

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 9, 2024

Mr. Austin Hastings
VP, Gas Asset Management and System Operations
Pacific Gas and Electric Company
Gas Transmission and Distribution Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

GI-2024-06-PGE-29-19

SUBJECT: Closure letter for General Order (G.O.) 112-F Compliance Audit of Pacific Gas and Electric's Pipeline Construction and Material Traceability.

Dear Ms. Hastings:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed PG&E's response letter dated August 28, 2024, that addressed one (1) area of concern noted during G.O. 112-F compliance audit of Pacific Gas and Electric Company's (PG&E) Pipeline Construction and Material Traceability program. This audit was conducted on June 3 through 7 and June 10 through June 14, 2024.

Attached is a summary of SED's inspection findings, PG&E's response to SED's findings, and SED's evaluation of PG&E's responses to the findings.

This letter serves as the official closure of the 2024 G.O. 112-F audit of PG&E's Pipeline Construction and Material Traceability compliance.

If you have any questions, please contact Nicholas Penno at (916) 214-4269 or by email at Nicholas.peno@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthewson Epuna".

Matthewson Epuna
Program & Project Supervisor
Gas Safety & Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Findings and Responses

cc: Kristina Castrence, PG&E Gas Regulatory Compliance
Paul Camarena, PG&E Gas Regulatory Compliance
Frances Yee, PG&E Gas Regulatory Compliance
Matthewson Epuna, SED
Claudia Almengor, SED

Summary of Inspection Findings

Concerns

1. During records review, SED noted that PG&E did not document pipeline weld completion dates on the following construction packages: R985, R1075, R1316, R1795, R687, and R888. Although PG&E explained that the pipeline welding dates are written on the buried pipeline, SED is concerned that this process does not completely capture the entire pipeline welding process to ensure Traceable, Verifiable and Complete records. SED recommends that PG&E begin documenting the pipeline welding dates on its weld map and weld procedure records to ensure traceable, verifiable and complete records.

PG&E's Response:

PG&E disagrees with this finding. The weld completion dates for the projects indicated were all documented in accordance with the requirements of the Daily Field Weld Summary Report (DFWSR), TD-4160P-60-JA01 (see Attachment 1). The "Report Completion Date" states to "Record month, day, and year (mm/dd/yyyy) in which the DFWSR was fully completed" (see Figure 1 below).

Daily Field Weld Summary Report Instructions
TD-4160P-60-JA01
Publication Date: 03/17/2021
Effective Date: 06/17/2021
Rev. 3b

Project ID: ① Location: ③ Inspector Name, ID: ⑤
Order Number: ② Line Number: ④ Report Completion Date: ⑥

Project Information	
1 Project ID	Record project ID (workstream-specific ID) if available. Otherwise record NA. Examples: R-421, T-1245, V-512
2 Order Number	Record project order number (8-digit number associated with project billing, e.g., 41856481, 30854865). If the project has multiple order numbers, provide the order number that coincides with the installation location.
3 Project Location	Record project site location. Examples: city, mile post marker, designated dig location, or station facility
4 Line Number	Record the pipe's line number. Examples: L-109, DFM-0820-01
5 Inspector Name, ID	Record full name of qualified welding inspector who inspects the welds and completes a daily field weld summary report (DFWSR). Provide PG&E LAN ID or contractor ID. Examples: PG&E: Bob Jones, J5JM; contractor: Dennis Klein, F210
6 Report Completion Date	Record month, day, and year (mm/dd/yyyy) in which the DFWSR was fully completed.

Figure 1. TD-4160P-60-JA01, rev 3b

It has been the intent of this form that a weld is not complete until all the procedural requirements are met, whether that weld requires a final visual inspection, magnetic particle

testing (MT), or radiographic testing (RT or X-ray). The weld is not fully completed until the date all required weld inspection has been accepted. The reason for using the “fully completed” status on the DFWSR is to have a control in place that indicates the weld has met all inspection requirements prior to releasing a weld into the system or for hydrostatic testing. This is considered conservative from a compliance perspective, as using a later date representing when the weld is “fully completed” would create more opportunity for qualification lapses if the welder was near his welder qualification renewal date.

Provided as Attachments 2-7 are copies of the Daily Field Weld Summary Reports related to construction packages: R985, R1075, R1316, R1795, R687, and S888.

SED’s Conclusion:

SED accepts PG&E’s response.