

APPENDIX A

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 30, 2020

Christine Cowsert
Vice President
Gas Asset Management & System Operations
Pacific Gas and Electric Company
6111 Bollinger Canyon Road
San Ramon, CA 94583
Email: Christine.Cowsert@pge.com

Re: General Order 112-F Section 101.3 Waiver Request for 49 CFR § 192.465(a) External Control Monitoring Due to Closure at Los Vaqueros Reservoir and Watershed Due to Nesting of Golden Eagles

Dear Ms. Cowsert:

This letter grants a request from Pacific Gas and Electric Company (PG&E) for a waiver until August 21, 2020 of the 49 CFR § 192.465(a) inspection requirement at certain facilities in the Los Vaqueros Reservoir and Watershed due to golden eagle nesting. I am informed that the Commission's Safety and Enforcement Division does not oppose the waiver request.

On June 2, 2020, PG&E submitted a waiver request to SED for an approximately two-month extension from the current due dates to complete Leak Surveys and Atmospheric Corrosion Inspections where a "Can't Get In" situation exists. In this case, you have explained that on March 4, 2020, a PG&E Corrosion Technician traveled to the Los Vaqueros Watershed area in order to collect cathodic protection pipe-to-soil data in accordance with 49 CFR § 192.465, External Corrosion Control Monitoring. The technician found the location to be closed by the Contra Costa County Water District due to the nesting of golden eagles in the area. You state that the area is scheduled to reopen in "late June," noting that "Since we are dealing with wildlife and their annual habits can be unpredictable, we are respectfully requesting a waiver to extend the due date of this task to August 21, 2020."

You state that the cathodic protection pipe-to-soil data was last collected at this location in March 2019, resulting in the last compliant dates to perform maintenance in June 2020. The impacted locations affected by this letter appear in Attachment A, which is your June 2, 2020 letter.

My review of General Order 112-F indicates that waivers to comply with the inspection and monitoring requirements are formally adopted by this Commission. While in the ordinary course of

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Ms. Cowser
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business, a utility would formally apply to the Commission for a waiver, I am issuing this directive under the authority granted by Commission Policy CL-1, which states:

It is the Commission's policy that:

4. The executive Director shall have the authority to act expeditiously and in coordination with other agencies of the State of California in emergencies endangering the public health, safety and the environment....

I intend to obtain ratification by the full Commission of the actions directed by this letter at a future Commission meeting to further satisfy the General Order's provisions regarding waivers.

Sincerely,



Alice Stebbins
Executive Director

cc: Leslie Palmer, Safety and Enforcement Division
Terence Eng, Gas Safety and Reliability Branch

ATTACHMENT A



**Pacific Gas and
Electric Company™**

Christine Cowser
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June 2, 2020

Mr. Terence Eng
Gas Safety and Reliability Branch
Safety and Enforcement Division Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Reference: GO 112-F Section 101.3 Waiver Request for 49 CFR§ 192.465(a). External Control Monitoring Due to Closure at Los Vaqueros Reservoir and Watershed Due to Nesting of Golden Eagles

Dear Mr. Eng,

On March 4, 2020, a PG&E Corrosion Technician traveled to the Los Vaqueros Watershed area in order to collect cathodic protection pipe-to-soil data in accordance with 49 CFR §192.465 - External corrosion control: Monitoring. The technician found the location to be closed by the Contra Costa County Water District due to the nesting of golden eagles in the area. For this reason, we are respectfully requesting a two-month extension from the current due dates for this monitoring requirement.

Going forward, as a result of this closure we will be adjusting the future maintenance schedules in order to avoid the nesting season. Eagles are protected by the Bald and Golden Eagle Protection Act (16 United States Code 668) and Migratory Bird Treaty Act (Title 16 USC 703). Bald and golden eagles are also fully protected by the California Department of Fish and Wildlife (California Fish and Game Code Section 3511).

Our cathodic protection pipe-to-soil data was last collected at this location in March 2019, resulting in our last compliant dates to perform maintenance in June 2020. The area is scheduled to reopen in "late June." Since we are dealing with wildlife and their annual habits can be unpredictable, we are respectfully requesting a waiver to extend the due date of this task to August 21, 2020. Below we have provided the SAP notification and order numbers of the prior three years of pipe to soil readings.

Impacted Locations:

Location	SAP Order Number	SAP Notification Number	Functional Location	Asset Identification	Mandatory Compliance Date
1	44188301	118516153	GT.TM.BBAY.303	ETS, POTENTIAL, L303. MILE POINT 13.1	6/22/2020
2	44188301	118516127	GT.TM.BBAY.114_P4	ETS, POTENTIAL, L114. MILE POINT 21.3	6/22/2020
3	44188278	118516085	GT.TM.BBAY.303	COUPON, L303. MP 13.03	6/21/2020

Prior 3 Year Maintenance History-192.465 External corrosion control: Monitoring

Pipe-To-Soil Readings 2017 – 2019 (all CP data is negative)

Location	SAP Order.#	SAP Notification #	2017 Data	Date Maintenance Performed	2018 Data	Date Maintenance Performed	2019 Data	Date Maintenance Performed
1	44188301	118516153	-1116	3/20/17	-1262	3/9/18	-1381	3/22/19
2	44188301	118516127	-1590	3/17/17	-1562	3/9/18	-1752	3/22/19
3	44188278	118516085	N/A	N/A	ON -1292 OFF -1101 NATIVE -451	5/7/18	ON -1362 OFF-1118 NATIVE -371	3/21/19

Anticipated impact, risk and mitigation include the following:

Impacts of the waiver request:

Implementing this waiver will ensure we avoid environmental impact in regard to disturbing the protected species currently in nesting season. Both safety and reliability impacts result from delaying the corrosion protection inspection of these assets. These impacts will be minimal as the inspections on these assets will be completed 30-60 days past the 15th month mark for this year only.

Probability of the Impact

There is a very low probability that a reliability issue with the Cathodic Protection system is present. We do not anticipate that this waiver would have any significant impact on Safety. This is a Class 1 location, with cathodic protection levels exceeding the required minimums. There are no outstanding maintenance or reliability issues at this location.

Safeguards to Mitigate Impacts

The maintenance plans will be adjusted so that, moving forward, these inspections will be completed outside the nesting season of the protected species. All future years will meet the 192.465 requirements; by shifting the schedule we'll only be missing the "not to exceed 15 months" timing requirements for this year.

We appreciate your consideration of PG&E's waiver request and look forward to answering any questions you may have.

Sincerely,

/s/ Christine Cowsert

Vice President, Gas Asset Management & System Operations

cc: Leslie Palmer, CPUC

Dennis Lee, CPUC

Meredith Allen, PG&E

Vince Tanguay, PG&E

Vincent Gaeto, PG&E

Susie Richmond, PG&E

Attachments : Asset Location Map

Notification: Closure at Los Vaqueros Reservoir and Watershed Due to Nesting of Golden Eagles