PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



June 12, 2019

GI-2018-12-PGE-29

Ms. Christine Cowsert, VP, Gas Asset Management & System Operations Pacific Gas and Electric Company 6121 Bollinger Canyon Road San Ramon, CA 94583

SUBJECT: SED's closure letter for General Order 112-F Gas Safety Inspection of PG&E's Pipeline Safety Enhancement Program (PSEP)

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas and Electric Company's (PG&E) response letter dated April 24, 2019 regarding the concern identified in the G.O. 112-F inspection of PG&E's PSEP Construction Safety Assurance Inspections conducted on December 3 through 7, 2018 and January 15 through 17, 2019.

Attached is a summary of SED's inspection findings, PG&E's response to SED's findings, and SED's evaluation of PG&E's response to SED's concern.

This letter serves as the official closure of the 2018, G.O. 112-F inspection of PG&E's PSEP Construction Safety Assurance Inspections and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program.

If you have any questions, please contact Ha Nguyen at (213) 576-5762 or by email at Ha.Nguyen@cpuc.ca.gov.

Sincerely,

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

Bhavini Shah, PG&E

Kenneth Bruno, Claudia Almengor, and Matt Epuna, SED

Post-Inspection Written Preliminary Findings

Date of Transmittal: 02/13/2019

Dates of Inspection: 12/03 -12/07, 2018 & 1/15 – 1/17, 2019

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: 2011 – 2015 Pipeline Safety Enhancement Plan (PSEP)

Assets (Unit IDs): Main Office (Specialized Inspections) (86283)

System Type: GT

Inspection Name: PG&E PSEP Records 2011-2015 and Material Traceability

Lead Inspector: Ha Nguyen

Operator Representative: Stephen Ramos and Daniel Rakin

Unsatisfactory Results

No Preliminary Findings.

Concerns

SED is concerned that the current PG&E's Material Traceability process is convoluted and non-user friendly. SED recommends that PG&E make its Material Traceability process more user friendly by streamlining the traceability and verification process to include electronic documentation and integration of the Material Test Report (MTR), Heat Number, Welding Map and etc.

Responses

PG&E is developing procedures and forms to provide guidelines and record the traceability of materials. These changes and improvements will enable a more easily auditable material inspection, traceability, and as-building process.

SED's Conclusion

SED reviewed PG&E's response and agreed with changes and improvements it is implementing to address the documentation and integration of the Material Test Report (MTR), Heat Number, Welding Map and etc.