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January 4, 2022

Mr. Terence Eng
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: State of California – Public Utilities Commission
General Order 112-F Inspection of PG&E's Central Area Transmission

Dear Mr. Eng:

The Safety and Enforcement Division (SED) of the CPUC conducted a General Order 112-F inspection of PG&E's Central Area Transmission (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. On December 23, 2021, the SED submitted their inspection report, identifying two concerns. Below is PG&E's response to the SED inspection report.

Concern 1: [192.163(d)] 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?

SED's Concern: 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.

Concern 2: [192.491(c) (192.475(a), 192.475(b))] Do records document examination of removed pipe for evidence of internal corrosion?

SED's Concern: 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.

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.

Please contact Glen Allen at (925) 278-3462 or Glen.Allen@pge.com for any questions you may have regarding this response.

Sincerely,

/v/ Susie Richmond
Manager, Regulatory Compliance

Attachments

cc: Victor Muller, CPUC
Dennis Lee, CPUC
Jason McMillan, CPUC
Claudia Almengor, CPUC