

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 12, 2024

Austin Hastings
VP, Gas Engineering
6121 Bollinger Canyon Road
San Ramon, CA 94583

GI-2024-03-PGE-02-02ABC

SUBJECT: SED's Closure Letter for General Order (GO) 112-F Gas Inspection of PG&E's Diablo Division

Dear Mr. Hastings:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas & Electric Company's (PG&E) response letter dated May 31, 2024, for the findings identified during the General Order 112-F inspection of PG&E's Diablo Division (Division) which was conducted from March 18 to 29, 2024.

A summary of the inspection findings documented by SED, PG&E's response to our findings, and SED's evaluation of PG&E's response taken for each identified Violation and Area of Concern is attached.

This letter serves as the official closure of the 2024 GO 112-F inspection of PG&E's Diablo Division and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. If you have any questions, please contact Wai Yin (Franky) Chan at (415) 703-2482 or by email at wai-yin.chan@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Preliminary Findings

cc: Kristina Castrence, PG&E
Frances Yee, PG&E
Izzat Taha, PG&E Gas Regulatory Compliance
Claudia Almengor, SED
Terence Eng, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 3/18/2024 – 3/29/2024

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Diablo Division

Assets (Unit IDs) with results in this report: Diablo Division (85405)

System Type: GD

Inspection Name: 2024 Comp Std 15007 PG&E Diablo Division CPUC GD CA

Lead Inspector: Wai-Yin Chan

Operator Representative: Izzat Taha, Mark Montoya, Paul Camarena, Jaime Hidalgo, Justin Leany

Unsatisfactory Results

Maintenance and Operations : ROW Markers, Patrols, Leakage Survey and Monitoring (MO.RW)

1. Question Title, Distribution Patrolling, MO.RW.DISTPATROL.R (also presented in: PD.RW)
ID

Question 9. Do records indicate distribution patrolling was conducted as required?

References 192.603(b) (192.721(a), 192.721(b))

Assets Covered Diablo Division (85405 (2))

Issue Summary G.O. 112-F Reference Title 49 Code of Federal Regulations (49 CFR), Part 192, §192.721(b)(2) states in part:

"(b) Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled:

(2) Outside business districts, at intervals not exceeding 7 1/2 months, but at least twice each calendar year....."

SED reviewed PG&E's distribution patrol records for 2020-2023 and noted a distribution main pipeline segment with site ID DIA_17 was not patrolled by PG&E within the minimum frequencies. DIA_17 is an exposed Main near span on an eroded stream bank. PG&E patrolled DIA_17 once in 2021, on 4/4/21. The next recorded patrol was the following calendar year on 2/27/22. PG&E failed to conduct patrols at intervals not exceeding 7 1/2 months. Therefore, SED finds that PG&E is in probable violation of G.O. 112-F Reference Title 49 CFR, Part 192, Section 192.721(b)(2).

PG&E's Response:

PG&E was unable to verify one distribution patrol for DIA_17 during the 2021 calendar year. In the subsequent years, distribution patrol requirements have been timely completed without any new notable observations. PG&E completed the installation of new main on January 8, 2024 and deactivated/abandoned in place the exposed old main (PM 35443032) on April 19, 2024.

CAP 128089476 was created to review and enhance the patrols process as part of our ongoing efforts to improve patrolling operations.

SED's Conclusion:

SED has reviewed PG&E's response and accepts the corrective action. SED has decided not to impose a fine or penalty at this moment. SED will review the records of the corrective action during future inspections.

Concerns

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

1. Question Title, Valve Maintenance Distribution Lines, MO.GM.DISTVALVEINSPECT.O
ID

Question 8. Is proper inspection being performed for each distribution system valve that might be required in an emergency, and prompt remedial action to correct any valves found inoperable?

References 192.747(a) (192.747(b))

Assets Covered Diablo Division (85405 (2))

Issue Summary PG&E and GSRB staff could not find a curb valve that was chosen for field examination by GSRB staff. The identifier is: CV-DI281 at [REDACTED] in Oakley.

GSRB wanted to check that this valve was operable; it was pulled from the electronic emergency valve spreadsheet provided from PG&E as part of the pre-audit data request. However, the valve could not be found by either PG&E or GSRB staff when we were out at the location at [REDACTED]. It had apparently been buried.

Please provide an update for finding the valve and operating it.

PG&E's Response:

Curb valve CV-DI281 at [REDACTED] in Oakley was not found during the SED inspection due to it being slightly buried and behind a locked gate. Upon further inspection two days later, PG&E was able to access the gate, locate the valve, and confirm the valve is fully operational. See Attachment #1 for the location map and photos of the valve.

SED's Conclusion:

SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concern.

Maintenance and Operations : Gas Pipeline Overpressure Protection (MO.GMOPP)

2. Question Title, Pressure Limiting and Regulating Stations Inspection and Testing, MO.GMOPP.PRESSREGTEST.O
ID

Question 5. Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?

References 192.739(a) (192.739(b))

Assets Covered Diablo Division (85405 (2))

Issue Summary SED went to district regulator station DR A02 to observe an "A"-type regulator maintenance inspection. SED observed the pilot control piping frozen. Upon inspection, it was determined by PG&E staff that an O-ring was doubled up on one of the pilots.

Please identify PG&E's remedial actions to prevent future recurrence.

PG&E's Response:

The "Maintenance of Regulator Stations (Non-HPR, HPR) and Farm Tap Sets Field Guide" will be revised to add a step and caution for field coworkers to remove all old O-rings before replacing them with new O-rings. See Attachment #2 for the field guide mark-up.

SED's Conclusion:

SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concern.