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July 25, 2022

Mr. Dennis Lee, P.E.
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 for Pacific Gas and Electric Company – NOPV for non-DOT incident investigations completed as of the second quarter of 2022 - Q2 2022

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 July 12, 2022, associated with non-DOT reportable incident investigations completed as of the second quarter of 2022 - Q2 2022. For clarity, the overpressure (OP) incident identified in Attachment A of SED’s NOPV letter is repeated below followed by PG&E’s response.

PUC ID: G20220129-3330:

Date	01/29/2022
Address	██████████ Leveroni Road, Sonoma County:Sonoma
Code References	49 CFR §192. 605(b)(3), §192. 605(a), §192. 740(b) and PU Code §451
Investigation Findings	On January 29, 2022, at approximately 1300 hours, PG&E identified an overpressure event occurred at ██████████ Leveroni Road in Sonoma due to a farm tap leak by malfunctioning equipment. The highest pressure reached was 75 PSIG, which was 25% above the maximum allowable operating pressure (MAOP) of 60 PSIG. There were no reports of injuries, fatalities, or customer impact regarding this incident. This incident is being reported due to exceeding MAOP plus allowable build up. Based on the information gathered, SED found PG&E in violation of Title 49 CFR, Part 192, §192.605(a) for failing to follow Utility Standards, §192.605(b)(3) for failing to make construction records, maps, and operating history available to appropriate operating personnel, § 192.740(b) for failing to test the farm tap regulator set every 3 calendar years, not exceeding 39 months, and PU Code §451 for failing to maintain the farm tap regulator set.

Response to G20220129-3330:

PG&E recognizes SED’s findings. Please note that all causes, (apparent and contributing) with associated corrective actions were self-identified by PG&E in the previously provided Causal Evaluation, “Index 15520-02 Supp02_122903182 OP Leveroni Rd Final 040122_CONF”, submitted 4/7/2022.

Below, please find Attachment 1 for an update on all corrective actions from PG&E’s Causal Evaluation related to this OP event. On 3/4/2022, PG&E completed work to replace the Farm Tap, including new High Pressure

Regulation (HPR) and relief equipment, and installed a new service line to the customer. The temporary Compressed Natural Gas (CNG) tank was removed and the single customer at [REDACTED] Leveroni Road returned to service.

Please contact Glen Allen at (925) 278-3462 or Glen.Allen@pge.com for any questions you may have regarding this response.

Sincerely,



Jerrod Meier
Director of Risk, Compliance and Standards Engineering
Pacific Gas and Electric Company

cc: Terence Eng, SED-GSRB
Mohammad Ali, SED-GSRB
Joel Tran, SED-GSRB
Hengyao Chen, SED-GSRB
Jerrod Meier, PG&E
Susie Richmond, PG&E

Attachment 1

Progress of Causal Evaluation 122903182 Corrective Actions

Corrective Action ID	Description	Status
ICA-1	Shut in and put on alternate source. Place [REDACTED] Leveroni customer on Compressed Natural Gas (CNG)	Complete
ICA-2	Correct location address from [REDACTED] to [REDACTED] Leveroni Road in SAP	Complete
CA-1	Create a strategy and seek management approval to provide guidance on how to onboard and resolve unlocatable assets requests, including Farm Taps.	In Progress. Due Date 9/30/22
CA-2	<p>Owner to confirm in SAP that the below statement is correct:</p> <p>Since this error occurred in 2019-2020, a new consistent process has been developed and implemented. The process was a successful barrier and identified the lack of assigned maintenance on this asset.</p> <p>Other enhancements include dedicated asset strategists to workgroups, and the use of electronic requests (Pronto form) that are routed to the appropriate reviewers.</p>	Complete
CA-3	Communicate expectations via 5-minute meeting for workers to first use system of record mapping data when trying to locate assets and not rely on customer or functional location descriptions unless mapping data is insufficient.	Complete