

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 12, 2021

Christine Cowser
VP, Gas Asset Management and System Operations
Pacific Gas and Electric Company
Gas Transmission and Distribution Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

GI-2021-05-PGE-07-02ABC

SUBJECT: General Order (GO) 112-F Gas Inspection of PG&E's De Anza Division

Dear Ms. Cowser:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Yi (Rocky) Yang, Wai-Yin (Franky) Chan, Hengyao (Henry) Chen and Ragib Arefin conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) De Anza Division from 5/17-21 and 5/24-28, 2021. The inspection included a virtual review of the Division's operation and maintenance records for the years 2017 through 2020, and a field inspection of a representative sample of the Division's facilities. SED staff also reviewed the Division's operator qualification records, which included a 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 records and pipeline facilities that SED inspected.

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 Yi (Rocky) Yang at (415) 940-8639 or by email at yi.yang@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 Camarena, PG&E Gas Regulatory Compliance
Terence Eng, SED
Claudia Almengor, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 05/17-21/2021 and 05/24-28/2021

Operator: PACIFIC GAS & ELECTRIC CO

Operator ID: 15007 (primary)

Inspection Systems: De Anza Gas Distribution

Assets (Unit IDs) with results in this report: De Anza Division (85400)

System Type: GD

Inspection Name: 2021 PG&E DeAnza Division

Lead Inspector: Yi Yang

Operator Representative: Sajjad Azhar

Unsatisfactory Results

Design and Construction: Pressure Testing (DC.PT)

Question 1. Do records indicate that pressure testing is conducted in accordance with 192.513?

References 192.517(b) (192.513(a), 192.513(b), 192.513(c), 192.513(d))

Assets Covered De Anza Division (85400 (7))

Issue Summary SED reviewed selected Leak Repair Forms and Project Records. Those records showed that PG&E did not document the temperature during the pressure test of plastic pipes.

Per §192.513 (d), during the test, the temperature of thermoplastic material may not be more than 100 °F (38 °C), or the temperature at which the material's long-term hydrostatic strength has been determined under the listed specification, whichever is greater.

- PG&E failed to demonstrate the compliance of this code section with their pressure testing records. The ambient temperature can be more than 100 °F in some areas, and the pressurized gas can have higher temperature than the ambient temperature. Without temperature monitoring during the pressure test, the plastic pipe could exceed 100 °F.

SED believes that PG&E should have a way of documenting the temperature during plastic pipe pressure test to show compliance with §192.513 (d).

- PG&E's existing Procedure TD-4138P-01 relative to this code requirement states that "the surface temperature for thermoplastic material must not be more than 100°F". However, the procedure does not specify what device should be used or how to measure the pipe temperature.

SED suggests that PG&E modify the procedure to include the process for verifying temperature during plastic pipe pressure testing.

Concerns

Design and Construction: Construction (DC.CO)

Question 7. Do records indicate persons inspecting the making of plastic pipe joints have been qualified?

References 192.287 (192.807(a), 192.807(b))

Assets Covered De Anza Division (85400 (7))

Issue Summary SED reviewed A-Form records that did not include a plastic joining inspection section.

PG&E explained that they made changes to the Leak Repair Form (A-Form) to include documentation of plastic joint inspection. They have not published the new A-Form. The old form did not have a plastic joining inspection section.

PG&E should update SED on the publish date of the new A-Form.

Design and Construction: Materials (DC.MA)

Question 1. Are pipe, valves, and fittings properly marked for identification in accordance with the requirements of 192.63?

References 192.63(a) (192.63(b), 192.63(c), 192.63(d))

Assets Covered De Anza Division (85400 (7))

Issue Summary During field visit at the Shoreline & Middlefield regulator station, SED observed that one of the fire valves was tagged as **49-E4F** onsite, which matched the station diagram. However, in the Gas+ mobile app, the valve was identified as **3349-E4F**.

SED suggests that PG&E follow a consistent naming system for all equipment in order to avoid confusion.

Maintenance and Operations: Gas Pipeline Operations (MO.GO)

Question 3. Are lines being purged in accordance with 192.629?

References 192.629(a) (192.629(b))

Assets Covered De Anza Division (85400 (7))

Issue Summary SED observed that during purging of gas at the regulator station at Shoreline & Middlefield, a PG&E employee released the gas at ground level using a rubber tube. He then put a traffic cone on top of the tube to prevent it from moving while the gas was released.

SED believes this way of purging the gas was improper and unsafe. SED requested PG&E's procedure on purging gas but did not see the "purge gas above head" requirement. Although CFR Part 192 does not require gas to be purged above head, it is a better practice to release gas above head into the air with a solid stack to prevent damage to plants and reduce the inhalation of gas. SED suggests that PG&E make "purge gas above head with a stack" as the standard practice in related procedures to ensure the gas is released in a way that does not disturb the environment and is safe for people around the gas purging site.