

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 18, 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: General Order (GO) 112-F Gas Inspection of PG&E's Stockton Division

Dear Ms. Cowser:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Anthony Phu, Joel Tran, and Randy Fienberg conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Stockton Division (Division) from July 13 to 24, 2020. The inspection 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. SED staff also reviewed the Division's operator qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED found two (2) probable violations and one (1) concern during the inspection. 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 Anthony Phu at (916) 531-1016 or by email at anthony.phu@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 Gas Regulatory Compliance
Michael Lang, PG&E Gas Regulatory Compliance
Jason R McMillan, CPUC Gas Safety and Reliability Branch
Kelly Dolcini, CPUC Gas Safety and Reliability Branch

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).

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, eff. 01/01/16) Section 2.2.4e requires operator personnel to "record differential pressure reading on maintenance record" form. Section 2.9.4 of the same utility standard requires operator personnel to "record all 'as-left' equipment settings on maintenance record"

form. During review of regulator maintenance records SED found that PG&E failed to record the 'as-found' and 'as-left' filter differential settings of District Regulator Station LOHP-04 on 1/27/17.

PG&E Utility Standard TD-4540P-01 (rev. 1d, eff. 01/01/19) Section 6.1.2 requires operator personnel to "fill in all fields on maintenance record" form. During review of regulator maintenance records SED found that PG&E failed to fill in all required fields on the maintenance record form for work performed at District Regulator Station TYHP-64 on 4/22/19.

PG&E failed to keep records as necessary to administer Utility Standard TD-4540P-01 and violated Title 49 CFR §192.603(b).

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 PG&E Utility Standard TD-4181S Section 7.4.3 requires a drivable anode to be installed if readings are less negative than -900mV. PG&E Utility Standard TD-4181P-201 Section 3.1.1 classifies a reading of less negative than -950mV to be considered "Low P/S potential readings".

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

SED requests that PG&E report any corrective actions taken to remediate the listed low pipe-to-soil potential readings and ensure these test points are within compliance.