

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 12, 2019

GI-2019-02-PGE-29-03

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

SUBJECT: SED's closure letter for General Order 112-F Gas Safety Inspection of PG&E's Operations, Maintenance and Emergency Procedures, Design and Constructions standard Procedures, and Part 191 related Procedures

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 April 30, 2019 regarding the findings identified in the G.O. 112-F inspection of PG&E's Operations, Maintenance and Emergency Procedures, Design and Construction standards, and Part 191 related Procedures that was conducted on February 4 through 8, 2019.

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

This letter serves as the official closure of the 2019 G.O. 112-F inspection of PG&E's Operations, Maintenance and Emergency Procedures, Design and Constructions standard Procedures, and Part 191 related Procedures and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program.

If you have any questions, please contact Ha Nguyen at (213) 576-5762 or by email at Ha.Nguyen@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 Gas Regulatory Compliance
Bhavini Shah, PG&E
Kenneth Bruno, Claudia Almengor, and Matt Epuna, SED

Post-Inspection Written Preliminary Findings

Date of Transmittal: 03/15/2019

Dates of Inspection: 02/04/2019 – 02/08/2019

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Operations and Maintenance Plans, Design and Construction Standards, and Part 191 related plans

Assets (Unit IDs): Main Office (Specialized Inspections) (86283)

System Type: GD and GT

Inspection Name: 2019 PG&E O&M

Lead Inspector: Ha Nguyen

Operator Representative: Jaime Hidalgo

Unsatisfactory Results

No Preliminary Findings.

Concerns

1. Procedures: Normal Operating and Maintenance (PRO.SUBLNORMOPS)

Question Text	Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?
References	192.605(a)
Assets Covered	Main Office (Specialized Inspections) (86283 (29))
Issue Summary	<p>The document, Utility Standard Practice (USP) 22, “Safety and Health Program” has been superseded by SAFE-1001S, “Safety and Health Program Standard”. The following documents refer to older version and therefore need to be updated.</p> <p>TD-4125P-01</p> <p>TD-4125P-03</p> <p>TD-4430P-02</p>

Response:

PG&E recognizes this concern and will perform the following corrective action:

Revisions to TD 4125P 01, TD 4125P 03 and TD 4430P 02 will be completed in 2019.

Reference to Utility Standard Practice (USP) 22, "Safety and Health Program" will be updated to reference SAFE 1001S, "Safety and Health Program Standard" in the above-mentioned procedures.

SED's Conclusion:

SED reviewed PG&E's response and agreed with corrective action that PG&E has articulated. SED may review the records of the corrective action during future inspections.

**Procedures: Pressure Limiting and Regulating Station
(PRO.SUBMOVERPRESS)**

Question Text	Does the process require telemetering or recording gauges be utilized as required for distribution systems?
References	192.605(b)(1) (192.741(a), 192.741(b), 192.741(c))
Assets Covered	Main Office (Specialized Inspections) (86283 (29))
Issue Summary	PG&E Procedure TD-4125P-05 references WP4540-01 for maintaining accuracy of pressure recording equipment. WP4540-01 was superseded by TD-4540P-01 and Procedure TD-4125P-05 should be updated to reflect this change.

Response:

PG&E recognizes this concern and will perform the following corrective action:

TD 4125P 05 will be revised in 2019 updating the reference to WP4540 01. The revision will reference TD 4540P 01.

SED's Conclusion:

SED reviewed PG&E's response and agreed with corrective action it has articulated. SED may review the records of the corrective action during future inspections