

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 13, 2023

GI-2023-09-PGE-90-01ABC

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: General Order 112-F Gas Inspection of PG&E's Bay Area East Transmission Area and Standard Pacific Gas Line

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Bay Area East Transmission Area (Bay Area East) and Standard Pacific Gas Line Inc. (StanPac) from September 11 to September 29, 2023. The inspection included a review of the Bay Area East's and StanPac's records for the period of 2019 through 2022, as well as a representative field sample of facilities. SED staff also reviewed Bay Area East's and StanPac'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 five (5) concerns 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 concerns noted in the Summary.

If you have any questions, please contact Kai Cheung at (415) 940-8836 or by email at Kai.Cheung@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 Gas Regulatory Compliance
Kristina Castrence, PG&E
Frances Yee, PG&E
Sajjad Azhar, PG&E Gas Regulatory Compliance
Dennis Lee, SED
Claudia Almengor, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 09/11/2023 – 09/29/2023

Operator: PACIFIC GAS & ELECTRIC CO (PG&E) and STANDARD PACIFIC GAS LINE (StanPac)

Operator ID: 15007 (PG&E, primary) and 18608 (StanPac by PG&E)

Inspection Systems: Bay Area East Transmission and StanPac

Assets (Unit IDs) with results in this report: Bay Area East (86285) and StanPac (88672)

System Type: GT

Lead Inspector: Kai Cheung

Operator Representative: Sajjad Azhar

I. Unsatisfactory Results

No Preliminary Findings.

II. Concerns

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

(1) Question 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 Bay Area East Transmission (Bay Area East)

Issue Summary SED made the following observations during the field visits:

(1) SED observed that a segment of exposed pipe, Span (EQ ID # 44823727), had no coating. PG&E mentioned that an Other Corrective Work (OCW) # 124741971 was issued and a copy of the notification was provided. Please provide a status update.

(2) SED observed that coating was disbonded on one side at the air-soil interaction of Span (EQ ID # 43161602). Please take remedial measures and provide an update.

(3) SED observed that the pipe segment, Span (EQ ID # 43164708), had rust, two burn marks, and needed to be checked for link seals (seals at the intersection of pipe and bridge abutment). Please examine, take remedial measures, and provide an update.

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

(2) Question Are impressed current sources properly maintained and are they functioning properly?

References 192.465(b)

Assets Covered Bay Area East Transmission (Bay Area East)

Issue Summary During **SED's** field visit, the rectifier EQ 44817948 (Old EQ 42711824) had a reading of zero amperes. PG&E created a CWF (Corrective Work Form) to address the issue. Please provide an update.

(3) Question Do records adequately document actions taken to correct any identified deficiencies in corrosion control?

References 192.491(c) (192.465(d))

Assets Covered Bay Area East Transmission (Bay Area East)

Issue Summary PG&E provided spreadsheet BA_E# 16 CPA Down report. Several CPAs have been down for more than 200 days, for example, EQ IDs 125442184, 124598552, 124800143 and others. SED requested a status update which was provided (BA_E#61). PG&E should continue to work on these diligently to resolve the issues and provide a progress update.

Time-Dependent Threats: External Corrosion - Cathodic Protection (TD.CP)

(4) Question Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?

References 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))

Assets Covered Bay Area East Transmission (Bay Area East)

Issue Summary SED observed pipe and casing pipe-to-soil reads at various locations in East Bay, Mission and Diablo Divisions. For EQ ID 41397509, the read for the pipe was -1623 mV and the casing was -1010 mV, indicating a contact. PG&E should investigate and remediate.

(5) Question Do records indicate the location of all corrosion control items listed in §192.491(a)?

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

Assets Covered Bay Area East Transmission (Bay Area East)

Issue Summary During **SED's** field visit in Diablo Division, PG&E personnel were unable to locate ETS 42737025. PG&E reported that the coordinates for this equipment are not available in SAP. It is important that coordinates/location of all assets be available for PG&E personnel to locate and perform regular maintenance. PG&E later reported that the actual coordinates are approximately [REDACTED] and a Request for Work (RW) notification # 127134468 was created to add LAT/LONG to SAP. Please provide an update.