

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 22, 2019

GI-2019-04-PGE-09

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

**SUBJECT: General Order 112-F Comprehensive Operation and Maintenance Inspection
of PG&E's Humboldt Division**

Dear Mr. Christopher:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112-F Comprehensive Operation and Maintenance Inspection of Pacific Gas & Electric Company's (PG&E) Humboldt Division, between April 9 through 18, 2019 for calendar years 2016 thru 2018. SED used the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety's "Inspection Assistant Form" as a reference guide to conduct the inspection. SED staff conducted field inspections of pipeline facilities which included field observation of randomly selected individuals performing covered tasks.

SED's staff identified three concerns which are described in the attached "Post-Inspection Written Preliminary Findings".

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the concerns noted in the "Post-Inspection Written Preliminary Findings".

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 "Dennis Lee".

Dennis Lee, 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
Mahmoud Intably, Kan-Wai Tong, Desmond Lew, Claudia Almengor, SED
Kenneth Bruno, 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

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.

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.

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.