Pacific Gas and Electric Company®

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August 4, 2023

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

Re: General Order 112-F Inspection of PG&E's North Valley Division (Distribution)

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to the Safety and Enforcement Division's (SED) Post-Inspection Written Preliminary Findings (Summary) received July 28, 2023, stemming from the 2023 SED inspection of PG&E's North Valley Division distribution pipeline records and facilities conducted May 15 to 26, 2023.

For clarity, the one concern identified in the Summary will be repeated followed by PG&E's response.

Concern #1: Time-Dependent Threats : External Corrosion - CP Monitoring (TD.CPMONITOR)

Question Title, ID	Rectifier or other Impressed Current Sources, TD.CPMONITOR.CURRENTTEST.O
Question Text	17. Do field observations confirm impressed current sources are properly maintained and are functioning properly?
References	192.465(b)
Issue Summary	PG&E performs a detailed check once each calendar year on their "Pedestal Mount Rectifier Test and Site Evaluation" form. Per TD-4181P-301 Rectifier Maintenance and Adjustment, part of the process of checking the rectifiers is to measure the ground rod resistance of the AC disconnect to verify integrity and continuity of the grounding system. Table 2 "Rectifier Safety Hazard Examples" of this procedure lists ground rod resistance greater than 25 Ohms as a safety hazard requiring remediation. SED observed 2 rectifiers with high ground resistance: 1. Equipment #42705170. SED found ground resistance of 41.3 Ohms 2. Equipment #44409574. SED found ground resistance of 28.4 Ohms SED recommends that PG&E bring the ground resistance of these rectifiers under 25 Ohms.

Response to Concern #1:

Following the two ground resistance readings greater than 25 Ohms, "Next Step" remedies provided in the second column of Table 2 of TD-4181P-301 (see Att#01) were completed for both rectifiers, confirming potential safety hazards are adequately mitigated. Both rectifiers were verified to have an existing second ground rod installed, and the integrity and continuity of grounding connections were inspected, cleaned, and tightened as needed. A summary is outlined in the table below:

EQ#	OHMS (SED INSP.)	SAP NOTIFICATION#	OHMS (SUBSEQUENT)	ATTACHMENT
42705170	~41 Ohms	126252303	23 Ohms	Att#02
44409574	~28 Ohms	126259144	28 Ohms	Att#03

Please contact [redacted] for any questions you may have regarding this response.

Sincerely,

[redacted]
Director, Gas Regulatory and Risk

cc: Dennis Lee, CPUC
Jason McMillan, CPUC
Claudia Almengor, CPUC
Anthony Phu, CPUC
[redacted] PG&E
[redacted] PG&E

Attachments:

Att#01_Table 2 of TD-4181P-301.pdf
Att#02_screenshot of Notif#126252303 comments.pdf
Att#03_screenshot of Notif#126259144 comments.pdf