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

June 9, 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.

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 one (1) probable violation and three (3) 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 Matthew Shaffer at (916) 969-9334 or by email at MSL@cpuc.ca.gov.

Sincerely,

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
Justin Leany, PG&E Gas Regulatory Compliance
Jason McMillan, SED
Claudia Almengor, 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).

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.

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.

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.