

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

November 9, 2018

GI-2018-08-PGE-02 (Lafayette)

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

SUBJECT: Safety and Enforcement Division closure letter for the General Order 112-F Inspection of Pacific Gas and Electric Company's Transmission Facilities in the City of Lafayette

Dear Mr. Christopher:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas and Electric Company's (PG&E) response letter dated October 2, 2018 for the findings identified during the General Order (GO) 112-F inspection of PG&E's transmission facilities within the City of Lafayette which was conducted from August 13-17, 2018.

A summary of the inspection findings documented by SED, PG&E's response to SED findings, and SED's evaluation of PG&E's response taken for each finding are outlined for each identified violation.

This letter serves as the official closure of the 2018 PG&E transmission facilities within the City of Lafayette safety inspection 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 audit. Please contact Joel Tran at (415) 515-3442 or by email at joel.tran@cpuc.ca.gov if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

cc: Susie Richmond, PG&E (gsr8@pge.com)
Bhavini Shah, PG&E (B1A1@pge.com)
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I. SED Findings

Probable Violation 1.1 – Title 49 CFR §192.605(a) states in part:

“Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.”

PG&E procedure TD-4540P-01, Section 1.3 under Preliminary Maintenance Steps, states in part:
“6. Ensure accuracy of both station diagram copies...”

During records review of pressure regulating stations, SED observed that Regulator Station RW-38 had a mapping error. The Operating Diagram labeled a Pilot Operated Regulator (Regulator R10) as a Valve. PG&E has issued a Corrective Action Plan (CAP) to correct the Operating Diagram to correctly indicate R10 as a Regulator (CAP Notification Number: 114898249 on 8/13/2018).

PG&E’s Response:

The operating diagram has been updated, please find a copy attached 'Updated Operating Diagram_CONF.pdf'

SED’s Conclusion:

SED has opted not to impose a fine or penalty since PG&E took the appropriate remedial actions, and the violation did not create any hazardous conditions for the public or utility employees.

Probable Violation 2.1 – Title 49 CFR §192.707(a) states in part:

“Buried pipelines....a line marker must be placed...(2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference.”

PG&E procedure TD-4412P-09, Section 1.3 under Pipeline Marker Requirements, states in part:
“Install markers within line of sight of one another (by the unaided eye).”

During field inspections at Las Trampas Creek - Geohazard site B-1, SED observed that PG&E is not maintaining line of sight at the location, as there was only one visible pipeline marker. PG&E does not have any visible pipeline markers at Las Trampas Creek - Geohazard site A-1. PG&E has issued a CAP to install new pipeline markers (CAP Notification Number: 114896872 on 8/16/2018).

PG&E’s Response:

CAP #114896872 has been created to install additional markers along this line, including at the location identified during the field inspections. The planned locations are plotted in the attached document '114896872 - Line marker locations_CONF.pdf' (marked A-N with the blue post its). The installations have begun and are expected to be completed by the end of 2018.

SED’s Conclusion:

SED has opted not to impose a fine or penalty since PG&E took the appropriate remedial actions, and the violation did not create any hazardous conditions for the public or utility employees.