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April 11, 2024

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 Non-DOT Gas Incidents Probable Violations 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 March 12, 2024, associated with non-DOT reportable incident investigations completed as of the third quarter of 2023 – Q3 2023. 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: G20220829-3421:

Date	08/29/2022
Address	Fresno Gas Load Center, Fresno, CA. County: Fresno
Code References	G.O. 112-F, Reference 49 CFR Part 192, §192.603(a), §192.605(a), §192.619(a) and §192.13(c)
Investigation Findings	On August 29, 2022, at approximately 1300 hours, PG&E personnel confirmed the discovery of an overpressure event at the Fresno Gas Load Center, Fresno, Fresno County during a "B-inspection" of the regulator station GS-07. The current temporary MAOP of the outlet of GS-07 is 495 psig. GS-07 is under a temporary reduction of pressure. The pressure at the time of discovery by PG&E employees was 612 psig. PG&E employees performed the necessary valving to reduce the outlet pressure to below the temporary 495 PSIG MAOP. The design MAOP at the outlet of the regulator station is 650 psig, so a leak survey was not conducted on all facilities downstream of GS-07. PG&E identified the overpressure (Exceeding the current temporary MAOP of 495 psig) was caused by two of its employees' failure to follow the gas clearance procedure written for the B-inspection. Title 49 CFR Part 192 Section 192.13(c) states: " Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.". Therefore, SED found PG&E in violation of G.O.112-F, Reference 49 CFR, Part 192, Sections 192.13(c), 192.619(a), 192.603(a) and 192.605(a) for failing to follow gas clearance procedure for B-inspection.

PG&E Response to PUC ID: G20220829-3421:

PG&E acknowledges SED’s findings. Note that all causes (apparent and contributing), with associated corrective actions were self-identified by PG&E in the previously provided Causal Evaluation, “Final 420 Report - 2022 08 29 Fresno, OP Event” attachment “Index 16055-02 Supp01_Final Fresno GLC OP ACE report_CONF.pdf”, submitted on 12/19/2022. Note that the PG&E personnel involved will complete training and recertification before they can perform similar work in the future.

Please see below for an update on all corrective actions from PG&E’s Causal Evaluation related to this OP event.

Progress of Causal Evaluation 124391351 Corrective Actions:

Corrective Action (CA) ID	Description	Status
CA-1	<p>Type of Control: Administrative Action: The following operator qualifications were revoked for the Clearance Supervisor:</p> <ul style="list-style-type: none"> - OQ1401 and 1402 Regulators / Monitors - 15.04 – SCADA - OQ1701 – Valves - Clearance approve / write / endorse – was revoked from SAP <p>Deliverables to show completion: Updated OQ and SAP record.</p>	Complete
CA-2	<p>Type of Control: Administrative Action: The following operator qualifications were revoked for the GPOM crew member:</p> <ul style="list-style-type: none"> - OQ1701 – Valves <p>Deliverables to show completion: Updated OQ record</p>	Complete

PUC ID: G20230316-3510:

Date 03/16/2023

Address 145453 National Trail Hwy Needles, CA. County: San Bernardino

Code References G.O. 112-F, Reference 49 CFR Part 192 §192.605(a)

Investigation Findings On March 16, 2023, at about 0726 hours, PG&E confirmed an overpressure condition at the Topock natural gas compressor Station in Needles, California. The suction side equalized with the discharge side through open bypass valves and the pressure increased to 735.2 psig, exceeding the 660 psig MAOP of the suction side by 11%. SED’s investigation found that the over pressure event was caused by PG&E’s lack of a power outage response plan to provide PG&E’s personnel with practical steps to take in the event of a power outage, and PG&E’s personnels’ failure to follow procedures to ensure correct relief valve configuration during station operation. Therefore, SED found PG&E in violation of G.O. 112-F, Reference 49 CFR, Part 192, Section 192.605(a) for failing to follow procedures to correct relief valve configuration during station operation.

PG&E Response to PUC ID: G20230316-3510:

PG&E acknowledges SED’s findings. Note that all causes (apparent and contributing), with associated corrective actions were self-identified by PG&E in the previously provided Causal Evaluation, “Final 420 Report - Gas Reportable Incident: 2023 03 16 Topock - Index 16389” attachment “Index 16389-02 Supp01_Topock OP ACE Final_CONF.pdf”, submitted on 6/14/2023.

Please see below for an update on all corrective actions from PG&E’s Causal Evaluation related to this OP event.

Progress of Causal Evaluation 125668382 Corrective Actions:

Corrective Action (CA) ID	Description	Status
CA-1	<p>Type of Control: Engineering Action: Engineer a solution in which the pneumatically controlled units can safely shut down by engaging the Emergency Safety Device (ESD), even in the event that there is no station power. Deliverables to show completion: A project scope that identifies an engineered solution with a project and order number.</p>	Complete
CA-2	<p>Type of Control: Administrative Action: Develop a power outage response plan to ensure safe operation in the event of a loss of station power. Deliverables to show completion: Provide a guidance document for station operators.</p>	Complete/see Attachment 1
CA-3	<p>Type of Control: Administrative Action: Develop a job aid that describes how to operate and maintain both pressure safety valve (PSV) control racks. Deliverables to show completion: Provide a guidance document for GPOM station technicians.</p>	Complete/see Attachment 2

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

Sincerely,



Kristina Castrence
 Sr. Director, Gas Regulatory and Risk

cc: [redacted] PG&E
 Kristina Castrence / PG&E
 Mohammad Ali / SED-GSRB
 Terence Eng / SED-GSR
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