

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 5, 2013

Ms. Jane Yura
Vice President, Gas Operations, Standards and Policies
Pacific Gas & Electric Company
6121 Bollinger Canyon Road
Office # 4460A
San Ramon, CA 94583

GA2012-03

SUBJECT: GO 112-E Gas Audit of PG&E's Willows District

Dear Ms. Yura:

On behalf of the Safety and Enforcement Division (SED), formally the Consumer Protection and Safety Division, of the California Public Utilities Commission, George Carter, Terence Eng, and Alin Podoreanu conducted a General Order 112-E audit of Pacific Gas and Electric Company's (PG&E) Willows District (District) from April 9-13, 2012. The audit included a review of the District's operation and maintenance records for the years 2008 through 2011 as well as a field inspection of a representative sample of the District's facilities. SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records and pipeline facilities that SED inspected during the audit.

Pursuant to Commission Resolution ALJ-274, SED staff has the authority to issue citations for each violation found during the audit. SED will notify PG&E of the enforcement action it plans to take. If you have any questions, please contact Terence Eng at (415) 703-5326.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Robertson".

Michael Robertson
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings
PG&E's Internal Audit Findings

cc: Frances Yee, PG&E Gas Engineering and Operations
Larry Berg, PG&E Gas Regulatory Support
Larry Deniston, PG&E Gas Regulatory Support
Dennis Lee, SED
Terence Eng, SED

SUMMARY OF INSPECTION FINDINGS

PG&E's Internal Audit Findings

Prior to the start of the April 9-13, 2012 audit, PG&E provided SED its findings from the internal audits it conducted of the District. Some of PG&E's internal audit findings are violations of PG&E's operations and maintenance standards, and are therefore violations of Title 49 Code of Federal Regulations (CFR), §192.13(c). All of the violations that PG&E identified are noted in the following table.

All of PG&E's Internal Review findings were corrected prior to the start of the SED audit.

Willows District Internal Review Summary

Item	Title 49 CFR Part 192	Topic - Findings	Number of Violations	Year(s) Violations were Discovered
1	192.13(c)	Emergency Valves - Inoperable Valve	10	2008, 2011
2	192.13(c)	Emergency Valves - Valve Card Missing signature	32	2008, 2009, 2010
3	192.13(c)	Emergency Valves - Valve Card Missing employee Lan ID	"Several"	2010
4	192.745(a)	Emergency Valves - Missing Maintenance	2	2009
5	192.13(c)	Emergency Valves - White-out used on valve card	3	2010, 2011
6	192.13(c)	Emergency Valves - Valve actuators were not in PLM	4	2010
7	192.13(c)	CP / Damage Prevention - Did not use proper span inspection form	1	2011
8	192.465(a), 192.13(c)	CP / Damage Prevention - No pipe-to-soil potential measured. Not corrected or addressed within 60 days.	2	2011
9	192.13(c)	Station Maintenance - Missing supervisor signature	3	2009, 2010
10	192.13(c)	Station Maintenance - OM&I reviews missing	2	2009
11	192.13(c)	Station Maintenance - Pencil used on station maintenance form	1	2008
12	192.13(c)	Station Maintenance - Outdated Pipeline patrol form used	1	2011

Willows District Internal Review Summary (continued)

Item	Title 49 CFR Part 192	Topic - Findings	Number of Violations	Year(s) Violations were Discovered
13	192.13(c)	Odorization - Missing odorization report	1	2011
14	192.13(c)	Equipment Calibration - Missing reads	6	2010
15	192.13(c)	Equipment Calibration - Missing documentation	1	2011