

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 12, 2024

Non-DOT NOPV Q3-2023

Ms. Christine Cowsert
Senior Vice Present, Gas Engineering
Pacific Gas and Electric Company
6121 Bollinger Canyon Road
San Ramon, CA 94583

SUBJECT: Notice of Non-DOT Gas Incidents Probable Violations for Pacific Gas and Electric Company (PG&E)

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following Notice of Probable Violation (NOPV) for Non-DOT reportable incident investigations completed in Q3 of 2023. This letter serves as notification to you that as a result of our investigation, SED found PG&E in violations of the following:

1. General Order (G.O.) 112-F, Reference Title 49 Code of Federal Regulations (49 CFR), Part 192, §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. G.O. 112-F, Reference 49 CFR, Part 192, §192.603(a) states in part:

“(a) No person may operate a segment of pipeline unless it is operated in accordance with this subpart.”

3. G.O. 112-F, Reference 49 CFR, Part 192, §192.619(a) states in part:

“(a) No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure (MAOP)...”

4. G.O. 112-F, Reference 49 CFR, Part 192, §192.13(c) states in part:

“(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.”

The summary of the identified violations 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 violations.

For any question, please contact Mohammad Ali at (415) 471-9289 or at ma5@cpuc.ca.gov.

Sincerely,



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

CC: [REDACTED] / PG&E
Kristina Castrence/PG&E
[REDACTED]/PG&E
Mohammad Ali / SED-GSRB
Terence Eng / SED-GSR
Wilson Lule/ SED-GSRB

ATTACHMENT: Incidents with Probable Violations

Attachment A
Incidents with Probable Violations

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Finding	Code Violation
G20220829-3421	8/29/2022	Fresno Gas Load Center Fresno, CA County: Fresno	PG&E	N/A	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.	G.O. 112-F, Reference 49 CFR Part 192, §192.603(a), §192.605(a), §192.619(a) and §192.13(c)

G20230316-3510	3/16/23	145453 National Trail Hwy Needles, CA County: San Bernardino	PG&E	N/A	<p>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.</p>	G.O. 112-F, Reference 49 CFR Part 192 §192.605(a)
----------------	---------	--	------	-----	---	---