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July 12, 2021

Mr. Terence Eng Gas Safety and Reliability Branch Safety and Enforcement Division California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: General Order (GO) 112-F Gas Inspection of PG&E's Kern Division [GI-2021-04-PGE-16-02ABC]

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to the Safety and Enforcement Division's (SED) Post-Inspection Written Preliminary Findings (Summary), dated June 14, 2021, stemming from the two week Kern Division inspection conducted from April 26 to May 07, 2021. For clarity, each Summary item identified will be repeated followed by PG&E's response.

Unsatisfactory Results

No Preliminary Findings.

Concerns

Concern #1:

Question Text

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)]

Issue Summary

- (1.1) During field observation, SED noted 2 meter set assembly leaks at the following locations:
 - a. La Paz Ct., Bakersfield b. Arroyo Seco Dr., Bakerfield

SED recommends that PG&E takes the appropriate corrective measure to remedy the meter set assemblyleaks.

- (1.2) During field observation, SED noted 4 meter set assemblies that were not protected from vehicular damage at the following locations:
 - a. Toluca Dr., Bakerfield
 - b. La Paz Ct., Bakersfield
 - c. La Paz Ct., Bakerfield
 - d. La Paz Ct., Bakersfield

SED recommends that PG&E takes the appropriate corrective measure to protect the meter set assembly from vehicular damage.

Response to Concern #1:

- (1.1) PG&E repaired leaks at both meter set assemblies at the following locations on May 6, 2021.
 - a. La Paz Ct., Bakersfield (Riser thread and regulator vent Leak)- Repaired 5/6/2021 Field Order ID: 6452752745
 - b. Arroyo Seco Dr., Bakersfield (Shut off valve)- Repaired 5/6/2021 Field Order ID: 6468508308
- (1.2) PG&E plans to provide adequate meter protection to the following addresses by Q4 2021.
 - a. Toluca Dr., Bakersfield
 - b. La Paz Ct., Bakersfield
 - c. La Paz Ct., Bakersfield
 - d. La Paz Ct., Bakersfield

Concern #2:

appropriate CP monitoring criteria?

References §192.465(a) [192.463(b), 192.463(c), 192.463(a)]

Issue Summary (2.1) During field observation, SED noted the following low pipe-to-soil reads:

Equipment #	Read (mV)	Corrective #
41940195	-826	120941432
44380646	-823	120941432
44380648	-825	120941432
44380649	-821	120941432
44380657	-723	120941432
44421547	-510	120934564
44262859	-829	120944399
41249939	-636	120951400

Please update SED with the results.

Response to Concern #2:

Updates on cathodic protection restoration for the noted eight locations are outlined in the table below:

Equipment #	Read (mV)	Corrective #	Status/Comment(s)
41940195	-826	120941432	Due to extenuating circumstances, further investigation is now targeting Oct-2021. This later date should see lower temperatures, lessening the current extremely dry condition of the area's sandy soil, yielding improved pipe-to-soil readings.
44380646	-823	120941432	
44380648	-825	120941432	
44380649	-821	120941432	
44380657	-723	120941432	
44421547	-510	120934564	
44262859	-829	120944399	Completed on 15-Jun-2021 (notif# 120944399), recorded up read was -891 mV
41249939	-636	120951400	Due to extenuating circumstances, corrective work (install drivable anode in concrete) has been scheduled for Aug-2021 (notif# 120951400).

Concern #3:

Question Text 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)]

Issue Summary (3.1) During field observation, SED noted that zone valve V-Z031 was inoperable. PG&E

submitted a work ticket PM#44772890 to repair this valve. Please update SED the result of

this corrective action.

Response to Concern #3:

The difficult-to-operate valve (i.e. V-Z031) was flushed and successfully maintained on June 4, 2021 under PG&E PM44772890.

Please contact Jaime Hidalgo at (925) 786–0008 or jaime.hidalgo@pge.com for any questions you may have regarding this response.

Sincerely,

/s/ Vincent Tanguay

Director, Risk, Compliance, & Oper. Qual.

cc: Dennis Lee, SED

Mahmoud Intably, SED

Andrew Kwan, SED

Claudia Almengor, SED

Vince Tanguay, PG&E

Susie Richmond, PG&E