

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 23, 2021

GI-2021-04-PGE-29-14

Ms. Christine Cowsert, Vice President
Gas Asset Management and System Operations
Pacific Gas and Electric Company
6121 Bollinger Canyon Road
San Ramon, CA 94583

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a **General Order (G.O.) 112-F Inspection of Pacific Gas and Electric Company (PG&E)'s Damage Prevention Program** on April 20 through 22, 2021. SED staff reviewed PG&E's Damage Prevention Plan and related records for the period of 2018 through 2020 and used Pipeline and Hazardous Materials Safety Administration (PHMSA)'s Inspection Assistance (IA) as a reference guide to conduct the inspection.

SED's staff identified no violations of G.O. 112-F, Reference Title 49 of CFR, Part 192, but noted areas of concern; two (2) in transmission and two (2) in distribution, which are described in the attached "Post-Inspection Written Preliminary Findings".

Please provide a written response within 30 days of your receipt of this letter indicating the measures taken by PG&E to address the concerns noted in the "Post-Inspection Written Preliminary Findings".

Thank you for your cooperation in this inspection. If you have any questions, please contact Desmond Lew, Senior Utilities Engineer (Specialist), at (213) 576-7020 or by email at dl4@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Terence Eng".

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

Attachment

cc: See next page

Susie Richmond, Manager
Gas Regulatory Compliance
Pacific Gas and Electric Company
6121 Bollinger Canyon Road
San Ramon, CA 94583

Alberta Ekukinam, Senior Engineer
Gas Regulatory Compliance
Pacific Gas and Electric Company
6121 Bollinger Canyon Road
San Ramon, CA 94583

Dennis Lee
Program and Project Supervisor
Safety and Enforcement Division

Mahmoud Intably
Program and Project Supervisor
Safety and Enforcement Division

Kan-Wai Tong
Senior Utilities Engineer (Supervisor)
Safety and Enforcement Division

Desmond Lew
Senior Utilities Engineer (Specialist)
Safety and Enforcement Division

Claudia Almengor
Associate Governmental Program Analyst
Safety and Enforcement Division

Post-Inspection Written Preliminary Findings

Dates of Inspection: April 20 through 22, 2021

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Assets (Unit IDs) with results in this report: Main Office (Specialized Inspections) (86283)

System Type: GT

Inspection Name: 2021 PG&E Damage Prevention Transmission

Lead Inspector: Desmond Lew

Operator Representative: Alberta Ekukinam

Unsatisfactory Results

No Preliminary Findings.

Concerns

Public Awareness and Damage Prevention : Damage Prevention (PD.DP)

Question 5. Does the process specify how reports of TPD are checked against One-Call tickets?

References 192.614(c)(3)

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary During records review on April 20, 2021, Pacific Gas and Electric Company indicated that it does not specify a process or procedure of how reports of Third-Party Damage are checked against One-Call tickets.

SED recommends Pacific Gas and Electric Company modify the Damage Prevention Program to specify how reports of Third-Party Damage are checked against One-Call tickets. The process or procedure should include: 1) Damage identified as Third-Party Damage is linked back to One-Call events in the vicinity; and 2) Ensuring Third-Party Damage was not original construction damage if there is no evidence of excavation in the vicinity.

Question 7. Does the damage prevention program meet minimum requirements specified in 192.614(c)?

References 192.614(c)

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary During records review on April 21, 2021, Pacific Gas and Electric Company provided a list of approximately 5,000 "Late Tickets" for 2018, 2019, and 2020. SED recommends Pacific Gas and Electric Company review the reasons for "Late Tickets" and make process improvements to reduce the number.

Post-Inspection Written Preliminary Findings

Dates of Inspection: April 20 through 22, 2021

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Assets (Unit IDs) with results in this report: Main Office (Specialized Inspections) (86283)

System Type: GD

Inspection Name: 2021 PG&E Damage Prevention Distribution

Lead Inspector: Desmond Lew

Operator Representative: Alberta Ekukinam

Unsatisfactory Results

No Preliminary Findings.

Concerns

Public Awareness and Damage Prevention : Damage Prevention (PD.DP)

Question 5. Does the process specify how reports of TPD are checked against One-Call tickets?

References 192.614(c)(3)

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary During records review on April 20, 2021, Pacific Gas and Electric Company indicated that it does not specify a process or procedure of how reports of Third-Party Damage are checked against One-Call tickets.

SED recommends Pacific Gas and Electric Company modify the Damage Prevention Program to specify how reports of Third-Party Damage are checked against One-Call tickets. The process or procedure should include: 1) Damage identified as Third-Party Damage is linked back to One-Call events in the vicinity; and 2) Ensuring Third-Party Damage was not original construction damage if there is no evidence of excavation in the vicinity.

Question 7. Does the damage prevention program meet minimum requirements specified in 192.614(c)?

References 192.614(c)

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary During records review on April 21, 2021, Pacific Gas and Electric Company provided a list of approximately 5,000 "Late Tickets" for 2018, 2019, and 2020. SED recommends Pacific Gas and Electric Company review the reasons for "Late Tickets" and make process improvements to reduce the number.