

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 22, 2019

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

GI-2019-07-PGE-90

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

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas & Electric Company's (PG&E) response letter dated October 11, 2019 for the findings identified during the General Order 112-F inspection of PG&E's Bay Area East Transmission which included the transmission assets in PG&E's East Bay, Mission and Diablo Divisions. The inspection was conducted between July 8-12 and 15-19, 2019.

Included is SED's evaluation of PG&E's response taken for each identified Violation and Area of Concern/ Recommendation.

This letter serves as the official closure of the 2019 GO 112-F Inspection of PG&E's Bay Area East Transmission 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 Sikandar Khatri at (415) 703-2565 or by email at [Sikandar.Khatri@cpuc.ca.gov](mailto:Sikandar.Khatri@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  
Vincent Tanguay, PG&E  
Claudia Almengor, SED

SED's Conclusions on PG&E's responses to violations and concerns/recommendation are as under. The numbers referred here for violations and concerns/recommendation refers to those in PG&E's response to this inspection.

## **SED's CONCLUSIONS:**

### **Unsatisfactory Results (#1):**

- *Violation:* SED has reviewed the response from PG&E and has opted not to impose a fine or penalty at this time.
- *Concerns/Recommendations:* SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concerns.

### **Unsatisfactory Results (#2):**

SED has reviewed the response (Main Line Valve, MLV 181.42, SAP WM number 41438566) from PG&E and has opted not to impose a fine or penalty at this time. SED has reviewed the responses for other items and accepted the provided explanation.

### **Unsatisfactory Results (#3):**

SED has reviewed the response from PG&E and has opted not to impose a fine or penalty at this time.

### **Unsatisfactory Results (#4):**

SED has reviewed the response from PG&E and has opted not to impose a fine or penalty at this time.

### **Unsatisfactory Results (#5):**

SED has reviewed the response from PG&E and has opted not to impose a fine or penalty at this time.

### **Unsatisfactory Results (#6a):**

SED has reviewed the response from PG&E and accepted the same.

### **Unsatisfactory Results (#6b):**

SED has reviewed the response from PG&E and accepted the same.

### **Unsatisfactory Results (#7):**

SED has reviewed the response from PG&E and has opted not to impose a fine or penalty at this time.

### **Concern (#1):**

SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concern.

**Concern (#2):**

SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concern. SED may opt to review the results of the audit initiated by PG&E in next future SED audits.

**Concern (#3):**

SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concern.

**Concern (#4):**

SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concern.

**Concern (#5):**

SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concern.

**Concern (#6a):**

SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concern.

**Concern (#6b):**

SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concern for the examples mentioned in PG&E's response. However, the records for not updated for construction projects 31282195 and 74004041, and in general PG&E is lacking in keeping up with the update of records. A prompt action is needed to keep all records up-to-date for availability to operating personnel and for inspection purposes.

**Concern (#6c):**

SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concern.

**Concern (#7):**

SED has reviewed the response from PG&E and accepted the same.

**Concern (#8a):**

SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concern.

**Concern (#8b):**

SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concern.

**Concern (#9a):**

SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concern.

Concern (#9b):

SED has reviewed the response from PG&E. A follow-up on new procedure, TD-4183P-120 may be conducted in future SED audits.