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March 10, 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 Gas Inspection of PG&E's Operation & Maintenance and Emergency
Plan (updates)

Dear Mr. Eng:

The Safety and Enforcement Division (SED) of the CPUC conducted a General Order 112-F inspection of PG&E's Operation & Maintenance and Emergency Plan (updates) from January 10, 2022 through January 14, 2022. On February 9, 2022, the SED submitted their inspection report, identifying eight concerns. Attached is PG&E's response to the CPUC inspection report; See 2022 O&M and EP SED Inspection Response – FINAL file for details.

Please contact Rosa Dueñas at (510) 298-7063 or Rosa.Duenas@pge.com for any questions you may have regarding this response.

Sincerely,

/v/ Susie Richmond
Manager, Regulatory Compliance

Attachments

Cc : Dennis Lee, CPUC
Sikandar Khatri, CPUC
Jerrod Meier, PG&E

2022 Operation Maintenance and Emergency Plan (updates) SED Inspection Responses

Topic/Question: Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?

Code Reference: 192.605(a)

#	SED Finding	PG&E Response	Associated Attachment
CONCERNS			
	SED observed a number of discrepancies, listed below, in the PG&E documents which should have been addressed during the updates or annual reviews required by Title 49 Code of Federal Regulations (CFR) §192.605(a). It is also important that PG&E staff have access to up-to-date and accurate information. SED reviewed only documents updated in 2021. PG&E should review all documents to make sure there are no other discrepancies and should conduct thorough annual reviews in future to avoid it.	PG&E recognizes this concern and has taken the following corrective actions listed below: - PG&E will be increasing the thoroughness of reviews to ensure dates and document references are validated.	Intentionally left blank
1	(1) SED sent a pre-audit data request for PG&E documents that have been changed/updated during the year 2021. PG&E sent the list, but there were a number of documents missing (for example, A39, TD-4012P-04 and others) from the list which SED used during the review of "TD-4192M_Rev0c". SED relies on the accuracy of the information provided by PG&E. In future, PG&E should provide accurate information, and perform the manual check if need to verify the accuracy of the information submitted to SED.	PG&E recognized this concern and took the following corrective actions: - PG&E will take steps to ensure that annual review data is pulled and examined consistently.	Intentionally left blank
2	(2) SED observed that for the following two documents the "effective date" is earlier than the "publication date". - TD-4110P-09 Rev. 6c (Publication Date: 12/15/2021 Effective Date: 02/01/2021) - M-11.2 4a (Publication Date: 12/18/2019 Effective Date: 03/18/2019) PG&E completed the corrections and changed the two Effective dates to 02/01/2022 and 03/18/2020, respectively.	PG&E recognized this concern and took the following corrective actions: Corrections included updating the Effective dates to 02/01/2022 and 03/18/2020, respectively. See files attached	TD-4110P-09 Rev. 6c M-11.2 4a
3	(3) A-34 Rev 6b refers to Gas Design Standard A-51 at a number of places. The title mentioned is "Cold Tap Branch Connection Requirements". However, PG&E confirmed that the title has been revised as "Branch Connection Requirements". PG&E should make the correction to the references in A-34 Rev 6b.	PG&E recognized this concern and took the following corrective actions: Corrections included updating the title for A-51 to "Branch Connection Requirements" in the document A-34. See file attached.	A-34 Rev 6a
4	(4) PG&E documents TD-4182P-01 Rev: 0a, TD-4411S Rev: 2a and TD-4810P-26 Rev: 0 refer to the document, GDS O-16, "Corrosion Control Standard". This Standard has been obsolete and have been replaced by a number of other documents. PG&E should make the correction. In addition, PG&E should look into other documents that refer to O-16 and make corrections, if needed.	PG&E recognized this concern and took the following corrective actions: Corrections included removing the reference to O-16 from TD-4810P-26, TD-4411S and TD-41810P-26. See file attached.	TD-4182P-01 Rev 0b TD-4411S Rev 2b TD-4810P-26 Rev 0a
5	(5) TD-5100P-01 section 3.4 has a reference to Utility Procedure TD-9500-16 with the title, "Deactivation and/or Retirement of Underground Gas Facilities." The title of this document has changed to "Abandonment of Underground Gas Facilities." PG&E should make the correction to the references in TD-5100P-01.	PG&E recognized this concern and took the following corrective actions: Corrections included updating the title for TD-9500P-16 to "Abandonment of Underground Gas Facilities." See file attached.	TD-5100P-01 Rev 1d TD-9500P-16
6	(6) TD-4820P-01 Rev: 0b, PG&E should add the revision publication date and effective date for rev. 0a under "Revision Notes".	PG&E recognized this concern and took the following corrective actions: Corrections included updating the Publication date to 02/28/20 and effective date to 05/28/2020, respectively. See file attached.	TD-4820P-01 Rev 0b
7	(7) TD-4436P-06 Rev: 5d, publication and effective dates for prior Revision 5c and Revision 5b in Revision Notes section were missing. PG&E completed the corrections.	PG&E recognized this concern and took the following corrective actions: Corrections included updating the Publication date from 5c to 05/19/2020 and 5b to 01/15/2019. See file attached.	TD-4436P-06 Rev 5d
8	(8) TD-4413P-01, Rev: 3c, in the "Revision Notes", the "effective date" is earlier than the "publication date" for Revision 3b (Publication Date: 10/21/2021, Effective Date: 01/21/2021). PG&E confirmed that the date within the revision notes of Rev-3c is in error. PG&E should make the appropriate corrections.	PG&E recognized this concern and took the following corrective actions: Corrections included updating the Publication date to 02/25/21 and effective date to 03/12/21, respectively. See file attached.	TD-4413P-01 Rev 3c