

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 2, 2021

GI-2021-04-PGE-16-02ABC

Christine Cowser
VP, Gas Asset Management and System Operations
Pacific Gas and Electric Company
Gas Transmission and Distribution Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

SUBJECT: SED's Closure Letter for General Order 112-F Gas Inspection of PG&E's Kern Division

Dear Ms. Cowser:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas & Electric Company's (PG&E) response letter dated July 12, 2021, for the findings identified during the General Order (GO) 112-F inspection of PG&E's Kern Division (Division) which was conducted from April 26 to May 7, 2021.

A summary of the inspection findings documented by SED, PG&E's response to our findings, and SED's evaluation of PG&E's response taken for each identified Area of Concern is attached.

This letter serves as the official closure of the 2021 GO 112-F inspection of PG&E's Kern Division and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

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

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

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

Summary of Inspection Findings

Dates of Inspection: 4/26/2021 – 5/7/2021

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Assets (Unit IDs): P&GE Kern Division (85404)

System Type: GD

Inspection Name: PG&E Kern Division

Lead Inspector: Kai Cheung

Operator Representative: Jaime Hidalgo

I. Unsatisfactory Results

No Preliminary Findings.

II. Concerns

(1) Pipeline Field Inspection: Pipeline Inspection (Field) (FR.FIELDPIPE)

(1.1) Question Text Are meters and service regulators being located consistent with the requirements of 192.353?

References 192.351 (192.353(a), 192.353(b), 192.353(c), 192.353(d))

Assets Covered P&GE Kern Division

Issue Summary (1.1.1) During field observation, SED noted two (2) meter-set-assembly leaks at the following locations:

- a) [REDACTED] La Paz Ct, Bakersfield
- b) [REDACTED] Arroyo Seco Dr, Bakersfield

SED recommends that PG&E takes the appropriate corrective measure to remedy the meter set assembly leaks.

(1.1.2) During field observation, SED noted four (4) meter-set-assemblies that were not protected from vehicular damage at the following locations:

- a) [REDACTED] Toluca Dr, Bakersfield
- b) [REDACTED] La Paz Ct, Bakersfield
- c) [REDACTED] La Paz Ct, Bakersfield
- d) [REDACTED] La Paz Ct, Bakersfield

SED recommends PG&E take appropriate corrective measure to protect the meter-set-assembly from vehicular damage.

PG&E's Response (1.1.2) PG&E repaired leaks at both meter set assemblies at the following locations on May 6, 2021.

- a) [REDACTED] La Paz Ct, Bakersfield - (Riser thread and regulator vent Leak) - Repaired 5/6/2021 Field Order ID: 6452752745
- b) [REDACTED] Arroyo Seco Dr, Bakersfield - (Shut off valve)- Repaired 5/6/2021 Field Order ID: 6468508308

(1.1.2) PG&E plans to provide adequate meter protection to the following addresses by Q4 2021.

- a) [REDACTED] Toluca Dr, Bakersfield
- b) [REDACTED] La Paz Ct, Bakersfield
- c) [REDACTED] La Paz Ct, Bakersfield
- d) [REDACTED] La Paz Ct, Bakersfield

SED's Conclusion SED determined that the corrective action taken by PG&E sufficiently addresses SED's concern.

(1.2) Question Text Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?

References 192.465(a) (192.463(b), 192.463(c), 192.463(a))

Assets Covered P&GE Kern Division

Issue Summary During field observation, SED noted the following low pipe-to-soil reads:

Equipment #	Read (mV)	Corrective #
41940195	-826	120941432
44380646	-823	120941432
44380648	-825	120941432
44380649	-821	120941432
44380657	-723	120941432
44421547	-510	120934564
44262859	-829	120944399
41249939	-636	120951400

Please update SED with the results.

PG&E's Response Updates on cathodic protection restoration for the noted eight locations are outlined in the table below:

Equipment #	Read (mV)	Corrective #	Status/Comment(s)
41940195	-826	120941432	Due to extenuating circumstances, further investigation is now targeting Oct-2021. This later date should see lower temperatures, lessening the current extremely dry condition of the area's sandy soil, yielding improved pipe-to-soil readings.
44380646	-823	120941432	
44380648	-825	120941432	
44380649	-821	120941432	
44380657	-723	120941432	
44421547	-510	120934564	
44262859	-829	120944399	Completed on 15-Jun-2021 (notif# 120944399), recorded up read was -891 mV.
41249939	-636	120951400	Due to extenuating circumstances, corrective work (install drivable anode in concrete) has been scheduled for Aug-2021 (notif# 120951400).

SED's Conclusion SED determined that the corrective action taken by PG&E sufficiently addresses SED's concern.

(1.3) Question Text Is proper inspection being performed for each distribution system valve that might be required in an emergency, and prompt remedial action to correct any valves found inoperable?

References 192.747(a) (192.747(b))

Assets Covered P&GE Kern Division

Issue Summary During field observation, SED noted that zone valve V-Z031 was inoperable. PG&E submitted a work ticket PM#44772890 to repair this valve. Please update SED the result of this corrective action.

PG&E's Response The difficult-to-operate valve (i.e., V-Z031) was flushed and successfully maintained on June 4, 2021, under PG&E PM# 44772890.

SED's Conclusion SED determined that the corrective action taken by PG&E sufficiently addresses SED's concern.