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

September 7, 2021

Janisse Quinones
Senior Vice President, Gas Engineering
Pacific Gas and Electric Company
Gas Transmission and Distribution Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

GI-2021-05-PGE-07-02ABC

SUBJECT: SED's Closure Letter for General Order 112-F Gas Inspection of PG&E's De Anza Division

Dear Ms. Quinones:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas & Electric Company's (PG&E) response letter dated Aug 11, 2021, for the findings identified during the General Order 112-F inspection of PG&E's De Anza Division (Division). This inspection included a review of the Division's records for the period of 2017 through 2020. The inspection was conducted, partly remotely due to California's stay at home orders, and field sample of the Division's facilities from May 17 – May 28, 2021.

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

This letter serves as the official closure for this portion of the 2021 GO 112-F Inspection of PG&E's De Anza 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 Yi Yang at (415) 940-8639 or by email at yi.yang@cpuc.ca.gov.

Sincerely,

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

cc: Susie Richmond, PG&E
Alberta Ekukinam, PG&E
Dennis Lee, SED/GSRB
Mohammad Molla Ali, SED/GSRB
Claudia Almengor, SED/GSRB

Enclosure: Post-Inspection Written Preliminary Findings

Post-Inspection Written Preliminary Findings

Dates of Inspection: 05/17-21/2021 and 05/24-28/2021

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: De Anza Gas Distribution

Assets (Unit IDs) with results in this report: De Anza Division (85400)

System Type: GD

Inspection Name: 2021 PG&E De Anza Division

Lead Inspector: Yi Yang

Operator Representative: Sajjad Azhar

Unsatisfactory Results

Design and Construction: Pressure Testing (DC.PT)

Question 1. Do records indicate that pressure testing is conducted in accordance with 192.513?

References 192.517(b) (192.513(a), 192.513(b), 192.513(c), 192.513(d))

Assets Covered De Anza Division (85400 (7))

Issue Summary SED reviewed selected Leak Repair Forms and Project Records. Those records showed that PG&E did not document the temperature during the pressure test of plastic pipes.

Per §192.513 (d), during the test, the temperature of thermoplastic material may not be more than 100 °F (38 °C), or the temperature at which the material's long-term hydrostatic strength has been determined under the listed specification, whichever is greater.

- PG&E failed to demonstrate the compliance of this code section with their pressure testing records. The ambient temperature can be more than 100 °F in some areas, and the pressurized gas can have higher temperature than the ambient temperature. Without temperature monitoring during the pressure test, the plastic pipe could exceed 100 °F.

  SED believes that PG&E should have a way of documenting the temperature during plastic pipe pressure test to show compliance with §192.513 (d).

- PG&E's existing Procedure TD-4138P-01 relative to this code requirement states that "the surface temperature for thermoplastic material must not be more than 100°F". However, the procedure does not specify what device should be used or how to measure the pipe temperature.

  SED recommends that PG&E modify its TD-4138P-01 Procedure to include a process for verifying and documenting the ambient and pipe temperature during pressure testing.

PG&E's Response
While PG&E understands that §192.513 (d) does not require recording of pipe temperature during test, PG&E agrees that the procedures could be improved to provide clarity regarding pipe temperature. PG&E will review its procedures to ensure the requirements are fully met.

SED's Conclusion
SED recommends that PG&E modify its TD-4138P-01 Procedure to include a process for verifying and demonstrating that PG&E complied with 49 CFR, Part 192 §192.513(d), that thermoplastic pipe temperature did not exceed 100 °F (38 °C) during pressure testing. SED believes that PG&E has a responsibility to demonstrate its compliance with 49 CFR, Part 192 §192.513(d), through verification of the ambient and pipe temperatures during the pressure test. SED will review actions taken regarding this concern during the CPUC's pipeline construction inspections.

Concerns

Design and Construction: Construction (DC.CO)

Question	7. Do records indicate persons inspecting the making of plastic pipe joints have been qualified?
References	192.287 (192.807(a), 192.807(b))
Assets Covered	De Anza Division (85400 (7))
Issue Summary	SED reviewed A-Form records that did not include a plastic joining inspection section.

PG&E explained that they made changes to the Leak Repair Form (A-Form) to include documentation of plastic joint inspection. They have not published the new A-Form. The old form did not have a plastic joining inspection section.

PG&E should update SED on the publish date of the new A-Form.

PG&E's Response
A new A-form that became effective July 2021 includes plastic joining inspection section. Please see "Attachment 1" for a copy of the A-form.

SED's Conclusion
SED has reviewed PG&E's response and will verify plastic joint inspection record starting from the publish date.

Design and Construction: Materials (DC.MA)

Question	1. Are pipe, valves, and fittings properly marked for identification in accordance with the requirements of 192.63?
References	192.63(a) (192.63(b), 192.63(c), 192.63(d))
Assets Covered	De Anza Division (85400 (7))
Issue Summary	During field visit at the Shoreline & Middlefield regulator station, SED observed that one of the fire valves was tagged as **49-E4F** onsite, which matched the station diagram. However, in the Gas+ mobile app, the valve was identified as **3349-E4F**.

SED suggests that PG&E follow a consistent naming system for all equipment in order to avoid confusion.

PG&E's Response

PG&E's map+ app and GD-GIS includes the complete plat number (e.g., 3349-E4F) that can be viewed by PG&E employees throughout PG&E territory. The complete plat number helps PG&E employees to narrow it down to the specific division where the digits "33" designates a particular area within the system. However, since the local GPOM employees are already working in that specific area, the valve tag shows 49-E4F only omitting the "33" in front of it. PG&E GPOM team is aware of this convention and acknowledges the differences. Furthermore, when searching for the valve (in GD-GIS), the valve can be located entering the numbers either way thus eliminating any confusion.

SED's Conclusion
SED has reviewed PG&E's response and accepts the explanation. However, SED still suggests that PG&E have the naming convention documented in the procedure for new employees. SED will verify if the valve can be identified either with or without the area code during future inspections.

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

Question	3. Are lines being purged in accordance with 192.629?
References	192.629(a) (192.629(b))
Assets Covered	De Anza Division (85400 (7))
Issue Summary	SED observed that during purging of gas at the regulator station at Shoreline & Middlefield, a PG&E employee released the gas at ground level using a rubber tube. He then put a traffic cone on top of the tube to prevent it from moving while the gas was released. SED believes this way of purging the gas was improper and unsafe. SED requested PG&E's procedure on purging gas but did not see the "purge gas above head" requirement. Although CFR Part 192 does not require gas to be purged above head, it is a better practice to release gas above head into the air with a solid stack to prevent damage to plants and reduce the inhalation of gas. SED suggests that PG&E make "purge gas above head with a stack" as the standard practice in related procedures to ensure the gas is released in a way that does not disturb the environment and is safe for people around the gas purging site.

PG&E's Response
Please see "Attachment 2" for PG&E purging procedure. In the above-mentioned case, PG&E employee was purging using Parker Parflex (psi rating of 5000) to the atmosphere as required by 192.629. Since the incident the employee has received tailboard to use tools in the future that would keep the purging process steadier.

SED's Conclusion
SED has reviewed the purging procedure provided in PG&E's response. According to PG&E's purging procedure Gas Design Standard A-38 Safety section 1 page 3, "Vented natural gas and air/gas mixtures must be diffused into the air without hazard to Company personnel, the public, or property". PG&E's employee that performed the purging did not follow PG&E's purging procedure. Purging gas at ground level may result in the public and PG&E's personnel inhalation of the gas.