

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 28, 2021

GI-2020-06-PGE-29-08

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

SUBJECT: General Order 112-F Inspection of PG&E's Transmission Integrity Management Program – City of Lafayette

Dear Ms. Cowsert:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Paul Penney and Kai Cheung conducted a General Order 112 inspection of Pacific Gas & Electric Company's (PG&E) Transmission Integrity Management Program (TIMP) June 22-26, 2020 and December 14-18, 2020. The inspection included a review of procedures and records related to the Lafayette Gas Safety Task Force's (LGSTF) concerns both within and not within the scope of PG&E's TIMP. These concerns were expressed in two letters to the CPUC: one to the President of the Commission on 2/3/20; the other to SED management on 6/2/20.

SED's findings are noted in the Post-Inspection Written Preliminary Findings (Summary) which is enclosed with this letter. The summary reflects only those procedures and records that SED reviewed during the inspection. SED discovered one violation, two concerns and two recommendations during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the violation, two concerns, and two recommendations noted in the Summary.

If you have any questions, please contact Paul Penney at (415) 703-1817 or by email at Paul.Penney@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,
Dennis Lee (Dennis.Lee@cpuc.ca.gov), SED/GSRB,
Kai Cheung (kai.Cheung@cpuc.ca.gov), SED/GSRB,
Mahmoud Intably (Mahmoud.Intably@cpuc.ca.gov), SED/GSRB,

Post-Inspection Written Findings

Dates of Inspection: 6-22-20→6-26-20 and 12-14-20→12-18-20

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: The City of Lafayette + Two Mile Buffer

Assets (Unit IDs) with results in this report: Lafayette TIMP+ Two Mile Buffer

System Type: GT

Inspection Name: Lafayette TIMP Inspection

Lead Inspector: Paul Penney

Operator Representative: Glen Allen, et. All

Unsatisfactory Results

Integrity Management : High Consequence Areas (IM.HC)

Question 10. Do records indicate identification of identified sites being performed as required?

References 192.947(d) (192.903, 192.905(b))

Assets Covered Lafayette TIMP+ Additional Items (Lafayette TIMP)

Issue Summary **Violation:**

PG&E has a process for finding identified sites as defined in 192.903. However, PG&E failed to find the Girl Scout Camp in Lafayette and identify it as an identified site. PG&E is therefore in violation of Title 49, Code of Federal Regulations, Section 192.905(b)(1). PG&E found process improvements to help locate identified sites in the future (**PG&E data request response 13843.01, Rev01**). No additional new identified sites have been found within the city of Lafayette plus the two-mile buffer.

As noted by PG&E during the audit, the Girl Scout Camp was found to be an identified site in 2019. However, the Girl Scout Camp should have been identified much sooner than 2019. The transmission pipe associated with the Girl Scout Camp will be integrity assessed in 2022.

Concerns

Integrity Management : Preventive and Mitigative Measures (IM.PM)

Question 1. Does the process include requirements to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area?

References 192.935(a)

Assets Lafayette TIMP+ Additional Items (Lafayette TIMP)
Covered

Issue **Concern:** Per the Summary of Findings Section of the Vertical Displacement Study, continue to collect data to confirm Summary the findings. SED believes PG&E should collect this data both for data within the study parameters (specific tree type, tree size range and range of pipeline depths of cover) and data outside the study parameters (i.e., larger trees, shallower depths of cover, etc.).

Recommendation #1: If PG&E has not already done so, PG&E should incorporate into its Right-of-Way (ROW) standard the recommendations for a modified vegetation encroachment management approach from the "PG&E Briones Pipe Span Addendum" report for the following locations:

(1) The Buckeye Ranch Trail and Girl Scout Camp on Line 191-1

(2) Other pipeline spans outside of the City of Lafayette in High Consequence Areas (HCAs) and non-HCAs within a high fire threat areas, having similar material characteristics (pipe material and coating), and other factors that PG&E deems appropriate.

Recommendation #2: Consider how PG&E can include fire threat risk as one factor to consider when prioritizing leaks for repair.

Integrity Management : Risk Analysis (IM.RA)

Question 3. Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?

References 192.947(b) (192.917(a), 192.917(e), 192.913(b)(1))

Assets Covered Lafayette TIMP+ Additional Items (Lafayette TIMP)

Issue Summary **Concern:**

During SED's afternoon meeting with PG&E on 6-24-20, PG&E stated that during tree removal, stumps and/or roots were not removed from directly over the pipeline. PG&E defines directly over the pipeline as within 5 feet of the pipeline.

As discussed during the meeting, tree roots could potentially damage the pipe coating and cause shielding of the cathodic protection. Per Title 49, Code of Federal Regulations, Section 192.917(a), PG&E is required to **"...identify and evaluate all potential threats to each covered pipeline segment. Potential threats that an operator must consider include, but are not limited to, the threats listed in ASME/ANSI B31.8S (incorporated by reference, see §192.7), section 2..."**

After the first week of the audit, PG&E provided SED staff with a report entitled: **"Index 14447-02_Final Report PGE Tree Root Interference Assessment April 27, 2015."** This report concludes there is a high correlation of tree roots causing damage to pipe coatings (Summary of Findings, Section C.1, page iv), but *"The ability to cathodically protect buried pipe does not appear to be adversely affected by tree roots."* (Summary of Findings, Section C.1, page v) As a result, shielding of the pipeline does not appear to happen.

In addition, the report also concludes: *"There was insufficient data collected in this study to draw any conclusions as to whether the presence of dead tree roots in contact with the pipe has any impact on pipeline integrity."* (Summary of Findings, Section C.1, page v)

As pointed out in the report, the results and conclusions are based on a limited data set (53 trees). SED staff believes PG&E should develop a plan and continue to collect data to validate the results and conclusions of the report mentioned above.