

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 22, 2019

GI-2019-04-PGE-09

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

SUBJECT: Closure Letter for General Order 112-F Operation and Maintenance Inspection of Pacific Gas and Electric Company's Humboldt Division

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 June 21, 2019, that addressed the concerns identified during the General Order (G.O.) 112-F Comprehensive Operation and Maintenance Inspection of PG&E Humboldt Division, that was conducted on April 9 through 18, 2019.

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

This letter serves as the official closure of the 2019 G.O. 112-F Inspection of PG&E Humboldt Division.

Thank you for your cooperation in this inspection. If you have any questions, please contact Desmond Lew at (213) 576-7020 or by email at desmond.lew@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Mahmoud Intably".

Mahmoud Intably, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Preliminary Findings

cc: Stephen Ramos, PG&E Gas Regulatory Compliance
Susie Richmond, PG&E Gas Regulatory Compliance
Dennis Lee, Kan-Wai Tong, Desmond Lew, Claudia Almengor, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 04/09/2019 – 04/18/2019

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Pacific Gas and Electric Humboldt Division

Assets (Unit IDs): Humboldt Division (86277)

System Type: GD

Inspection Name: PG&E Humboldt Division

Lead Inspector: Desmond Lew

Operator Representative: Stephen Ramos, PG&E Regulatory Compliance

Unsatisfactory Results

No Preliminary Findings.

Concerns

Records: Corrosion Control (PRR.CORROSION)

1) Question Do records document inspection of aboveground pipe for atmospheric corrosion?

References 192.491(c) (192.481(a), 192.481(b), 192.481(c))

Assets Covered Humboldt Division (86277 (09))

Issue Summary During records review, SED found that the following spans were inspected in 2016 and had deficiencies that were not addressed in a timely manner:

1. Notification No.: 111859123, Order No.: 42772801, Equipment No.: 44464322 (Wrap disbanding, Holidays, Recoating, and Stickers)
2. Notification No.: 111859125, Order No.: 42772801, Equipment No.: 44464323 (Corrosion pitting, Recoating, and Stickers)
3. Notification No.: 111859128, Order No.: 42772801, Equipment No.: 44464326 (Recoating and Stickers)
4. Notification No.: 111859136, Order No.: 42772801, Equipment No.: 44464334 (Pipe Alteration and Recoating)

PG&E has provided the following work orders numbers for remediation:

- Span 1 (44464322) will be remediated per OCW 42856648.
- Span 2 (44464323) will be remediated per OCW 42797309.
- Span 3 (44464326) will be remediated per OCW 42797310.
- Span 4 (44464334) will be remediated per OCW 42797317.

SED recommends that PG&E takes the appropriate corrective measure to remedy the atmospheric corrosion on its pipeline.

PG&E Response:

PG&E recognizes this concern and has taken the following corrective action: As noted in the description, PG&E has created corrective orders to remediate the AC at these span locations. Please see below for a status update on the remediation.

- Span 1 (44464322) was remediated under PM#42856648 on 5/10/19. Please see attached "Att 1 - Span 1 (44464322).PM42856648.pdf" for the span remediation photos.
- Span 2 (44464323) will be remediated under PM#42797309. The work is scheduled to be completed by Q4 2019.
- Span 3 (44464326) will be remediated under PM#42797310. The work is scheduled to be completed by Q4 2019.
- Span 4 (44464334) will be remediated under PM#42797317. The work is scheduled to be completed by Q4 2019.

SED's Conclusion:

SED has reviewed PG&E's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

Pipeline Field Inspection: Pipeline Inspection (Field) (FR.FIELDPIPE)

2) Question Are meters and service regulators being located consistent with the requirements of 192.353?

References 192.351 (192.353(a), 192.353(b), 192.353(c), 192.353(d))

Assets Covered Humboldt Division (86277 (09))

Issue Summary SED noted during the field inspection a meter set assembly located at 901 Second Street, Eureka which was not protected from vehicular damage. PG&E issued PM#43766986 to install protective bollards. SED recommends that PG&E takes the appropriate corrective measure to protect the meter set assembly from vehicular damage.

PG&E Response:

PG&E recognizes this concern and has taken the following corrective action: As noted in the description, PG&E issued PM#43766986 to install protective bollards. The bollard installation was completed on 5/7/19. Please see "Att 2 - Meter Protection.pdf" for a photo of the installation.

SED's Conclusion:

SED has reviewed PG&E's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

3) Question Is pipe that is exposed to atmospheric corrosion protected?

References 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))

Assets Covered Humboldt Division (86277 (09))

Issue Summary SED noted during the field inspection atmospheric corrosion on a meter set assembly located at 2002 Adams Court, Arcata. PG&E issued Field Order #3518722687 to replace the regulator and paint the meter. SED recommends that PG&E takes the appropriate corrective measure to remedy the atmospheric corrosion on its pipeline.

PG&E Response:

PG&E recognizes this concern and has taken the following corrective action: The AC remediation was completed on 6/5/19 under Field Order 3515263425. Please see "Att 3 - AC Meter Remediation_CONF.pdf" for a screenshot of the field remarks.

SED's Conclusion:

SED has reviewed PG&E's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.