



Susie Richmond
Manager
Compliance
Gas Operations

6111 Bollinger Canyon
Road
San Ramon, CA 94583
Phone: 925.328.5776
E-mail: GSR8@pge.com

April 30, 2019

Mr. Ken Bruno
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: State of California – Public Utilities Commission
General Order 112-F Gas Inspection of PG&E’s Operations and Maintenance plans,
Design and Construction standards, and Part 191 related plans

Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the CPUC conducted a General Order 112F inspection of PG&E’s Operations and Maintenance plans, Design and Construction standards, and Part 191 related plans from February 4 through February 8, 2019. On April 2, 2019, the SED submitted their inspection report, identifying violations and findings. Attached is PG&E’s response to the CPUC inspection report.

Please contact Jaime Hidalgo at (925) 786-0008 or JKHX@pge.com for any questions you may have regarding this response.

Sincerely,

/s/ Susie Richmond
Manager, Compliance

Attachments

cc: Ha Nguyen, CPUC
Dennis Lee, CPUC
Aimee Cauquiran, CPUC
Terence Eng, CPUC
Bhavini Shah, PG&E

2019 OM Inspection SED Inspection Response

#	Finding Type	Topic	Code Reference	SED Finding	PG&E Response
1	Concerns	Procedures: Normal Operating and Maintenance (PRO.SUBLNORMOPS)	192.605(a)	<p>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?</p> <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The document, Utility Standard Practice (USP) 22, "Safety and Health Program" has been superseded by SAFE-1001S, "Safety and Health Program Standard".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>	<p>PG&E recognizes this concern and will perform the following corrective action:</p> <p>Revisions to TD-4125P-01, TD-4125P-03 and TD-4430P-02 will be completed in 2019.</p> <p>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.</p>
2	Concerns	Procedures: Pressure Limiting and Regulating Station (PRO.SUBMOVERPRESS)	192.605(b)(1) (192.741(a), 192.741(b), 192.741(c))	<p>Question Text: Does the process require telemetering or recording gauges be utilized as required for distribution systems?</p> <p>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.</p>	<p>PG&E recognizes this concern and will perform the following corrective action:</p> <p>TD-4125P-05 will be revised in 2019 updating the reference to WP4540-01. The revision will reference TD-4540P-01.</p>