

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 15, 2023

Ms. Christine Cowser Chapman
Senior Vice President, Gas Engineering
6121 Bollinger Canyon Road
San Ramon, CA 94583

GI-2023-06-PGE-91-01ABC

SUBJECT: General Order (GO) 112-F Gas Inspection of PG&E's Bay Area West Transmission

Dear Ms. Chapman:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Shuai (James) Zhang, Anthony Phu, Matthew Shaffer, and Dylan Glass conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Bay Area West Transmission (Milpitas District, San Francisco Division, De Anza Division, and Peninsula Division) from June 05 through June 23, 2023. The inspection included a review of Bay Area West Transmission's records for the period of 2019 through 2022, as well as a representative field sample of Bay Area West Transmission's facilities. SED staff also reviewed Bay Area West Transmission's operator qualification (OQ) records, which included field observation of randomly selected individuals performing covered tasks.

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 during the inspection. SED discovered two violations during the inspection.

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 James Zhang at (415) 603-1310 or by email at james.zhang@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "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
Paul Camarena, PG&E Gas Regulatory Compliance
Claudia Almengor, SED
Dennis Lee, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 6/5/2023 – 6/23/2023

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: GT

Assets (Unit IDs) with results in this report: Bay Area West Transmission (86287)

System Type: GT

Inspection Name: 2023 PG&E Bay Area West Transmission

Lead Inspector: James Zhang

Operator Representative: Paul Camarena

Unsatisfactory Results

Time-Dependent Threats: Atmospheric Corrosion (TD.ATM)

Question Title, ID Atmospheric Corrosion Monitoring, TD.ATM.ATMCORRODEINSP.R

Question 4. Do records document inspection of aboveground pipe for atmospheric corrosion?

References 192.491(c) (192.481(a), 192.481(b), 192.481(c), 192.481(d))

Assets Covered Bay Area West Transmission (86287 (91))

Issue Summary PG&E Procedure TD-4188S (revision 1, effective date 01/01/2017) Section 4 "Mitigation" states:

"The mitigation timeline of atmospheric corrosion-related abnormal operating conditions (AOCs) found during monitoring must not exceed thirty-nine months from the date of the AOC identification, except assets that meet requirements in Section 1.4."

Section 1.4 of this procedure states:

"Per 49 CFR §192.479 (c), the Company need not protect from atmospheric corrosion any pipeline (except portions of pipelines in off-shore splash zones or soil-to-air interfaces) for which the Company demonstrates by test, investigation, or experience appropriate to the environment of the pipeline that corrosion will meet at least one of the following criteria:

- Only be a light surface oxide.
- Not affect the safe operation of the pipeline before the next scheduled inspection."

Title 49 Code of Federal Regulations (49 CFR) §192.605(a) states in part:

"General. 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 failed to remediate an atmospheric corrosion-related AOC within thirty-nine months from date of AOC identification for span 44447917 from 12/13/2017 to 06/22/2023, totaling sixty-six months. PG&E is in violation of 49 CFR §192.605(a) for failing to follow PG&E's procedure TD-4188S to remediate within the given timeframe.

Training and Qualification: Operator Qualification (TQ.OQ)

Question Title, ID Contractor Qualification, TQ.OQ.OQCONTRACTOR.R

Question 5. Are adequate records containing the required elements maintained for contractor personnel?

References 192.807(a) (192.807(b))

Assets Covered Bay Area West Transmission (86287 (91))

Issue Summary Title 49 CFR §192.807 states in part, "*Each operator shall maintain records that demonstrate compliance with this subpart.*"

SED reviewed contractors' Operator Qualification (OQ) records of inspector [REDACTED] (Tulsa LLC) for project PM-84008462 in 2019 (see Coating Inspection Report dated 06/05/19), and inspector [REDACTED] for file 74033845 and 74039822, project PM-84013693 in 2021 (see Pipe Inspection Form dated 09/27/21). PG&E was unable to provide adequate or traceable OQ records for the following employees performing covered tasks:

- OQ-0321 General Coating Inspections and OQ-0323 Wrapped & Hot Wax Coating Inspections for inspector [REDACTED]
- OQ-0309 Internal Corrosion/Monitor for inspector [REDACTED].

Therefore, PG&E is in violation of 49 CFR §192.807 for failing to provide records of contractors' qualification documentation, or records identifying the evaluation process used, and the qualification process used to qualify the individual for coating inspection and internal corrosion inspection.

Concerns

No Preliminary Concerns.