

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 18, 2020

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-2020-04-PGE-02-02ABC

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

Dear Ms. Cowsert:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Dmitriy Lysak, Andrew Kwan, Randy Fienberg and Angel Garcia conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Diablo Division (Division) from April 20 to 24, 2020. The inspection included a review of the Division's records for the period of 2017 through 2019. SED conducted this records review inspection remotely due to California's stay at home orders. SED will conduct a future inspection to cover field observations and review some records that it could not review during this remote inspection.

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 Dmitriy Lysak at (916) 327-6779 or by email at dmitriy.lysak@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Terence Eng".

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Preliminary Findings

cc: Susie Richmond, PG&E Gas Regulatory Compliance
Vincent Tanguay, PG&E
Ed Sentigar, PG&E Gas Regulatory Compliance
Dennis Lee, SED
Claudia Almengor, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 4/20/2020 – 4/24/2020

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Diablo Division

Assets (Unit IDs): Diablo Division (85405)

System Type: GD

Inspection Name: PG&E Diablo Division

Lead Inspector: Dmitriy Lysak

Operator Representative: Ed Sentigar

Unsatisfactory Results

No Preliminary Findings.

Concerns

Records : Corrosion Control (PRR.CORROSION)

Question Text Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?

References 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))

Assets Covered Diablo Division (85405 (2))

Issue Summary SED inspected casing isolation records. PG&E's distribution casings are a new part of their inspection as of 2019. PG&E is running the Enhanced CP Survey Project running until 2021 to develop the procedures and standards for distribution casing inspections

Two distribution casings read in 2019 had casing to soil potential more negative than -800mV, however no corrective notifications were generated for these casings. According to PG&E, since criteria for distribution casings has not yet been finalized, contractor testing in 2017 and 2018 were used to determine isolation.

SED reviewed contractor inspections for both casings and equipment # 44647877 showed a pipe to soil potential of -1226mV and a casing to soil potential of -1021mV. The contractor was using PG&E's transmission casing criteria to test for isolation. According to PG&E's transmission casing criteria, if a

casing to soil potential is more negative than -800, it is possibly not isolated. Equipment # 44647877 was marked as isolated even though the casing to soil potential exceeded -800mV.

PG&E stated that the contractor did further testing to determine isolation for this casing but it was not documented. PG&E will have the contractor retest the casing for isolation and provide results to SED.

Question Text Do records document examination of removed pipe for evidence of internal corrosion?

References 192.491(c) (192.475(a), 192.475(b))

Assets Covered Diablo Division (85405 (2))

Issue Summary SED observed that additional inspection form(A-form) with Order Number 3133142 had record of a steel pipe cutoff with plastic insert afterwards. PG&E performed a corrosion inspection of the external surface of the pipe, but not the internal surface. The A-form is a leak repair form which also captures records for internal inspections. Part 192.475(b) states in part, "Whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion..." TD-4186S 1.2.1 states, "Whenever any pipe is removed from a pipeline for any reason, or whenever the interior surface of the pipeline is exposed, the internal surface must be inspected for evidence of corrosion." SED believes that, based on the record, an inspection for internal corrosion was possible. The A-form question states: Is the internal surface of the pipe visible? Neither 192.475(b) or TD-4186S 1.2.1 refers to the visibility of the interior surface. The criteria for inspection in 192.475(b) and TD-4186S is for any pipe that is removed for any reason, and the exposure of the interior surface by TD-4186S, which would still include the steel which housed a plastic insert in Order 3133142.

SED recommends that PG&E updates the relevant forms and procedures so that more information is captured when an internal corrosion inspection is unable to be performed due to lack of visibility.