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By Email

Mr. Dennis Lee
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 28, 2019 – Notice of Gas Incident Violations by Pacific Gas and Electric Company (PG&E) - PGE NOPV G20171127-2428

Dear Mr. Lee:

This letter is in response to the Safety and Enforcement Division's (SED) letter dated October 28, 2019 regarding a DOT reportable incident (#1198192) that occurred on November 27, 2017 at [REDACTED] San Francisco.

In its letter, SED found PG&E in violation of the following:

U.S. Department of Transportation Title 49 CFR §192.621 states in part:

“(a) No person may operate a segment of a high pressure distribution system at a pressure that exceeds the lowest of the following pressures, as applicable:

(1) The design pressure of the weakest element in the segment, determined in accordance with subparts C and D of this part.”

U.S. Department of Transportation Title 49 CFR §192.605(a) states in part:

“General. Each operator shall prepare and follow for each pipeline, a manual of procedures for conducting operations and maintenance activities...”

SED's Findings:

1. PG&E failed to properly abandon the service line to [REDACTED] during project 30267522X. The failure to permanently seal the still live service tee resulted in the X-Pando plug being used for longer than its typical temporary application, as well as being subject to pressures higher than the component is designed for, especially after the uprate project in 2013. Therefore, SED finds PG&E in violation of Title 49 CFR § 192.621(a)(1).

2. PG&E failed to follow Procedure C-36.1 Rev #00 Grunsky Bag Method for Stopping Off Low Pressure Service Tees when it failed to remove the X-Pando plug from the service tee. PG&E also failed to follow A-93.2 for failing to use approved mechanical or fusion end caps to seal the cut end. Therefore, SED finds PG&E in violation of Title 49 CFR §192.605(a).

PG&E’s Response: PG&E agrees with the 192.621(a)(1) finding, but respectfully disagrees with SED’s finding of the 192.605(a) violation since standards A-93.2 and C-36.1 were not part of PG&E’s O&M Manual prior to and during 2013.¹ Following the incident, PG&E conducted a root cause evaluation. As a result, PG&E implemented corrective actions to prevent similar incidents from happening in the future. The details of these actions are listed in Table 1 below.

Table 1. List of corrective actions taken

Corrective and Preventative Actions	Status
CA-1 (INTERIM ACTION): Conduct conference calls with the extended leadership teams of the target organizations and distribute a Five Minute Meeting to require a performer and checker to provide independent verification of end cap installation during service deactivations.	<i>Completed: 04/30/2018-05/11/2018</i>
CA-2 (INTERIM ACTION): Add a check to the Quality Control protocols to review GSRs to confirm that performer and checker is completed for service deactivations (see of CA-1 interim action).	<i>Completed: 05/15/2018</i>
CA-3: Revise tooling or processes used for expander plug installation and service tee deactivation to reduce the likelihood of an expander plug being left in place and the service tee outlet uncapped.	<i>Completed: 08/20/2018</i>
CA-4: Revise C-36.1, “Grunsky Bag Method for Stopping off Low Pressure Service Tees” and TD-4150P-105, “Low-Pressure Service Tee Operation Using Grunsky Bag Method” and TD-4150P-107, “Mazco Safe-T-Stopper for Shop-Fabricated Tees” as necessary to incorporate CA-3 tooling and process changes.	<i>Completed: 02/22/19</i>
CA-5 (IMMEDIATE ACTION): Conduct an all-hands call and distribute a Five Minute Meeting to require that all uprates projects be reviewed and approved by the DIMP Director.	<i>Completed: 04/30/2018-05/11/2018</i>

¹ Standard A-93.2 was added to PG&E’s O&M Manual in February 2016.

CA-6 (INTERIM ACTION): Issue a bulletin or minor revision for 4125P-03 to reflect the required review and approval by the DIMP Director.	<i>Completed: 07/26/18</i>
CA-7: Revise 4125P-03, "Revising the MAOP of Pipelines Operating at 60 psig or less", to require an integrity pressure test before the uprate or as part of the uprate for all low pressure uprates to semi-high pressure or to high pressure and semi-high pressure to high pressure uprates. The integrity test will require an air pressure test in accordance with test pressures of A-34, Piping Design and Test Requirements", and with a minimum pressure hold time of 4 hours. Include the option to use helium for the pressure test to aid in leak detection.	<i>Completed: 03/25/19</i>



Sincerely,

/s/Vincent Tanguay

Director, Regulatory Compliance

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