

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 10, 2022

GI-2022-02-PGE-06-02ABC

Ms. Janisse Quinones  
Senior Vice President, Gas Engineering  
Pacific Gas and Electric Company  
Gas Transmission and Distribution Operations  
6121 Bollinger Canyon Road  
San Ramon, CA 94583

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

Dear Ms. Quinones:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas & Electric Company's (PG&E) response letter dated March 9, 2022, for the findings identified during the General Order (GO) 112-F inspection of PG&E's Central Coast Division (Division) which was conducted from February 14 to February 18, 2022.

A summary of the inspection findings documented by SED, PG&E's response to our findings, and SED's evaluation of PG&E's response taken for each identified Area of Concern is attached.

This letter serves as the official closure of the 2022 GO 112-F inspection of PG&E's Central Coast Division and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

If you have any questions, please contact Kai Cheung at (415) 940-8836 or by email at [Kai.Cheung@cpuc.ca.gov](mailto:Kai.Cheung@cpuc.ca.gov).

Sincerely,

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

Enclosure: Summary of Inspection Findings

cc: Susie Richmond, PG&E Gas Regulatory Compliance  
Jaime Hidalgo, PG&E Gas Regulatory Compliance  
Claudia Almengor, SED  
Terence Eng, SED

# Summary of Inspection Findings

**Dates of Inspection:** 2/14/2022 – 2/18/2022

**Operator:** PACIFIC GAS & ELECTRIC CO

**Operator ID:** 15007 (primary)

**Inspection Systems:** Central Coast Division Gas Distribution

**Assets (Unit IDs) with results in this report:** Central Coast Division (86276)

**System Type:** GD

**Inspection Name:** PG&E Central Coast Division

**Lead Inspector:** Kai Cheung

**Operator Representative:** Jaime Hidalgo

## Unsatisfactory Results

*No Preliminary Findings.*

### I. Concerns

#### (1) Records: Corrosion Control (PRR.CORROSION)

(1.1) Question Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?

References 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))

Assets Covered Central Coast Division (CC)

Issue Summary 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.

#### **PG&E's Response:**

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.

### **SED's Conclusion**

SED has reviewed the response from PG&E and determined that the ongoing corrective actions articulated by PG&E sufficiently address SED's concern.

(1.2) Question Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?

References 192.491(c) (192.455(a), 192.461(a), 192.461(b), 192.483(a))

Assets Covered Central Coast Division (CC)

Issue Summary 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.

### **PG&E's Response:**

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.

### **SED's Conclusion:**

SED has reviewed the response from PG&E and determined that the ongoing corrective actions articulated by PG&E sufficiently address SED's concern.