

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 1, 2022

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

GI-2021-10-PGE-77-01ABC

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

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 January 4, 2022, regarding the findings identified during the General Order 112-F inspection of PG&E's Central Area (Rio Vista, Tracy, Stockton, and Yosemite Districts, including the Standard Pacific pipeline and the Bethany compressor station) from October 4th through October 15th and from October 25th through November 5th, 2021.

A summary of the inspection findings documented by SED, PG&E's response to the findings, and SED's evaluation of PG&E's response 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 Central Area 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 Victor Muller at (916) 327-6780 or by email at Victor.muller@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 and Responses

cc: Susie Richmond, PG&E Gas Regulatory Compliance
Glen Allen, PG&E Gas Regulatory Compliance
Claudia Almengor, SED
Jason McMillan, SED
Terence Eng, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 10/4/21-10/15/21 and 10/25/21-11/5/21

Operator: PACIFIC GAS & ELECTRIC CO

Operator IDs: 15007 (primary) 18608

Inspection Systems: Central Area

Assets (Unit IDs) with results in this report: Central Area (86288)

System Type: GT

Inspection Name: 2021 PG&E Central Transmission

Lead Inspector: Victor Muller

Operator Representative: Glen Allen

Unsatisfactory Results

No Preliminary Findings.

Concerns

Facilities and Storage: Compressor Stations (FS.CS)

Question 7. Do fenced areas around compressor stations have at least two gates that provide for easy escape to place of safety, and do gates located within 200 feet of any compressor plant open outward and able to be opened from the inside without a key when the station is occupied?

References 192.163(d)

Assets Covered Central Area (86288 (77))

Issue Summary During SED's inspection of Bethany Compressor Station, SED observed that most of the gates along the perimeter of the station fencing were chained and locked closed. There were two gates that could be opened from the inside without removing a chain: the gate with a push bar, east of the compressor building, and the main vehicle entrance to the station, southeast of the compressor building. SED had concerns that a person without keys exiting from the north or west sides of the station would have to pass by the compressor building to leave the station.

In response to SED's concerns, PG&E has updated the site safety plan for Bethany Compressor Station to require the chained exit gates to be unlocked while the station is occupied. PG&E also provided training on this plan change to the relevant personnel. PG&E has also generated a corrective to replace the locked gates with push gates.

SED finds PG&E's actions taken in response to this concern to be appropriate. SED recommends that PG&E review their site safety plans for PG&E's other compressor stations to ensure that similar potential safety risks are not present at other sites.

PG&E's Response PG&E agrees with SED's concern. As stated above, PG&E has updated the site safety plan for Bethany Compressor Station to require the chained exit gates to be unlocked while the station is occupied. PG&E also provided training on this plan change to the relevant personnel. PG&E has also generated a corrective to replace the locked gates with push gates. The estimate for installation of the new push gates is in the 2nd quarter of 2022.

In addition, PG&E GPOM personnel have inspected all other PG&E compressor stations and determined that the Bethany Compressor Station was the only facility identified as having locked, non-push type gates.

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.

Time-Dependent Threats: Internal Corrosion - Preventive Measures (TD.ICP)

Question 2. Do records document examination of removed pipe for evidence of internal corrosion?

References 192.491(c) (192.475(a), 192.475(b))

Assets Covered Central Area (86288 (77))

Issue Summary On two A-forms associated with order number 74022649 (TD-5100P-01-F03 dated 7/21/19 and 7/29/19), the internal surface of removed pipe was indicated as visible, but the results of the required internal corrosion inspections were not recorded. PG&E confirmed via email with the construction manager, that the while the inspections were not recorded, the inspections were performed, and no issues were found. PG&E stated that the A-forms were filled out electronically.

SED recommends that PG&E consider adding controls or logic to the electronic A-form to prevent similar errors from occurring in the future.

PG&E's Response PG&E agrees with SED's concern. As previously provided by email to SED lead auditor Victor Muller on December 1, 2021, the Pipe Inspection Form (PIF) is not a digital form in SAP. Currently it is being completed as a tech down (fillable pdf version) and submitted with as-built records. PG&E is in the process of starting an IT project in 2022 to update the current state of the PIF and incorporate it in SAP. The IT project team will schedule working sessions with stakeholders to discuss the data points and any necessary logics to be added.

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.