

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 14, 2020

Ms. Christine Cowsert, Vice President
Pacific Gas and Electric Company
Gas Asset Management and System Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

SUBJECT: Notice of Gas Incident Violations for Pacific Gas and Electric Company

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following Notice Of Probable Violations (NOPV) for non-DOT reportable incident investigations completed as of the second quarter of 2019. This letter serves as notification to you that as a result of our investigations, SED found Pacific Gas and Electric Co. (PG&E) in violation of the following:

1. Title 49 Code of Federal Regulations (CFR) §192.605(a) states in part:

“(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.”

2. Title 49 Code of Federal Regulations (CFR) §192.605(b)(3) states in part:

“(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations: ...

(3) Making construction records, maps, and operating history available to appropriate operating personnel.”

3. Title 49 Code of Federal Regulations (CFR) §192.605(b)(5) states in part:

“(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations: ...

(5) Starting up and shutting down any part of the pipeline in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and controlling devices”

The summary of the identified violation is listed in Attachment A of this letter. Please provide a written response within 30 days of the date of this letter indicating the measures taken by PG&E to address the violation.

For any questions, please contact Mohammad Ali at (916) 928-2109 or by email at MA5@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

CC: Susie Richmond / PG&E
Mohammad Ali / SED-GSRB
Terence Eng / SED-GSRB

ATTACHMENT: List of Incidents with Probable Violations

Attachment A
List of Incident(s) with Probable Violation(s)

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Findings	Code Violation(s)
G20171004-2369	10/2/2017	<div style="background-color: black; width: 100px; height: 40px; margin-bottom: 5px;"></div> Firebaugh	PG&E	N/A	<p>On 9/28/2017, PG&E technicians were inspecting a customer primary set serving a Large Volume Customer (Olam Spices) in response to high pressure alarm notifications received earlier that morning, when an overpressurization event occurred (MAOP is reported to be 60 psig). During inspection, PG&E technicians manually throttled the bypass valve to maintain supply to the customer. Although the technicians were said to be monitoring the gauge, they failed to observe the increase in pressure for 20 minutes. PG&E's standard TD-4540P-01 "Maintenance of Regulator Stations" currently do not address the use of bypass valves to maintain supply to customer. Based on the information gathered, SED found that PG&E's procedure does not adequately address 49 CFR §192.605(b)(5) which requires operators to include procedures for starting up and shutting down any part of the pipeline in a manner designed to assure operation within the MAOP limits plus the build-up allowed. PG&E must include guidance to its personnel on the maintenance of customer primary sets, the use of bypass valves when maintaining supply downstream, and emphasize the importance of monitoring pressures during maintenance.</p>	49 CFR §192.605(b)(5)

G20171016-2387	10/16/2017	Derrick Avenue and Palmer Avenue, Coalinga	PG&E	N/A	<p>On 10/13/2017, PG&E was gathering pressure data from Large Volume Customers when it discovered that the meter set assembly (MSA) for GCUST20344 had a pressure of 465 psig, exceeding its maximum allowable operating pressure (MAOP) of 200 psig. PG&E's Measurement and Control Lab found sulfur in the regulation equipment and that the poor working condition of the regulation equipment was the cause of the overpressurization. Based on the information gathered, SED found PG&E in violation 49 CFR §192.605(a) for: (1) failure to follow PG&E procedure TD-4540P-02 Section 5 by not downloading the electronic pressure recording and reviewing the data following the 8/29/2016 and 8/29/2017 maintenance and; (2) failure to follow PG&E procedure when the maintenance crew installed a test gauge on the bypass line instead of installing a test gauge downstream of regulation and the outlet valve as required in TD-4540P-02 during the 8/29/2017 maintenance. Furthermore, SED is concerned that PG&E's current procedures insufficiently address abnormal operations which led to the overpressurization not being detected during the 8/29/2017 maintenance. PG&E procedure TD-4530P-04 "Performance Checks and Maintenance of Turbine Gas Meters" does not require personnel to verify "as-found" upstream and downstream pressure prior to performing meter maintenance. Similarly, PG&E procedure TD-4540P-02 "Maintenance of Gas Regulation Equipment on Meter Set Assemblies" allows for missed opportunities to detect similar abnormal conditions when multiple maintenance tasks are performed since the "as-found" pressure can be taken after pressure has been relieved from the facilities during performance of previous tasks, as was the case on 8/29/2017 when the PG&E crew performed performance check of the turbine gas meter prior to maintaining the gas regulation equipment on the MSA.</p>	49 CFR §192.605(a)
----------------	------------	--	------	-----	--	--------------------

G20180216-2497	02/16/2018	[REDACTED], San Francisco	PG&E	Mitchell Engineering	<p>On 02/16/2018, a third-party contractor struck a gas service line with a mini excavator, resulting in an unintentional release of gas. The contractor had a valid Underground Service Alert (USA) ticket (W734700952), however according to PG&E, due to a weak locating signal, a PG&E locator was required to use maps to determine the location of the service, resulting in markings that were off by approximately 5 feet. PG&E's map for this service line incorrectly indicated a 1/2" plastic service instead of 1" plastic service, and did not indicate an offset of approximately 5 feet east of the actual service line marking. Based on SED's investigation, this incident was caused by PG&E's violation of Title 49 CFR § Part 192.605(b)(3) for failing to provide their Mark and Locate personnel with accurate information which contributed to the mismarking of the gas service line.</p>	49 CFR §192.605(b)(3)
----------------	------------	---------------------------	------	----------------------	---	-----------------------