

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 18, 2019

Christine Cowsert
VP, Gas Asset Management and System Operations
Pacific Gas and Electric Company
Gas Transmission and Distribution Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

GI-2019-09-PGE-12

SUBJECT: General Order (GO) 112-F Gas Inspection of PG&E's North Valley Division

Dear Ms. Cowsert:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Victor Muller, Jason McMillan, Alan Wehrman, Anthony Phu, and Andrew Kwan conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) North Valley Division (Division) from September 30 to October 11, 2019. The inspection included a review of the Division's records for the period of 2016 through 2018, as well as a representative field sample of the Division's facilities. SED staff also reviewed the Division's operator qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED's findings are noted in the Post-Inspection Written Preliminary Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records and pipeline facilities that SED inspected.

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

If you have any questions, please contact Victor Muller at (916) 327-6780 or by email at victor.muller@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: Susie Richmond, PG&E Gas Regulatory Compliance
Justin Leany, PG&E Gas Regulatory Compliance
Terence Eng, SED
Claudia Almengor, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 9/30/19-10/11/19

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Assets (Unit IDs): North Valley Division (86279)

System Type: GD

Inspection Name: 2019 PG&E North Valley Distribution

Lead Inspector: Victor Muller

Operator Representative: Mike Lang

Unsatisfactory Results

Records: Corrosion Control (PRR.CORROSION)

Question Text 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 North Valley Division (86279 (12))

Issue Summary Title 49 CFR §192.481(c) states:

"If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by §192.479."

SED found records of 4 exposed pipe spans where PG&E found indications of major corrosion during the 2016 atmospheric corrosion inspections. Those indications were still present on the 2019 inspections of those spans. SED find PG&E in violation of §192.481(c) for allowing an entire inspection cycle to pass before providing the corrosion protection required.

The following outlines the specific issues observed:

Pentz Ave, South of Butte College, EQ#44464609: The AC inspection performed on 9/15/2016 found holidays with pitting on the span. Those indications were still present on the 2019 inspection. PG&E created a corrective order for this span (Corrective Notification 112055294) on 10/18/2016, and estimates the work will be completed on 10/09/2019. SED observed this span in the field and confirmed remedial work had been performed.

PARK AVE N/O W. 11TH ST., EQ#44464604: The AC inspection performed on 9/15/2016 found major issues on the span, including disbonding, or missing coating. Those indications were still present on the 2019 inspection. PG&E created a corrective order for this span (Corrective Notification 112055207) on 10/18/2016, and estimates the work will be completed on 10/15/2019.

GRAND AVE @ 14TH STREET, EQ#44464624: The AC inspection performed on 9/15/2016 found major issues on the span, including missing coating and a "field bend that may need to be looked at". Those indications were still present on the 2019 inspection. PG&E created a corrective order for this span (Corrective Notification 117880853) on 9/13/2019, and estimates the work will be completed prior to 12/15/2019. SED observed this span in the field and confirmed remedial work had been performed.

OPHIR RD W/O LINCOLN STREET, EQ#44464616: The AC inspection performed on 9/15/2016 found major issues on the span, and the notes stated that the pipe "needs repainting" and had "no protection." Those indications were still present on the 2019 inspection. PG&E created a corrective order for this span (Corrective Notification 112132663) on 11/01/2016, and estimates the work will be completed prior to 12/15/2019.

Concerns

Records: Operations And Maintenance (PRR.OM)

Question Text Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?

References 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))

Assets Covered North Valley Division (86279 (12))

Issue Summary Odorometer S/N 2001623004 went out of calibration on 12/21/2018 and was calibrated by ATS on 12/27/2018. During that time, records indicate this odorometer was used on 12/26/2018.

Per conversation with supervisors, it is not possible for this particular odorometer to have been used 1 day before it was calibrated by ATS. SED agrees that this was likely a mistake in the records. The confusion is caused by technicians using quotation marks " " to signify they were using the same odorometer as used on the previous test, rather than writing the full S/N each time.

SED recommends cautioning technicians against this approach, and encouraging technicians to record the entire serial number, or the last 4 digits.

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

Question Text 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 North Valley Division (86279 (12))

Issue Summary SED observed that the exposed span at 1424 Hwy 45 had several holidays. These holidays were initially found in 2017. SED recognizes that PG&E has a current corrective order open for this span, and the estimated time of completion is of 3/17/2020.