

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 31, 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-2017-08-PGE23-01C

Re: SED's closure letter for the General Order 112-F Inspection of PG&E's Hollister District

Dear Mr. Singh:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas and Electric Company's (PG&E) response letter dated November 2, 2017 for the findings identified during the General Order 112-F Inspection of PG&E's Hollister District (District) from August 28 through September 1, 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 PG&E Hollister District 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.

Sincerely,

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

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

cc: Mike Bradley, PG&E Regulatory Compliance
Susie Richmond, PG&E Regulatory Compliance
Kenneth Bruno, SED/GSRB
Terence Eng, SED/GSRB
Kelly Dolcini, SED/GSRB

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 the 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), §192.605(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: Findings from PG&E's Internal Review

Item	Code Section	# of Non-Compliances	Finding Description	Corrective Action	Remediation Status
1	192.605 (a)	30	The valves displayed on tab A-1 went greater than 30 days without a supervisor review as outlined in TD-4430P-04.	All valves maintenance has been reviewed for completeness and signed by the Hollister District Supervisor. A pre-audit QA review has determined that no reviews remain outstanding as of 7/1/2017.	Completed 7/1/2017
2	192.605 (a)	13	The equipment listed on tab B-1 went beyond 45 days between successive calibrations. (PG&E's internal maximum allowable interval).	Hollister maintenance and operations personnel received a refresher review on 8/11/2017	Completed 8/11/2017
3	192.605 (a)	2	The patrol on tab C-1 was missed along line 310 from mile point (MP) 4.72 to 8.54. Compliance date to patrol was 1/1/16. Reason for late patrol was due to all non-PG&E gate locks, main entry barbed wire, alternate routes road closed and barbed wire.	Created CAP# 7022535 – Site was patrolled late on March 17, 2016.	Completed 8/17/2017

PG&E’s Response:

There are no pending actions from the internal review findings for the Hollister District.

SED’s Conclusion:

SED has opted not to impose a fine or penalty since PG&E took the necessary corrective actions. However, recurrence of the same violations in the future may result in enforcement action.

B. SED Findings

None.

II. Areas of Concern / Recommendations

1. During the field inspection, PG&E verified 2 above ground leaks at two valves in Table 1 below. SED is aware that PG&E identified both leaks since 2014 and is in the process of repairing the leaks. Please provide SED the corrective actions taken to address those two leaks.

Table 1: Above ground leaks at two valves

Location	Valve #
Tres Pinos Station	V-B (zerk fitting)
Hollister Station	V-450.79 (tuning and unions)

PG&E’s Response:

Tres Pinos Station/ V-B/ The valve is scheduled to be repaired by Q4 2018 under PM 42758303.

Hollister Station / V-450.79/ The leak on the tubing was repaired on 9/11/17 under PM 43100441. Please see attached “PM 43100441_Work_Ticket.pdf.”

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.