

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 19, 2020

Christine Cowser
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-2020-07-PGE-17-02ABC

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

Dear Ms. Cowser:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas & Electric Company's (PG&E) response letter dated October 2, 2020 for the findings identified during the General Order 112-F inspection of PG&E's Stockton 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.

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 Stockton 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 Anthony Phu at (916) 713-4136 or by email at anthony.phu@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc: Susie Richmond, PG&E Gas Regulatory Compliance
Vincent Tanguay, PG&E
Michael Lang, PG&E Gas Regulatory Compliance
Terence Eng, SED
Claudia Almengor, SED
Kelly Dolcini, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 07/13/2020 – 07/24/2020

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: PG&E Stockton Division Distribution

Assets (Unit IDs): Stockton Division (85403)

System Type: GD

Inspection Name: PG&E Stockton Division

Lead Inspector: Anthony Phu

Operator Representative: Michael Lang

Unsatisfactory Results

Records : Operations And Maintenance (PRR.OM)

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

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

Assets Covered Stockton Division (85403 (17))

Issue Summary Title 49 CFR §192.605(a) states, "Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."

PG&E's Utility Standard TD-4110P-09 (rev. 4) Section 9.2 lists "Action to take for Grade 3 leaks: 1. Recheck at 15 months to the date or during the next scheduled survey, whichever comes first." During records review of PG&E's leak recheck records, SED noted Leak Number 11919874 was reported as a Grade 3 Leak on 8/30/2016 and a recheck was conducted on 12/6/2017, exceeding 15 months to the date.

PG&E failed to follow their Utility Standard TD-4110P-09 and violated Title 49 CFR §192.605(a).

PG&E's Response PG&E recognizes this finding and has taken the following actions:

In an effort to prevent recurrence, the PG&E Leak Survey group is utilizing the DC Inspect App which loads rechecks directly into Inspect, avoiding the physical printing of paper rechecks, greatly reducing the risk of missing rechecks. In addition, the Leak Survey group now performs weekly Monday Leak Survey Tier calls where leaks are reviewed from the Recheck Report that are coming due.

In addition, Leak Number 111919874 was repaired on 1/11/2018 on Order 42785196.

SED's Conclusion SED has reviewed PG&E's response and accepts the corrective actions that it has articulated and implemented.

Question Text Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?

References 192.709(c) (192.739(a), 192.739(b))

Assets Covered Stockton Division (85403 (17))

Issue Summary Title 49 CFR §192.603(b) states, "Each operator shall keep records necessary to administer the procedures established under §192.605."

PG&E's Utility Standard TD-4540P-01 (rev. 1b) Section 2.2.4e requires operator personnel to "record differential pressure reading on maintenance record" form; Section 2.9.4 requires operator personnel to "record all 'as-left' equipment settings on maintenance record" form. During records review of regular scheduled maintenance of District Regulator Station LOHP-04 on 1/27/17, PG&E failed to provide recordings for the 'as-found' and 'as-left' filter differential settings on their maintenance record form.

PG&E Utility Procedure TD-4540P-01 (rev. 1d) Section 6.1.2 requires operator personnel to "fill in all fields on maintenance record" form. During records review of regular scheduled maintenance of District Regulator Station TYHP-64 on 4/22/19, PG&E failed to fill in all required fields on their maintenance record form.

PG&E failed to follow their Utility Standard TD-4540P-01 and violated Title 49 CFR §192.603(b).

PG&E's Response PG&E recognizes this finding and has taken the following preventative actions:

On 7/30/2020 the GPOM Supervisor performed a tailboard refresher for TD-4540P-01 "Maintenance of Regulator Stations" with the crew emphasizing the importance of complete and thorough documentation of maintenance activities. Please see attachment "Stockton GPOM 4540P-01 Tailboard.pdf".

SED's Conclusion SED has reviewed PG&E's response and accepts the corrective actions that it has articulated and implemented.

Concerns

Pipeline Field Inspection : Pipeline Inspection (Field) (FR.FIELDPIPE)

Question Text Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?

References 192.465(a) (192.463(b), 192.463(c), 192.463(a))

Assets Covered Stockton Division (85403 (17))

Issue Summary During field observation, SED noted the following read points to be low:

10%ers

- 600 Grattan Ave: -866 mV
- 342 Best Rd: -790 mV
- 2404 Coelho Rd: -828 mV
- 3330 Anne St: -885 mV

ETS

- 3847 N Sutter St: -844 mV
- 2422 Harding: -732 mV

- 2410 E 9th St: -828 mV
- 2317 Yosemite: -506 mV
- 3036 Sonoma Ave: -788 mV
- Pole across 125 W Vernalis Rd: -846 mV
- 2714 Florence Ave: -477 mV
- 27715 Banta: -746 mV
- 260 4th St: -709 mV

PG&E's Response PG&E recognizes this concern and has taken the following actions:

A corrective notification was created for each of the low pipe-to-soil potential readings found. Please see attached spreadsheet "Stockton CP Correctives-2020.xlsx" for the restoration data or remediation status of each location.

SED's Conclusion SED has reviewed PG&E's response and attachment and accepts the corrective actions that it has articulated and implemented.