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January 19, 2021

Mr. Terence Eng
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

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

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to Post-Inspection Written Preliminary Findings (Summary), dated December 18, 2020. The actual inspection was held between August 24, 2020 and September 4, 2020.

Unsatisfactory Result:

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))

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.

Response to Unsatisfactory Result:

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 deviates 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.

Concern #1:

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))
Issue Summary	<p>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".</p> <p>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.</p>

Response to Concern #1:

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.

Concern #2:

Question Text	Are pipe, valves, and fittings properly marked for identification?
References	192.63(a) (192.63(b), 192.63(c), 192.63(d))
Issue Summary	<p>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.</p> <p>SED suggests that PG&E keep the valve name consistent to avoid confusion.</p>

Response to Concern #2:

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.

Concern #3:

Question Text	Do records indicate distribution leakage surveys were conducted as required?
References	192.603(b) (192.723(a), 192.723(b))
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.

Response to Concern #3:

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.

Concern #4:

Question Text	Do records adequately document cathodic protection monitoring tests have occurred as required?
References	192.491(c) (192.465(a))
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.

Response to Concern #4:

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

Please contact Sajjad Azhar at (415) 418-9046 or slat@pge.com for any questions you may have regarding this response.

Sincerely,

/s/ Vincent Tanguay

Director, Risk, Compliance, & Oper. Qual.

cc: Dennis Lee, SED
Joel Tran, SED
Paul Penny, SED
Wai-Yin (Franky) Chan
Yi (Rocky) Yang, SED
Vince Tanguay, PG&E
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