve 3410-F8B was not modified.</p> <p>SED recommends PG&E update its AMCs soon after the issue is resolved to reflect the current situation, as it could improve emergency response.</p>	<p>Both valves V-3410-F8B and V-3411-E1B have been repaired and their AMCs removed on 6/30/17 with the completion of work on valve 3410-F8B. Attached, please find attachment 21 – "AMC & Valve Card V-3410-F8B" and attachment 22 – "AMC & Valve Card V-3411-E1B". A hard copy of this documentation had previously been provided to the CPUC on 6/30/17 as completed data request #93.</p>	<p>Atch 21_AMC & Valve Card V-3410-F8B_CONF.pdf Atch 22_AMC & Valve Card V-3411-E1B_CONF.pdf</p>
AOC	4	<p>During the SED's field visit of valve maintenance on V-11-E1A, PG&E identified a leak at nearby pressure limiting station D-04 at the corner of Stevens Creek Blvd and Stelling Road in Sunnyvale. PG&E later repaired the leak at the Valve-1 greasing pin.</p> <p>This note serves only for the purpose of record and PG&E need not to respond.</p>	<p>This note serves only for the purpose of record and PG&E need not to respond.</p>	
AOC	5	<p>During the SED's field visit, the Division recorded the following two low pipe-to-soil readings:</p> <ol style="list-style-type: none"> 1228 Crescent Terr, Sunnyvale (Isolated service, 10%er): -830mV 450 Mathilda, Bldg B, Sunnyvale (Annual): -762mV <p>On July 18, 2017; PG&E submitted the following update on the status:</p> <ol style="list-style-type: none"> 1228 Crescent Terr, Sunnyvale (10%er): -830mV – This area has been corrected. The read is now -1068mV – Notification in SAP is 113005453 450 Mathilda, Bldg B, Sunnyvale (Annual): -762mV – This area has been corrected. The read is now -1093mV – Notification is 113005608" <p>This note serves only for the purpose of record and PG&E need not respond.</p>	<p>This note serves only for the purpose of record and PG&E need not to respond.</p>	
AOC	6	<p>During the SED's field visit of the exposed span, "DFM over Permanent Creek at Ranch San Antonio Park", SED observed that the blowdown valve V-082 did not have any locking mechanism and the area was accessible to the public. SED found that the valve did not have adequate security.</p> <p>On July 18, 2017, PG&E provided documentation with a picture of the valve with a lock installed.</p> <p>This note serves only for the purpose of record and PG&E need not to respond.</p>	<p>This note serves only for the purpose of record and PG&E need not to respond.</p>	