

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 1, 2022

GI-2022-01-PGE-29-03-04

Ms. Janisse Quinones
Senior Vice President, Gas Engineering
6121 Bollinger Canyon Road
San Ramon, CA 94583

SUBJECT: Closure Letter for General Order (GO) 112-F Gas Inspection of PG&E's Operation and Maintenance and Emergency Plans

Dear Ms. Quinones:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Pacific Gas & Electric Company's (PG&E) response letter dated March 10, 2022, for the findings identified during the General Order 112-F inspection of PG&E's Operation and Maintenance and Emergency Plans. The inspection was conducted between January 10-14, 2022.

Included is SED's evaluation of PG&E's response taken for identified Areas of Concern/ Recommendations. This letter serves as the official closure of the 2022 GO 112-F Inspection of PG&E's Operation and Maintenance and Emergency Plans.

Thank you for your cooperation in this inspection. If you have any questions, please contact Sikandar Khatri at (415) 703-2565 or by email at Sikandar.Khatri@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: Closure letter

cc: Susie Richmond, PG&E
Claudia Almengor, SED
Terence Eng, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: January 10-14, 2022

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: PG&E Operation & Maintenance (O&M) and Emergency Plan (2021 update)

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

System Type: GD

Inspection Name: PG&E Distribution O&M Inspection - 2022

Lead Inspector: Sikandar Khatri

Operator Representative: Rosa Duenas

Unsatisfactory Results

No Preliminary Findings.

Concerns

Procedures : Normal Operating And Maintenance (PRO.SUBLNORMOPS)

Question 1. Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?

References 192.605(a)

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

Issue Summary Concerns:

SED observed a number of discrepancies, listed below, in the PG&E documents which should have been addressed during the updates or annual reviews required by Title 49 Code of Federal Regulations (CFR) §192.605(a). It is also important that PG&E staff have access to up-to-date and accurate information. SED reviewed only documents updated in

2021. PG&E should review all documents to make sure there are no other discrepancies and should conduct thorough annual reviews in future to avoid it.

PG&E's response:

PG&E recognizes this concern and has taken the following corrective actions listed below:- PG&E will be increasing the thoroughness of reviews to ensure dates and document references are validated.

SED's conclusion:

SED has reviewed the response and has accepted the same.

- (1) SED sent a pre-audit data request for PG&E documents that have been changed/updated during the year 2021. PG&E sent the list, but there were a number of documents missing (for example, A39, TD-4012P-04 and others) from the list which SED used during the review of "TD-4192M_Rev0c". SED relies on the accuracy of the information provided by PG&E. In future, PG&E should provide accurate information, and perform the manual check if need to verify the accuracy of the information submitted to SED.

PG&E's response:

PG&E recognized this concern and took the following corrective actions:- PG&E will take steps to ensure that annual review data is pulled and examined consistently.

SED's conclusion:

SED has reviewed the response and has accepted the same.

- (2) SED observed that for the following two documents the "effective date" is earlier than the "publication date".

TD-4110P-09 Rev. 6c (Publication Date: 12/15/2021 Effective Date: 02/01/2021)

M-11.2 4a (Publication Date: 12/18/2019 Effective Date: 03/18/2019)

PG&E completed the corrections and changed the two Effective dates to 02/01/2022 and 03/18/2020, respectively.

PG&E's response:

PG&E recognized this concern and took the following corrective actions: Corrections included updating the Effective dates to 02/01/2022 and 03/18/2020, respectively. See files attached

SED's conclusion:

SED has reviewed the response and has accepted the same.

- (3) A-34 Rev 6b refers to Gas Design Standard A-51 at a number of places. The title mentioned is "Cold Tap Branch Connection Requirements". However, PG&E confirmed that the title has been revised as "Branch Connection Requirements". PG&E should make the correction to the references in A-34 Rev 6b.

PG&E's response:

PG&E recognized this concern and took the following corrective actions: Corrections included updating the title for A-51 to "Branch Connection Requirements" in the document A-34. See file attached.

In the initial PG&E response letter, "A-34 Rev 6a" was mentioned in "Associated Attachment" column, however Rev 6c document was sent. This was later clarified by PG&E through email dated 3/22/2022.

SED's conclusion:

SED has reviewed the response and has accepted the same.

(4) PG&E documents TD-4182P-01 Rev: 0a, TD-4411S Rev: 2a and TD-4810P-26 Rev: 0 refer to the document, GDS O-16, "Corrosion Control Standard". This Standard has been obsolete and have been replaced by a number of other documents. PG&E should make the correction. In addition, PG&E should look into other documents that refer to O-16 and make corrections, if needed.

PG&E's response:

PG&E recognized this concern and took the following corrective actions: Corrections included removing the reference to O-16 from TD-4810P-26, TD-4411S and TD-41810P-26. See file attached.

SED's conclusion:

SED has reviewed the response and has accepted the same.

(5) TD-5100P-01 section 3.4 has a reference to Utility Procedure TD-9500-16 with the title, "Deactivation and/or Retirement of Underground Gas Facilities." The title of this document has changed to "Abandonment of Underground Gas Facilities." PG&E should make the correction to the references in TD-5100P-01.

PG&E's response:

PG&E recognized this concern and took the following corrective actions: Corrections included updating the title for TD-9500P-16 to "Abandonment of Underground Gas Facilities." See file attached.

SED's conclusion:

SED has reviewed the response and has accepted the same.

(6) TD-4820P-01 Rev: 0b, PG&E should add the revision publication date and effective date for rev. 0a under "Revision Notes".

PG&E's response:

PG&E recognized this concern and took the following corrective actions: Corrections included updating the Publication date to 02/28/20 and effective date to 05/28/2020, respectively. See file attached.

SED's conclusion:

SED has reviewed the response and has accepted the same.

(7) TD-4436P-06 Rev: 5d, publication and effective dates for prior Revision 5c and Revision 5b in Revision Notes section were missing. PG&E completed the corrections.

PG&E response:

PG&E recognized this concern and took the following corrective actions: Corrections included updating the Publication date from 5c to 05/19/2020 and 5b to 01/15/2019. See file attached.

SED's conclusion:

SED has reviewed the response and has accepted the same.

(8) TD-4413P-01, Rev: 3c, in the "Revision Notes", the "effective date" is earlier than the "publication date" for Revision 3b (Publication Date: 10/21/2021, Effective Date: 01/21/2021). PG&E confirmed that the date within the revision notes of Rev-3c is in error. PG&E should make the appropriate corrections.

PG&E's response:

PG&E recognized this concern and took the following corrective actions: Corrections included updating the Publication date to 02/25/21 and effective date to 03/12/21, respectively. See file attached.

SED's conclusion:

SED has reviewed the response and has accepted the same.

Post-Inspection Written Preliminary Findings

Dates of Inspection: January 10-14, 2022

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: Gas Transmission Operation & Maintenance and Emergency Plan (2021 update)

Assets (Unit IDs) with results in this report:

System Type: GT

Inspection Name: PG&E Transmission O&M Inspection - 2022

Lead Inspector: Sikandar Khatri

Operator Representative: Rosa Duenas

Unsatisfactory Results

No Preliminary Findings.

Concerns

No Preliminary Concerns.