

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



April 2, 2019

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

GI-2018-12-PGE-29

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

Dear Mr. Christopher:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F Construction Safety Assurance Inspections of Pacific Gas and Electric (PG&E) Company's Pipeline Safety Enhancement Program (PSEP). On December 03 through December 07, 2018, SED's staff reviewed PG&E's construction records for the PSEP projects that were completed between 2011 and 2015. In addition, SED's staff conducted material traceability records review and field verification of PG&E's construction projects on January 15 through 17, 2019.

SED's staff did not observe any probable violations of the PG&E's Transmission Design and Construction Plan. However, 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 MTR, Heat Number, Welding Map and etc.

SED's findings are noted in the attached Post-Inspection Written Preliminary Findings (Summary) section of this letter. The Summary reflects only those particular records and pipeline facilities that SED inspected during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the Concern noted in the Summary.

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

cc: Susie Richmond, PG&E Gas Regulatory Compliance, Bhavini Shah, PG&E  
Dennis Lee, 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, etc.*