



Larry Deniston  
Manager  
Regulatory Compliance  
Gas Operations

6111 Bollinger Canyon Rd.  
San Ramon, CA 94583  
Phone: 925.328.5756  
E-mail: LCD1@pge.com

November 10, 2015

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

Re: State of California – Public Utilities Commission  
General Order 112-E Audit – PG&E’s Mission Division

Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the CPUC conducted a General Order 112-E audit of PG&E’s Mission Division from July 6-10, 2015. On October 12, 2015, the SED submitted their audit report, identifying violations and findings. Attached is PG&E’s response to the CPUC audit report.

Please contact Cheryl Dizon at (925) 328-5721 or [c1dz@pge.com](mailto:c1dz@pge.com) for any questions you may have regarding this response.

Sincerely,

/S/  
Larry Deniston

Attachments

cc: Aimee Caguiran, CPUC  
Dennis Lee, CPUC

Mike Falk, PG&E  
Sumeet Singh, PG&E

| Finding Type<br>[Internal,<br>NOV, AOC] | Finding # | Finding  | Response   | Associated Attachment<br>(File Name) |
|---|-----------|--|--|--------------------------------------|
| NOV<br>Internal<br>Findings             |           | At the start of the inspection, PG&E provided SED its findings from the internal review it conducted of the Division. 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.  | As stated in CPUC's October 12, 2015 Inspection letter, PG&E corrected all of its findings prior to SED's inspection.  | N/A                                  |
| NOV                                     | 1 i)      | Title 49 CFR §192.605(a) states:<br>"General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."<br>i) PG&E Procedure J-95 requires installation of meter protection if a meter is within 8 feet of a commercial driveway/parking area. SED found during the field inspection on 7/8/2015 that the meters located at 1396 B St. in the City of Hayward were within 8 feet of a commercial driveway/parking area but did not have meter protection installed. | PG&E has created an expense job Notification (#110848316) to install meter protection at 1396 B St, Hayward. This work is scheduled for completion in the First Quarter of 2016. | N/A                                  |

| Finding Type<br>[Internal,<br>NOV, AOC] | Finding # | Finding   | Response  | Associated Attachment<br>(File Name)   |
|---|-----------|---|---|--|
| NOV                                     | 1 ii)     | <p>Title 49 CFR §192.605(a) states:<br/>"General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."</p> <p>ii) PG&amp;E Procedure WP4133-04 requires PG&amp;E to create an action plan if a casing is suspected to be in electrical contact with the pipeline. During its records review, SED found that the casing for CPA 27-01 at Mile Point 0.01 was in electrical contact with the pipeline on 9/9/2013, but the Division did not create an action plan for investigation and remediation.</p>  | <p>Please refer to the attached action plan "Casing L2405-01 MP 0.01 CPA27-01".<br/>Mechanics were tailboarded on October 19, 2015 regarding the purpose, importance, and timeliness of action plans.</p> <p>In addition, PG&amp;E has implemented a weekly CPA Open Corrective report which highlights all on going corrective work. This report is reviewed weekly to determine prioritization and ensure implementation to meet all compliance deadlines. CPAs with extenuating circumstances are now required to be restored within 12 months from the date the CPA is found below adequate levels of protection, not to exceed 15 months to the date, per Gas Utility Standard TD-4181S, "External Corrosion Control of Gas Facilities," Rev 0, published 3/26/14.</p>   | <p>Casing L2405-01 MP 0.01 CPA27-1_CONF.pdf<br/>Action Plan Tailboard_CONF.pdf<br/>WP4133-04_CONF.pdf</p>  |
| NOV                                     | 2         | <p>Title 49 CFR §192.475(b) states:<br/>"Whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion."</p> <p>The Division removed portions of its steel pipeline, but did not conduct an inspection on the internal surface during the following projects:</p> <ul style="list-style-type: none"> <li>- Leak #24-09-23068-1; 6/28/2013</li> <li>- Leak #24-12-20276-1; 6/8/2012</li> <li>- Leak #24-12-23407-1; 4/29/2014</li> <li>- Leak #24-13-20537-1; 6/26/2013</li> <li>- Leak #24-13-20612-1; 5/28/2013</li> <li>- Leak #24-13-20720-1; 11/15/2013</li> <li>- Leak #24-13-21806-1; 11/1/2013</li> <li>- Leak #24-13-40058-1; 7/1/2013</li> <li>- Leak #24-13-77067-1; 9/23/2013</li> <li>- Leak #24-14-35003-1; 2/11/2014</li> <li>- Leak #24-91-21568-1; 5/10/2013</li> </ul> | <p>To prevent reoccurrence, PG&amp;E published a new internal corrosion control standard and five new internal corrosion control procedures in July 2014, with an effective date of January 1, 2016. Please refer to the attached for a copy of PG&amp;E's internal corrosion standard ("TD-4186S_CONF.pdf") and the five associated procedures ("TD-4186P-100_CONF.pdf" through "TD-4186P-500_CONF.pdf").</p> <p>In addition, the mobile data entry of the A-form prompts the repair person to answer the question whether the Internal Surface of the pipe is visible. The repair person must answer this question before completing the electronic A-form. PG&amp;E has also revised the paper ("Tech DOWN") version of the A-form and the A-Form Job Aid Instructions (see attached A-Form Job Aid.pdf) which specifies that answering this question is a required field to be completed.</p> <p>A Corrective Action Program (CAP) Notification (7012817) was also generated to develop a 5 Minute Meeting to reinforce to personnel in all Divisions of the requirement to fill out the Internal Inspection portion of the A-form whenever the inside surface of the steel pipe is visible, and also to reinforce that all employees qualified for 03-05, ("Pipe Inspection"), are qualified to perform this inspection. This 5 Minute Meeting has been completed and was issued on 8/10/2015. Refer to the attached "5MM A Form Internal Inspection.doc".</p> | <p>TD-4186S_CONF.pdf<br/>TD-4186P-100_CONF.pdf<br/>TD-4186P-200_CONF.pdf<br/>TD-4186P-300_CONF.pdf<br/>TD-4186P-400_CONF.pdf<br/>TD-4186P-500_CONF.pdf<br/>5MM A Form Internal Inspection_CONF.pdf<br/>A-Form Job Aid_CONF.pdf</p> |
| NOV                                     | 3         | <p>Title 49 CFR §192.475(b)(1) states:<br/>"Whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion. If internal corrosion is found, the adjacent pipe must be investigated to determine the extent of internal corrosion"</p> <p>The Division found internal corrosion in portions of its steel pipeline, but did not investigate adjacent pipe to determine the extent of internal corrosion during the following projects:</p> <ul style="list-style-type: none"> <li>- Leak #109234020; 11/12/2014</li> <li>- Leak #24-14-41031-1; 7/11/2014</li> </ul>   | <p>Please refer to response to NOV 2 above</p>  | <p>TD-4186S_CONF.pdf<br/>TD-4186P-100_CONF.pdf<br/>TD-4186P-200_CONF.pdf<br/>TD-4186P-300_CONF.pdf<br/>TD-4186P-400_CONF.pdf<br/>TD-4186P-500_CONF.pdf<br/>5MM A Form Internal Inspection_CONF.doc<br/>A-Form Job Aid_CONF.pdf</p> |

| Finding Type<br>[Internal,<br>NOV, AOC] | Finding #                                     | Finding  | Response   | Associated Attachment<br>(File Name) |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
|---|---|--|--|--------------------------------------|----------------|---------|-------------------------|---------|----------------|---------|----------------|---------|------------------|---------|--------------|---------|------------------|---------|----------------------|---------|----------------------|---------|----------------------|---------|-----------------|---------|-----------------------|---------|--|----------|--------------|----------------|---|-------------------------|--|----------------|--|----------------|---|------------------|--|--------------|--|------------------|--|----------------------|--|----------------------|--|----------------------|--|-----------------|---|-----------------------|---|-----|
| AOC                                     | 1   | <p>During SED’s field verification of pipe-to-soil readings, the Division recorded pipe-to-soil readings that did not meet Title 49 CFR Part 192, Appendix D. Table 12 lists all of the out-of-compliance readings.</p> <p>Table 2: Out of Compliance ETS Stations</p> <table border="1"> <thead> <tr> <th>Location</th> <th>P/S reading</th> </tr> </thead> <tbody> <tr><td>20900 Birch St</td><td>-693 mV</td></tr> <tr><td>4th St/D St (CPA 12-37)</td><td>-626 mV</td></tr> <tr><td>821 Corburn Ct</td><td>-841 mV</td></tr> <tr><td>957 Joaquin St</td><td>-823 mV</td></tr> <tr><td>16103 Via Arriba</td><td>-820 mV</td></tr> <tr><td>3228 Kerr St</td><td>-833 mV</td></tr> <tr><td>18400 Watters Dr</td><td>-678 mV</td></tr> <tr><td>2809 Fountainhead Dr</td><td>-358 mV</td></tr> <tr><td>2889 Fountainhead Dr</td><td>-346 mV</td></tr> <tr><td>2891 Fountainhead Dr</td><td>-341 mV</td></tr> <tr><td>958 Portola Ave</td><td>-763 mV</td></tr> <tr><td>3909 Presidio Bldg #3</td><td>-704 mV</td></tr> </tbody> </table> <p>Please provide SED a status report on the cathodic protection at these locations.</p> | Location   | P/S reading                          | 20900 Birch St | -693 mV | 4th St/D St (CPA 12-37) | -626 mV | 821 Corburn Ct | -841 mV | 957 Joaquin St | -823 mV | 16103 Via Arriba | -820 mV | 3228 Kerr St | -833 mV | 18400 Watters Dr | -678 mV | 2809 Fountainhead Dr | -358 mV | 2889 Fountainhead Dr | -346 mV | 2891 Fountainhead Dr | -341 mV | 958 Portola Ave | -763 mV | 3909 Presidio Bldg #3 | -704 mV | <p>Please refer to the updated table below showing the subsequent pipe-to-soil readings.</p> <p>20900 Birch Street was discovered to be tied to a neighboring cathodic protection area when insulation was removed from a valve during a recent construction job. A project to reinsulate the valve which will separate the two CPAs is currently in engineering review (Notification #110707246). Once the project is complete a follow up pipe-to-soil reading can be taken at that location.</p> <p>Table 2: Out of Compliance ETS Stations</p> <table border="1"> <thead> <tr> <th>Location</th> <th>P/S readings</th> </tr> </thead> <tbody> <tr><td>20900 Birch St</td><td>-693 mV; Subsequent read-543 mV, 10/12/2015</td></tr> <tr><td>4th St/D St (CPA 12-37)</td><td>-626 mV; Subsequent read -906 mV, 09/18/2015</td></tr> <tr><td>821 Corburn Ct</td><td>-841 mV; Subsequent read -948 mV, 10/22/2015</td></tr> <tr><td>957 Joaquin St</td><td>-823 mV; Subsequent read -1441 mV, 10/22/2015</td></tr> <tr><td>16103 Via Arriba</td><td>-820 mV; Subsequent read -862 mV, 09/08/2015</td></tr> <tr><td>3228 Kerr St</td><td>-833 mV; Subsequent read -865 mV, 09/02/2015</td></tr> <tr><td>18400 Watters Dr</td><td>-678 mV; Subsequent read -914 mV, 09/02/2015</td></tr> <tr><td>2809 Fountainhead Dr</td><td>-358 mV; Subsequent read -895 mV, 10/19/2015</td></tr> <tr><td>2889 Fountainhead Dr</td><td>-346 mV; Subsequent read -918 mV, 10/19/2015</td></tr> <tr><td>2891 Fountainhead Dr</td><td>-341 mV; Subsequent read -894 mV, 10/19/2015</td></tr> <tr><td>958 Portola Ave</td><td>-763 mV; Subsequent read -1071 mV, 09/01/2015</td></tr> <tr><td>3909 Presidio Bldg #3</td><td>-704 mV; Subsequent read -865, 10/21/2015</td></tr> </tbody> </table> | Location | P/S readings | 20900 Birch St | -693 mV; Subsequent read-543 mV, 10/12/2015 | 4th St/D St (CPA 12-37) | -626 mV; Subsequent read -906 mV, 09/18/2015 | 821 Corburn Ct | -841 mV; Subsequent read -948 mV, 10/22/2015 | 957 Joaquin St | -823 mV; Subsequent read -1441 mV, 10/22/2015 | 16103 Via Arriba | -820 mV; Subsequent read -862 mV, 09/08/2015 | 3228 Kerr St | -833 mV; Subsequent read -865 mV, 09/02/2015 | 18400 Watters Dr | -678 mV; Subsequent read -914 mV, 09/02/2015 | 2809 Fountainhead Dr | -358 mV; Subsequent read -895 mV, 10/19/2015 | 2889 Fountainhead Dr | -346 mV; Subsequent read -918 mV, 10/19/2015 | 2891 Fountainhead Dr | -341 mV; Subsequent read -894 mV, 10/19/2015 | 958 Portola Ave | -763 mV; Subsequent read -1071 mV, 09/01/2015 | 3909 Presidio Bldg #3 | -704 mV; Subsequent read -865, 10/21/2015 | N/A |
| Location                                | P/S reading                                   |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 20900 Birch St                          | -693 mV                                       |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 4th St/D St (CPA 12-37)                 | -626 mV                                       |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 821 Corburn Ct                          | -841 mV                                       |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 957 Joaquin St                          | -823 mV                                       |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 16103 Via Arriba                        | -820 mV                                       |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 3228 Kerr St                            | -833 mV                                       |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 18400 Watters Dr                        | -678 mV                                       |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 2809 Fountainhead Dr                    | -358 mV                                       |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 2889 Fountainhead Dr                    | -346 mV                                       |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 2891 Fountainhead Dr                    | -341 mV                                       |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 958 Portola Ave                         | -763 mV                                       |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 3909 Presidio Bldg #3                   | -704 mV                                       |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| Location                                | P/S readings                                  |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 20900 Birch St                          | -693 mV; Subsequent read-543 mV, 10/12/2015   |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 4th St/D St (CPA 12-37)                 | -626 mV; Subsequent read -906 mV, 09/18/2015  |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 821 Corburn Ct                          | -841 mV; Subsequent read -948 mV, 10/22/2015  |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 957 Joaquin St                          | -823 mV; Subsequent read -1441 mV, 10/22/2015 |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 16103 Via Arriba                        | -820 mV; Subsequent read -862 mV, 09/08/2015  |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 3228 Kerr St                            | -833 mV; Subsequent read -865 mV, 09/02/2015  |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 18400 Watters Dr                        | -678 mV; Subsequent read -914 mV, 09/02/2015  |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 2809 Fountainhead Dr                    | -358 mV; Subsequent read -895 mV, 10/19/2015  |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 2889 Fountainhead Dr                    | -346 mV; Subsequent read -918 mV, 10/19/2015  |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 2891 Fountainhead Dr                    | -341 mV; Subsequent read -894 mV, 10/19/2015  |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 958 Portola Ave                         | -763 mV; Subsequent read -1071 mV, 09/01/2015 |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| 3909 Presidio Bldg #3                   | -704 mV; Subsequent read -865, 10/21/2015     |  |  |                                      |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| AOC                                     | 2   | <p>During SED’s field verification of casing readings, the Division recorded a casing reading that was more negative than the -800 mV criteria listed in PG&amp;E’s Work Procedure WP4133-03.</p> <p>- CPA 2402-1 MP 4.56. Casing: -920 mV; Pipe: -1050 mV</p> <p>Please provide SED a status report on this casing.</p>   | Local corrosion confirmed contact under Notification #110848275 and will add this to the casing remediation list to determine the necessary mitigative measures.   | N/A                                  |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |
| AOC                                     | 3   | <p>During SED’s review of rectifier maintenance records, SED noted that Rectifier #766 in CPA M-17-2 had a Voltage reading of 42 Volts but the rectifier was only rated for 40 Volts.</p> <p>Please provide SED the corrective actions taken to address this issue.</p>  | Universal Rectifiers sent PG&E a letter noting that the warning not to exceed rated capacity does not apply to the ES model rectifiers purchased by PG&E. Per Universal Rectifiers Inc., exceeding the DC voltage rating of Universal type ES Series rectifiers will not cause any damage to the rectifier. See attachment "Universal letter 10-14-15.pdf" | Universal letter 10-14-15_CONF.pdf   |                |         |                         |         |                |         |                |         |                  |         |              |         |                  |         |                      |         |                      |         |                      |         |                 |         |                       |         |  |          |              |                |   |                         |  |                |  |                |   |                  |  |              |  |                  |  |                      |  |                      |  |                      |  |                 |   |                       |   |     |