

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 3, 2021

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: Closure letter for Notice of Probable Violations for Non-DOT Reportable incidents issued in fourth quarter (Q4) of 2020**

Dear Ms. Cowsert,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) has reviewed the Pacific Gas & Electric Company's (PG&E) response of January 27, 2021 to the Notice of Probable Violation forwarded to PG&E on January 4, 2021 for incidents that occurred during the quarter Q4 of 2020.

A summary of findings documented by SED, PG&E's responses to SED's findings, and SED's evaluation and conclusion of PG&E's responses taken for each finding is attached with this letter.

This letter serves as an official closure of the 2020-Q4 Non-DOT NOPV letter for incidents G20200306-3011 in Hollister and any matters that are being recommended for enforcement will be processed through the Commission's Citation program or a formal proceeding. Pursuant to Commission Decision 16-09-055, SED has the authority to issue citations for each violation found.

If you have any questions, please contact Mohammad Ali at (916) 928-2109 or by email at [ma5@cpuc.ca.gov](mailto: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: Vincent Tanguay / PG&E  
Susie Richmond / PG&E  
Terence Eng / SED-GSRB  
Mohammad Ali / SED-GSRB  
Claudia Almengor / SED-GSRB

## SUMMARY OF INVESTIGATION FINDINGS

### **SED Findings: SED identified 1 probable violation as described below:**

- I. In the NOPV letter dated 1/4/2021, the violation SED found was that PG&E violated 49 CFR §192.605(a) as shown below:

#### **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.”*

On March 6, 2020, PG&E experienced an overpressure event at the at the Hollister Gas Metering Station in Hollister, San Benito County. Line 301A is fed from the Hollister Gas Metering Station. Line 301A reached a maximum pressure of 569.29 psig from Hollister Station at MP 0.00 to Moss Landing Station at MP 10.00. This event is considered a large over-pressure (OP) event, exposing the piping and equipment to undesired operating conditions and risk. PG&E’s action led to the overpressure, including bypassed over-pressure protection without using additional safeguards, failure to provide adequate span-of-control oversight of an unqualified technician operating valves, performing leak repair work without an appropriate clearance, and lack of supervisor awareness of the tasks being performed on the day of the event. Therefore, SED finds PG&E in violation of 49 CFR §192.605(a).

#### **PG&E’s Response:**

PG&E recognizes SED’s findings. Please note that all causes, (direct, root and contributing) with associated corrective actions were self-identified by PG&E in the previously provided Causal Evaluation, “Index 13866 Supp02\_Hollister OP Event RCE Final Draft”, submitted 9/10/2020. Below, please find Attachment 1 for an update on all corrective actions from the Causal Evaluation (RCE) related to this OP event. In addition, in September 2020, PG&E introduced training on our revised Operations and Maintenance manual, GAS-0174WBT, to reinforce that our Operations and Maintenance manual is a legal commitment and to reinforce that all procedures must be followed as written. This training is required for all gas employees and contractors who work on PG&E facilities. As of January, 2021, a total of 4,867 individuals have completed training for GAS-0174WBT. This includes 3,799 Employees and Contractors who have LANIDs and 1,068 external Contractors. In addition, 100% of the current Gas Pipeline Operations & Maintenance (GPOM) employees have completed the training.

#### **SED’s Conclusion:**

Upon review of PG&E’s response, SED agrees that PG&E adopted the corrective actions by self-identifying the incident and performing causal evaluation, updating the O&M Manual with training requirement of all gas employees and contractors working on PG&E facilities to address this over pressure event and to prevent future occurrence.

SED has opted not to impose a fine or penalty at this time.