

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 19, 2021

Mr. Jerrod Meier  
Director of Risk, Compliance & Standards Engineering  
Pacific Gas and Electric Company  
Gas Transmission and Distribution Operations  
6121 Bollinger Canyon Road  
San Ramon, CA 94583

SUBJECT: Response to PG&E's Requests for an Extension of Reassessment Interval (49 CFR §192.939) L-105B Contra Costa County and L-118G Merced County

Dear Mr. Meier:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) reviewed Pacific Gas and Electric Company's (PG&E) requests for an extension of reassessment interval for L-105B Contra Costa County and L-118G Merced County in two letters both dated October 5, 2021.

1. PG&E seeks a six month extension for the integrity assessment of Line 118G due to encountering fine debris which will require liquid cleaning.
  - SED believes that it is the operator's responsibility to prepare its pipeline for testing, including cleaning debris, to meet the requirements of 49 CFR §192.939.
2. PG&E seeks a six month extension for the integrity assessment of Line 105B out of concern that should in-line inspections (ILI) on parallel lines identify immediate anomalies requiring a reduction in pressure, there would not be enough adequate gas velocity to perform the assessment of Line 105B. Furthermore, PG&E has concerns about not being able to meet the minimum pressure requirements of customers.
  - SED believes that it is the operator's responsibility to schedule and monitor its operations to meet the requirements of 49 CFR §192.939.

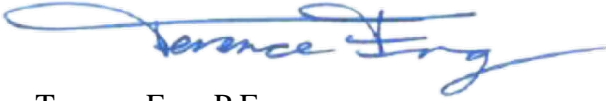
After its review, SED contends that the operator is responsible for meeting the deadlines specified in 49 CFR §192.939. SED hereby denies PG&E's requests in obtaining waivers from the CPUC pursuant to General Order 112-F, Section 101.3 regarding the two waiver requests.

Should PG&E fail to meet the requirements of 49 CFR §192.939, it should provide to SED a self-identified non-compliance notification pursuant to CPUC Decision 18-05-023.

SED notified PHMSA of its decision to deny PG&E's extension requests. PHMSA responded with no comments or objections.

If you have any questions, please contact Dennis Lee at (415) 806-0493 or by email at [Dennis.Lee@cpuc.ca.gov](mailto:Dennis.Lee@cpuc.ca.gov).

Sincerely,



Terence Eng, P.E.  
Program Manager  
Safety and Enforcement Division (SED) – Gas Safety and Reliability Branch (GSRB)

cc: Steve Nanney, PHMSA  
Susie Richmond, PG&E  
Anthony Kwong, PG&E  
Lee Palmer, SED  
Dennis Lee, SED/GSRB