

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 23, 2021

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

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

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

Dear Ms. Quinones:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Victor Muller, Anthony Phu, Chirag (CJ) Patel, Matthew Shaffer, and Mohammad Nouredine conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) 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. The inspection included a review of the Central Area's records for the period of 2018 through 2020, as well as a representative field sample of the Central Area's facilities. SED staff also reviewed the Central Area's operator qualification (OQ) records, which included field observation of randomly selected individuals performing covered tasks.

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 and pipeline facilities that SED inspected during the inspection. SED discovered two 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 violations and concerns noted in the Summary.

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 "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 Gas Regulatory Compliance
Paul Camerena, PG&E Gas Regulatory Compliance
Claudia Almengor, 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.

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 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.