

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 24, 2023

GI-2023-06-PGE-29-09

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

SUBJECT: General Order (GO) 112-F Gas Inspection of PG&E's Distribution Integrity Management Program (DIMP) – Follow up and review of 2022 changes

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) Distribution Integrity Management Program (DIMP). The inspection entailed follow up on SED's 2022 Inspection findings and review of changes made to DIMP Program during the year 2022. The inspection took place between June 26-27, 2023.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records that SED inspected during the inspection. SED discovered two Unsatisfactory findings 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 finding noted in the Summary.

If you have any questions, please contact Sikandar Khatri at (415) 703-2565 or by email at [Sikandar.Khatri@cpuc.ca.gov](mailto:Sikandar.Khatri@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: Summary of Inspection Findings

cc: Susie Richmond, PG&E  
Dennis Lee, SED  
Claudia Almengor, SED

# Summary of Inspection Findings (Summary)

**Dates of Inspection:** June 26-27, 2023

**Operator:** PACIFIC GAS & ELECTRIC CO

**Operator ID:** 15007 (primary)

**Inspection Systems:** Distribution

**Assets (Unit IDs) with results in this report:** Main Office (Specialized Inspections) (86283)

**System Type:** GD

**Inspection Name:** 2023 PG&E DIMP Inspection

**Lead Inspector:** Sikandar Khatri

**Operator Representative:** Barbara Patterson

## Unsatisfactory Results

### Gas Distribution Integrity Management : Knowledge of the System (GDIM.KN)

Question Title, ID System Knowledge - Gaps, GDIM.RA.GAPS.P

Question 2. Does the plan contain procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?

References 192.1007(a)(3)

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary PG&E's Utility Procedure TD-4850P-01 rev 4 section 4.3.2 states in part:

"DIMP personnel review each data source by assessing the following information: ...  
"Completeness of data"

However, PG&E does not have a process describing how it determines that the "Completeness of data" is achieved and if not, the procedure used to identify missing, inaccurate or incomplete records.

PG&E's Utility Procedure TD-4850P-01 rev 4 section 4.5.1 defines "Missing Information" as:

"DIMP defines missing information as GD GIS main & service asset attributes that are needed for the risk assessment process (see Attachment H, Appendix B) but are recorded as unknown or missing in GD GIS (e.g., null values or a 01/01/1800 installation date)."

Attachment H "Threat Identification and Risk Evaluation", Appendix B Revision 10 consists of a table of the database structure of the "2022 RiskFinder Data Sources" & assigned Subject Matter Expert (SME) (effective date 7/29/2022), but does not include a methodology to confirm or cross-reference the integrity of the data & therefore can not determine if the data sets are complete. Per follow-up data request by SED, PG&E stated that the "2022 RiskFinder Data Sources" includes all the threat categories (i.e. natural forces, excavation, etc.).

PG&E's Utility Procedure TD-4850P-01 rev 4 section 4.5.1(a) states:

"Data from Leak repair, Inspection & Gas Quarterly Incident Report (A-Form) (Form TD-5100P-01-F01), which must be completed for leak repairs, or the Pipe Inspection Form (Form TD-5100P-01-F03), which must be completed when a section of buried pipeline is exposed for non-leak reasons, may be used in the risk model in place of missing main or service attributes."

PG&E's Utility Procedure TD-4850P-01 rev 4 section 4.5.1(a) identifies which forms must be completed & a method for substituting incomplete records for leak repairs in the risk model, but omits the other threat categories (i.e. Natural Forces, Excavation damage, Incorrect operations, etc.).

Title 49 Code of Federal Regulations (CFR) §192.1007(a)(3) states, "Identify **additional information** needed and provide a plan for gaining that information over time through normal activities conducted on the pipeline (for example, design, construction, operations or maintenance activities)." Furthermore, this **additional information** is needed to fill gaps due to missing, inaccurate, or incomplete records.

Therefore, PG&E is in violation of Title 49 CFR §192.1007(a)(3) for not having procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records.

Question Title, ID System Knowledge - Information Needed, GDIM.RA.INFONEEDS.P

Question 3. Do the procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?

References 192.1007(a)(3)

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Title 49 Code of Federal Regulations (CFR) §192.1007(a)(3) states, "Identify ***additional information*** needed and provide a plan for gaining that information over time through normal activities conducted on the pipeline (for example, design, construction, operations or maintenance activities)." Furthermore, this ***additional information*** is needed to fill gaps due to missing, inaccurate, or incomplete records.

Therefore, PG&E is in violation of Title 49 CFR §192.1007(a)(3) for not having adequate procedures that specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.).

## Concerns

*No Preliminary Concerns.*