

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 11, 2015

GI-2015-04-PGE24-01A

Mr. Sumeet Singh, Vice President (s1st@pge.com)  
Pacific Gas and Electric Company  
Gas Asset and Risk Management  
6111 Bollinger Canyon Road, Room 4590-D  
San Ramon, CA 94583

SUBJECT: General Order 112-E Gas Inspection of PG&E's Kettleman Transmission District

Dear Mr. Singh:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Joel Tran and Nathan Sarina conducted a General Order 112-E inspection of Pacific Gas & Electric Company's (PG&E) Kettleman District (District) from April 20-24, 2015. The inspection included a review of the District's operation and maintenance records including corrosion control for the years 2013 through 2014, as well as a field inspection of a representative sample of the District's facilities, including the Kettleman Compressor Station. SED staff also reviewed the District's operator qualification records, which included a field observation of randomly selected individuals performing covered tasks.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the violations and observations noted in the Summary. Pursuant to Commission Resolution ALJ-274, SED staff has the authority to issue citations for each violation found during the inspection.

If you have any questions, please contact Joel Tran at (916) 928-9838 or by email at joel.tran@cpuc.ca.gov.

Sincerely,

Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

K. B.  
6/11/15

Enclosure: Summary of Inspection Findings

cc: Larry Berg, PG&E Gas Regulatory Support (lmb5@pge.com)  
Larry Deniston, PG&E Gas Regulatory Support (lcd1@pge.com)  
Mike Falk, PG&E (mdfl@pge.com)  
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## SUMMARY OF INSPECTION FINDINGS

### **I. Probable Violations**

#### **A. PG&E's Internal Inspection Findings**

At the start of the inspection, PG&E provided SED its findings from the internal review it conducted of the District. Some of PG&E's internal review findings are violations of PG&E's standards, and are therefore violations of Title 49 Code of Federal Regulations (CFR), §192.605(a). SED is aware that PG&E corrected all of its findings prior to SED's inspection. Table 1 lists all of the violations from PG&E's internal review.

**Table 1: Findings from PG&E's Internal Review**

<b>Code</b>	<b>Finding</b>	<b>Instances</b>
192.605(a)	Late or Missing CP readings	10
192.605(a)	Rectifier maintenance deficiencies; no Action Plan created within 60 days of discovery	9
192.605(a)	Deficient Action Plans	4
192.605(a)	ETS Stations with insufficient reads and no Action Plan created within 60 days of discovery	24

## B. SED Findings

### 1. Title 49 CFR §192.465(d) states:

*"Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring."*

SED noted that the District failed to take prompt remedial action to correct the following deficiencies indicated by the monitoring. Remedial action should have been taken within 15 months of discovery.

- L-306; MP 5.16 to 67.7
  - Discovered insufficient test points on 10/14/2011 and will begin conducting remedial actions in 2015; no remedial actions taken by the time of this CPUC inspection
- L-300A; MP 230.32
  - ETS found low on 10/19/2013; action plan created on 4/15/2015
- L-300A; MP 401.98
  - Span noted by the District requiring remediation on 7/15/2013 with no remediation planned until 5/3/2016

### 2. Title 49 CFR §192.469 states:

*"Each pipeline under cathodic protection required by this subpart must have sufficient test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection."*

The District determined an insufficient number of test stations in 2011 during routine maintenance. At the time of this SED inspection, no new test stations have been installed. The insufficient number of test stations is located at L-306 MP 5.16 to 67.7.

### 3. Title 49 CFR §192.475(b) states:

*"Whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion."*

The District removed portions of its steel pipeline, but did not conduct an inspection on the internal surface during the following projects:

- L-164-1; Colinga Tap (from L300B); 6/5/2012; SAP 30846923
- L-300B; 2380' WO L300A MP 371.85; 5/8/2012; SAP 30846923
- L-300A; 2500' NW/O Hubert Way & Cyril PI MP 345.04532; 4/23/2013; SAP 30846926
- L-300B; HWY 119 MP 272.06; Date not documented; SAP 30863003
- L-306; 1620 Geneseo Rd MP 43.2962; 5/5/2014; SAP 30959338
- L-X6526; 2 mi. S/O & 0.2 mi. W/O HWY 41 & 25<sup>th</sup> Ave; 9/19/2013; SAP 41710903

4. Title 49 CFR §192.163(e) states:

*“Electrical equipment and wiring installed in compressor stations must conform to the NFPA-70, so far as that code is applicable.”*

During SED’s field inspection of the Kettleman Compressor station, the District was unable to demonstrate conformance to the NFPA-70.

**II. Areas of Concern / Recommendations**

1. During SED’s field verification of pipe-to-soil readings, the District recorded pipe-to-soil readings that did not meet the -850 mV to -1600 mV criteria listed in PG&E’s Standard O-16. Table 12 lists all of the noncompliant readings.

**Table 2: Out of Compliance ETS Stations**

<b>Location</b>	<b>P/S reading</b>
L-300B, MP 280.39	-806 mV
L-401, MP 411.15	-1898 mV
L-401, MP 401.85	-1711 mV

Please provide SED a status report on the cathodic protection at these locations.