

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



April 21, 2021

GI-2021-03-PGE-29-09

Ms. Christine Cowsert, VP  
Gas Asset Management and System Operations  
6121 Bollinger Canyon Road  
San Ramon, CA 94583

**SUBJECT: General Order (GO) 112-F Gas Inspection of PG&E's Distribution Integrity Management Program (DIMP) – Follow up and review of DIMP Projects**

Dear Ms. Cowsert:

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) Distribution Integrity Management Program (DIMP) which entailed follow-up and review of DIMP projects. The inspection took place between March 1-5 and 8-12, 2021.

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 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 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](mailto:Sikandar.Khatri@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "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  
Vincent Tanguay, PG&E  
Mahmoud Intably, SED  
Dennis Lee, SED

# Post-Inspection Written Preliminary Findings

**Dates of Inspection:** March 1-5 and 8-12, 2021

**Operator:** PACIFIC GAS & ELECTRIC CO

**Operator ID:** 15007 (primary)

**Inspection Systems:** Distribution

**Assets (Unit IDs) with results in this report:** Main Office (Specialized Inspections) (86283)

**System Type:** GD

**Inspection Name:** PG&E DIMP Inspection - 2021

**Lead Inspector:** Sikandar Khatri

**Operator Representative:** Paul Camarena

## Unsatisfactory Results

*No Preliminary Findings.*

## Concerns

### Design and Construction : Construction (DC.CO)

(1) Question 5. Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285?

References 192.285(d) (192.285(a), 192.285(b), 192.285(c), 192.807(a), 192.807(b))

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary During SED's DIMP inspection in 2017, it was pointed out that PG&E should document names of joiners for each plastic joint made, for example on documents like GSR (Gas Service Record) or As-Built or elsewhere. During this inspection, it was observed that some of GSRs had a 'red stamp' that lists names of joiners/welders and others as applicable (for example, GSRs for PM # 31125322). However, GSRs for some other projects did not have this 'red stamp'. Therefore, until PG&E comes up with other alternative, it should use the 'red stamp' approach for GSRs/As-Built to document the names of joiners/welders, as applicable.

## **Gas Distribution Integrity Management : Identify Threats (GDIM.TH)**

(2) Question 4. In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline?

References 192.1007(b)

Assets Covered Main Office (Specialized Inspections) (86283 (29))

Issue Summary PG&E is aware of the fact of sulfur deposition in filters at regulating stations which has also been observed by SED staff during a number of inspections. PG&E has procedures to handle this once the sulfur deposits are found, however, PG&E DIMP team should investigate it as a potential threat. Therefore, PG&E DIMP team should collect existing information/data, investigate for the causes and devise mitigation measures for the same.