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February 28, 2014

Mr. Mike Robertson
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 West 4th Street, Suite 500
Los Angeles, CA. 90013

Re: State of California – Public Utilities Commission
General Order 112-E Gas Audit – PG&E's Topock District

Dear Mr. Robertson:

The Safety and Enforcement Division (SED) conducted a General Order 112-E audit of PG&E's Topock District from August 5-9, 2013. On December 30, 2013, the SED submitted its audit report, identifying violations and findings. PG&E agrees with 7 violations and respectfully disagrees with 1 violation. Attached is PG&E's response, and the the updated information about the steps PG&E has taken to respond to several of the issues identified in the CPUC's audit report. PG&E greatly values the SED's feedback, and is working to incorporate some of the recommendations made by the SED.

Please contact Sonal Patni at (925) 328-5778 or S1PW@pge.com for any questions you may have regarding this response.
Sincerely,

/S/

Larry Deniston

Attachments

cc: Terence Eng, CPUC
Dennis Lee, CPUC
Liza Malashenko, CPUC
Sumeet Singh, PG&E
Bill Gibson, PG&E
ChristiAne Mason, PG&E
Larry Berg, PG&E

General Order 112-E Findings
CPUC Inspection Report December 30, 2013
Topock District

INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
August 5-9, 2013	Internal Review	Terence Eng	(415) 703-5326

INSPECTION FINDING

CPUC Finding

A. PG&E's Internal Audit Findings

Prior to the start of the audit, PG&E provided SED its findings from the internal review it conducted of Topock District (District). Some of PG&E's internal review findings are violations of PG&E's operations and maintenance standards, and are therefore violations of Title 49 Code of Federal Regulations (CFR), §192.13(c). Table 1 lists all of the violations that PG&E noted.

SED is aware that PG&E corrected some of its findings prior to SED's audit. Please provide SED an update on the items that were still pending corrective actions as of August 5, 2013.

Table 1: Findings from PG&E's Internal Review Dated July 2013

Topic	Code Violation	Finding	Instances	Completed
Emergency Valves	192.13(c)	Valve maintenance cards were not properly filled out (missing valve data) and are not latest version of form	117	Yes
	192.13(c)	Valve actuator maintenance record not fully complete	33	Yes
Station Maintenance	192.13(c)	PLS 2 Operating and Maintenance Instructions (OMI) was out of date (annual review)	1	Yes
	192.13(c)	CGT Station Maintenance Report, UO Standard S4432 Form Field Transducers 3-Point Check incorrectly labeled Diff Pressure.	1	Yes
	192.13(c)	Instances that the supervisor review was not documented	3	Yes
	192.13(c)	Relief valve was identified with two unique tag numbers	2	Yes

Definitions: NOV – Notice of Violation
AOC – Area of Concern

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Odorization	192.13(c)	Lan ID was not recorded	1	Yes
Cathodic Protection	192.13(c)	Supervisor review was not documented	3	Yes
	192.465(a)	Missed ETS reads	11	Yes
	192.13(c)	Action plan not on file on CP issue over 60 days	1	Yes
Leak Survey	192.13(c)	Leak Survey log was missing the Lan ID review and date	1	Yes
Spans	192.13(c)	Missing mile point stencil	4	Yes
	192.13(c)	Instances of coating (paint and wrap) failure	270	No
	192.13(c)	Exposed pipe/wrap from erosion (PLM prioritize and Fix)	3	No
	192.13(c)	Instances of support footing erosion	2	No
	192.13(c)	Initials entered on records, when Lan ID should have been entered	13	Yes
A-Forms	192.13(c)	USA# was left blank	3	Yes
	192.13(c)	Mapping Review Lan ID/date missing	4	Yes
	192.13(c)	Above ground/below ground not identified	2	Yes
	192.13(c)	Incomplete documentation: welded by, inspected by, Lan ID/date missing	2	Yes
Equipment Calibrations	192.13(c)	Documentation of HFI/Flame Pak was incomplete	1	Yes
	192.13(c)	Odorometer annual calibration late	2	Yes
	192.13(c)	Calibration of instrument did not meet minimum requirements	1	Yes

Definitions: NOV – Notice of Violation
AOC – Area of Concern

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PG&E RESPONSE

Instances of coating failure and Exposed pipe/wrap from erosion

PG&E has included the areas identified as having coating degradation in PG&E's Corrective Action Program (CAP). These locations are being evaluated by Corrosion Engineering, and prioritized for work accordingly. In the interim, PG&E will continue to perform annual atmospheric inspections in accordance with TD4430P-02, "Gas Station Facilities Inspection, Testing, and Maintenance Procedures ", (Attachment A) to ensure accelerated corrosion is not taking place at these locations. Any locations identified as having missing coating and active corrosion have been prioritized for remediation by Corrosion Engineering. Locations that do not have active corrosion will be monitored through regular O&M activities.

Instances of support footing erosion

PG&E currently inspects spans annually in accordance with [Procedure], and enters the results of these inspections into PG&E's Pipeline Maintenance Program (PLM). PG&E acknowledges that this is an area for improvement, and is working to develop a comprehensive ground movement program that will evaluate and prioritize these locations. In the interim, PG&E is training its patrollers to identify areas with land movement, and to notify integrity management (IM) of these locations. As PG&E works to build a robust program, PG&E will review these locations, evaluate any integrity concerns, and assign mitigative work if deemed necessary. IM is currently reviewing the 2 locations identified and will develop the appropriate remediation action by the end of the 1st quarter of 2014.

ATTACHMENTS

Attachment #	Title or Subject
A	TD4430P-02

ACTION REQUIRED

Action To Be Taken	Due Date	Completion Date	Responsible Dept.
Complete review of 2 locations with erosion		3/31/2014	Risk Management

Definitions: NOV – Notice of Violation
AOC – Area of Concern

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INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
August 5 - 9, 2013	NOV-1	Terence Eng	(415) 703-5326

INSPECTION FINDING

CPUC Finding

B. Audit Findings and Violations

1 Title 49 CFR §192.13(c) states:

"Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part."

1.1 PG&E's Standard O-16, Corrosion Control of Gas Facilities, page 7, states in part:

"A "Rectifier Test and Site Evaluation" form (Attachment A of Numbered Document O-11.1, Form FO-11.1-A) shall be completed to ensure that rectifiers are functioning correctly and that there are no safety violations."

1.1.1 The District failed to verify that the arc flash sticker was installed at Rectifier at 145453 National Trails Hwy, mile point (MP) 0.24 (Serial number 121130) in 2012.

1.1.2 The District failed to verify that the polyvinyl chloride (PVC) service riser was free of separations, defects, and securely strapped, that the AC disconnect switch enclosure was locked, and that the AC disconnect switch handle can be and was locked in the "on" position at the following rectifiers during each annual maintenance performed from 2009-2013:

A. Rectifier #0.24, Serial #942522

B. Rectifier R-111, Serial #93J1392

C. Rectifier R-110, Serial #71058

SED understands that not all items are applicable to each and every rectifier. SED recommends the District provide an indication or explanation on the form for each unchecked item.

1.2 PG&E's standard M-53.3 Verifying the Calibration of Portable Combustible Gas Indicators, Hydrogen Flame Ionization Units, Optical Methane Detectors, and Remote Methane Leak Detectors, page 1, states in part:

Definitions: NOV – Notice of Violation
AOC – Area of Concern

"Verifying Calibration of Portable Gas Detectors

…

If the calibration is not within the allowable limits, send the instrument to an approved service provider for adjustment or repair."
In addition,

Form FM-53.3-D, Monthly Verification of the Calibration of Personal Air Monitors states that the acceptable calibration limit for Mine Safety Appliances (MSA) testing at 50% LEL is a reading of 47 to 55% LEL.

MSA Serial Number: BO-40160-66 failed its calibration with a reading of 43% LEL in January 2010. The District did not send the instrument to an approved service provider for adjustment or repair.

1.3 PG&E's Utility Procedure TD-4110P-09, Leak Grading and Response, page 11, states in part:

"Recheck Grade 3 leaks during the next scheduled survey."
The District rechecked leak number 09-30008-1 on 8/31/10 and subsequently on 12/13/11, spanning an interval of 15 months and 13 days. The District failed to recheck this leak during the last leak survey it conducted.

1.4 PG&E's Utility Procedure TD-4110P-09, Leak Grading and Response, page 8, states in part:

"6.1 Actions to Take for Grade 2+ Leaks
Take the following actions for a Grade 2+ leak:

…

2. Repair or clear the leak, as designated by the operating department, in a time period not to exceed 90 days, to the date, from the date reported or before the ground freezes or other adverse changes in venting conditions occur."

The District failed to repair or clear leak number 10-30018-1 within 90 days. The District discovered the Grade 2+ leak on 10/18/10, but did not subsequently repair or clear the leak until 2/17/11, 122 days later.

1.5 PG&E's Standard S4350-TD-4350D Odorization of Natural Gas, section 4.6 states in part:

"Gas odor must be readily detectable at a concentration of 0.6% gas-in-air or less."

PG&E's Form 62-3480 expands on the requirement, stating:

"If the odor intensity reading is over 0.6% gas in air (too weak) or below 0.1% gas in air (too strong), a confirmation test with a different operator will be performed and the System Gas Control supervisor, or GT&D district supervisor, shall be notified immediately."

The District documented odor intensity readings of greater than 0.6% on the following dates listed in **Error! Reference source not found.**, but provided no documentation of a confirmation test or supervisor notification.

Table 2: Odorization Test Locations requiring remedial action

Date	Line 300A Discharge Odorometer Reading	Line 300B Discharge Odorometer Reading	TW Odorometer Reading
8/30/2012	48%	50%	48%
9/26/2012	40%	49%	42%
10/23/2012	42%	39%	54%
11/8/2012	36%	37%	33%
12/26/2012	31%	40%	50%

1.6 PG&E's Work Procedure WP4540-01 District Regulator Station Maintenance, page 12, states in part:

"On the back of Form 62-6321 or Form 62-6321A, show any corrective work that was done. This corrective work may include the following:

1. Any regulator, monitor, or relief valve set point changes. Specify the reasons for the changes.

2. Replacement of failed parts. Specify the reason for the replacement.

3. Component replacement (e.g., replaced filters, regulators, pilots, and valves).

Specify the reason for the replacement."

1.6.1 On 5/14/08, the District set Thermo-Electric Generator (TEG) Regulator at MP 6.93A, 2nd run to operate at 40 psig. On 5/21/09, the District discovered the As Found pressure setting of the

		regulator to be 224 psig, before subsequently adjusting the setpoint back to 40 psig. The District failed to specify the reason for the regulator set point change.
	1.6.2	On 5/8/08, the District set TEG Regulator at MP 72.00A, 2nd run to operate at 40 psig. On 5/19/09, the District discovered the As Found pressure setting of the regulator to be 225 psig, before subsequently adjusting the setpoint back to 40. The District failed to specify the reason for the regulator set point change.

PG&E RESPONSE

1.1.1 PG&E agrees with this violation. PG&E strives to communicate safe practices with field personnel and identify potentially hazardous situations. Historically, PG&E has been challenged to find a supplier for Arc Flash stickers for its equipment. PG&E has since addressed this issue, and currently keeps various safety stickers in its yard. Arc Flash stickers were unavailable at the time this rectifier was installed on May 23, 2012. The District subsequently installed an Arc Flash sticker in 2013.

1.1.2 PG&E acknowledges the CPUC's concern with ensuring all field observations are documented adequately. PG&E continues to provide its field personnel with training to stress the importance of appropriately documenting their observations. However, PG&E respectfully disagrees with the cited violation, since PG&E personnel followed the Pole-Mount/Pedestal-Mount Rectifier Test and Site Evaluation Form, F-11.1-A (Attachment B), which states that field personnel will leave the fields blank if those fields do not apply to the inspection. The three rectifiers referenced in the CPUC's letter met this criteria and were left blank in accordance with PG&E's Procedure O-16,"Corrosion Control of Gas Facilities" (Attachment C).

- Rectifier #0.24, Serial #942522, does not have a disconnect switch and receives power from a circuit breaker.
- Rectifier R-111, Serial #93J1392, has no traditional overhead electrical supply to inspect.
- Rectifier R-110, Serial #71058, supplies protection to a water tank and is not connected in any way to gas transmission lines.

In response to the CPUC's second concern, PG&E monitors station equipment at

Topock Compressor Station from a secure 24 hr manned facility. PG&E agrees with the CPUC that additional preventative measures such as installing locks on all of this equipment will add an additional level of protection. PG&E plans to install these locks at Topock Compressor Station by the end of the first quarter of 2014.

1.2 PG&E agrees with this violation. The calibration of MSA Serial Number: BO-40160-66 failed its calibration with a reading of 43% LEL in January 2010. Subsequent calibrations in 2010 showed this equipment within the acceptable limits.

To prevent reoccurrence Topock District Employees received a refresher briefing on acceptable limits for calibration (Attachment D). PG&E will submit the completed sign-in sheet, with all employee signatures, by the end of the 1st quarter. In the long-term, as part of the Mariner Program additional controls for proper maintenance documentation will be implemented with the deployment of mobile devices to capture maintenance activities electronically. The mobile devices will directly update the SAP Preventative Maintenance tool. SAP will have validations that will not allow for preventative maintenance to be prematurely or inadvertently closed without proper inputting by maintenance personnel. Backbone transmission assets maintained in transmission districts will first need to convert to SAP for preventative maintenance scheduling before these mobile devices can be used to record transmission district maintenance. The SAP conversion and deployment of mobile devices are expected to be completed for the transmission districts in 2016.

1.3 PG&E shares this concern. On April 20, 2011, while performing an annual leak survey, a Topock employee noted the recheck of leak number 09-30008-1 on the leak survey log. The employee failed to note the recheck on A-Form 09-30008-1, and has since updated this information (Attachment E). To prevent reoccurrence Topock District Employees received a refresher briefing on TD-4110P-09, Leak Grading and Response (Attachment D). PG&E will submit the completed sign-in sheet, with all employee signatures, by the end of the 1st quarter.

1.4 PG&E agrees with this violation. The Grade 2+ leak was on a pressure transmitter fitting above ground within the compressor station, and at no time did this condition pose a safety hazard to the public. Although repairs were started before the 90 day requirement the completion exceeded the 90 days. . To prevent future occurrences, leaks will be entered into SAP. SAP will have validations that will not allow for preventative maintenance to be prematurely or inadvertently closed without proper inputting by maintenance personnel.

1.5 PG&E agrees with this violation and acknowledges the CPUC's concern with ensuring

all field observations are documented adequately. PG&E continues to provide its field personnel with training to stress the importance of appropriately documenting their observations. Note that although the odor intensity was incorrectly documented and PG&E personnel failed to follow up on these values, the odor intensities were always within tolerance.

To prevent reoccurrence a refresher briefing was given to Topock District to ensure employees are aware to document Odor Intensity readings properly (Attachment D). PG&E will submit the completed sign-in sheet, with all employee signatures, by the end of the 1st quarter. In the longer-term, as part of the Mariner Program additional controls for proper maintenance documentation will be implemented with the deployment of mobile devices to capture maintenance activities electronically. The mobile devices will directly update the SAP Preventative Maintenance tool. SAP will have validations that will not allow for preventative maintenance to be prematurely or inadvertently closed without proper inputting by maintenance personnel. Backbone transmission assets maintained in transmission districts will first need to convert to SAP for preventative maintenance scheduling before these mobile devices can be used to record transmission district maintenance. The SAP conversion and deployment of mobile devices are expected to be completed for the transmission districts in 2016.

1.6 PG&E agrees with this violation and acknowledges the CPUC's concern with ensuring all field observations are documented adequately. PG&E continues to provide its field personnel with training to stress the importance of appropriately documenting their observations. PG&E believes the technician inadvertently transferred the as found pressure from the 1st run to the as found pressure on the 2nd run in the case of both 1.6.1 (MP 6.93A) and 1.6.2. (MP 72.00A). At no time did the set point (as left pressure) change for either of these locations. (Attachment F)

To prevent recurrence, the District performed a refresher tailboard on the importance of timely and accurate documentation (Attachment D). PG&E will submit the completed sign-in sheet, with all employee signatures, by the end of the 1st quarter.

ATTACHMENTS

Attachment #	Title or Subject
B	Rectifier Maintenance Form
C	O-16E, Rectifier Maintenance Procedure
D	Employee Refresher Training
E	Leak Survey Log for 09-30008-1
F	Regulator Set Point Data

Definitions: NOV – Notice of Violation
AOC – Area of Concern

General Order 112-E Findings
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Topock District

ACTION REQUIRED

Action To Be Taken	Due Date	Completion Date	Responsible Dept.
Install locks at Topock Station		3/31/2014	Topock District
Get signatures for refresher training		3/31/2014	Topock District

Definitions: NOV – Notice of Violation
AOC – Area of Concern

General Order 112-E Findings
CPUC Inspection Report December 30, 2013
Topock District

INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
August 5 - 9, 2013	NOV-2	Terence Eng	(415) 703-5326

INSPECTION FINDING

CPUC Finding	2 Title 49 CFR §192.225(a) states, in part: *"Welding must be performed by a qualified welder in accordance with welding procedures qualified under section 5 of API 1104 (incorporated by reference, see §192.7) or section IX of the ASME Boiler and Pressure Vessel Code "Welding and Brazing Qualifications" (incorporated by reference, see §192.7) to produce welds meeting the requirements of this subpart."* The District failed to ensure a qualified welder repaired leak number 10-88794-3 in 2012.

PG&E RESPONSE

PG&E agrees with this violation and acknowledges the CPUC's concern with ensuring all field observations and work are documented adequately. PG&E continues to provide its field personnel with training to stress the importance of appropriately documenting their work. The Welder/Supervisor completed their work in accordance with PG&E's procedures, but did not adequately document their work. Additionally the welders were operator qualified (Attachment G). NOV 3 and NOV 4.1 are similar, as the employee performed the work per PG&E standards, but failed to complete the documentation associated with completing this work. The associated A-Form has since been updated to show completeness of work (Attachment H).

Historically PG&E field crews have manually captured Gas Leaks, Repairs, and Other Corrective Work on paper forms. The resultant notifications have been stored in a variety of dispersed, non-integrated systems from which current, accurate and comprehensive information has not always been easy to access. Along with time-consuming review and correction of manually entered data, this outdated system has also posed the risk of delays in completing compliance work and repairs, as well as their documentation and related mapping.

When the Mariner program is fully deployed to Gas Transmission in 2016, relevant data will be captured by field crews using hand-held electronic devices. From there, it will be

Definitions: NOV – Notice of Violation
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transmitted to, stored and organized within a custom-designed SAP system—one integrated, coherent, real-time data source—from which Gas Transmission Districts and organizational leaders can draw on to perform comprehensive analysis, planning and decision-making. Once fully implemented to our field operations, this new technology will dramatically transform both the accessibility and reliability of our gas distribution and transmission pipeline information.

ATTACHMENTS

Attachment #	Title or Subject
G	Welder Qualifications
H	IGIS A-Form 10-88794-3

ACTION REQUIRED

Action To Be Taken	Due Date	Completion Date	Responsible Dept.
None			

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INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
August 5 - 9, 2013	NOV-3	Terence Eng	(415) 703-5326

INSPECTION FINDING

CPUC Finding	3 Title 49 CFR §192.241 states in part: *"(a) Visual inspection of welding must be conducted by an individual qualified by appropriate training and experience to ensure that:* *(1) The welding is performed in accordance with the welding procedure"* 3.1 The District failed to visually inspect the weld performed in 2011 to repair leak number 09-30008-1. 3.2 The District failed to visually inspect the weld performed in 2012 to repair leak number 10-88794-3. Please provide a status report on the welds and if and when the District plans to visually inspect them.

PG&E RESPONSE

3.1 Please see response for NOV#2. Similarly, the leak noted (repair leak number 09-30008-1) was repaired in accordance with PG&E's procedures, but these repairs were not adequately documented (Attachment E)

3.2 Please see response for NOV #2.

ATTACHMENTS

Attachment #	Title or Subject
E	IGIS A-Form 09-30008-1
G	IGIS A-Form 10-88794-3

ACTION REQUIRED

Definitions: NOV – Notice of Violation
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Action To Be Taken	Due Date	Completion Date	Responsible Dept.
None			

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INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
August 5 - 9, 2013	NOV-4	Terence Eng	(415) 703-5326

INSPECTION FINDING

CPUC Finding

4 Title 49 CFR §192.327(a) states:

(a) Except as provided in paragraphs (c), (e), (f), and (g) of this section, each buried transmission line must be installed with a minimum cover as follows:

Location	Normal Soil	Consolidated Rock
	Inches (Millimeters)	Inches (Millimeters)
Class 1 locations	30 (762)	18 (457)
Class 2, 3, and 4 locations	36 (914)	24 (610)
Drainage ditches of public roads and railroad crossings	36 (914)	24 (610)

4.1 The Leak Repair, Inspection, and Gas Quarterly Incident Report (Form A) for leak number 10-88794-3 on PLS-1B 40.49B, indicated the pipe cover as 0 inches. The District verbally indicated that buried piping had been exposed and reburied, but could not provide further documentation to indicate the pipe was reburied with the minimum cover required by §192.327(a). Please provide SED with a status report on this issue.

4.2 Form A for Project Management (PM) #41497332, Line 300-B, MP 0.2235, 2011 pressure test at Topock Compressor Station, Location B did not specify a value to indicate the pipe was reburied with the minimum cover required by §192.327(a).

4.3 Form A for PM #41497332, Line 300-B, MP 0.1557, 2011 pressure test at Topock Compressor Station, Location C did not specify a value to indicate the pipe was reburied with the minimum cover required by §192.327(a).

PG&E RESPONSE

Definitions: NOV – Notice of Violation
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4.1

See response to NOV #2.The depth of the cover after backfill was 42 inches, and noted in Attachment H.

4.1 and 4.2

PG&E acknowledges the CPUC's concern with ensuring all field observations and work are documented adequately. PG&E continues to provide its field personnel with training to stress the importance of appropriately documenting their work. PG&E respectfully disagrees with this violation, as the pipe depth is shown graphically on Page 3 of the respective H-Forms (Attachment I)

ATTACHMENTS

Attachment #	Title or Subject
H	IGIS A-Form 10-88794-3
I	H-Forms for Topock Compressor Station

ACTION REQUIRED

Action To Be Taken	Due Date	Completion Date	Responsible Dept.
None			

Definitions: NOV – Notice of Violation
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INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
August 5 - 9, 2013	NOV-5	Terence Eng	(415) 703-5326

INSPECTION FINDING

CPUC Finding

5 Title 49 CFR §192.481(c) states:

"If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by §192.479."

In addition,

PG&E's Utility Procedure TD-4430P-02 Gas Station Facilities Inspection, Testing, and Maintenance Procedures, Attachment 7, Table 1, states that if pipe integrity is not OK, i.e. pitting is present, the depth of pitting must be recorded.

5.1 The District noted pitting on the Fuel Gas Header K-Units during its inspection on 5/2/13. The District did not record the depth of pitting. SED noticed that the pitting was still evident during its field inspection of the facility on 8/8/13. The District did not provide protection against the corrosion as required by CFR §192.479.

5.2 The District noted pitting on the P-Unit Fuel Gas Regulators during its inspections on 6/2/11 and 5/2/13. The District did not record the depth of pitting. The District did not provide protection against the corrosion as required by CFR §192.479.

PG&E RESPONSE

PG&E agrees with this violation, and did not follow its procedure to document pit depth. PG&E continues to provide its personnel with training to stress the importance of appropriately documenting their work. Both areas were reviewed by the corrosion engineer and found not to have critical wall loss, and only required a recoat (Attachment J).

To prevent recurrence, the District performed a refresher tailboard on the importance on timely and accurate documentation (Attachment D). PG&E will submit the completed sign-in sheet, with all employee signatures, by the end of the 1st quarter.

Definitions: NOV – Notice of Violation
AOC – Area of Concern

ATTACHMENTS

Attachment #	Title or Subject
D	Employee Refresher Training
J	PLM Work Request for Recoat

ACTION REQUIRED

Action To Be Taken	Due Date	Completion Date	Responsible Dept.
Get signatures for refresher training		3/31/2014	Topock District

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INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
August 5 - 9, 2013	AOC-1	Terence Eng	(415) 703-5326

INSPECTION FINDING

CPUC Finding	**C. Observations and Concerns** 1. PG&E Gas Station Facilities Maintenance Report, TD-4430P-02-F02, requires the transducer operating pressure to be recorded in psig. The District recorded the transducer operating pressure in millivolts rather than in psig for the following line rupture control valves. A. LRCV – MP 21.23A, May 4, 2010 & May 21, 2011 B. LRCV – MP 20.84B, May 4, 2010 & May 24, 2011 Please provide an explanation for the discrepancy.

PG&E RESPONSE

PG&E agrees with this concern. Technicians use millivolt readings to determine the transducer operating pressure. They then convert the millivolt reading to psig for input onto form TD-4430P-02-F02. The Technicians were given a refresher briefing to only record pressure in pisg, as per guidelines (Attachment D). PG&E will submit the completed sign-in sheet, with all employee signatures, by the end of the 1st quarter.

In the long-term, as part of the Mariner Program additional controls for proper maintenance documentation will be implemented with the deployment of mobile devices to capture maintenance activities electronically. The mobile devices will directly update the SAP Preventative Maintenance tool. SAP will have validations that will not allow for preventative maintenance to be prematurely or inadvertently closed without proper inputting by maintenance personnel. Backbone transmission assets maintained in transmission districts will first need to convert to SAP for preventative maintenance scheduling before these mobile devices can be used to record transmission district maintenance. The SAP conversion and deployment of mobile devices are expected to be completed for the transmission districts in 2016.

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ATTACHMENTS

Attachment #	Title or Subject
D	Employee Refresher Training

ACTION REQUIRED

Action To Be Taken	Due Date	Completion Date	Responsible Dept.
None			

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INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
August 5 - 9, 2013	AOC-2	Terence Eng	(415) 703-5326

INSPECTION FINDING

CPUC Finding	2. The American Public Gas Association (APGA) Glossary defines "Pressure Limiting Station" as: *Equipment installed for the purpose of preventing the pressure on a pipeline or distribution system from exceeding some maximum pressure by restricting the flow of gas.* Topock District maintains six pressure limiting stations (PLS) that meet this definition: PLS 1A, PLS 1B, PLS 2A, PLS 2B, Amboy Station, and Needles Tap. The District's Statistical Report for the Calendar Year Ending December 31, 2012 states that only four pressure limiting stations meet the definition. Please provide an explanation for the discrepancy.

PG&E RESPONSE

PG&E agrees with this concern. Traditionally the District has considered PLS 1A and PLS 1B as one station, and the same for PLS 2A and 2B. To prevent any future misunderstanding, PG&E will record these PLS stations separately which will total 6 stations on future Statistical Reports.

ATTACHMENTS

Attachment #	Title or Subject
None	

ACTION REQUIRED

Action To Be Taken	Due Date	Completion Date	Responsible Dept.
None			

Definitions: NOV – Notice of Violation
AOC – Area of Concern

General Order 112-E Findings
CPUC Inspection Report December 30, 2013
Topock District

INSPECTION INFORMATION

Inspection Dates	Finding	CPUC Contact	CPUC Phone #
August 5 - 9, 2013	AOC-3	Terence Eng	(415) 703-5326

INSPECTION FINDING

CPUC Finding	3. During SED's field inspection on 8/8/13, the District recorded a pipe-to-soil reading (-730mV) that did not meet the -850mv criteria on Line 300A, MP 21.23. Please provide SED a status report on the cathodic protection at this location.

PG&E RESPONSE

PG&E agrees with this concern. The pipe to soil potential at L-300A MP 21.23 was found to be -730 mV rectifier on, which does not meet the -850 mV rectifier on criteria for demonstrating sufficient cathodic protection levels at this location. A new cathodic protection station was installed at L-300B MP 10.5 to address the low cathodic protection levels at L-300A MP 21.23 and at other locations. Following start-up of the new cathodic protection station at MP-10.5 it was found that the pipe-to-soil potential at L-300A MP 21.23 had been depressed only to -820 mV rectifier on, which does not demonstrate compliance at this location. The data indicates it likely can be demonstrated that sufficient cathodic protection levels exist at L-300A MP 21.23 using the 100 mV shift criteria. A coupon test station (CTS) will be installed near L-300A MP 21.23 in order to demonstrate that sufficient levels of cathodic protection exist using the 100 mV criteria. It is expected that this new CTS will be installed by June 30th 2014. An action plan has been created to track the progress of this work.

ATTACHMENTS

Attachment #	Title or Subject
None	

ACTION REQUIRED

Action To Be Taken	Due Date	Completion Date	Responsible Dept.
Install CTS		6/30/2014	Topock District

Definitions: NOV – Notice of Violation
AOC – Area of Concern