PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

July 9, 2021

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

GI-2021-06-PGE-05-02ABC

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

Dear Ms. Cowsert:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Wai Yin (Franky) Chan, Yi (Rocky) Yang, Hengyao (Henry) Chen, and Ragib Arefin conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) San Francisco Division (Division) from June 14 to June 25, 2021. The inspection included a review of the Division's records for the period of 2017 through 2020, as well as a representative field sample of the Division's facilities. SED staff also reviewed the Division'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 one violation and four 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 Wai Yin (Franky) Chan at (415) 703-2482 or by email at wai-yin.chan@cpuc.ca.gov.

Sincerely,

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
Claudia Almengor, SED

# Post-Inspection Written Preliminary Findings

**Dates of Inspection:** 6/14/2021 to 6/25/2021

**Operator:** PACIFIC GAS & ELECTRIC CO

**Operator ID:** 15007 (primary)

**Inspection Systems:** San Francisco Division

**Assets (Unit IDs) with results in this report:** San Francisco Division (85402)

**System Type:** GD

**Inspection Name:** 2021 PG&E San Francisco Division

**Lead Inspector:** Wai-Yin Chan

**Operator Representative:** Paul Camarena, Sajjad Azhar, Alberta Ekukinam, and Anthony Kwong,

# Unsatisfactory Results

## Design and Construction : Pressure Testing (DC.PT)

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| 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 | San Francisco Division (85402) |
| 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.<br><br>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.<br><br>PG&E failed to demonstrate the compliance of this code section with their pressure testing record. 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. PG&E's procedure TD-4138P-01 states that "the surface temperature for thermoplastic material must not be more than 100°F". However, TD-4138P-01 does not specify what device should be used or how to measure the pipe temperature.<br><br>SED believes that PG&E should have a way of documenting the temperature during plastic pipe pressure testing to show compliance of §192.513 (d). Therefore, PG&E is in violation of §192.513 (d).<br><br>SED also suggests that PG&E modify TD-4138P-01 to include the process for verifying temperature during plastic pipe pressure testing. |

# Concerns

## Maintenance and Operations : Gas Pipeline Overpressure Protection (MO.GMOPP)

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| Question | 4. Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations? |
| References | 192.709(c) (192.739(a), 192.739(b)) |
| Assets Covered | San Francisco Division (85402) |
| Issue Summary | For dual-run regulator station DR-198, PG&E record showed that the left run was left as working run at 50 psi in 2018, 2019 and 2020. PG&E later confirmed that it was a documentation mistake. The left run was left at 49 psi as the standby and the right run was left at 50 psi as the working run in 2019.<br><br>For dual-run regulator station DR-231, the right run was left at 8.5 w.c. as the working run on 11/27/19. During the next inspection on 5/8/20, the left run was still left as the working run at 8.5 w.c.<br><br>PG&E did not have any explanation on why the runs were not switched.<br><br>SED suggests that PG&E be more careful on documenting maintenance records and the supervisor should review the record thoroughly before signing on the record. |
| Question | 5. Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate? |
| References | 192.739(a) (192.739(b)) |
| Assets Covered | San Francisco Division (85402) |
| Issue Summary | During field inspection on 6/22/21 at DR-198, SED observed that the above ground regulator station did not have any sign to prevent unauthorized people from entering the station. There was graffiti drawn on the fence and the pipe.<br><br>PG&E said they would issue a ticket and put signs on the fence. On 6/25/21, PG&E provided the corrective action was scheduled as Notif #121593649, PM #44876316.<br><br>• PG&E should update SED the progress of the corrective action and provide evidence of completion.<br>• SED suggests PG&E take additional measurements to prevent unauthorized people from entering the station and protect PG&E's assets from vandalism. |

# Time-Dependent Threats : Atmospheric Corrosion (TD.ATM)

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| Question | 3. Do records document inspection of aboveground pipe for atmospheric corrosion? |
| References | 192.491(c) (192.481(a), 192.481(b), 192.481(c)) |
| Assets Covered | San Francisco Division (85402) |
| Issue Summary | Because a large number of meter set assemblies (MSAs) in San Francisco are inside locked doors or gates, the Division has a significant number of MSAs that are overdue for atmospheric corrosion (AC) inspections and leakage surveys (LS). Since the issue was reported in the 2017 SED inspection of this division, PG&E has provided monthly updates on the statistics of these AC and LS "can't get in" (CGI) situations. Based on the latest update, SED acknowledges that the total number of AC and LS CGIs in San Francisco has reduced from 75,004 and 19,975 at the time when PG&E reported this issue back in 2017 to 1,218 and 9,398, respectively.<br><br>SED also recognizes that the COVID-19 and Shelter-In-Place situation has made it more difficult for PG&E to reduce these AC and LS CGIs. Because many of these MSAs are inside locked doors or gates, inspecting them often requires interacting with the property owners or the public to get access to these MSAs and social distancing is sometimes not possible. Last year, PG&E had requested for waiver to extend the due dates to complete the AC and LS CGIs to minimize the potential health risk to both PG&E's workforce and the public. This waiver was granted by the Commission with Resolution M-4845 and it was effective as of November 10, 2020.<br><br>While SED recognizes the challenge to completely eliminate these AC inspections and LS CGIs backlogs, SED is still concerned with the significant number of current overdue AC inspections and leakage surveys. SED is requesting PG&E to continue providing required updates on the statistics of AC and LS CGIs by divisions until resolution of this issue. |
| Question | 4. Is pipe that is exposed to atmospheric corrosion protected? |
| References | 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c)) |
| Assets Covered | San Francisco Division (85402) |
| Issue Summary | On 6/24/21, SED found that at regulator station DR-227 there was atmospheric corrosion on the pipe. PG&E did not document the surface corrosion in 2020 during the regulator station inspection.<br><br>SED pointed out the AC problem and PG&E said they will issue a ticket to mitigate the atmospheric corrosion.<br><br>On 6/24/21, PG&E provided the corrective action ID number Notif #121594045, PM #44876480.<br><br>PG&E should update SED on the progress of the corrective action and provide evidence of completion. |