

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 9, 2021

GI-2020-10-PGE-29-04

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

SUBJECT: Closure Letter for General Order (GO) 112-F Gas Inspection of PG&E's Emergency Response Program

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas & Electric Company's (PG&E) response letter dated January 19, 2021 for the findings identified during the General Order 112-F inspection of PG&E's Emergency Response Program. The inspection was conducted on October 19 thru October 23, 2020.

Included is SED's evaluation of PG&E's responses taken for the identified Area of Concern.

This letter serves as the official closure of the 2020 GO 112-F Inspection of PG&E's Emergency Response Program.

Thank you for your cooperation in this inspection. If you have any questions, please contact Michelle Wei, at (213) 620-2780 or by email: miw@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "ME", enclosed in a circular scribble.

Matthewson Epuna
Program & Project Supervisor
Gas Safety & Reliability Branch
Safety and Enforcement Division

cc: Susie Richmond, PG&E
Alberta Ekukinam, PG&E
Kan Wai Tong, SED/GSRB
Claudia Almengor, SED/GSRB
Kelly Dolcini, SED/GSRB

Post-Inspection Written Preliminary Findings

Dates of Inspection: October 19-23, 2020

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Emergency Response Program

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

System Type: GT

Inspection Name: PG&E Emergency Response

Lead Inspector: Michelle Wei

Operator Representative: Alberta Ekukinam

Unsatisfactory Results

No Preliminary Findings.

Concerns

Emergency Preparedness and Response : Emergency Response (EP.ERG)

Question Text Does the process include procedures for beginning action under 192.617, if applicable, as soon after the end of the emergency as possible?

References 192.615(a) (192.615(a)(10))

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary During record review, SED noted that PG&E's GERP Response aids A and B mention "Preserve Gas Facilities for potential investigation and maintain chain of custody" and "Preserve and maintain any photos or documents from scene." In an email response to a data request PG&E elaborated that the evidence gathering process would be conducted per the chain of custody procedure TD-4100P-14. PG&E also explained that once pipe is preserved, assuming there was no legal or regulatory hold, they would conduct a technical investigation/analysis using the processes addressed in TD-4810P-26. Although those documents serve as the procedure for chain of custody and root cause analysis, PG&E's GERP does not have any reference to those documents with respect to the process of incident investigation after the end of the emergency. Therefore, SED suggests that PG&E add references to both of those procedures to the GERP to demonstrate compliance of 192.615(a)(10) and 192.617.

PG&E's Response:

PG&E recognizes this concern and has taken steps to demonstrate compliance with 192.615(a)(10) and 192.617 by updating the Gas Emergency Response Plan (GERP). Version 10 GERP now features Section 1.8, "Incident Investigation," which details the background of the regulatory requirement and PG&E's process to meet the requirement. Additionally, PG&E Utility Procedures TD-4100P-14 "Removing, Documenting, and Preserving Gas Transmission Pipe and Components," and TD-4810P-26 "Direct-Cause and Root-Cause Analysis," along with other relevant procedures have been added as references. Please see "Att 2 - GERP V10 Final Incident Investigation" for the updated GERP cover page with its new effective date, table of contents listing Section 1.8, and Section 1.8's Incident Investigation content.

SED's Conclusion:

SED has reviewed and accepted PG&E's response. SED may review any actions taken regarding this concern during the next inspection.