

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 31, 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-18

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

Dear Mr. Cowsert:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Kai Cheung, Victor Muller, Alan Wehrman, Andrew Kwan, Wilson Lule, and Oliver Garcia conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Yosemite Division (Division) from September 9 to 20, 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 Kai Cheung at (415) 940-8836 or by email at [Kai.Cheung@cpuc.ca.gov](mailto:Kai.Cheung@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:** 09/09/2019 – 09/20/2019

**Operator:** PACIFIC GAS & ELECTRIC CO

**Operator ID:** 15007 (primary)

**Assets (Unit IDs):** Yosemite Division (86281)

**System Type:** GD

**Inspection Name:** PG&E Yosemite Division

**Lead Inspector:** Kai Cheung

**Operator Representative:** Justin Leany

## i. Unsatisfactory Results

### (1) Records: Operations and Maintenance (PRR.OM)

(1.1) Question Text Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?

References 192.709(c) (192.743(a), 192.743(b), 192.743(c))

Assets Covered Yosemite Division (86281 (18))

Issue Summary Title 49 CFR §192.605(a) states:

*"Procedural manual for operations, maintenance, and emergencies. (a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."*

PG&E's Gas design standard H-70, Pressure relief devices, section "Detailed Process for Inspection and Review" states:

*"37. The following steps must be completed by local engineering personnel within 30 days of a follow-on operation being generated... E. If a new calculation review form is created, local engineering must forward the completed calculation review form and supporting documents to the local maintenance personnel..."*

During review of regulator station records for HPR RC 04, the relief valve calculation sheet in 2016 indicated lowering the setpoint to 50 psi from 55. However, the records show the setpoint was maintained at 55 psi for years 2017-2019. Additional regulator stations with similar setpoint calculations: HPR RD-15, OAK HP 45, OAK HP 43, OAK HP 38, N HP 24, HP 07 Canal School Rd & HW 33.

(1.2) Question Text Do records indicate persons inspecting the making of plastic pipe joints have been qualified?

References 192.287 (192.807(a), 192.807(b))

Assets Covered Yosemite Division (86281 (18))

Issue Summary Title 49 CFR §192.287 states:

*"No person may carry out the inspection of joints in plastic pipes required by §§192.273(c) and 192.285(b) unless that person has been qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints made under the applicable joining procedure."*

SED reviewed OQs for individuals (YO#56) who performed plastic joining in selected leak repair (YO#54). SED found that, in the construction project for SGO Capacity Franklin Street Escalon (Order No. 31095008) on 8/11/2016, LAN ID MASA was listed on the as-built drawing as the plastic fusion inspector. Upon further research, it was found that MASA did not possess the required OQ, 21-01 Polyethylene Pipeline Connection Inspection.

## ii. Concerns

### (1) Records: Operations and Maintenance (PRR.OM)

(1.1) Question Text Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?

References 192.709(c) (192.739(a), 192.739(b))

Assets Covered Yosemite Division (86281 (18))

Issue Summary Stations DR RB-15, DR RA-24, and DR RB-61 have regularly had issues with achieving lock up. During this inspection, SED observed on 9/16/19 that the left run regulator and monitor of station DR RA-24 failed to lock up. SED is concerned that while lock up is always achieved after maintenance, there may be underlying issues that are not being addressed and the stations will continue to have problems achieving lock up.

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

(2.1) Question Text Are meters and service regulators being protected from damage consistent with the requirements of 192.355?

References 192.351 (192.355(a), 192.355(b), 192.355(c))

Assets Covered Yosemite Division (86281 (18))

Issue Summary SED observed two service regulators that were missing a screen to protect the regulator vent from insects and other blockage:

- ETS location at equipment ID 42071064, 11th St N/O Alley in Firebaugh
- ETS location at equipment ID 44317823, Lynn & Merced in Dos Palos

Date	Issue	City	Equip#	Notes
9/16/19	Screen missing in reg vent	Firebaugh	42071064	Technician plan to visit location Fri
9/17/19	Screen missing in reg vent	Dos Palos	44317823	Technician plan to visit location Fri

(2.2) Question Text Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?

References 192.465(a) (192.463(b), 192.463(c))

Assets Covered Yosemite Division (86281 (18))

Issue Summary During the field verification of pipe-to-soil readings, SED noted six low pipe-to-soil readings (outside the -850mV requirement) at the following locations:

Date	Issue	City	Equip#	Corrective#	Notes
9/16/19	-809mV on ETS	Chowchilla	44354689	Notif# 117888164	troubleshoot to take place
9/16/19	-827mV on ETS	Firebaugh	44381205	Notif# 117888167	troubleshoot to take place

9/18/19	-255mV on 10%er	Newman	42821909	USA# X926300129-00X	Anode to be replaced, USA# opened, followed by SAP corrective #s
9/18/19	-550mV on 10%er	Turlock	42822053	USA# X926300136-00X	Anode to be replaced, USA# opened, followed by SAP corrective #s
9/19/19	-831mV on ETS	Modesto	44331802	Notif# 117901234	troubleshoot to take place
9/19/19	-494mV on ETS	Modesto	44331800	Notif# 117901230	troubleshoot to take place

Please provide to SED what PG&E plans to do to address this issue.