

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 30, 2024

GI-2023-11-PGE-78-01ABC

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: G.O. 112-F Compliance Inspection of PG&E Southern Transmission Area

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) conducted a General Order 112-F Comprehensive Inspection of Pacific Gas & Electric Company's (PG&E) Southern Transmission Area (Comprehensive Standard Transmission Backbone - Topock & Hinkley Districts / Stations - Hinkley & Topock / Local Transmission - Kern Division) from November 13 thru 17, November 27 thru December 1, and December 4 thru 8, 2023. The inspection included a review of the PG&E's Southern Transmission area's operation and maintenance records for the period of calendar year 2019 through 2022. Also, SED conducted a representative field sample inspection of PG&E's gas pipeline facilities in the Southern Transmission Area. SED staff also reviewed Southern Transmission area's operator qualification (OQ) records, which included field observation of randomly selected individuals performing covered tasks.

SED's inspection findings are noted in the "Post-Inspection Written Preliminary Findings" report, which is enclosed in this letter. The finding report reflects only those particular records and pipeline facilities that SED inspected during the inspection. SED staff noted four (4) areas of concern as shown in the report.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the concerns noted in the SED's Post-Inspection Written Preliminary Findings.

If you have any questions, please contact Sann Naing, Senior Utilities Engineer (Specialist) at (213) 266-4723 or by email at sn1@cpuc.ca.gov.

Sincerely,

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosure: Post-Inspection Written Preliminary Findings

CC: Susie Richmond, PG&E
Kristina Castrence, PG&E
Glen M. Allen, PG&E
Matthewson Epuna, SED/GSRB
Sann Naing, SED/GSRB
Claudia Almengor, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: November 13 to 17, and November 27 to December 8, 2023

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: PG&E Southern Transmission

Assets (Unit IDs) with results in this report: Southern Transmission (88996)

System Type: GT

Inspection Name: 2023 PG&E Southern Transmission

Lead Inspector: Sann Naing

Operator Representative: Glen M. Allen

Unsatisfactory Results

No Preliminary Findings.

Concerns

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

1.) Question Title, ID Flanges and Flange Accessories, DC.DPC.FLANGE.O

Question 8. Do flanges and flange accessories meet the requirements of 192.147?

References 192.147 (192.147(a), 192.147(b), 192.147(c), 192.607)

Assets Covered Southern Transmission (88996 (78))

Issue Summary During field inspection, SED team observed some pipeline flange bolts did not extend completely through the nuts at the following locations:

1. Topock Compressor Station, unit K-5 discharge by-pass valve flange
2. Ridgecrest Primary Regulator station, valves V1, V4, V7, and V8
3. UPF Corporation Meter & Reg Station flanges

PG&E generated the following repair work order notifications for these findings: Work Order numbers - 46079024 for K-5 discharge by-pass valve flange, 127548610 for Ridgecrest station valves, and 127548712 for UPF Corporation Meter & Reg Station flanges.

PG&E identified this issue (Flange bolts not completely extending through the nuts) as a systemwide issue and reported it in 2023 Q2 Internal Review Summary of Findings (IRSF) report it submitted to SED on 7/13/23.

PG&E's standard procedure B-45.4 - Flange Bolt-Tightening Sequence and Torque Values, Section 2.1 (E) states:

"Bolts/studs must be fully engaged and extend completely through the nut, with a recommended minimum of one thread exposed. Any excess thread protruding beyond the nut face should be minimized with a recommendation, not to exceed 1/2-inch beyond nut face."

American Society of Mechanical Engineers (ASME) / American National Standards Institute (ANSI) B16.5-2003, incorporated by reference into Title 49 CFR, Part 192, 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.

SED requests repair status update on these findings. SED recommends that PG&E's work group evaluation should include identification and remediation of these issues during its normal operations and maintenance (O&M) activities.

2.) Question Title, ID Supports and Anchors, DC.DPC.SUPPORT.O

Question 29. Do field observations confirm each length of pipe and each component is being visually inspected for sufficient installation of anchors or supports to prevent undue strain on connected equipment, to resist longitudinal forces, to prevent or dampen excessive vibration, and is in accordance with §192.161?

References 192.141 (192.161(a), 192.161(b), 192.161(c), 192.161(d), 192.161(e), 192.161(f))

Assets Covered Southern Transmission (88996 (78))

Issue Summary During field inspection, SED observed some pipeline supports that were not in contact with the pipelines (not in contact to provide support for the pipelines that needed the support). Also, some of the gaps in supporting frame were bridged with temporary wooden wedges at the following locations:

1. Needles Tap Station
2. Searles Valley Minerals Meter Station
3. Ridgecrest Primary Reg Station

PG&E generated the following repair work order notifications for these findings: Work order notification numbers - 127496127 for Needles Tap station, 127548611 for Searles Station, and 127548549 Ridgecrest Primary Reg Station. Please provide a remedial action report to SED.

Maintenance and Operations : Gas Pipeline Operations (MO.GO)

3.) Question Title, ID Continuing Surveillance, MO.GO.CONTSURVEILLANCE.O (also presented in: MO.GOCLASS)

Question 3. Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?

References 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))

Assets Covered Southern Transmission (88996 (78))

Issue Summary During a field inspection, PG&E conducted a leak survey with an instrument and discovered gas leaks at the following locations:

1. Three (3) leaks during Topock Compressor Station leak survey
2. A Launcher inside the Hinkley Compressor station
3. MLV 275.86B at Gosford Rd. Meter Station

PG&E generated the following work order notifications for these findings: Work Order Notification numbers - 127484097, 127484132, and 127484300 for Topock Compressor Station leaks, 127529671 for the Launcher inside the Hinkley Compressor station, and 127549297 for MLV 275.86B at Gosford Rd. Meter Station. PG&E informed SED it completed remediation of all the gas leaks that were discovered the field inspections the leak at MLV 275.86B. Please provide a remedial action report to SED for the gas leak at MLV 275.86B.

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

4.) Question Title, ID Atmospheric Corrosion Monitoring, TD.ATM.ATMCORRODEINSP.O

Question 5. Is pipe that is exposed to atmospheric corrosion protected?

References 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192.481(d))

Assets Covered Southern Transmission (88996 (78))

Issue Summary During field inspection, SED team observed surface rust with indications of atmospheric corrosion and disbonded coating at the following locations:

1. V-20 and blind flange near Needles Tap
2. Topock compressor station unit K-5 discharge by-pass valve
3. Victorville G TAP flanges and volts
4. Oro Grande Reg station flanges and volts
5. Searles Valley Minerals Meter Station volts and flanges
6. L-300A span (EQ# 41453454) just outside of Topock compressor station

PG&E generated the following work order notifications for these findings: Work Order Notification numbers: 127496126 for V-20 and blind flange near Needles Tap, 127496128 for K-5 discharge by-pass valve, 127658648 for Victorville G TAP flanges and volts, 127658649 for Oro Grande Reg station flanges and volts, 127549055 for Searles Station, and 120503300 for Span outside of Topock Compressor station. Please provide a remedial action report to SED.