



Public Utilities Commission
STATE OF CALIFORNIA

Citation Date: October 15, 2018
Citation #: D.16-09-055 G.18-10-003
Operator ID#: 15007

CITATION
ISSUED PURSUANT TO DECISION D.16-09-055

Gas Corporation (Operator) To Which Citation is issued: Pacific Gas and Electric (PG&E)

OFFICER OF THE RESPONDENT:

Mr. Jesus Soto, Senior Vice President
Pacific Gas & Electric Company
6111 Bollinger Canyon Road, Room 4590-D
San Ramon, CA 94583

CITATION:

Operator is cited a financial penalty amount of \$4,050,000 for violating General Order (G.O.) 112-F. Safety and Enforcement Division (SED) found five violations as a result of SED's investigation of gas incident G20160810-2059.

VIOLATIONS:

General Order 112-F, Section 104.1 states:

"It is the intent of the California Public Utilities Commission to automatically incorporate all revisions to the Federal Pipeline Safety Regulations, 49 Code of Federal Regulations (CFR) Parts 191, 192, 193, and 199 with the effective date being the date of the final order as published in the Federal Register.."

The operator has violated G.O. 112-F Reference, Title 49 CFR, Part 192 §192.605(a) as identified below.

- 1. U.S. Department of Transportation Chapter 49 CFR §192.605(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 August 10, 2016, two PG&E employees were dispatched to a single-family residence at 950 Champion Lane, Deer Park to perform maintenance on a Nordstrom-type customer service valve that was stuck in the open position. The employees loosened the valve packing nut slightly and tapped the valve with a brass hammer in an attempt to free it. The valve came apart forcefully and gas began flowing through openings in the valve body. The escaping gas flow ignited on the pilot light of a nearby water heater, and the resulting fire burned two utility workers, and caused severe damage to the house.

The PG&E procedures that address how to maintain and change customer service valves are TD-6100P-11, and TD-4150P-01. Neither of the procedures include using a brass hammer to loosen a frozen valve.

SED found that the practice of attempting to "free" an inoperable valve by loosening the packing nut and tapping the tang with a brass hammer is included in an obsolete procedure



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(TD-6436P-27). The practice was eliminated by PG&E procedure TD-6100P-11, Rev. 0; which was published on 07/30/14, and made effective on 09/01/14. The revision notes state:

“Removed guidance from the previous procedure TD-6436P-27 to use a brass hammer to hit the valve stem (tang) to loosen core. Added requirement to repair frozen core by lubrication or replace valve.”

Procedure TD-6100P-11 states that potential hazards include “explosion or igniting of escaping gas.” Procedure TD-4150P-01 states in several notes that gas may be “exhausted” from the valve body during the operation of the valve changer. Section A2 of PG&E’s procedure TD-6100P-01 requires field service personnel to inspect any job site for workplace hazards. Both procedures that outline service valve maintenance and replacement state the possibility of gas release. PG&E personnel should have been more diligent in examining the work area to identify possible sources of ignition.

When PG&E personnel performed the “hammer tap” practice to free a stuck valve, they were not following their procedure TD-6100P-01 for maintaining and repairing or replacing valves. This failure to follow procedure violates Chapter 49 CFR §192.605(a) and directly contributed to the incident.

In response to their Root Cause Evaluation of the incident, PG&E is updating the Job Site Safety Analysis (JSSA) to include consideration of the potential for release of gas, potential ignition sources, and the potential for gas migration and how to mitigate these hazards. PG&E claim the revisions will be completed by March 28, 2018.

Through research into reportable incidents, and through interviews with PG&E field personnel, SED believes that this type of instantaneous forceful disassembly of a valve is an extremely rare occurrence, and to date SED has found no other instances of it happening. The field personnel working in Deer Park that day were using an outdated practice, but the new procedure had not been communicated to them by PG&E, and it had not been included in their required OQ training.

PENALTY:

SED recommends that PG&E should incur a fine of \$50,000 for this violation.

- 2. U.S. Department of Transportation Chapter 49 CFR §192.605(a): “(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.”**

PG&E’s current Meter Valve Maintenance procedure (TD-6100P-11, Rev. 0, effective 09/01/2014) states that valves with a frozen core, or a broken tang should be replaced. Valves that cannot be replaced must be referred to dispatch, and a repair crew must be requested. The current Service Valve Replacement procedure (TD-4150P-01, Rev. 1, published 01/29/2014) states that the “service valve must be operational to perform [valve replacement]”. The procedure requires that gas flow be stopped before the valve change tool is attached, but assumes that the service valve is operable. Neither TD-6100P-11 nor TD-4150P-01 provides guidance on pressure control for valves that are frozen in the open position. Moreover, neither procedure provides guidance on how to proceed with the replacement of a valve which is frozen open.



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In its procedures, PG&E does not address how to safely replace frozen valves, or valves that are inoperable due to broken tangs. By not addressing this maintenance issue within its procedures PG&E is in violation of Chapter 49 CFR §192.605(a). The absence of a proper, safe procedure to address these situations contributed to the incident.

In response to their Root Cause Evaluation of the incident, PG&E revised their work procedures TD-4150P-01 (Valve Changer 3/4 inch through 1-1/4 inch Service Valve), TD-4150P-02 (Valve Changer 3/4 inch through 1-1/4 inch Service Riser Thread), TD-4150P-03 (Valve Changer 3/4 inch through 1-1/4 inch Service Riser), and TD-4150P-04 (Valve Changer 1-1/2 inch and 2 inch Service Valve Replacement). All these documents now have new guidance on controlling upstream pressure before attempting to replace a service valve that is damaged or inoperable. These documents have been published with effective dates of October 4, 2017.

Although dealing with a stuck, damaged, or inoperable service valve may be uncommon, it is not so rare that PG&E could reasonably ignore or discount the possibility of it occurring on their system. PG&E did not provide its field personnel proper guidance on how to make the situation safe, and allowed them to work in an unsafe manner. As previously stated, the instantaneous forceful disassembly of a valve may be very rare, but it proved to be incredibly hazardous to life and property. If PG&E had provided instruction that the gas be controlled upstream of the damaged/compromised valve, the injuries and damages suffered in Deer Park would not have happened.

PG&E was operating with an inadequate procedure during the entire time that TD-4150P-01, Rev. 1 was in effect. The original publish date was January 29, 2014, and the new revision became effective, and superseded the previous revision, on October 4, 2017; which means the inadequate procedure was in effect for a total of 1,344 days, or approximately 44 months.

PENALTY:

SED recommends that PG&E should incur a fine of \$50,000 per month in which the violation occurred, which results in a total fine of \$2,200,000 for this violation.

- 3. U.S. Department of Transportation Chapter 49 CFR §192.805(f): “Each operator shall have and follow a written qualification program. The program shall include provisions to...communicate changes that affect covered tasks to individuals performing those covered tasks”**

On August 11, 2016, SED interviewed both of the PG&E employees involved with the incident. One stated that he was not aware of any procedure that did not involve tapping the valve with a hammer to free it from a frozen position. Both employees claimed that they perform the “hammer tap” practice often. Neither employee was aware that it was an obsolete practice, and neither was aware that it had been superseded by a different procedure.

PG&E reported that the procedural change was not formally communicated to the Maintenance and Construction (M&C) crews or supervisors, because those target audiences were listed as “informational only”. TD-6100P-11 is a procedure targeted primarily at Gas Service Representatives (GSRs). TD-4150P-01, which is targeted at M&C personnel, does not reference TD-6100P-11, which contains the note about removing the “hammer tap” guidance.



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The elimination of the “hammer tap” procedure without proper communication to the individuals responsible for performing the task is a violation of Chapter 49 CFR §192.805(f), and contributed to the incident.

In response to their Root Cause Evaluation of the incident, PG&E revised their work procedure TD-6100P-11 by adding Gas M&C and General Construction (GC) employees to the target audience for the procedure. The revised document was published on June 21, 2017 with an effective date of July 5, 2017, and PG&E has provided a copy of the revised document to SED. PG&E claims a tailboard meeting will be conducted with the M&C and GC crew to review the newly revised procedure, and that the tailboard will be completed by October 31, 2017.

PG&E did not actively communicate important procedural changes to the field personnel who were responsible for knowing and performing the tasks outlined in the procedure. PG&E was in violation of 49 CFR §192.805(f) for the entire time between the original effective date of TD-6100P-11, Rev. 0 (September 1, 2014) and the effective date of the new revision, (July 5, 2017), a total of 1,038 days, or approximately 34 months.

PENALTY:

SED recommends that PG&E should incur a fine of \$50,000 per month in which the violation occurred, which results in a total fine of \$1,700,000 for this violation.

- 4. U.S. Department of Transportation Chapter 49 CFR §192.805(b): “Each operator shall have and follow a written qualification program. The program shall include provisions to...ensure through evaluation that individuals performing covered tasks are qualified [from §192.803: Qualified means that an individual has been evaluated and can: (a) Perform assigned covered tasks; and (b) Recognize and react to abnormal operating conditions.]”**

During an interview conducted on August 11, 2016, one of the PG&E employees involved stated that he did not recall receiving formal training through the Operator Qualification (OQ) training process on “unsticking” a frozen valve; most of his training regarding frozen valves was “on-the-job”. He stated that more formal training on how to perform maintenance on frozen valves would be helpful.

The other PG&E employee also stated that he did not recall being trained on Nordstrom valves (the type involved in the incident) at all during his OQ training.

The OQ task identified by PG&E to perform valve replacement is 06-10, “Operate Riser Valve Changer Equipment and Service Riser Thread Replacement (3/4” to 2”)”. Both employees had most recently obtained the qualifications to perform that task in June 2016, approximately 2 months before the incident. Neither of the employees had been informed that the “hammer tap” procedure was obsolete during this training, and neither had been trained on how to change a valve that was stuck in the open position. PG&E reported that “valve changer training does not address replacing inoperable valves,” and “Valve changer OQs (OQ 06-10 & OQ 06-23) do not address changing valves that are damaged, e.g. broken tang.”

Both a frozen valve, and a valve with a damaged tang are abnormal operating conditions (AOCs) that affect how maintenance tasks are performed. By failing to train its personnel



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on how to react to these AOCs, and by failing to evaluate how its personnel react to these AOCs, PG&E was not ensuring that its employees were qualified to perform tasks involving service valve maintenance. This failure to train and to evaluate its employees violates Chapter 49 CFR §192.805(b), and contributed to the incident.

In their response to the NOPV letter, PG&E stated that they “will review and revise OQ-0610 and OQ-0623 tests to add a knowledge check on what to do if an AOC such as a frozen or inoperable valve is encountered during the valve change process.” PG&E claims this revision will be completed by 10/31/2017.

PENALTY:

SED recommends that PG&E should incur a fine of \$50,000 for this violation for failing to train the technicians involved with the incident.

- 5. U.S. Department of Transportation Chapter 49 CFR §192.801(b):** *“For the purpose of this subpart, a covered task is an activity, identified by the operator, that: (1) Is performed on a pipeline facility; (2) Is an operations or maintenance task; (3) Is performed as a requirement of this part; and (4) Affects the operation or integrity of the pipeline.”*

Procedure TD-6100P-11 (Valve Maintenance) states that OQ Requirements do not apply to the procedure, but the GSRs are required to complete training course CSV-0032. TD-6100P-11 includes maintenance tasks like valve inspections, service valve lubrication, and changing valve components.

SED believes that the tasks included in TD-6100P-11 meet the 4 requirements of 49 CFR §192.801(b), and should be considered covered tasks, and therefore would require qualified personnel to perform the tasks. This violation of 49 CFR §192.801(b) did not contribute to the incident, but SED believes it is a deficiency in PG&E’s procedures and their OQ program, and should be addressed.

In their response to the NOPV letter, PG&E states “PG&E agrees that TD-6100P-11 includes work that meets the 4-part rule criteria and that our exam(s) can be enhanced to more fully address the work in this procedure. PG&E will update the applicable task(s) and exam content by October 31, 2017.”

However, in the newly revised Procedure TD-6100P-11, Rev.1 (Valve Maintenance) provided by PG&E to SED, the “Operator Qualification Requirement” is still specified as “NA” or not applicable. In the “Before You Start” section of Procedure TD-6100P-11, Rev.1, it requires that:

“Field Services (FS) supervisor should confirm that all FS personnel have completed training course GAS-3001 or GAS-3009, as defined by task.”

SED is unsure whether these training courses (GAS-3001 and GAS-3009) are equivalent to an OQ-level course; specifically if they train personnel to recognize and react to abnormal operating conditions. If PG&E’s Field Service personnel are expected to independently perform tasks that meet the 4 requirements of 49 CFR §192.801(b), they should be trained through PG&E’s OQ program, and should hold a qualification to perform the tasks listed.



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Additionally, in the "Before You Start" section of Procedure TD-6100P-11, Rev.1, it requires that:

"Construction supervisor confirms that M&C or GC personnel attended training for identifying service valve abnormal operating conditions."

SED recommends that PG&E change the procedure to require that supervisors confirm that all M&C or GC personnel performing this procedure have successfully completed training for recognizing and reacting to AOCs, and have not merely attended that training.

PENALTY:

SED does not believe PG&E has addressed this violation adequately. SED recommends that PG&E should incur a fine of \$50,000 for this violation.

TOTAL PENALTY AMOUNT

As a result of the violations determined by SED and identified in this report, SED recommends a total fine of \$4,050,000. Decision 16-09-055 adopted an administrative limit of no more than \$8 million for each citation issued under the gas and electric safety citation programs.

In accordance with Decision 16-09-055, the total amount of this citation is \$4,050,000.

STATEMENT OF FACTS AND ENCLOSURES:

The following enclosures were used to establish the findings of fact:

- 1- *Enclosure 1 – SED's Incident Investigation Report (G20160810-2059) dated March 16, 2017*
- 2- *Enclosure 2 – PG&E's Root Cause Evaluation Report: SIF Potential – Deer Park Incident*
- 3- *Enclosure 3 – SED's Notice of Gas Incident Violations for Pacific Gas and Electric Company, dated August 23, 2017*
- 4- *Enclosure 4 – SED's Attachment A: Incident with Probable Violations*
- 5- *Enclosure 5 – PG&E's Response to Notice of Gas Incident Violation for Pacific Gas and Electric Company: Deer Park, dated September 22, 2017*
- 6- *Enclosure 6 – PG&E's Deer Park NOPV Response*

The violation in this citation was established based on the aforementioned six enclosures, Operator's records and/or substantiating documents obtained from other sources, or other reasons as stated in the attached report.



SED CITATION ANALYSIS

Element	Staff Finding
Number of violation(s) and duration of violation(s)	<p><i>Five violations:</i></p> <p><i>One violation of 49 CFR §192.605(a) that occurred when PG&E technicians did not follow procedures during the incident.</i></p> <p><i>One violation of 49 CFR §192.605(a) occurred for 1,344 days; the time in which PG&E operated with an inadequate procedure that put their employees and the public at risk.</i></p> <p><i>One violation of 49 CFR §192.805(f) occurred for 1,038 days; the time in which PG&E did not properly communicate procedural changes to employees which performed safety sensitive work.</i></p> <p><i>One violation of 49 CFR §192.805(b) that occurred when PG&E failed to train their technicians properly.</i></p> <p><i>One violation of 49 CFR §192.801(b) that occurred when PG&E did not require that personnel who perform valve maintenance (a covered task) to be trained through their OQ Program.</i></p>
Severity or gravity of the offense	<p><i>PG&E failed to provide proper training, adequate procedures, or the communication to their employees who perform maintenance work on energized gas lines. PG&E did not ensure that their employees were working in a safe</i></p>



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	<i>manner, and these failures increased the risk of injury to employees and the public.</i>
Conduct of the utility	<i>The utility is being cooperative.</i>
Self-reporting of the violation	<i>Not self-reported. Violations found as a result of SED's Investigation into Gas Incident G20160810-2059.</i>
Financial resources of the utility	<i>4.3 Million customers, \$715 Million Revenue requirement</i>
The totality of the circumstances	<i>PG&E's violations of 49 CFR 192 directly contributed to the incident which injured two PG&E employees and severely damaged a customer's home.</i>
The role of precedent	<i>N/A</i>
Resultant Citation Taking All Of These Factors Into Account	\$4,050,000



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RESPONSE:

Respondent is hereby called upon to provide a response to this Citation by: **5:00 PM on November 14, 2018**. By way of such response, Respondent, **within 30 calendar days**, must either pay the amount of the penalty set forth in this citation¹, or appeal² the citation. In addition Respondent must do one of the following:

- (1) For violations constituting immediate safety hazards: Respondent must immediately correct the immediate safety hazards.
- (2) For violations that do not constitute immediate safety hazards: Violations that do not constitute immediate safety hazards must be corrected within 30 days after the citation is served. If said violations that do not constitute immediate safety hazards cannot be corrected within 30 days, then the Respondent must submit a detailed Compliance Plan to the Director of SED within 30 days after the citation issues, unless the utility and the Director of SED, before the expiration of the 30 day period, agree in writing to another date, reflecting the soonest that the Respondent can correct the violations. The Compliance Plan must provide a detailed description of when the violation will be corrected, the methodology to be utilized, and a statement supported by an declaration from Respondent's Chief Executive Officer or appropriate designee (CEO Declaration) stating that in the Respondent's best judgment, the time that will be taken to correct the violation will not affect the safety or integrity of the operating system or endanger public safety.

Note: Respondent will forfeit the right to appeal the citation by failing to do one of these two options outlined in the Response above within 30 days. Payment of a citation or filing a Notice of Appeal does not excuse Respondent from curing the violation. The amount of the penalty may continue to accrue until a Notice of Appeal is filed. Penalties are stayed during the appeal process. A late payment will be subject to a penalty of 10% per year, compounded daily and to be assessed beginning the calendar day following the payment-due date. The Commission may take additional action to recover any unpaid fine and ensure compliance with applicable statutes and Commission orders.

¹ For fines paid pursuant to Pub. Util. Code § 2107 and D.16-09-055 Respondent shall submit a check payable to California Public Utilities Commission using the attached Citation Payment Form. Upon payment, the fine will be deposited in the State Treasury to the credit of the General Fund and this citation will become final.

² Respondent may Appeal this citation by completing and submitting a Notice of Appeal Form. Please see the attached document, "Directions For Submitting An Appeal To A Citation Issued Pursuant To Decision 16-09-055" for information on the appeals process and the attached "Notice of Appeal Of Citation Form."



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NOTIFICATION TO PUBLIC AGENCIES:

As soon as is reasonable and necessary, and no later than 30 calendar days after service of the citation is effected, Respondent must provide a notification to the Chief Administrative Officer or similar local agency authority in the city and county where the violation occurred. Within 10 days of providing such notification, Respondent must serve an affidavit to the Director of SED, at the mail or e-mail address noted below, attesting that the local authorities have been notified; the date(s) for when notification was provided; and the name(s) and contact information for each local authority so notified.

The CPUC expects the Operator to take actions, as soon as feasible, to correct, mitigate, or otherwise make safe all violations noted on the Citation regardless of the Operator's intentions to accept or appeal the violation(s) noted in the Citation.

FOR EIM 

Elizaveta Malashenko
Director – Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
elizaveta.malashenko@cpuc.ca.gov



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CITATION PAYMENT FORM

I (we) _____ hereby agree to comply with this citation dated _____, and have corrected/mitigated the violation(s) noted in the citation on _____ and no later than _____, all work to make permanent corrections to any mitigated, or otherwise remaining concerns related to the violation(s) will be completed as noted in the Compliance Plan we have submitted to the Director of SED and, herewith, pay a fine in the amount of \$ _____ as included in the citation. Also as payment for the citation, SWG agrees to follow the remedies stated in Enclosure 1.

Signature of Gas Corporation's Treasurer,
Chief Financial Officer, or President/Chief Executive
Officer, or delegated Officer thereof

(Signature) (Date)

(Printed Name and Title)

Payment must be with a check made payable to the **California Public Utilities Commission** and sent to the below address. Please include the citation number on the memorandum line of the check to ensure your payment is properly applied.

California Public Utilities Commission
Attn: Fiscal Office
505 Van Ness Avenue
San Francisco, CA 94102-3298

NOTE: A copy of the completed Citation Payment Form must be sent to the Director of the Safety and Enforcement Division, via email or regular mail, to the address provided on the Citation.



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DIRECTIONS FOR SUBMITTING AN APPEAL TO A CITATION ISSUED PURSUANT TO DECISION 16-09-055

Within 30 calendar days of the Respondent being served with a **CITATION ISSUED PURSUANT TO DECISION 16-09-055**, Respondent may appeal the citation. Beyond 30 calendar days of being served with the citation, Respondent is in default and, as a result, is considered as having forfeited rights to appeal the citation. The Respondent must still correct the violation(s) as instructed in the Response section of this citation.

To appeal the citation, Respondent/Appellant must file a Notice of Appeal (including a completed title page complying with Rule 1.6 of the Commission's Rules of Practice and Procedure, and attached Notice of Appeal Form) along with copies of any materials the Appellant wants to provide in support of its appeal with the Commission's Docket Office **and** must serve the Notice of Appeal, at a minimum, on

- 1) The Chief Administrative Law Judge (with an electronic copy to: ALJ_Div_Appeals_Coordinator@cpuc.ca.gov),
- 2) The Director of Safety and Enforcement Division
- 3) The Executive Director
- 4) General Counsel
- 5) The Director of the Office of Ratepayer Advocates

At the address listed below within 30 calendar days of the date on which the Appellant is served the Citation. The Appellant must file a proof of service to this effect at the same time the Appellant files the Notice of Appeal. The Notice of Appeal must at a minimum state: (a) the date of the citation that is appealed; and (b) the rationale for the appeal with specificity on all grounds for the appeal of the citation.

California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102
Attn: <Insert Title>

NOTE: Submission of a *Notice of Appeal Form* in no way diminishes Appellant's responsibility for correcting the violation described in the citation, or otherwise ensuring the safety of facilities or conditions that underlie the violations noted in the Citation.

Ex Parte Communications, as defined by Rule 8.1(c) of the Commission's Rules of Practice and Procedure, are prohibited from the date the citation is issued through the date a final order is issued on the citation appeal.



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After receipt of the Appellant's *Notice of Appeal Form*, Appellant has a right to a hearing to be convened before an Administrative Law Judge. At least ten business days before the date of the hearing, the Appellant will be notified and provided with the location, date, and time for the hearing. At the hearing,

- (a) Appellant may be represented by an attorney or other representative, but any such representation shall be at the sole expense of the Appellant;
- (b) Appellant may request a transcript of the hearing, but must pay for the cost of the transcript in accordance with the Commission's usual procedures;
- (c) Appellant is entitled to the services of an interpreter at the Commission's expense upon written request to the Chief Administrative Law Judge not less than five business days prior to the date of the hearing;
- (d) Appellant is entitled to a copy of or electronic reference to Resolution ALJ-299 Establishing Pilot Program Citation Appeal and General Order 156 Appellate Rules (Citation Appellate Rules); and
- (e) Appellant may bring documents to offer in evidence (Rule 13.6 (Evidence) of the Commission's Rules of Practice and Procedure applies) and/or call witnesses to testify on Appellant's behalf. At the Commission's discretion, the hearing in regard to the Appellant's appeal can be held in a CPUC hearing room at either of the following locations:

San Francisco:
505 Van Ness Avenue
San Francisco, CA 94102

Los Angeles:
320 West 4th Street, Suite 500
Los Angeles, CA 90013

The hearing(s) held in regard to the Appellant's appeal will be adjudicated in conformance with all applicable Public Utilities Code requirements.



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Notice of Appeal Form
Appeal from Citation Issued by Safety and Enforcement Division
Pursuant to Decision 16-09-055

Appellant:

Name
Vice President, Gas Operations
Gas Utility Name
Mailing Address
City, CA Zip

Citation Date: October 15, 2018
Citation #: D.16-09-055 G.18-10-003
Operator ID#: 15007
Appeal Date: _____

“Appeal of _____ from _____ issued by Safety and
[Operator Name] [Citation Number]
Enforcement Division”

Statements supporting Appellant’s Appeal of Citation (You may use additional pages if needed and/or attach copies of supporting materials along with this form).



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Enclosures to Accompany Utility Appeal

Utility to add Enclosures as appropriate