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

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to Post-Inspection Written Preliminary Findings (Summary), dated July 12, 2021. The actual inspection was held between May 17, 2021 and May 28, 2021.

Unsatisfactory Result:

Question Text	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))
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.

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 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.

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).

The Procedure TD-4138P-01 PG&E has related 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 also suggest that PG&E modify the procedure to include the process for verifying temperature during plastic pipe pressure testing.

Response to Unsatisfactory Result:

While PG&E understands that §192.513 (d) does not require recording of pipe temperature during test, PG&E agrees that the procedures could be improved to provide clarity regarding pipe temperature. PG&E will review its procedures to ensure the requirements are fully met.

Concern #1:

Question Text	Do records indicate persons inspecting the making of plastic pipe joints have been qualified?
References	192.287 (192.807(a), 192.807(b))
Issue Summary	PG&E has made changes to the Leak Repair Form (A-Form) to include documentation of plastic joint inspection. SED selected A-Form record showed that no plastic joining inspection was filled out. PG&E explained that they haven't published the new A-Form and the old one did not have plastic joining inspection section. PG&E should update SED the publish date of the new A-Form.

Response to Concern #1:

A new A-form that became effective July 2021 includes plastic joining inspection section. Please see "Attachment 1" for a copy of the A-form.

Concern #2:

Question Text	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))
Issue Summary	During field visit at the Shoreline & Middlefield regulator station, SED observed that one of the fire valve 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 suggest that PG&E follow a constant naming system for all valves in order to avoid confusion.

Response to Concern #2:

PG&E's map+ app and GD-GIS includes the complete plat number (e.g. 3349-E4F) that can be viewed by PG&E employees throughout PG&E territory. The complete plat number helps PG&E employees to narrow it down to the specific division where the digits "33" designates a particular area within the system. However, since the local GPOM employees are already working in that specific area, the valve tag shows 49-E4F only omitting the "33" in front of it. PG&E GPOM team is aware of this convention and acknowledges the differences. Furthermore, when searching for the valve (in GD-GIS), the valve can be located entering the numbers either way thus eliminating any confusion.

Concern #3:

Question Text	Are lines being purged in accordance with 192.629?
References	192.629(a) (192.629(b))
Issue Summary	SED observed that during purging of gas at regulator station Shoreline & Middlefield, PG&E employee released the gas on the ground using a rubber tube with a traffic cone on top of it.

SED believe this was not a proper way of purging the gas. PG&E should have a procedure to purge gas in a way that does not disturb the environment and people passing by.

Response to Concern #3:

Please see “Attachment 2” for PG&E purging procedure. In the above-mentioned case, PG&E employee was purging using Parker Parflex (psi rating of 5000) to the atmosphere as required by 192.629. Since the incident the employee has received tailboard to use tools in the future that would keep the purging process steadier.

Please contact Sajjad Azhar at (415) 418-9046 or slat@pge.com for any questions you may have regarding this response.

Sincerely,

/s/ Vincent Tanguay

Director, Risk, Compliance, & Oper. Qual.

cc: Dennis Lee, SED
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