

**2021 DIMP Inspection SED Responses**

#	Finding Type	Topic	Code Reference	SED Finding	PG&E Response	Associated Attachment (File Name)
1	Concerns	Records	192.285(d) 192.285(a) 192.285(b) 192.285(c) 192.807(a) 192.807(b)	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.	Joiner information is currently an optional field in GSRs, found in page 2 of the GSR template, TD-9500P-14-F01 (lower left hand corner, "connections" section). If the joiner info is provided, the crew is given guidance per GSR Instructions Job Aid, TD-9500P-14-JA01 (page 18). A copy of a GSR and associated job aid are attached.  As stated in our 2017 DIMP audit response letter, PG&E believes that a successful implementation of pipe joiner tracking will require a technology solution on a mobile platform that allows the capture of this data in near real time and in a digital format that is query-able for joiner tracking and traceability. PG&E is still determining the best technology solution to capture this information.	<a href="#">Att01 - TD-9500P-14-F01.pdf</a> <a href="#">Att02 - TD-9500P-14-JA01.pdf</a>
2	Concerns	Records	192.1007(b)	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.	PG&E recognizes CPUC's concern and recommendation regarding sulfur deposition in filters and regulating stations. We will monitor this issue as possible threat to our system as per our existing threat monitoring procedure, detailed in Attachment G of the DIMP manual. This stipulates that DIMP will conduct quarterly review of data sources such as PHMSA bulletins, NSTB Accident Reports, Material Problem Reports, etc. to monitor for new threats.	