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August 25, 2015

Mr. Ken Bruno
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: State of California – Public Utilities Commission
General Order 112-E Audit – PG&E’s Burney Transmission District

Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the CPUC conducted a General Order 112-E audit of PG&E’s Burney Transmission District from May 11 through May 15, 2015. On July 30, 2015, the SED submitted their audit report, which included identified areas of concern. Attached is PG&E’s response to the CPUC audit report.

Please contact Glen Allen at (925) 244-3388 or gmad@pge.com for any questions you may have regarding this response.

Sincerely,

/S/
Larry Deniston

Attachments

cc: Aimee Cauguiran, CPUC
Dennis Lee, CPUC

Mike Falk, PG&E
Sumeet Singh, PG&E

2015 Burney District Audit Findings and Responses

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
NOV PG&E's Internal Audit Findings	1	<p>During the inspection, PG&E provided SED staff with its findings from the internal review it conducted of the Burney District. Table 1 lists all of the findings from PG&E's internal review. Some of PG&E's internal review findings are violations of PG&E's standards, and are therefore violations of Title 49 Code of Federal Regulations (CFR), §192.13(c).</p> <p>SED staff noted that some of the findings were corrected prior to the inspection. For those items not corrected prior to the inspection, please provide an update on PG&E's progress to complete the corrective actions.</p>	Attached, please find Attachment 1 - Updated - Burney District 2015 Internal Review, indicating the findings, corrective actions taken and the closure date. Updates have been highlighted in yellow.	Att 1_Updated - Burney District 2015 Internal Review.pdf
AOC	1	While doing field work at the Tionesta compressor station, we noted two valves with low pipe-to-soil reads. Those valves were V-5 (710mV) and V-K (710mV). Title 49 CFR §192.463(a) requires operators to provide cathodic protection consistent with one or more of the applicable criteria in Appendix D, and Title 49 CFR §192.465(d) requires operators to take prompt remedial action to correct deficiencies found. Please provide documentation verifying that PG&E has restored cathodic protection levels to one or more criteria identified in Appendix D.	Attached, please find Attachment 2 - "AOC 1 Work Requests" verifying that cathodic protection levels at valves V-5 and V-K are within compliance levels. Work Requests 213470 and 213471 were completed on 6/24/2015. The new reads are -1388 mv for valve V-5 and -1362 mv for valve V-K.	Att 2_AOC 1 Work Requests_CONF.pdf
AOC	2	<p>In data request 14, we asked PG&E to determine if there is a casing on L-400 across the street from MP 83.31, and to demonstrate that PG&E has been monitoring the casing if it is present.</p> <p>PG&E stated in its response: "Attached, please find PG&E Drawing 145418 indicating that there is a casing on Transmission line 400 across the street from MP 83.31. This casing, Bar ID BNCP00570, was monitored until 5/14/2009 at which time the read type was changed from "casing" to "850 on". It has been monitored as a "850 on" read until the present. During the CPUC inspection on 5/13/14, the casing potential was read as -208 mv, and therefore is electrically isolated from the carrier pipe. On 5/19/15, this read type was changed back to a casing read. See attached reads for Bar ID BNCP00570."</p> <p>After review of the cathodic protection run report (dated 5-19-15), SED staff has a number of follow-up questions:</p> <p>2.1 Are instant off reads a separate OQ task?</p> <p>2.2 If so, were all the corrosion mechanics who took the instant off reads between 2009 and 2014 qualified to do so?</p> <p>2.3 Is there a process in place to allow the corrosion mechanics to correct what is being read if field conditions do not match what is being asked for in the paperwork? If so, please describe the process.</p>	<p>2.1: There is not a separate OQ task for instant off reads. The measurement being taken is a pipe-to-soil measurement. The term "instant off" refers to the source of current being interrupted so that the IR (V=IxR) free measurement can be recorded.</p> <p>2.2: N/A since the instant off reads are not a separate OQ task.</p> <p>2.3: There is a process in place to allow the corrosion mechanics to correct what is being read if field conditions do not match what is being asked for in the paperwork. For SAP assets, the mechanic would put in a work request to correct the location, address, read type, etc. The asset strategist would then make the desired changes in SAP. PLM would be a similar process where the technician would document the necessary changes and PLM would be updated accordingly by the asset strategist.</p>	
AOC	3	While doing field work on L-401 at MP 121.6, SED staff noted multiple leads coming on the ETS. What are the reads being measured?	A follow up was performed on 8/10/15 to determine which leads went where at the north side casing ETS at MP 121.6 on L-401. After locating the wires, performing continuity testing and taking pipe to soil readings, it was determined that both white and black wires at the test station on the north side of the casing are connected to L-401. Another test station is located on the south side of the casing, which also has white and black wires inside. At this test station the white wires are attached to the casing and the black wires are attached to L-401. Wires will be labeled to mitigate any confusion in the future. Please see attachment 3 showing photographs of the ETS and wires.	Att 3_IMG 1-3.pdf