

2017 Hinkley District Audit Findings and Responses

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
NOV PG&E's Internal Review Findings	1	Prior to the start of the audit, PG&E provided SED its findings from the internal review it conducted of PG&E's Hinkley District. 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 some of its findings prior to SED's inspection. Please provide updates to the items that were still pending by the end of the inspection. Table 1 lists all of the violations from PG&E's internal review.	All corrective actions related to PG&E's Internal Review Findings at the Hinkley District were remediated prior to the start of the 2017 CPUC Hinkley District Audit. This was confirmed with the lead SED Inspector by telephone on 1/12/2018. Attached, please find attachment 1 - "Hinkley 2017 Internal Review Summary".	Atch 1_Hinkley 2017 Internal Review Summary.pdf
AOC	1	At L-300A MP 108.39 and L-300B MP 147.92 exposed pipe was observed. Please provide PG&E's plan of action for those locations.	L-300A MP 108.39 - This section of exposed pipe was discovered by Pipeline Patrol on 2/3/2015. Projects in the Shallow and Exposed Pipe program are prioritized by HCA and risk (consequence of failure and likelihood of failure factors). This project has been prioritized outside of the 2019 rate case. Therefore, the construction year will be beyond 2022 due to its low occupancy (class 1 location, non-HCA) and low risk. The location is currently monitored during the annual leak survey by the local Hinkley Gas Pipeline Operations & Maintenance (GPOM) crew and will continue to be monitored until completion of the project. In addition, special patrols will be performed following heavy rain occurrences. Attached, please find attachment 2 - "FIMP Scope Doc L-300A". L-300B MP 147.92 - This project has been prioritized for 2018 construction per PSRS (Project Status Reporting System) 27947. Completion is currently estimated for the 4th quarter of 2018. Attached, please find attachment 3 - "PSRS 27947 Detail Report L-300B".	Atch 2_FIMP Scope Doc L-300A.pdf Atch 3_PSRS 27947 Detail Report L-300B.pdf
AOC	2	At L-314 MP 22.21, significant erosion has been observed behind and around the PG&E constructed retaining wall with the washout area approximately 18 feet from the pipeline. Please provide PG&E's plan of action for this location.	L-314 MP 22.21 - The erosion at this location has been scoped into the Shallow and Exposed Pipe program per PSRS 29802. Currently, as noted in the AOC, there is no exposure of the pipeline. Projects in the Shallow and Exposed Pipe program are prioritized by HCA and risk (consequence of failure and likelihood of failure factors). This project has been prioritized outside of the 2019 rate case. Therefore, the construction year will be beyond 2022 due to its low occupancy (class 1 location, non-HCA) and low risk. The location is currently monitored as part of a monthly leak survey by the local Hinkley Gas Pipeline Operations & Maintenance (GPOM) crew and will continue to be monitored until completion of the project. In addition, special patrols will be performed following heavy rain occurrences. Attached, please find attachment 4 - "PSRS 29802 Detail Report L-314".	Atch 4_PSRS 29802 Detail Report L-314.pdf