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March 9, 2022

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: State of California – Public Utilities Commission
General Order 112-F Gas Inspection of PG&E's Central Coast Division

Dear Mr. Eng:

The Safety and Enforcement Division (SED) of the CPUC conducted a General Order 112-F inspection of PG&E's Central Coast Division from February 14, 2022 through February 18, 2022. On March 1, 2022, the SED submitted their inspection report, identifying two concerns. Attached is PG&E's response to the CPUC inspection report.

Please contact Jaime Hidalgo at (925) 786-0008 or Jaime.Hidalgo@pge.com for any questions you may have regarding this response.

Sincerely,

/v/ Susie Richmond
Manager, Regulatory Compliance

Attachments

Cc : Dennis Lee, CPUC
Claudia Almengor, CPUC
Joel Tran, CPUC
Kai Cheung, CPUC
Jerrold Meier, PG&E
Susie Richmond, PG&E

2022 Central Coast Division Inspection SED Inspection Responses

#	Finding Type	Topic	Code Reference	SED Concern	PG&E Response
1	Concerns	Corrosion Control, Records - Casings	192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))	SED reviewed PG&E's Casing Evaluation Form dated 4/14/2021 with Notification number 121434115 and found that the contact type of the casing evaluation result was Shorted/Electrolytic. According to PG&E, its Distribution Enhanced CP Survey program includes mitigation efforts on metallically shorted casings, and the program has already identified 287 metallically shorted main casings and has mitigated 99 of these with a project completion date for mitigation of 2026. Please verify that this shorted casing in the Notification number 121434115 is included in the mitigation efforts of the Distribution Enhanced CP Survey. PG&E's current casing testing and mitigation procedures do not include distribution casings. SED would like to request for a status update on PG&E's progress to include distribution casings in its casing testing and mitigation procedures.	All distribution casings that are currently in SAP and being maintained by local corrosion operations were initially inspected as a part of the Enhanced CP Distribution Program. This specific casing's initial assessment found an electrolytic couple, and therefore the casing was added to SAP for annual monitoring. This demonstrates the mitigation efforts and the inclusion of this casing in the Distribution Enhanced CP Survey Program. PG&E is currently in the process of creating casing testing and mitigation procedures to include distribution casings.
2	Concerns	Corrosion Control, Records - Casings	192.491(c) (192.455(a), 192.461(a), 192.461(b), 192.483(a))	SED reviewed PG&E's data request response (CC#20) which provides a list of unprotected pipeline or pipe sections that meet §192.455(b) and §192.455(c). Based on PG&E's investigation, some of these pipeline or pipe sections in the list are not unprotected. Some are protected or have been replaced by plastic. PG&E is continuing its investigation and its final determination of the status of some of these pipelines or pipe sections listed in CC#20. SED would like to request for a status update on PG&E's investigation and any corrective actions taken to improve the quality of the unprotected pipeline or pipe sections list.	There is an ongoing project led by Corrosion Engineering that uses CP diagrams to build out each of the existing Cathodic Protection Areas across the entire gas distribution system in the GD-GIS system. As they are built out, the protection status of the mains and services within these areas gets updated to the appropriate value (CPA Name, Type of CP--Galvanic, Impressed Current, Unknown, or Unprotected). They have built out about 40% of these Cathodic Protection Areas but still have a few years to go before they'll be done. PG&E's current data base will continue to produce responses similar to what was provided for CC#20. However, PG&E will address the quality of this data by initiating a thorough review of all data that is produced by the above mentioned process prior to submitting future unprotected pipeline or pipe section responses to the SED.