

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 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-2020-08-PGE-08-02ABC

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

Dear Ms. Cowsert:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Yi (Rocky) Yang, Paul Penny and Wai-Yin (Franky) Chan conducted a General Order F112 inspection of Pacific Gas & Electric Company's (PG&E) San Jose Division (Division) from 8/24 – 9/4, 2020. The inspection included a remote review of the Division's operation and maintenance records for the years 2017 through 2019, and a field inspection of a representative sample of the Division's facilities. SED staff also reviewed the Division's operator qualification records, which included a field observation of randomly selected individuals performing covered tasks.

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 Yi (Rocky) Yang at (415) 940-8639 or by email at yi.yang@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Terence Eng", is written over a horizontal line.

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
Justin Leany, PG&E Gas Regulatory Compliance
Dennis Lee, SED
Claudia Almengor, SED

Post-Inspection Written Preliminary Findings

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.

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 a 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 to 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.

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.

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 suggests 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.

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 Cathodic Protection Area (CPA), but when an 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 to be a monitoring point or be removed.