

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 1, 2022

GI-2022-02-PGE-06-02ABC

Ms. Janisse Quinones
Senior Vice President, Gas Engineering
Pacific Gas and Electric Company
Gas Transmission and Distribution Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

SUBJECT: General Order 112-F Gas Inspection of PG&E's Central Coast Division

Dear Ms. Quinones:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Central Coast Division (Division) on February 14 – February 18, 2022. The inspection included a review of the Division's records for the period of 2018 through 2021, as well as a representative field sample of the Division's facilities. SED staff also reviewed the Division's operator qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED's findings are noted in the Post-Inspection Written Preliminary Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records and pipeline facilities that SED inspected during the inspection. SED discovered two (2) concerns during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the concerns noted in the Summary.

If you have any questions, please contact Kai Cheung at (415) 940-8836 or by email at Kai.Cheung@cpuc.ca.gov.

Sincerely,

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Preliminary Findings

cc: Susie Richmond, PG&E Gas Regulatory Compliance
Jaime Hidalgo, PG&E Gas Regulatory Compliance
Dennis Lee, SED
Claudia Almengor, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 2/14/2022 – 2/18/2022

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Central Coast Division Gas Distribution

Assets (Unit IDs) with results in this report: Central Coast Division (86276)

System Type: GD

Inspection Name: PG&E Central Coast Division

Lead Inspector: Kai Cheung

Operator Representative: Jaime Hidalgo

Unsatisfactory Results

No Preliminary Findings.

I. Concerns

(1) Records: Corrosion Control (PRR.CORROSION)

(1.1) Question Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?

References 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))

Assets Covered Central Coast Division (CC)

Issue Summary SED reviewed PG&E's Casing Evaluation Form dated 4/14/2021 with Notification number 121434115 and found that the contact type of the casing evaluation result was Shorted/Electrolytic. According to PG&E, its Distribution Enhanced CP Survey program includes mitigation efforts on metallically shorted casings, and the program has already identified 287 metallically shorted main casings and has mitigated 99 of these with a project completion date for mitigation of 2026. Please verify that this shorted casing in the Notification number 121434115 is included in the mitigation efforts of the Distribution Enhanced CP Survey. PG&E's current casing testing and mitigation procedures do not include distribution casings. SED would like to request for a status update on PG&E's progress to include distribution casings in its casing testing and mitigation procedures.

(1.2) Question Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?

References 192.491(c) (192.455(a), 192.461(a), 192.461(b), 192.483(a))

Assets Covered Central Coast Division (CC)

Issue Summary SED reviewed PG&E's data request response (CC#20) which provides a list of unprotected pipeline or pipe sections that meet §192.455(b) and §192.455(c). Based on PG&E's investigation, some of these pipeline or pipe sections in the list are not unprotected. Some are protected or have been replaced by plastic. PG&E is continuing its investigation and its final determination of the status of some of these pipelines or pipe sections listed in CC#20. SED would like to request for a status update on PG&E's investigation and any corrective actions taken to improve the quality of the unprotected pipeline or pipe sections list.