

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 23, 2017

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) submits the following Notice of Probable Violation (NOPV) for a DOT reportable incident investigation that occurred on August 10, 2016 at [REDACTED], Deer Park. SED found that PG&E's failure to follow utility procedures and/or federal regulators directly contributed to the incident. This letter serves as a notification to you that as a result of our investigation, SED found PG&E in violation of the following:

Title 49 CFR §49 CFR 192.605(a) states:

"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."

Title 49 CFR §49 CFR 192.805(f) states:

"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"

Title 49 CFR §49 CFR 192.805(b) states:

"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.]"

Title 49 CFR §49 CFR 192.801(b) states:

"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."

Title 49 CFR §49 CFR 192.481(a) states:

“Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows: If the pipeline is located onshore, then the frequency of inspection is at least once every 3 calendar years, but with intervals not exceeding 39 months.

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 violation. Pursuant to Commission Decision 16-09-055, SED staff has the authority to issue citations for each violation found.

For any questions, please contact Jason McMillan (916) 928-2271 or by email at jason.mcmillan@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno". The signature is fluid and cursive, with a long horizontal stroke at the end.

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

CC: Michael Bradley/PG&E Compliance
Susie Richmond/PG&E Compliance
Terence Eng / SED-GSRB
Dennis Lee / SED-GSRB
Jason McMillan/SED-GSRB

ATTACHMENT: Incident with Probable Violations