



Mike Bradley
Senior Manager
Compliance
Gas Operations

6121 Bollinger Canyon Road
San Ramon, CA 94583
Phone: 925.328.5724
E-mail: M0BJ@pge.com

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By Email

Mr. Ken Bruno
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Response to October 20, 2017 – Notice of Gas Incident Violation for Pacific Gas and Electric Company – Yuba City (dated 01/12/2017)

Dear Mr. Bruno:

This letter is in response to the Safety and Enforcement Division's (SED) letter dated October 20, 2017 regarding a house fire incident that occurred on January 12, 2017 in Yuba City.

In its letter, SED found PG&E in violation of the following sections of Title 49 of the Code of Federal Regulations (CFR) Part 192:

Title 49 CFR §49 CFR 192.273 states, in part:

“(a) The pipeline must be designed and installed so that each joint will sustain the longitudinal pull-out or thrust forces caused by contraction or expansion of the piping or by anticipated external or internal loading.”

SED's Finding: The evidence reviewed indicates that the pipeline was not installed so that the joint involved in the incident could sustain the anticipated internal loading. Therefore, SED finds PG&E in violation of CPUC General Order No. 112-C, 49 CFR §192.273 (a).

PG&E's Response: PG&E agrees the 4" plastic joint that failed at [REDACTED], Yuba City had a fabrication error during the original installation in late 1973. Sampling of additional joints from the vicinity of the failed joint found no additional fabrication issues and PG&E has replaced the entire 1973 main, which contained the failed plastic joint. PG&E also performed daily leak surveys in the neighborhood for 29 days until the 1973 main was replaced.

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Title 49 CFR §49 CFR 192.281 states, in part:

“(a) General. Each plastic pipe joint must be made in accordance with written procedures that have been proven by destructive burst test to produce joints at least as strong as the pipe being joined. A plastic pipe joint that is joined by solvent cement, adhesive, or heat fusion may not be disturbed until it has properly set. Plastic pipe may not be joined by a threaded joint or miter joint.”

SED’s Finding: The evidence reviewed indicated a lack of weld bead and that a portion of the surface plane failed to contact the heater plate sufficiently to melt. PG&E Gas Standard D-21 Section 3.4.2 (b) (5) states that *“fusion should not be attempted until a bead of melt has rolled out on the heater face completely around the circumference of both pipe ends.”* SED therefore finds PG&E in violation of CPUC General Order No. 112-C, 49 CFR §192.281 (a) because it failed to make the joint in accordance with PG&E Gas Standard D-21.

PG&E’s Response: PG&E agrees the single 4" plastic joint that failed at [REDACTED], Yuba City had a fabrication error not in accordance with PG&E's written procedure D-21 during the original installation in late 1973. Sampling of additional joints from the vicinity of the failed joint found no additional fabrication issues and PG&E has replaced the entire 1973 4" main, which contained the failed plastic joint. PG&E continues to operate an Operator Qualification program for plastic butt fusions, which requires an employee to be re-qualified annually. The testing process involves a verbal test for competency and a performance test with a destructive evaluation of the test sample to ensure proper fusion. In addition, the Gas Quality Management department performs side-by-side quality checks on a sample of construction jobs.

This response contains information that should remain confidential and not be subject to public disclosure; see attached for PG&E’s declaration supporting confidential designation for additional detail (“Index 11452 Confidentiality Declaration.pdf”). Confidential information is highlighted yellow or outlined red within the referenced document(s).

Sincerely,

/s/ Mike Bradley
Senior Manager, Compliance

cc: Dennis Lee, CPUC
Aimee Cauguiran, CPUC
Terence Eng, CPUC
Susie Richmond, PG&E