PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

July 28, 2023

GI-2023-04-PGE-18-02ABC

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

SUBJECT: General Order 112-F Gas Inspection of PG&E's Yosemite Division

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Yosemite Division (Division) on April 3 - 14, 2023. The inspection included a review of the Division's records for the period of 2019 through 2022, 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.

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

This letter serves as the official closure for this portion of the 2023 GO 112-F Inspection of PG&E's Yosemite 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-Matthew Shaffer at (916) 969-9334 or by email at MSL@cpuc.ca.gov.

Sincerely,

Dennis Lee

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

Enclosure: Post-Inspection Written Findings

cc: Susie Richmond, PG&E Gas Regulatory Compliance
Justin Leany, PG&E Gas Regulatory Compliance
Jason McMillan, SED
Claudia Almengor, SED
Terence Eng, SED

Post-Inspection Written Findings

Dates of Inspection: April 3, 2023 – April 14, 2023

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Yosemite Division Distribution System

Assets (Unit IDs) with results in this report: Yosemite Division (86281)

System Type: GD

Inspection Name: PG&E Yosemite Division 2023

Lead Inspector: Matthew Shaffer

Operator Representative: Justin Leany

Unsatisfactory Results

A. Design and Construction : Design of Pipe Components (DC.DPC)

Question Title, ID	Flanges and Flange Accessories, DC.DPC.FLANGE.O
Question	2. Do flanges and flange accessories meet the requirements of 192.147?
References	192.141 (192.147(a), 192.147(b), 192.147(c))
Assets Covered	Yosemite Division (86281 (18))
Issue Summary	During the field inspection at the meter set assembly located at [redacted] #11 in Turlock, SED discovered four stud bolts that were not completely threaded through the nuts at two blind flanges. 49 CFR §192.147(a) states that "(a) Each flange or flange accessory (other than cast iron) must meet the minimum requirements of ASME/ANSI B 16.5 and MSS SP-44 (incorporated by reference, see § 192.7), or the equivalent." ASME B16.5-2003 Annex D requires that bolt length be calculated to include the length of the necessary nuts needed to connect the flange, plus the minimum flange thickness, plus the gasket thickness, plus the appropriate thickness tolerances. The four stud bolts do not meet the minimum requirements of ASME B16.5; therefore, PG&E is in violation of 49 CFR §192.147(a).
PG&E's Response	The bolt/nut engagement concerns raised during field inspections on 04/12/2023 at customer meter set at [redacted]t in Turlock, CA were brought into alignment with recommendations of section 2.1(E) of the current revision of PG&E guidance document B45.4 (see Att#01) on 04/17/2023 under SAP Notification# 125874150 (see pictures in Att#02). Note the meter set was installed in 1996 therefore 49 CFR §192.147(a) would have referenced the 1988 edition of ASME/ANSI B16.5. Annex D was not introduced until the 2003 edition of ASME/ANSI B16.5. While guidance in Annex D is not mandatory per footnote 1 (see Att#03), it aligns with current version of PG&E design standard B45.4 (Rev-0e, effective 03-10-2023) which requires that "bolts/studs must be fully engaged and extend completely through the nut, with a recommended minimum of one thread exposed…" per section 2.1(e).

SED's Conclusion PG&E's response stating "While guidance in Annex D is not mandatory per footnote 1" fails to acknowledge the second footnote "The use of shorter bolt lengths is acceptable provided that full thread engagement is obtained at assembly (see para. 6.10.2)." SED has reviewed PG&E's response and attached remediation evidence and accepts the corrective actions that has been implemented. No further action is necessary.

Concerns

B. Time-Dependent Threats : External Corrosion - CP Monitoring (TD.CPMONITOR)

Question Title, ID: Correction of Corrosion Control Deficiencies, TD.CPMONITOR.DEFICIENCY.R

Question: 13. Do records adequately document actions taken to correct any identified deficiencies in corrosion control?

References: 192.491(c) (192.465(d))

Assets Covered: Yosemite Division (86281 (18))

Issue Summary: During the review of rectifier maintenance records, SED found that the rectifier with Equipment #44984755 had multiple readings of 0 volts and 0 Amps between 4/28/2020 and 12/6/2022.

When SED asked PG&E about this rectifier, they stated it was currently non-operational, although the electronic test stations in that cathodic protection area were still more negative than -850 mV.

PG&E's Response: Cathodic Protection Area (CPA) 3176-07 was continually monitored and maintained to provide adequate levels of cathodic protection (i.e. -850mV or less) before and during the timeframe that the rectifier with equipment #44984755 was down due to a depleted deep-well anode. As of Nov-2022, the rectifier with equipment #44984755 was back in service and all periodic inspections for the rectifier with equipment #44984755 have demonstrated consistent, adequate amperage and voltage levels (Att#04).

SED's Conclusion: SED has reviewed PG&E's response and attached amperage and voltage levels of equipment #44984755 (Att#04) which indicates that the rectifier amperage read in 11/4/2022 was 0 Amps. The amperage and voltage readings after 11/18/2022 indicate that the rectifier is demonstrating adequate amperage and voltage. No further action is necessary.

C. Design and Construction : Meters, Service Regulators, and Service Lines (DC.METERREGSVC)

Question Title, ID: Customer Meters and Regulator Location, DC.METERREGSVC.CUSTMETERREGLOC.O

Question: 1. Are meters and service regulators being located consistent with the requirements of 192.353?

References: 192.351 (192.353(a), 192.353(b), 192.353(c), 192.353(d))

Assets Covered: Yosemite Division (86281 (18))

Issue Summary: SED observed two traffic protection bollards which were damaged and no longer provide adequate protection for a SCADA equipment cabinet (YO-TUR-PL08). Also, a communications module (YO-TUR-RU08) mounted on a utility pole was missing an access cover.

SED requests that PG&E take corrective actions to repair or replace the traffic bollards, as well as the communications module cover, and provide an update regarding those actions.

PG&E's Response: Correctives for the vehicle impact protection to the SCADA cabinet serving station YO-TUR-RU08 and cover plate for adjacent utility pole have been completed (see Att#05).

SED's Conclusion: SED has reviewed PG&E's response and attached remediation evidence and accepts the corrective actions that has been implemented. No further action is necessary.

D. Time-Dependent Threats : External Corrosion - CP Monitoring (TD.CPMONITOR)

Question Title, ID: Cathodic Protection Monitoring Criteria, TD.CPMONITOR.MONITORCRITERIA.O

Question: 3. 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: Yosemite Division (86281 (18))

Issue Summary	SED found one Electronic Test Station (Equipment #44302010) that had a pipe-to-soil (P/S) read of -815 mV. The previous P/S read was -818mV. According to PG&E, this area is out of tolerance due to a rectifier that is awaiting the installation of a new deep well anode. SED requests that once the installation is complete, up-reads be taken and sent to SED as confirmation of compliance.
PG&E's Response	Following the 04/05/2023 pipe-to-soil (P/S) reading of -815mV, the corrosion mechanic troubleshot the area and recorded a P/S reading of -867mV on 04/22/2023 (SAP Notification # 122925131) and a subsequent P/S reading taken 06/30/2023 was -910 mV (Att#06).
SED's Conclusion	SED has reviewed PG&E's response and attached remediation evidence and accepts the corrective actions that has been implemented. No further action is necessary.