

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 27, 2015

Mr. Sumeet Singh, Vice President
Pacific Gas and Electric Company
Gas Asset and Risk Management
6111 Bollinger Canyon Road, Room 4590-D
San Ramon, CA 94583

SUBJECT: Notice of Gas Incident Violations for Pacific Gas and Electric Company

Dear Mr. Singh:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) investigated gas incidents that occurred in the year 2014 within the Pacific Gas & Electric Company (PG&E) service territories.

This letter serves as notification to you that as a result of our investigations, SED found PG&E in violation of the following:

1. General Order (GO) 112-E, 122.2(b) states :

"(b) In the event of an incident listed in 122.2(a) above, an operator shall go to the Commission's website, select the link to the page for reporting emergencies and follow the instructions thereon. If internet access is unavailable, the Operator may report using the backup telephone system.

- 1. If the utility is notified of the incident during its normal working hours, the report should be made as soon as practicable but no longer than 2 hours after the utility is aware of the incident and its personnel are on the scene.*
- 2. If the utility is notified of the incident outside of its normal working hours, the report should be made as soon as practicable but no longer than 4 hours after the utility is aware of the incident and its personnel are on the scene."*

2. Title 49 CFR §192.13(c) states:

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

3. Title 49 CFR §192.605(a) states:

"(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. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted."

4. Title 49 CFR §192.614(a) states in part:

"(a) Except as provided in paragraphs (d) and (e) of this section, each operator of a buried pipeline shall carry out, in accordance with this section, a written program to prevent damage to that pipeline from excavation activities."

5. Title 49 CFR §192.614(b) states in part:

"(b) An operator may comply with any of the requirements of paragraph (c) of this section through participation in a public service program, such as a one-call system, but such participation does not relieve the operator of responsibility for compliance with this section."

6. Title 49 CFR §192.614(c)(5) states:

"(c) The damage prevention program required by paragraph (a) of this section must, at a minimum:

(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins."

7. California Government Code (CGC) 4216.3 (a)(1) states:

"Any operator of a subsurface installation who receives timely notification of any proposed excavation work in accordance with Section 4216.2 shall, within two working days of that notification, excluding weekends and holidays, or before the start of the excavation work, whichever is later, or at a later time mutually agreeable to the operator and the excavator, locate and field mark the approximate location and, if known, the number of subsurface installations that may be affected by the excavation to the extent and degree of accuracy that the information is available either in the records of the operator or as determined through the use of standard locating techniques other than excavating, otherwise advise the person who contacted the center of the location of the operator's subsurface installations that may be affected by the excavation, or advise the person that the operator does not operate any subsurface installations that would be affected by the proposed excavation."

8. California Government Code (CGC) 4216.4(a) states in part:

"When the excavation is within the approximate location¹ of subsurface installation, the excavator shall determine the exact location of subsurface installations in conflict with the excavation by excavating with hand tools within the area of the approximate location of subsurface installations as provided by the operators in accordance with (Section 4216.3) before using any power-operated or power-driven excavating or boring equipment within the approximate location of the subsurface installation..."

The summary of the identified violations are 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. Pursuant to Commission Resolution ALJ-274², SED staff has the authority to issue citations for each violation found.

For any questions, please contact Aimee Cauquiran (415) 703-2055 or by email at Aimee.Cauquiran@cpuc.ca.gov.

Sincerely,

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Kenneth B
5/27/15

CC: Aimee Cauquiran / SED-GSRB
Terence Eng / SED-GSRB
Dennis Lee / SED-GSRB

ATTACHMENT: List of Incidents with Probable Violations

¹ CGC 4216(a) defines "Approximate location of subsurface facilities" as "a strip of land not more than 24 inches on either side of the exterior surface of the subsurface installation".

² Adopted by the Commission on December 1, 2011.

Attachment A
List of Incidents with Probable Violations

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Findings	Code Violation(s)
G20140218-03	2/18/2014	3023 Albany Avenue, Davis	PG&E	Baja Construction	PG&E failed to mark all subsurface facilities within the delineated area which resulted in the excavator damaging the unmarked 1-inch PE gas service.	49 CFR §192.605(a) 192.614(c)(5)
G20140219-04	2/19/2014	1918 Alum Rock Avenue, San Jose	PG&E	Northern Underground Construction	PG&E failed to accurately mark its gas subsurface facilities which resulted in excavation damage to the 0.5-inch plastic service located approximately 8 feet from the PG&E markings.	49 CFR §192.605(a) 49 CFR §192.614(b) CGC 4216.3(a)(1)
G20140306-01	3/6/2014	Sutter and Jones Streets, San Francisco	PG&E	Phoenix Electric Company	PG&E failed to mark all subsurface facilities inside the delineated area within the required timeframe and failed to inform the excavator that it could not complete the markings before the scheduled start date, which resulted in excavation damage to the unmarked 2-inch plastic gas main.	49 CFR §192.605(a) 49 CFR §192.614(c)(5) CGC 4216.3(a)(1)
G20140314-01	3/13/2014	640 Whipple Avenue, Redwood City	PG&E	N/A	PG&E contractor, ARB, failed to follow procedures to leak test the Save-A-Valve prior to performing hot-tap installation on transmission line L-101 resulting in an uncontrolled leak which required shutdown of a portion of the transmission line.	49 CFR §192.13(c)

G20140409-02	4/8/2014	1367 Palou Avenue, San Francisco	PG&E	San Francisco Public Works	PG&E marked an inactive gas main instead of the active 8-inch gas main, and failed to mark the portion of a 1-inch plastic service located between the inactive and active main resulting in the excavation damage on the 1-inch plastic service.	49 CFR §192.614(c)(5) CGC 4216.3(a)(1)
G20140618-01	6/18/2014	1640 School Street, Moraga	PG&E	N/A	PG&E's contractor, Lombardo Sawcut, failed to follow PG&E procedures of safely exposing subsurface installations prior to using power-operated equipment damaging a 2-inch steel main found with 12 inches of cover.	49 CFR §192.605(a) 49 CFR §192.614(a) CGC 4216.4(a)
G20141024-01	10/24/2014	Wible and Houghton Roads, Bakersfield	PG&E	Farmer	PG&E failed to respond to a USA request for locate and mark and carry out the requirements of its damage prevention procedures for critical facilities which resulted in excavation damage to transmission line L-300A.	49 CFR §192.605(a) 49 CFR §192.614(a) 49 CFR §192.614(c) CGC 4216.3(a)(1)
G20141107-01	11/7/2014	1 South Market Street, San Jose	PG&E	GM Engineering	PG&E failed to follow its procedures and mark its subsurface facilities within the required timeframe resulting in excavation damage to a 2-inch plastic main. Although PG&E attempted to coordinate a field meet with the excavator, there was no record to show that an agreement was reached. PG&E's attempts to reach the excavator were also not made until an hour before the excavation work was scheduled to begin.	49 CFR §192.605(a) 49 CFR §192.614(c)(5) CGC 4216.3(a)(1)

G20141212-02	12/6/2014	977 E Hillsdale Boulevard, Foster City	PG&E	Express Concrete Breaking and Cutting	The incident occurred on 12/6/2014 and major media was observed on site. However, PG&E failed to report the incident within 2 hours of meeting the reportable criterion and the incident was not reported to CPUC until 12/12/2014.	General Order 112-E Section 122.2(b)(1)
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