

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 26, 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 reviewed Pacific Gas and Electric Company (PG&E)'s Damage Prevention Program response letter dated July 20, 2021, that addressed two (2) areas of concern in transmission and two (2) areas of concern in distribution identified during **General Order (G.O.) 112-F Inspection of PG&E's Damage Prevention Program** conducted on April 20 through 22, 2021.

Attached is a summary of SED's inspection findings, PG&E's responses to SED's findings, and SED's evaluation of PG&E's responses to the findings.

This letter serves as official closure of the 2021 Inspection of PG&E's Damage Prevention Program. Any matters that are being considered for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

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](mailto:dl4@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Mahmoud Intably".

Mahmoud Intably, P.E.  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

Attachment

cc: See next page

Vincent Tanguay, Director  
Compliance Gas Operations  
Pacific Gas and Electric Company  
6111 Bollinger Canyon Road  
San Ramon, CA 94583

Susie Richmond, Manager  
Gas Operations Regulatory Compliance  
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Terence Eng, P.E.  
Program Manager  
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Dennis Lee  
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 Ekuinam

## 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.

**PG&E's Response:**

PG&E recognizes this concern and is taking the following actions:

- Utility Procedure, *TD-5811P-501: Dig-In Investigation* has been canceled.
- Standards Engineering is working on updating Utility Procedure documents for Dig-In Response and Investigation that will detail Dig-In Reduction Team (DiRT) investigations of dig-ins and confirming the status or existence of USA tickets. While this is current practice, it will be formulated in the Utility Procedure documents by Q4 2021.

**SED's Conclusion:**

SED has reviewed PG&E's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

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.

**PG&E's Response:**

PG&E recognizes this concern:

- Late tickets are reviewed, and the reasons are identified in a report completed by the Quality Control team. Additionally, third party monitors are required as a result of the Locate and Mark OII IIIB.1 – Timely Ticket Review.

**SED's Conclusion:**

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**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 Ekuinam

## Unsatisfactory Results

**No Preliminary Findings.**

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References 192.614(c)(3)

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