

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 25, 2021

Ms. Christine Cowsert, VP
Gas Asset Management and System Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

GI-2021-06-PGE-05-02ABC

SUBJECT: SED's Closure Letter for General Order (GO) 112-F Gas Inspection of PG&E's San Francisco Division

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas & Electric Company's (PG&E) response letter dated August 9, 2021, for the findings identified during the General Order 112-F inspection of PG&E's San Francisco Division (Division) which was conducted from June 14 to June 25, 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 Violation and Area of Concern is attached.

This letter serves as the official closure of the 2021 GO 112-F inspection of PG&E's San Francisco Division and any matters that are being recommended 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 Wai Yin (Franky) Chan at (415) 703-2482 or by email at wai-yin.chan@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

Enclosure: Post-Inspection Written Preliminary Findings

cc: Susie Richmond, PG&E Gas Regulatory Compliance
Paul Camarena, PG&E Gas Regulatory Compliance
Claudia Almengor, SED
Terence Eng, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 6/14/2021 to 6/25/2021

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: San Francisco Division

Assets (Unit IDs) with results in this report: San Francisco Division (85402)

System Type: GD

Inspection Name: 2021 PG&E San Francisco Division

Lead Inspector: Wai-Yin Chan

Operator Representative: Paul Camarena, Sajjad Azhar, Alberta Ekukinam, and Anthony Kwong,

Unsatisfactory Results

Design and Construction: Pressure Testing (DC.PT)

Question 1. Do records indicate that pressure testing is conducted in accordance with 192.513?

References 192.517(b) (192.513(a), 192.513(b), 192.513(c), 192.513(d))

Assets Covered San Francisco Division (85402)

Issue Summary SED reviewed selected Leak Repair Forms and Project Records. Those records showed that PG&E did not document the temperature during the pressure test.

Per §192.513 (d), during the test, the temperature of thermoplastic material may not be more than 100 °F (38 °C), or the temperature at which the material's long-term hydrostatic strength has been determined under the listed specification, whichever is greater.

PG&E failed to demonstrate the compliance of this code section with their pressure testing record. The ambient temperature can be more than 100 °F in some areas, and the pressurized gas can have higher temperature than the ambient temperature. Without temperature monitoring during the pressure test, the plastic pipe could exceed 100 °F. PG&E's procedure TD-4138P-01 states that "the surface temperature for thermoplastic material must not be more than 100°F". However, TD-4138P-01 does not specify what device should be used or how to measure the pipe temperature.

SED believes that PG&E should have a way of documenting the temperature during plastic pipe pressure testing to show compliance of §192.513 (d). Therefore, PG&E is in violation of §192.513 (d).

SED also suggests that PG&E modify TD-4138P-01 to include the process for verifying temperature during plastic pipe pressure testing.

PG&E's Response:

While PG&E understands that §192.513 (d) does not require recording of pipe temperature during test, PG&E agrees that the procedures could be improved to provide clarity regarding pipe temperature. PG&E will review its procedures to ensure the requirements are fully met.

SED's Conclusion:

SED has reviewed PG&E's response and decided not to impose a fine or penalty at this moment. However, PG&E is responsible to demonstrate through any means that the temperature was checked during plastic pipe pressure test per §192.513 (d). A check list that includes temperature verification would satisfy if PG&E choose not to document the temperature. SED will also verify if temperature of plastic pipe is checked during test when we conduct distribution construction field inspection in the future.

Concerns

Maintenance and Operations: Gas Pipeline Overpressure Protection (MO.GMOPP)

Question 4. Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?

References 192.709(c) (192.739(a), 192.739(b))

Assets Covered San Francisco Division (85402)

Issue Summary For dual-run regulator station DR-198, PG&E record showed that the left run was left as working run at 50 psi in 2018, 2019 and 2020. PG&E later confirmed that it was a documentation mistake. The left run was left at 49 psi as the standby and the right run was left at 50 psi as the working run in 2019.

For dual-run regulator station DR-231, the right run was left at 8.5 w.c. as the working run on 11/27/19. During the next inspection on 5/8/20, the left run was still left as the working run at 8.5 w.c.

PG&E did not have any explanation on why the runs were not switched.

SED suggests that PG&E be more careful on documenting maintenance records and the supervisor should review the record thoroughly before signing on the record.

PG&E's Response:

Supervisor has noted the discrepancy and discussed the issue with the team of technicians in San Francisco. The Supervisor will take steps to note the working side of each regulator station to ensure equalized run-time on equipment.

SED's Conclusion:

SED has reviewed PG&E's response and accepted the corrective actions.

Question 5. Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?

References 192.739(a) (192.739(b))

Assets Covered San Francisco Division (85402)

Issue Summary During field inspection on 6/22/21 at DR-198, SED observed that the above ground regulator station did not have any sign to prevent unauthorized people from entering the station. There was graffiti drawn on the fence and the pipe.

PG&E said they would issue a ticket and put signs on the fence. On 6/25/21, PG&E provided the corrective action was scheduled as Notif #121593649, PM #44876316.

- PG&E should update SED the progress of the corrective action and provide evidence of completion.
- SED suggests PG&E take additional measurements to prevent unauthorized people from entering the station and protect PG&E's assets from vandalism.

PG&E's Response:

New signs have been installed on the station fencing for DR-198. Please see attached photos. We will be assessing potential additional security measures with the appropriate department.

SED's Conclusion:

SED has reviewed PG&E's response and accepted the corrective actions.

Time-Dependent Threats: Atmospheric Corrosion (TD.ATM)

Question 3. Do records document inspection of aboveground pipe for atmospheric corrosion?

References 192.491(c) (192.481(a), 192.481(b), 192.481(c))

Assets Covered San Francisco Division (85402)

Issue Summary Because a large number of meter set assemblies (MSAs) in San Francisco are inside locked doors or gates, the Division has a significant number of MSAs that are overdue for atmospheric corrosion (AC) inspections and leakage surveys (LS). Since the issue was reported in the 2017 SED inspection of this division, PG&E has provided monthly updates on the statistics of these AC and LS "can't get in" (CGI) situations. Based on the latest update, SED acknowledges that the total number of AC and LS CGIs in San Francisco has reduced from 75,004 and 19,975 at the time when PG&E reported this issue back in 2017 to 1,218 and 9,398, respectively.

SED also recognizes that the COVID-19 and Shelter-In-Place situation has made it more difficult for PG&E to reduce these AC and LS CGIs. Because many of these MSAs are inside locked doors or gates, inspecting them often requires interacting with the property owners or the public to get access to these MSAs and social distancing is sometimes not possible. Last year, PG&E had requested for waiver to extend the due dates to complete the AC and LS CGIs to minimize the potential health risk to both PG&E's workforce and the public. This waiver was granted by the Commission with Resolution M-4845 and it was effective as of November 10, 2020.

While SED recognizes the challenge to completely eliminate these AC inspections and LS CGIs backlogs, SED is still concerned with the significant number of current overdue AC inspections and leakage surveys. SED is requesting PG&E to continue providing required updates on the statistics of AC and LS CGIs by divisions until resolution of this issue.

PG&E's Response:

PG&E will continue updating SED on the statistics of AC and LS CGIs by divisions until resolution of this issue.

SED's Conclusion:

SED has reviewed the response from PG&E and determined that the corrective actions articulated by PG&E sufficiently address SED's concern.

Question 4. Is pipe that is exposed to atmospheric corrosion protected?

References 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))

Assets Covered San Francisco Division (85402)

Issue Summary On 6/24/21, SED found that at regulator station DR-227 there was atmospheric corrosion on the pipe. PG&E did not document the surface corrosion in 2020 during the regulator station inspection.

SED pointed out the AC problem and PG&E said they will issue a ticket to mitigate the atmospheric corrosion.

On 6/24/21, PG&E provided the corrective action ID number Notif #121594045, PM #44876480.

PG&E should update SED on the progress of the corrective action and provide evidence of completion.

PG&E's Response:

Notification #121594045 has been submitted for Atmospheric Corrosion. Insulation & Coating Dept. notified. Current expected completion is end of Q1, 2022.

SED's Conclusion:

SED has reviewed PG&E's response and accepted the corrective actions.