

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 9, 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: 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 conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) Operation and Maintenance and Emergency Plans. The inspection took place between January 10-14, 2022.

SED's findings are noted in the Post-Inspection Written Preliminary Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records that SED inspected during the inspection. SED discovered eight concerns during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the concerns noted in the Summary.

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 "Terence Eng".

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Preliminary Findings

cc: Susie Richmond, PG&E
Claudia Almengor, SED
Dennis Lee, 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.

(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.

(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.

(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.

(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.

(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.

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

(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.

(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.

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.