

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 28, 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-2020-10-PGE-29-04

Subject: General Order (G.O.) 112-F Compliance Inspection of Pacific Gas and Electric Company's Emergency Response Program

Dear Ms. Cowsert:

The Safety Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F inspection of Pacific Gas and Electric Company's (PG&E) Emergency Response Program on October 19-23, 2020. The inspection included a review of PG&E's records from calendar years 2016 to 2019. SED used the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety's "Inspection Assistant Form" as a reference guide to conduct the inspection. SED reviewed records remotely during this inspection due to COVID-19 and California Governor Newsom's Executive Order N-33-20 ("Safer at Home, Stay at Home"), shelter in place, and social distancing guidelines.

SED staff had one concern which is described in the enclosed "Summary of Inspection Findings". Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by PG&E to address the concern.

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 blue ink, appearing to read "Terence Eng".

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

CC: Michelle Wei, SED/GSRB
Susie Richmond, PG&E
Alberta Ekukinam, PG&E
Kan Wai Tong, 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

A. 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 Gas Emergency Response Plan (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.