2017 East Bay Division CPUC Audit Responses

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
Internal Review	n/a	2017 Corrosion Controls- Coatings- Standards or Procedures not being followed (22) Late Coating on Pipeline for Prevention of AC. (beyond 39 months). CAP #: 114259003 Discovered: 1/16/18 Compliance Dates: See Attached In process	Action to prevent changes were made to SAP so corrective notifications are automatically generated when atmospheric corrosion issues are identified during preventative maintenance for spans. In addition, we have established an I&C Paint process, in which paint work is identified and handed off to I&C for execution. Metrics have been established to ensure work in on track to be completed before compliance dates.	
Internal Review	n/a	2017 Leak Survey- Distribution- Not Following Company Processes (3) TD-4110P-09 Late Distribution Leak Rechecks/Repairs Grade 2 leaks missed recheck intervals of 6 months to the date per TD-4110P-09 Rev 5 and 5a, section 5.2.2. Those rechecks were done greater than 6 months to the date. CAP #: 113093923 Leak recheck completed. No new leaks found, no upgrades made.	A Grade 2 leak recheck tracker was developed to manually scrub and track future Grade 2 leak recheck due dates, from SAP dates. SAP upgrades to include fix of due date calculation for rechecks/repairs based upon compliance date. This upgrade was rolled out on 3/31/18.	
Internal Review	n/a	2016 Regulator Station- Non-compliance of company procedures (3) Station operating diagram and data sheet do not match Station Name/Location: DR R-F02 VIRGINIA & SOUTH 8TH ST-1RU-1; DR R-Z03 TELEGRAPH & PRINCE ST-1RU-1; R-C07 CEDAR & MLK JR. WAY	These diagrams have been updated via red-line and are in Mapping for correction. Now, OP diagrams are qc'd and updated at the time of maintenance per the station maintenance procedure TD-4540P-01 Section 1.3(d).	
Internal Review	n/a	2017 AC Inspection- Distribution- Non-Compliance with Internal Req''s. Missed AC Inspection due to CGI 11,721 CGI locations were included in the December 2017 report to SED.	PG&E recognizes that CGIs have become a system wide issue and has instituted a recovery plan to address these and a report is being submitted to the SED monthly.	
NOV	1	1. Title 49 CFR §192.721 (b) Distribution systems: Patrolling states: “Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled - (1) In business districts, at intervals not exceeding 4½ months, but at least four times each calendar year; and (2) Outside business districts, at intervals not exceeding 7½ months, but at least twice each calendar year.” PG&E procedure PG&E TD-4412P-07 stipulates the same requirements. SED observed that PG&E has identified a number of sites in East Bay Division for distribution patrolling; these include sites where physical movement and external loading is expected. PG&E records show that these have not been patrolled at the frequencies identified in the Code as outlined above and also per PG&E procedures. This was also discussed and pointed out in audit letters of 2012 and 2014. PG&E has failed to comply with the requirements. During this audit, this issue was discussed with PG&E, and the staff told that a comprehensive effort is under way system-wide to identify and develop monitoring plan for the distribution patrolling sites. Another issue discussed was about PG&E staff responsible for identifying and those performing patrolling need suitable training. Please provide an update on: (a) the identified sites for distribution patrolling in East Bay Division (b) changes made to patrolling frequencies for existing (at the time of audit) and newly identified sites (c) Steps taken to train patrolling staff.	Throughout 2017 and to date in 2018, patrol has executed numerous site investigations of areas which could be susceptible to land movement and/or erosion. A patrolling inventory was not created due to a lack of a defined process to identify and evaluate these sites. A process has been created (TD-4412P-07 Rev 7- attached, published on 4/18/18 and effective on 6/1/18) and includes notifying gas control of a potential threat to distribution mains. CAP will be used to track and assess potential distribution patrol locations, and evaluate criteria to determine if the distribution main should be included in the distribution patrol inventory. a) Currently, there are zero (0) sites identified for distribution patrolling in the East Bay Division. A number of sites were investigated during 2016 and continuing into 2018, however none were found to have met the established patrolling criteria published in revision 7 of TD-4412P-07. b) Patrolling sites have been placed on a schedule based on location within business districts according to Table 1 from TD-4412P-07 Rev07. c) TD-4412P-07 contains a job aid for identification of Geohazards in the field. Copies have been provided for the centralized ground patrol team. PG&E is currently reworking the training for OQ-08-01, Ground Patrolling, to include better detail on identification of Geohazards. This training is currently planned to be deployed in 4th Quarter of 2018. Some of the improvements include: • Clarification of types of land movement • Simulated land movement scenarios including pictures and 3D animation to show the before, during, and after of different types of geohazards • Simulated scenarios to show the impact of land movement on pipelines • Training is being converted to web based to allow increased number of participants and to make it easily accessible for refresher review after initial training occurs	TD-4412P-07 Rev7_CONF.pdf

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NOV	2	2. Title 49 CFR §192.453 General states: “The corrosion control procedures required by §192.605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods.” and Title 49 CFR §192.807 Recordkeeping states: “(b) Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years” PG&E under pre-audit data request #14 provided CP (pipe-to-soil) reads together with the LAN IDs of individuals taking the reads. On SED’s request, PG&E could not provide information that the individuals with LAN IDs, D6SC and R1T5 had the required training for Operator Qualification task 0306 to take the reads.	This work was performed in January of 2015. Span of control was researched by reviewing time cards associated with the notification numbers. 2 of the 5 leak notifications numbers had qualified individuals and appear to have span of control. The remaining 3 leak notifications were performed by the same crew. . The 3 remaining leak notifications were reread by a qualified employee on 6/22/18. The pipe to soil reads were low, and PM 43381003 was created to trouble shoot the area and track the work until these locations are restored. In late 2015 to 2016, qualifications cards and scanning technology were rolled out to the various divisions & districts. The supervisor and employees can scan the qualification card to confirm their OQs prior to starting the work. In addition, all employees have access to view a person’s qualification report on PG&E’s @Work For Me database.	
AOC	1	1. Alameda Point (former Naval Base) in the City of Alameda. The folders/records for meters 36 and 38 were not available. PG&E needs to locate these records or prepare the folders for future regular maintenance.	Three folders were found for the master meters in the Alameda Naval Base. One folder was created for the remaining master meter. All four of these meters had a differential test or pressure verification performed. Please see attached maintenance records.	maintenance record1_CONF.pdf maintenance record2_CONF.pdf
AOC	2	2. Alameda Point (former Naval Base) in the City of Alameda The maintenance (A-inspection) for the meter # 11 has not been performed as required by PG&E procedure D-4540S. The maintenance should be performed now and regularly thereafter at the required intervals.	The A-inspection on the meter set regulator 11M (Badge 44265793) was completed on 2/23/18. Please refer to the Meter Set Regulator Maintenance Record in AOC#1 attachment above. In addition, the master meter regulator has been placed in a maintenance plan in SAP to be maintained per TD-4540S.	
AOC	3	3. SED reviewed the Division’s span records and conducted field observations. (a) Span at the Oakland Zoo (Reference: GD.PHYS.OAKP.0010.0C05 WALL 10 PLAT C05, 112835344) had pitting and coating issues that were reported by PG&E staff in 2014. Subsequent inspection by PG&E in 2017 did not document any findings. SED during the field visit on 02/07/2018 verified that the pitting and coating issues have not been mitigated, and the span is also bent at a section. Please provide an update on action(s) taken to address these issues. (b) Span at Tenant & Railroad (Richmond area) – SED during the field visit observed visible surface rust and pitting, same condition as previously documented by PG&E staff in span folder. Please provide an update on action(s) taken to address these issues.	a) For the Span at the Oakland Zoo, PM # 43310797 has been created to complete this work. It is currently scheduled to be completed in 2019 per the work and compliance matrix. In 2014, this work was put on the atmospheric corrosion inspection list for monitoring. B) For the Span at Tenant & Railroad (in Crocket, not Richmond) PM # 31245966 has been created to complete this work. It is currently scheduled to be completed in the 3rd quarter of 2018.	
AOC	4	4. SED observed that a number of issues were identified by PG&E staff on different regulator stations starting 2015, some examples are: a. Coating Defect (RC-07, RC-10, RB-98), b. Vent Stack need replacement (RC-07) c. Ladders need to be fixed (RC-23) All identified issues have pending corrective actions. Please provide update on above and other stations.	PG&E investigated the observations and made or scheduled the necessary repairs. Please see details below: a. Coating Defect (RC-07, RC-10, RB-98) • RC-07- Notification # 109215431 has been created to track this work. The work is scheduled to be completed in 3rd quarter of 2018. • RC-10- Notification # 114287582/PM# 43271652 has been created to track this work. The work is scheduled to be completed in 3rd quarter of 2018. • RB-98- This work was completed in February of 2018 under Notification # 109215444/PM# 42189815. b. The vent stack replacement (RC-07) was completed on 11/14/17 under Notification # 111907983/PM# 42776758. c. Ladders need to be fixed (RC-23) Notification# 114307812 has been created to track this work. The work is scheduled to be completed in 4th quarter of 2018.	

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AOC	5	5. Some other SED observations were made include: (a) Shattuck Ave., Berkeley - Meter was buried (b) Market St., Richmond – Meter protection was missing (c) Giant way, San Pablo – Valve was buried (d) Aberdeen Way, Richmond – Meter was resting on ground	(a) Shattuck Ave., Berkeley - Meter was buried By 2/18/18 this work was completed. (b) Market St., Richmond – Meter protection was missing Notification 114318827 was created and PM 43280122 generated to install meter protection (new post) at Market Street, San Pablo. This work is scheduled to be completed before 2020 per the Gas & Electric Service Requirements book Standard J-95. (c) Giant Way, San Pablo – Valve was buried The job to remediate (paint) the rusty riser was completed on 5/4/17. The rest of the valve was unburied out of the dirt surrounding it by 6/21/18 and is now accessible. (d) 2375 Aberdeen Way, Richmond – Meter was resting on ground On 2/21/18 the buried meter was removed and a meter and module using high pressure bypass was installed.	a) Shattuck Ave., Berkeley - Meter.JPG b) no attachment c) Giant Way, San Pablo- Valve.jpg d) Aberdeen Way, Richmond – Meter.png_CONF.pdf
AOC	6	6. (Part 1) The pipe-to soil reads at following locations were found to be low: 1- 662 Longridge, Oakland -540 2- 6480 Melville, Oakland -712 3- 3020 Totterdell, Oakland -640 4- 1921 Durant, Oakland -770 5- 5326 Potrero, El Cerrito -858 (10%er) 6- 1347 Watkins, Berkeley -839 7- 1008 Key Route Blvd, Albany -650 8- 969 Curtis St., Berkeley -725 9- 1004 Peralta Ave, Albany -784	PG&E investigated the low reads, created troubleshoot tickets for locations requiring further investigation, and made necessary repairs. Please see details below: 1- 662 Longridge, Oakland -540 • PM 43349617 was created to install anodes to bring CP reads up. Per PG&E Procedure TD- 4181P-201 re-reads will be completed within 12 months of discovery. 2- 6480 Melville, Oakland -712 • Per PG&E Procedure TD- 4181P-201, this low read is being worked as a "trouble shoot" and will be corrected and repaired within 12 months of discovery. This is being tracked under Notification 43201577. 3- 3020 Totterdell, Oakland -640 • Per PG&E Procedure TD- 4181P-201, this low read is being worked as a "trouble shoot" and will be corrected and repaired within 12 months of discovery. This is being tracked under Notification 43201577. 4- 1921 Durant, Oakland -770 • PM 43271684 was created to install anodes to bring CP reads up. Per PG&E Procedure TD- 4181P-201 re-reads will be completed within 12 months of discovery. 5- 5326 Potrero, El Cerrito -858 (10%er) • Newest reading after troubleshooting on 4/12/18 was -1584 mV. 6- 1347 Watkins, Berkeley -839 • Newest reading after troubleshooting on 3/5/18 was -937 mV. 7- 1008 Key Route Blvd, Albany -650 • Newest reading after troubleshooting on 3/16/18 was -965 mV. 8- 969 Curtis St., Berkeley -725 • Newest reading after troubleshooting on 3/16/18 was -956 mV. 9- 1004 Peralta Ave, Albany -784 • Newest reading after troubleshooting on 3/16/18 was -1000 mV.	

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AOC	6	6. (Part 2) The pipe-to soil reads at following locations were found to be low: 10- 501 Colusa Ave, El Cerrito -640 11- 1920 Francisco Way, Richmond -720(10%er) 12- 2016 Market St., Richmond -693 13- 303 S. 18th, Richmond -835 (10%er) 14- 5413 Hillside, Richmond -824 (10%er) 15- 20 Eucalyptus Road, Berkeley -635 16- 2111 Martin Luther King Jr. Way, Berkeley -795 (ETS) 17- 304 Colette Richmond -504 18- 2942 Rollingwood, Richmond -507 (10%er)	10- 501 Colusa Ave, El Cerrito -640 • Area was restored on 3/16/17. 11- 1920 Francisco Way, Richmond -720(10%er) • Per PG&E Procedure TD- 4181P-201, this low read is being worked as a “trouble shoot” and will be corrected and repaired within 12 months of discovery. This is being tracked under Notification 43326138. 12- 2016 Market St., Richmond -693 • PM 43337488 was created to install anodes to bring CP reads up. Per PG&E Procedure TD- 4181P-201 re-reads will be completed within 12 months of discovery. 13- 303 S. 18th, Richmond -835 (10%er) • Newest reading after troubleshooting on 4/12/18 was a read of -940 mV. 14- 5413 Hillside, Richmond -824 (10%er) • Newest reading after troubleshooting on 4/12/18 was a read was a read of -998 mV. 15- 20 Eucalyptus Road, Berkeley -635 • Newest reading after troubleshooting on 4/12/18 was a read was a read of -940 mV. 16- 2111 Martin Luther King Jr. Way, Berkeley -795 (ETS) • PM 43283417 was created to install anodes to bring CP reads up. Per PG&E Procedure TD- 4181P-201 re-reads will be completed within 12 months of discovery. 17- 304 Colette Richmond -504 • Newest reading after troubleshooting on 4/12/18 was a read of -1500 mV. 18- 2942 Rollingwood, Richmond -507 (10%er) • Newest reading after troubleshooting on 4/12/18 was a read -1523 mV.	