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Non-DOT NOPV Q4 - 2022

February 24, 2023

Mr. Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Notice of Gas Incident Violations (NOPV) for Pacific Gas and Electric Company (PG&E)

Dear Mr. Lee:

Pacific Gas and Electric Company (PG&E) submits this response to the Safety and Enforcement Division’s (SED) Notice of Probable Violations (NOPV) letter dated January 26, 2023, associated with non-DOT reportable incident investigation completed as of the fourth quarter of 2022 – Q4 2022. For clarity, Attachment A of SED’s NOPV letter is repeated below followed by PG&E’s responses.

PUC ID: G20220901-3422:

Date 09/01/22
Address Union Street and Sea Avenue, Eureka, Humboldt County
Code Reference Title 49 CFR §192.605(a)

Investigative Finding:

On September 1, 2022, an overpressure event occurred on a section of the pipeline inside the distribution regulator station (HU_EUR_RR30) due to a leaking by-pass valve (V-3) and PG&E field crew’s incorrect operation. The highest pressure reached 127.3 PSIG which was 154.6% above the maximum allowable operation pressure (MAOP) of 50 PSIG. The overpressure pipe section was vented to 0 PSIG and the leaking valve was repaired before field crew contacted gas distribution control center (GDCC). A post-incident leak survey was conducted on the same day, and no leak was found. SED found PG&E in violation of Title 49 CFR, Part 192, §192.605(a) for failing to follow Utility Procedure TD-4441P-01.

Response to G20220901-3422:

PG&E notes that bypass valve V-3 is a plug valve. Plug valves rely on lube/sealant injected under high pressure into the annular space between the plug and valve body to keep from leaking. The leak was internal to the valve, from upstream to downstream inside the pipe. Pressurized gas worked its way around the plug and plug sealant into the downstream piping at a slow but steady rate. When the field crew discovered the over-pressured piping, they vented the trapped overpressure gas and took steps to slow/eliminate the weep by injecting lube/sealant into V-3, to create a good dispersion of lube/sealant onto all surfaces of the plug. The injection process took place on September 1, 2022, at 0800, immediately after the discovery and venting of the over-pressured section of piping.

PG&E notes that a “Quick Hit” email was sent to Gas Operations system-wide, which includes Gas Control, on September 1, 2022, with a brief description of the over pressure event and the initial corrective actions taken.

The PG&E employee responsible for the incorrect operation was counseled immediately after the incident. Furthermore, PG&E’s clearance writing team has been advised to ensure that there is not a ‘bottle’ situation when a clearance is created to avoid recurrence of a similar incident. Going forward, PG&E is planning to replace plug valves, that are slated for replacement, with ball valves that allows for utilizing the body cavity to create a double block and bleed. This action will also help prevent a similar incident in the future. Finally, PG&E plans to remove by-pass valve V-3 and replace 4” valve T79 at the regulator station to improve the conditions. Please see **Attachment 1** (PG&E Job ID V-968) for a copy of 60% design of the project that is currently under review.

Please contact [REDACTED] at [REDACTED] or [REDACTED] for any questions you may have regarding this response.

Sincerely,



Kristina Castrence
Director, Gas Regulatory and Risk

cc: Terence Eng, SED-GSRB
Mohammad Ali, SED-GSRB
Joel Tran, SED-GSRB
Hengyao Chen, SED-GSRB
Christine Cowsert, PG&E
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