

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 31, 2018

Mr. Melvin Christopher, Vice President
Pacific Gas and Electric Company
Gas Transmission and Distribution Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

GI-2018-04-PGE-73

SUBJECT: SED's Closure Letter for General Order 112-F Gas Inspection of PG&E's Northern Area

Dear Mr. Christopher:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas & Electric Company's (PG&E) response letter dated November 29, 2018 for the findings identified during the General Order 112-F inspection of PG&E's Northern Area (Burney District including Burney and Tionesta Compressor Station, North Valley Division, Willows District including Gerber and Delevan Compressor Station, Meridian District, Sierra Division and Sacramento Division) which was conducted on July 23 – August 3, 2018 and August 20 – August 31, 2018.

A summary of the inspection findings documented by the SED, PG&E's response to our findings, and SED's evaluation of PG&E's response taken for each identified Violation and Area of Concern and Recommendation is attached.

This letter serves as the official closure of the 2018 GO 112-F Inspection of PG&E's Northern Area and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. If you have any questions, please contact Shuai (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

cc: Susie Richmond, PG&E Gas Regulatory Compliance
Aimee Cauguiran, SED
Kelly Dolcini, SED
Bhavini Shah, PG&E
Kenneth Bruno, SED
Claudia Almengor, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 7/23/2018 – 8/3/2018, 8/20/2018 – 8/31/2018

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Burney District (Burney and Tionesta Compressor Station), North Valley Division, Willows District (Gerber and Delevan Compressor Station), Meridian District, Sierra Division, and Sacramento Division.

Assets (Unit IDs): PG&E Northern Area (73)

System Type: GT

Inspection Name: PG&E Transmission Northern

Lead Inspector: James Zhang

Operator Representative: Mike Lang

Unsatisfactory Results

Design and Construction: Design of Pipe - Overpressure Protection (DC.DPCOPP)

Question Text Do records indicate that pressure relief or pressure limiting stations being installed comply with 192.201?

References 192.201(a) (192.201(b), 192.201(c))

Assets Covered PG&E Northern Area (PG&E North)

Issue Summary Title 49 CFR 192.201 (a)(2)(i) states in part: "if the maximum allowable operating pressure (MAOP) is 60 psig or more, the pressure may not exceed the MAOP plus 10 percent or the pressure that produces a hoop stress of 75 percent of SMYS, whichever is lower;"

During the review of Sacramento Division's pressure regulating station datasheet and maintenance records, SED found that the MAOP was 85 psig and the Monitor regulator set up point was 95 psig (should be 93.5 psig or lower) at

station GT C-30 at Teichert & Sons Reg Station. CFR 192.201(a)(2)(i) requires the pressure may not exceed the MAOP plus 10 percent if the MAOP is 60 psig or more. During the field visit at this station, PG&E lowered the setpoint by 15 psig per direction of engineering.

PG&E's Response:

"PG&E respectfully disagrees with this finding. CAP # 115408941 was created to address and track this issue. A MAOP assessment was performed and per the attached assessment, the actual MAOP was determined to be 95 psig. A Gas Map Correction Form has been submitted to mapping to make this correction on the Operating Diagram, and the Regulator Station Datasheet and local copy of Operating Diagram have been updated to reflect this assessment. Please see attachment "MAOP Assessment_CONF.pdf".

SED's Conclusion:

SED has reviewed records provided and opted not to impose a fine or penalty at this time since PG&E provided clarification to address this issue.

Facilities and Storage: Valves (FS.VA)

Question Text Do records adequately document that compressor transmission line valves have been inspected and partially operated at the correct interval?

References 192.709(c) (192.745(a), 192.745(b))

Assets Covered PG&E Northern Area (PG&E North)

Issue Summary Title 49 CFR 192.745 (a) states: "Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year."

SED reviewed Sacramento Division's valve maintenance records and found that PG&E did not perform the required valve maintenance in 2015 and 2016 for valve V-18 at Elk Grove – Clarksburg Primary Station B-27.

PG&E's Response:

"PG&E recognizes this finding and has taken the following actions:

This valve has had a maintenance plan created in SAP, and was maintained during its scheduled maintenance frequency in 2017 and 2018. Please see attachment "V-18 Maintenance Record.pdf".

SED's Conclusion:

SED has reviewed records provided and opted not to impose a fine or penalty at this time since PG&E provided necessary corrective action plans and the violations did not result in a hazardous condition to PG&E employee and the public.

Maintenance and Operations: Gas Pipeline Operations (MO.GO)

Question Text Has the operator conducted annual reviews of the written procedures or processes in the manual as required?

References 192.605(a)

Assets Covered PG&E Northern Area (PG&E North)

Issue Summary Title 49 CFR 192.605 (a) states: "General: Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."

1. PG&E Utility Procedure TD-4188P-02 Section 1.3 states: Document each abnormal operating condition (AOC) observed on an exposed asset with photos and description..."

SED reviewed Burney District's exposed span inspections records and found that all five spans (equipment number: 41489657, 41484291, 41484300, 41489674, and 41489665) in Burney District were inspected in 2015 with no photos taken.

PG&E's Response:

"PG&E recognizes this finding and has taken the following action:

To prevent reoccurrence, the Burney crew was tailboarded on Utility Procedure TD-4188P-02, "Atmospheric Corrosion Inspection of Exposed Metallic Piping Systems", and to properly document all AOC's including photographs. Please see attachment "Burney Tailboard.pdf".

2. PG&E Utility Procedure TD-4181P-601, Section 2.2.5 states in part: "IF one or both of the conditions below are found ... THEN develop a contacted casing action plan in SAP (using the "notification long text comments"), PLM, or equivalent within 60 calendar days from the date the possible casing contact is found and notify corrosion services for additional investigative testing."

SED reviewed Willows District's corrosion records and found in 2017 two casings (equipment number: 41483856 and 41483863) met the conditions in TD-4181P-601 section 2.2.5 for the "Interrupted Casing-to-Soil Test," but were not added on the contacted casing master list for further evaluation due to an error with SAP. This section of the procedure says that SAP will automatically notify corrosion services when the test indicates a potential contact. Upon discussion with PG&E, it seems that the logic is not actually in place in SAP to generate this notification. This means that corrosion services were not notified, and no action plan was created for these casings within 60 days as required in PG&E's procedure.

SAP equipment #	Date of possible casing contact	Date added to contacted casing master list
41483856	6/28/2017	8/2/2018
41483863	6/26/2017	8/2/2018

PG&E's Response:

"PG&E recognizes this finding and has taken the following action:

During the inspection it was discovered that the SAP logic in place for the casing reads was not working correctly. To date, two of three logic issues have been corrected, while the 3rd is in the process of being resolved. In the interim, PG&E will be manually evaluating the maintenance inspection results entered into SAP for possible contact. As noted in the finding, these casings have been added to the contacted casing master list for additional corrosion engineering review and mitigation strategy per TD-4181P-602 "Mitigating Casing Contacts".

3. PG&E Utility Procedure TD-4181P-601, Section 2.1.4 states in part: "IF one or both of the conditions below are

found ... THEN develop a contacted casing action plan in SAP (using the "notification long text comments"), PLM, or equivalent within 60 calendar days from the date the possible casing contact is found and notify corrosion services for additional investigative testing."

SED reviewed Sierra Division's corrosion records and found the following casings were possibly contacted but were not added to the Contacted Casings Master List within 60 days:

SAP equipment #	Date of possible casing contact	Date added to contacted casing master list
41413174	9/7/2017	8/7/2018
41413184	9/7/2017	8/21/2018
41417017	9/7/2017	8/21/2018

PG&E's Response:

"PG&E recognizes this finding and has taken the following action:

These SAP issues were resolved and corrected in SAP as follows:

1. Pipe-to-Soil and Casing-to-Soil read is less than 100 mV of each other (fixed in SAP on 7/26/2018)
2. Casing-to-Soil read is -800mV or more negative (fixed in SAP on 9/6/2018)"

SED's Conclusion:

SED has reviewed records provided and opted not to impose a fine or penalty at this time since the violations did not result in a hazardous condition to PG&E employee and the public and PG&E provided necessary corrective action plans. SED may opt to review all the corrective action records and conduct field verifications of the remediation if necessary.

Question Text Are construction records, maps and operating history available to appropriate operating personnel?

References 192.605(a) (192.605(b)(3))

Assets Covered PG&E Northern Area (PG&E North)

Issue Summary Title 49 CFR 192.603 (b) states: "Each operator shall keep records necessary to administer the procedures established under 49 CFR 192.605." Also, Title 49 CFR 192.605 (b) (3) states: "Making construction records, maps, and operating history available to appropriate operating personnel."

During the record review, SED identified several instances where PG&E's records, such as work requests, corrective work orders, and maintenance records, are inaccurate or not available in SAP due to errors. The following record errors led to PG&E's failure to create notifications for maintenance or corrective action per code or procedure requirements:

1. SED reviewed Burney District's exposed span inspection records and found the inspection forms for the five spans (equipment number: 41489657, 41484291, 41484300, 41489674, and 41489665) indicated the need for work requests to address minor AOCs. However, the work requests could not be found in SAP or PLM to demonstrate remedial action(s) taken.

PG&E's Response:

"PG&E recognizes this finding and has taken the following actions:

N1 Corrective Notifications were created to address these minor AOC's as follows:

span 41489657 - L-401 mp 74.38 - N1# 43495187

span 41484291 - L-400 mp 111.0 - N1# 43495188

span 41484300 - L-400 mp 111.43 - N1# 43495189

span 41489674 - L-401 mp 111.44 - N1# 43495190

span 41489665 - L-401 mp 111.0 - N1# 43495191

To prevent reoccurrence, the Burney crew was tailboarded on Utility Procedure TD-4188P-02, "Atmospheric Corrosion Inspection of Exposed Metallic Piping Systems", and to properly document all AOC's including photographs. Please see attachment "Burney Tailboard.pdf".

2. SED reviewed Willows District's corrosion records and found in 2017 two casings (equipment number: 41483856 and 41483863) met the conditions in TD-4181P-601 section 2.2.5 for the "Interrupted Casing-to-Soil Test," but were not added on the contacted casing master list for further evaluation due to an error with SAP. This section of the procedure says that SAP will automatically notify corrosion services when the test indicates a potential contact. Upon discussion with PG&E, it seems that the logic is not actually in place in SAP to generate this notification. This means that corrosion services were not notified, and no action plan was created for these casings. SED had previously identified similar instances (equipment number: 41419633 and 41402273) during PG&E Central Transmission inspection.

PG&E's Response:

"PG&E recognizes this finding and has taken the following actions:

During the inspection it was discovered that the SAP logic in place for the casing reads was not working correctly. To date, two of three logic issues have been corrected, while the 3rd is in the process of being resolved. In the interim, PG&E will be manually evaluating the maintenance inspection results entered into SAP for possible contact.

These casings have been added to the contacted casing master list for additional corrosion engineering review and mitigation strategy per TD-4181P-602 "Mitigating Casing Contacts".

3. SED reviewed the Sierra Division's corrosion records and found three casings (equipment number: 41413174, 41413184 and 41417017) were possibly contacted but were not added to the Contacted Casings Master List within 60 days per PG&E TD-4181P-601 section 2.1.4.

PG&E's Response:

"PG&E recognizes this finding and has taken the following actions:

These SAP issues were resolved and corrected in SAP as follows: 1. Pipe-to-Soil and Casing-to-Soil read is less than 100 mV of each other (fixed in SAP on 7/26/2018) 2. Casing-to-Soil read is -800mV or more negative (fixed in SAP on 9/6/2018). As identified in finding 5, these spans were added

to the contacted casing list as follows:

SAP equipment #	Date of possible casing contact	Date added to contacted casing master list
41413174	9/7/2017	8/7/2018
41413184	9/7/2017	8/21/2018
41417017	9/7/2017	8/21/2018"

4. SED reviewed Sierra Division's exposed span inspections records and found five spans (equipment number: 42566379, 42566381, 42566396, 42566450, and 43188036) with corrective work orders created during the 2015 inspections. The corrective notifications for the first three spans were canceled without comment or documented justification. The remaining two corrective notifications were not entered in SAP. SED observed that the 2018 inspection records had almost the same concerns documented as in 2015. There were no available records to show corrective work performed.

PG&E's Response:

"PG&E recognizes this finding and has taken the following actions:

Equipment 42566379 WR 110144579 Span# 720 Comment: In 2015 minor AOC's were identified and corrective notification was cancelled by corrosion engineering due to minor corrosion threats per notification 110490229 with no additional action required. In 2018, major AOCs were identified and a N1 notification 114496157 was created to remediate the major AOCs.

Equipment 42566381 WR 110144580 Span#721 Comment: Span air to soil transitions were remediated on 11/4/2016 on project order # 42421398 as part of the Span Remediation program. In addition, N1 Corrective Notification 114496555 was created to address atmospheric corrosion.

Equipment 42566396 WR 110144576 Span#695 Comment: In 2015 minor AOC's were identified and corrective notification was cancelled by corrosion engineering due to minor corrosion threats per notification 110490586 with no additional action required. In 2018, major AOCs were identified and a N1 notification 114796636 was created to

remediate the major AOCs.

Equipment 42566450 WR 110144586 Span#701 Comment: This span is an unintentional span. Corrective Notification # 114507752 was created on 4/16/2018 for remediation.

Equipment 43188036 WR 110144577 Span#696 Comment: Span air to soil transitions were remediated on 7/6/2016 on project order # 42421157 as part of the Span Remediation program. In addition, N1 Corrective Notification 114496048 was created to address atmospheric corrosion."

5. SED reviewed Sierra Division's exposed span inspections records and found three spans (equipment number: 42566329, 43188056, and 43600417) that are no longer exposed in 2015, but remained listed as exposed spans in SAP until 4/27/18 and 5/18/18.

PG&E's Response:

"PG&E recognizes this finding and has taken the following actions:

1.) Span 42566329- this span was designed encased in concrete and was removed as an exposed span from SAP 5/16/2018 per RW 114255619

2.) Span 43188056- this span does not exist and was removed from SAP 4/27/2018 per RW 114508689

3.) Span 43600417- this span has been naturally covered by soil and is no longer exposed. Span removed from SAP 4/27/2018 per RW 114508120"

6. During the review of pressure regulating station maintenance records in Sacramento Division, SED found that PG&E did not maintain records for valve V-18 at Elk Grove – Clarksburg Primary Station B-27 as required by 192.603(b). According to PG&E, after reviewing as-built, the asset coordinator noticed that the valve was installed in 2012 but not present in their asset database. Upon discovery, the asset was created as V-18 as well as a valve card and maintenance record form. The valve was also inaccurately tagged as V-17, so the tag was switched to V-18 on 7/13/2018. PG&E also filled in the 2 previous valve inspections for V-18 from 7/9/2017 and 6/8/2018 based on memory of the maintenance occurring.

PG&E's Response:

"PG&E recognizes this finding and has taken the following actions:

This valve has had a maintenance plan created in SAP, and was maintained during its scheduled maintenance frequency in 2017 and 2018. Please see attachment "V-18 Maintenance Record.pdf".

SED's Conclusion:

SED has reviewed records provided and opted not to impose a fine or penalty at this time since the violations did not result in a hazardous condition to PG&E employee and the public, and PG&E provided the necessary corrective action plans. SED may opt to review all the corrective action records and conduct field verifications of the remediation if necessary.

Time-Dependent Threats: External Corrosion - Atmospheric (TD.ATM)

Question Text Do records document inspection of aboveground pipe for atmospheric corrosion?

References 192.491(c) (192.481(a), 192.481(b), 192.481(c))

Assets Covered PG&E Northern Area (PG&E North)

Issue Summary Title 49 CFR §192.481(a) states, in part: "Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows: Onshore At least once every 3 calendar years, but with intervals not exceeding 39 months."

SED reviewed Sacramento Division's exposed span inspection records and found that span 43188090 was discovered to not be on a maintenance plan on 1/3/2018. No records of prior inspections could be found; thus the span exceeded the 39-month inspection requirement.

PG&E's Response:

"PG&E recognizes this finding and agrees that this inspection was not performed during the compliance timeframe. Due to a clerical error, this span was inadvertently removed from the maintenance plan and has since had the maintenance plan re-established.

Prior to the Inspection, Sacramento identified this span and 3 others that exceeded the 39 month inspection requirement, but reported only the 3 other spans in the IRSF as part of the self-report process; this span was intended to be included with the 3 reported spans, but was inadvertently left off the IRSF due to a clerical error."

Title 49 CFR §192.481(b) states, in part: "During inspections the operator must give particular attention to pipe at soil-to-air interfaces..."

SED reviewed Sacramento Division's exposed span inspection records and found that, in the 2015 inspection of span 42713199, the air-to-soil transition was not inspected due to excessive vegetation. No follow-up inspection was performed.

PG&E's Response:

"PG&E recognizes this finding and has taken the following action:

From the inspection performed in 2015, Corrosion Engineering created a remediation project for the span which would remove the vegetation and recoat as required. The attached document for the scope of work included direction to remove vegetation and perform a full inspection of the span and report coating condition to engineering. The project was completed on 10-7-17. Please see attached job scope "Span 1004 Scope.pdf".

Title 49 CFR 192.481 (c) states: "If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by 49 CFR 192.479."

1. SED reviewed Burney District's exposed span inspection records and found the inspection forms for the following five spans indicated work requests were opened to address minor AOCs. However, the work requests could not be found in SAP or PLM to demonstrate remedial action(s) taken.

- 41489657
- 41484291
- 41484300

- 41489674

- 41489665

PG&E's Response:

"PG&E recognizes this finding and has taken the following actions:

N1 Corrective Notifications were created to address these minor AOC's as follows:

span 41489657 - L-401 mp 74.38 - N1# 43495187

span 41484291 - L-400 mp 111.0 - N1# 43495188

span 41484300 - L-400 mp 111.43 - N1# 43495189

span 41489674 - L-401 mp 111.44 - N1# 43495190

span 41489665 - L-401 mp 111.0 - N1# 43495191

To prevent reoccurrence, the Burney crew was tailboarded on Utility Procedure TD-4188P-02, "Atmospheric Corrosion Inspection of Exposed Metallic Piping Systems", and to properly document all AOC's including photographs. Please see attachment "Burney Tailboard.pdf".

2. SED reviewed Meridian District's exposed span inspections records and found the following four spans (equipment numbers with Work Requests (WR)) that were canceled without comment or documented justification after their inspections in 2015 and 2016:

- 41427278

- 41427971

- 41427989

- 49932083

PG&E's Response:

"PG&E recognizes this finding and has taken the following actions:

a. WR 213992 for equipment 41427278 This span was not in the Atmospheric Corrosion Program for remediation. A

corrective notification was created to remediate this span. See corrective notification # 114727225

b. WR 209888 for equipment 41427971 Construction for remediation of this span was completed on 10/3/2017 per order # 42959088.

c. WR 209893 for equipment 41427989 This is not an intentional span. This span is part of the shallow pipe program (Program ID Ex-1033). There is a project to relocate this pipe in 2019 per Order # 74020804.

d. WR 215074 for equipment 49932083 This span was not in the Atmospheric Corrosion Program for remediation. A corrective notification was created to remediate this span. See corrective notification # 114039373".

3. SED reviewed Sierra Division's exposed span inspections records and found the following equipment with corrective work orders created during the 2015 inspections. The corrective notifications for the first three spans were canceled without comment or documented justification. The remaining two corrective notifications were never entered in SAP. SED observed that the 2018 inspection records had almost the same concerns documented as in 2015. There were no available records to show corrective work performed.

- 42566379, WR # 110144579
- 42566381, WR # 110144580
- 42566396, WR # 110144576
- 42566450, WR # 110144586
- 43188036, WR # 110144577

PG&E's Response:

"PG&E recognizes this finding and has taken the following actions:

Equipment 42566379 WR 110144579 Span# 720 Comment: In 2015 minor AOC's were identified and corrective notification was cancelled by corrosion engineering due to minor corrosion threats per notification 110490229 with no additional action required. In 2018, major AOCs were identified and a N1 notification 114496157 was created to

remediate the major AOCs.

Equipment 42566381 WR 110144580 Span#721 Comment: Span air to soil transitions were remediated on 11/4/2016 on project order # 42421398 as part of the Span Remediation program. In addition, N1 Corrective Notification 114496555 was created to address atmospheric corrosion.

Equipment 42566396 WR 110144576 Span#695 Comment: In 2015 minor AOC's were identified and corrective notification was cancelled by corrosion engineering due to minor corrosion threats per notification 110490586 with no additional action required. In 2018, major AOCs were identified and a N1 notification 114796636 was created to remediate the major AOCs.

Equipment 42566450 WR 110144586 Span#701 Comment: This span is an unintentional span. Corrective Notification # 114507752 was created on 4/16/2018 for remediation.

Equipment 43188036 WR 110144577 Span#696 Comment: Span air to soil transitions were remediated on 7/6/2016 on project order # 42421157 as part of the Span Remediation program. In addition, N1 Corrective Notification 114496048 was created to address atmospheric corrosion."

4. SED reviewed Sacramento Division's span inspection records and found span 44273697 was inspected in 2016 when it was placed on a maintenance plan, and major coating issues were found. Corrosion engineering recommended creating a corrective notification to re-coat the span, but the corrective notification was not generated, and no corrective action was performed. The span was inspected again on 8/16/18. At that time, corrective notification 114898239 was created on 8/18/18 to remediate the span.

PG&E's Response:

"PG&E recognizes this finding and has taken the following actions:

A Corrective Notification (Number 114898239) was created on 8/17/18 for the remediation of this span. The required repaired date was established to be 12/31/2019, which will be within the 39 month window of when it is required to be remediated from the inspection date of 10/24/2016. See attached "Corrective Work Order 114898239_CONF.pdf".

SED's Conclusion:

SED has reviewed records provided and opted not to impose a fine or penalty at this time since the violations did not result in a hazardous condition to PG&E employee and the public, and PG&E provided necessary corrective action plans. SED may opt to review all the corrective action records and conduct field verifications of the remediation if necessary.

Concerns

Design and Construction: Design of Pipe - Overpressure Protection (DC.DPCOPP)

Question Text Do pressure relieving or pressure limiting devices meet the requirements of 192.199?

References 192.199(a) (192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h))

Assets Covered PG&E Northern Area (PG&E North)

Issue Summary During the field inspection at MLV Buckeye PLS in Willows District, SED noticed the cap on the blowdown stack was open. This cap should be kept closed to keep rain, dirt, etc. out of the blowdown stack. Please provide SED an update on any remedial actions taken.

PG&E's Response:

"PG&E recognizes this concern. The open cap on the blowdown stack at Buckeye PLS is the normal operation state. There are 2 caps that make up the blowdown stack. The outer Uni-bolt cap is intended to stay open, while an inner metal (rain) cap which is not visible from ground level remains closed to keep any rain or debris out. Please see attached detail drawing for blowdown stack "485041_12inBlowdownRaincapClosure_CONF.pdf".

SED's Conclusion:

SED has reviewed PG&E's response and determined that it sufficiently address SED's concern.

Question Text Do pressure relief or pressure limiting stations comply with the requirements of 192.201?

References 192.201(a) (192.201(b), 192.201(c))

Assets Covered PG&E Northern Area (PG&E North)

Issue Summary During the field inspection at station GT C-30 in Sacramento Division, SED witnessed a leak originating from a weld at a gauge tap when a soap test was performed. A leak number (114933194) and PM (43450512) was created to repair this issue.

PG&E's Response:

"PG&E recognizes this concern and has taken the following actions:

A corrective N1 notification # 114933194 was created on 8/3/2018 for repairs. Please see attachment "Corrective Notification 114933194_CONF.pdf". A job will be created by the resource coordinator to ensure the repairs are made with welding and project support".

SED's Conclusion:

SED has reviewed PG&E's response and determined that the proposed corrective actions articulated by PG&E sufficiently address SED's concern. SED may check the implementation of the corrective actions at a future date.

Maintenance and Operations: ROW Markers, Patrols, Leakage Survey and Monitoring (MO.RW)

Question Text Are line markers placed and maintained as required?

References 192.707(a) (192.707(b), 192.707(c), 192.707(d))

Assets Covered PG&E Northern Area (PG&E North)

Issue Summary During the field inspection in Meridian District, SED found a downed marker post that had been hit by a vehicle. The marker was for L-302 and was located near the rectifier at Tule Rd MER. Please provide SED a status update on the remediation.

PG&E's Response:

"PG&E recognizes this concern and has taken the following actions:

A corrective N1 notification # 114852787 was created on 8/3/2018 for repairs. Repairs were made on 8/15/2018 per order #43429542. See attached corrective notification "Replaced Marker Corrective 114852787.pdf".

SED's Conclusion:

SED has reviewed PG&E's response and determined that the corrective actions articulated by PG&E sufficiently address SED's concern. SED may check the implementation of the corrective actions at a future date.

Time-Dependent Threats: External Corrosion - Atmospheric (TD.ATM)

Question Text Is pipe that is exposed to atmospheric corrosion protected?

References 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))

Assets Covered PG&E Northern Area (PG&E North)

Issue Summary During the field inspection at the Tionesta compressor station in Burney District, SED noticed the wraps at the air-to-soil transitions for both the intake and discharge locations of both lines 400 and 401 were coming loose.

During the field inspection at MLV Buckeye Pressure limiting station in Willows District, SED noticed atmospheric corrosion on a vent stack at MLV Buckeye PLS.

Please provide SED an update on any remedial actions taken.

PG&E's Response:

"PG&E recognizes those concerns and has taken the following actions:

As a corrective and preventative measure, a corrective work order (# 114820728) was created to repair the air-to-soil transition. See attached notification "N1 114820728.pdf".

A Corrective N1 notification #114848091 was created to paint the vent stack showing atmospheric corrosion at Buckeye PLS. Work was completed on 09/20/2018 per Order 43427869. Please see attached photo "BuckeyePLS_Vent_Painted.pdf".

SED's Conclusion:

SED has reviewed PG&E's response and determined that the proposed corrective actions articulated by PG&E sufficiently address SED's concern. SED may check the implementation of the corrective actions at a future date.