

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 12, 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-2017-11-PGE-24-01C

SUBJECT: General Order 112-F Gas Inspection of PG&E's Kettleman District

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) Kettleman District (District) from November 13 - 17, 2017. The inspection included a review of the District's records for the period of 2013 through 2016, as well as a representative field sample of the District's facilities. SED staff also reviewed the District'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. PG&E have addressed the findings prior to, and during the course of SED's inspection. SED's evaluation of PG&E's corrective actions is also included in the Summary.

This letter serves as the official closure of the 2017 GO 112 Gas Inspection of PG&E's Kettleman District facilities. 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 Regulatory Compliance
Susie Richmond, PG&E Gas Compliance
Aimee Cauguiran, 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 audit, PG&E provided SED its findings from the internal review it conducted of the Kettleman District (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 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

Item	# of Non-Compliance	Findings	Corrective Actions Taken To Close Findings	Actions Completed to Prevent Recurrence	Completion Date
Equipment (Combustible Gas Indicator & Pipe Locator)	45	The equipment listed on tab B-1 went beyond 45 days between successive calibrations. (PG&E internal maximum allowable interval.)	Kettleman maintenance and operations personnel received a refresher review on 11/7/2017	PG&E has implemented a process using the Operations Specialists to review the documentation with the District supervisor to ensure accuracy on a weekly basis.	11/7/2017
Station (Odor Intensity)	30	TD-4570P-03 Weekly odor intensity test in Kettleman was missed, tab C-1 list all missed frequencies for 2015 and 2016. Also contains if an old form was used for documentation.	Current forms were provided to supervisor on 11/8/17 and operations personnel received a refresher review.	PG&E has implemented a process using SAP to call out separately the order of operation of the sniff test on May of 2016.	11/8/2017

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.

C. Area of Concern/Observations/Recommendations

During a field visit in Helm Tap Station, SED observed a new leak (grade 2) at Valve #AE in the curb valve box. PG&E technician created a follow up work order (A-Form) under notification # 113820481 to evaluate the need for repair. On 11/21/2017, the District completed the repair of Valve #AE. This item serves as a record of SED's observation.

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.