

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



Mar 15, 2021

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-2020-08-PGE-08-02ABC

SUBJECT: SED's Closure Letter for General Order 112-F Gas Inspection of PG&E's San Jose Division

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 San Jose Division (Division), which included a review of the Division's records for the period of 2017 through 2019, conducted remotely due to California's stay at home orders, as well as a representative field sample of the Division's facilities from August 24- September 4, 2020.

A summary of the inspection findings documented by the SED, PG&E's response to our findings, and SED's evaluation of PG&E's response taken for each identified Violation and Area of Concern and Recommendation is attached.

This letter serves as the official closure for this portion of the 2020 GO 112-F Inspection of PG&E's San Jose Division and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. If you have any questions, please contact Rocky Yang at (415) 940-8639 or by email at yi.yang@cpuc.ca.gov.

Sincerely,

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
Sajjad Azhar, PG&E Gas Regulatory Compliance
Terence Eng, SED
Claudia Almengor, SED

Closure Letter

Dates of Inspection: 08/24/2020 – 09/04/2020

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Assets (Unit IDs): San Jose Division (85401)

System Type: GD

Inspection Name: 2020 PG&E San Jose Division

Lead Inspector: Yi (Rocky) Yang

Operator Representative: Sajjad Azhar

Unsatisfactory Results

Time-Dependent Threats : External Corrosion - CP Monitoring (TD.CPMONITOR)

Question Text Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?

References 192.491(c) (192.473(a))

Assets Covered San Jose Division (85401 (8))

Issue Summary Per 192.473 (External Corrosion Control: Interference Currents), "(a) Each operator whose pipeline system is subjected to stray currents shall have in effect a continuing program to minimize the detrimental effects of such currents."

This item is regarding PG&E's response to DR#74: Interference currents on Distribution Pipe. PG&E explained in their email:

PG&E does not currently have a dedicated dynamic DC interference program for distribution piping but are planning on building resources to help troubleshoot suspected DC interference.

Since interference currents are known to exist on PG&E's transmission lines, GSRB staff believes that PG&E should develop a program a program for the distribution pipeline within the zone of influence of BART defined by PG&E for transmission pipelines.

PG&E'S Response

At present, PG&E has a robust interference program for both gas transmission and gas distribution pipelines. During regular maintenance, if there is any corrosion-related measurement that from predetermined criteria a troubleshoot is performed by PG&E. If interference is identified during the troubleshoot, corrective measures are taken to mitigate the issue. PG&E recognizes that gas transmission lines have a higher risk of dynamic interference than gas distribution systems since they may run parallel to structures

for a longer distance. As a result, PG&E has a risk-based dynamic interference program that prioritizes its gas transmission system due to the greater likelihood of dynamic interference and higher consequence of any failure along the transmission system. Once PG&E's gas transmission interference program reaches steady state PG&E plans to shift more resources towards existing gas distribution interference program.

SED's Conclusion

SED has reviewed PG&E's response and decided not to impose a fine or penalty at this moment. SED will further review PG&E's transmission interference program during TIMP audits and evaluate the effectiveness of the program.

Concerns

Design and Construction : Construction (DC.CO)

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 San Jose Division (85401 (8))

Issue Summary SED reviewed sample of PG&E's leak repair forms (A-Forms) with plastic joining activities. The A-form had a section "Plastic Joined by (LAN ID)___", but did not have a section specify who inspected the joint. In email response to DR#78 PG&E explained that both their employees and contractors had to go through their qualification process which includes self-inspection of the plastic joint. The A-form plastic joint section referred to "D-34 qualifications for joining plastic", which stated that "Ability of Company employees, Company contractors, and QC/S personnel to inspect joints is assessed with oral questions during the pipe joining qualification test process".

SED understands that the individual who joined the plastic pipe and signed his/her ID next to "Plastic Joined by (LAN ID)___" on the A-form were required and qualified to inspect the plastic joint. However, SED suggests that PG&E add "Plastic Joint inspected by___" or change the text to "Plastic Joined / inspected by (LAN ID)___" to directly demonstrate the compliance of 192.273(c), and remind the individual who made the plastic joint of the inspection requirement.

PG&E's Response

PG&E is in the process of revising the general format of the A-form to address SED's concern and will update SED once completed.

SED's Conclusion

SED has reviewed PG&E's response and PG&E should update SED with revised A-form.

Design and Construction : Materials (DC.MA)

Question Text Are pipe, valves, and fittings properly marked for identification?

References 192.63(a) (192.63(b), 192.63(c), 192.63(d))

Assets Covered San Jose Division (85401 (8))

Issue Summary The outlet fire valve in regulator Station DR F02 (equipment #41240340) was marked as **3415-J2E** in PG&E's Map+ app, which matched the valve tag on the field. However, the station diagram and valve card showed that the outlet fire valve was **V-15-J2E**. The name for the valve is inconsistent in PG&E's documentations.

SED suggests that PG&E keep the valve name consistent to avoid confusion.

PG&E's Response

PG&E is in the process of updating valve number in SAP (PG&E system of records) from V-3415-J2E to V-15-J2E to reflect operating diagram, data sheet and valve card. Once the update process is complete the valve name will be consistent with SAP, documents & Maps +. Please see "Attachment 1.PDF" for PG&E work in progress.

SED's Conclusion

SED has reviewed PG&E's response and accepts the corrective actions.

Maintenance and Operations : ROW Markers, Patrols, Leakage Survey and Monitoring (MO.RW)

Question Text Do records indicate distribution leakage surveys were conducted as required?

References 192.603(b) (192.723(a), 192.723(b))

Assets Covered San Jose Division (85401 (8))

Issue Summary The 5-year leak survey record for map 3352 (all sub areas) in 2018 showed that the previous leak survey was performed in 2017. After confirming with PG&E, they said that both 5-year and annual survey were done for that area. The record was not annual leak survey but 5-year survey and they made a mistake when documenting the previous leak survey date. SED later verified that annual leak survey was done properly.

SED suggest that PG&E be more careful on organizing the record and compare the previous record before documenting the new record to avoid the same mistake.

PG&E's Response

After a thorough review of the 2018 plats beginning with 3352, it was discovered that information in the "Previous Start Date" field of the map stamp, was actually correct. PG&E Leak Survey Group performed a 5year survey on the 3352 plats in 2017 and again in 2018. Please see "Attachment 2.PDF" for the completed leak survey maps and example shown for map 3352-E8.

SED's Conclusion

SED has reviewed PG&E's response and accepts the updated explanation.

Time-Dependent Threats : External Corrosion - CP Monitoring (TD.CPMONITOR)

Question Text Do records adequately document cathodic protection monitoring tests have occurred as required?

References 192.491(c) (192.465(a))

Assets Covered San Jose Division (85401 (8))

Issue Summary While doing a field review at 445 Lakeside Drive, the CP technician noted that this was a non-corrodible riser. The service and main were also identified as plastic. When asked what pipe the monitoring point was monitoring, the CP tech seemed uncertain about which facilities were being monitored. There is a rectifier within the CPA, but when a interrupting test was done, the effect on this monitoring point was nil.

As noted during our discussion of this issue with PG&E staff, there is another rectifier in this CPA. Please indicate if this monitoring point will continue as a monitoring point or be removed.

PG&E's Response

PG&E has removed this monitoring point. Please see "Attachment 3.PDF" for work completed.

SED's Conclusion

SED has reviewed PG&E's response with the attachment and accepts the corrective actions.