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**By Email**

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

Re: Response to January 14, 2020 – Notice of Gas Incident Violation for Pacific Gas and Electric Company – 2018 Q3 - 2019 Q2 PG&E NOPV Letter

Dear Mr. Eng:

This letter is in response to the Safety and Enforcement Division's (SED) letter dated January 14, 2020 regarding gas incidents that occurred on 10/2/2017, 10/16/2017 and 2/16/2018, and directing PG&E to describe the measures taken to address certain alleged violations. Attached is PG&E's response to the Notice of Gas Incident Violations Letter.

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 13805\_Confidentiality Declaration.pdf"). Confidential information is highlighted yellow or outlined red within the referenced document(s).

Sincerely,

/s/ Vincent Tanguay  
Director, Regulatory Compliance

cc: Dennis Lee, CPUC  
Mohammad Ali, CPUC  
Susie Richmond, PG&E

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Findings	Code Violation(s)	Response
G20171004-2369	10/2/2017	[REDACTED] Firebaugh	PG&E	N/A	On 9/28/2017, PG&E technicians were inspecting a customer primary set serving a Large Volume Customer [REDACTED] in response to high pressure alarm notifications received earlier that morning, when an overpressurization event occurred (MAOP is reported to be 60 psig). During inspection, PG&E technicians manually throttled the bypass valve to maintain supply to the customer. Although the technicians were said to be monitoring the gauge, they failed to observe the increase in pressure for 20 minutes. PG&E's standard TD-4540P-01 "Maintenance of Regulator Stations" currently do not address the use of bypass valves to maintain supply to customer. Based on the information gathered, SED found that PG&E's procedure does not adequately address 49 CFR §192.605(b)(5) which requires operators to include procedures for starting up and shutting down any part of the pipeline in a manner designed to assure operation within the MAOP limits plus the build-up allowed. PG&E must include guidance to its personnel on the maintenance of customer primary sets, the use of bypass valves when maintaining supply downstream, and emphasize the importance of monitoring pressures during maintenance.	49 CFR §192.605(b)(5)	<p>PG&amp;E agrees with the SED's finding. PG&amp;E has taken the following corrective actions to address this over pressure event and to prevent future occurrences:</p> <ul style="list-style-type: none"> <li>This station was reconfigured to protect it (installed slam shut, installed sulfur filter, brought the legacy ERX to start alarming into the control room, and confirmed the set points on the reg station). Additionally, in 2019, gas control moved all Legacy ERXs to alarm in the control room.</li> <li>CAP 118489695 has been entered to evaluate and track revision to TD-4540P-01 to add step in the Class A inspection section to always monitor downstream pressure, especially during manual bypass at single run stations.</li> <li>PG&amp;E teaches the importance of throttling a bypass in multiple courses provided to crewmembers. For example, "Regulator Refereshers (GPOM-7150)" was specifically targeted on the safety and critical thinking when bringing on or taking down a station. Additionally, material is included in 'Gas Fundamental 2 (GPOM-3000)' the regulation course, and in 'Gas Fundamental 1 (GPOM-2000)' describing the controls used when performing bypass activities.</li> </ul>
G20171016-2387	10/16/2017	Derrick Avenue and Palmer Avenue, Coalinga	PG&E	N/A	On 10/13/2017, PG&E was gathering pressure data from Large Volume Customers when it discovered that the meter set assembly (MSA) for GCUST20344 had a pressure of 465 psig, exceeding its maximum allowable operating pressure (MAOP) of 200 psig. PG&E's Measurement and Control Lab found sulfur in the regulation equipment and that the poor working condition of the regulation equipment was the cause of the overpressurization. Based on the information gathered, SED found PG&E in violation 49 CFR §192.605(a) for: (1) failure to follow PG&E procedure TD-4540P-02 Section 5 by not downloading the electronic pressure recording and reviewing the data following the 8/29/2016 and 8/29/2017 maintenance and; (2) failure to follow PG&E procedure when the maintenance crew installed a test gauge on the bypass line instead of installing a test gauge downstream of regulation and the outlet valve as required in TD-4540P-02 during the 8/29/2017 maintenance. Furthermore, SED is concerned that PG&E's current procedures insufficiently address abnormal operations which led to the overpressurization not being detected during the 8/29/2017 maintenance. PG&E procedure TD-4530P-04 "Performance Checks and Maintenance of Turbine Gas Meters" does not require personnel to verify "as-found" upstream and downstream pressure prior to performing meter maintenance. Similarly, PG&E procedure TD-4540P-02 "Maintenance of Gas Regulation Equipment on Meter Set Assemblies" allows for missed opportunities to detect similar abnormal conditions when multiple maintenance tasks are performed since the "as-found" pressure can be taken after pressure has been relieved from the facilities during performance of previous tasks, as was the case on 8/29/2017 when the PG&E crew performed performance check of the turbine gas meter prior to maintaining the gas regulation equipment on the MSA.	49 CFR §192.605(a)	<p>PG&amp;E agrees with the SED's finding. As described in the causal evaluation report, PG&amp;E has taken the following corrective actions to address this over pressure event and to prevent future occurrences:</p> <ul style="list-style-type: none"> <li>TD-4540S (attached) has been updated to require an annual A inspection and an 8 year B inspection for Transmission Large Volume Customer Meter Sets (LVCM).</li> <li>TD-4300B-07 (attached) has been updated to provide clarification that a pressure recorder is still required after a Class A inspection is completed.</li> <li>Additionally, CAP 118449595 has been created to evaluate and track revisions to TD-4540P-02 and TD-4530P-04 that will address the SED's concerns that PG&amp;E's procedures insufficiently address abnormal operations which led to the overpressurization not being detected during the 8/29/2017 maintenance.</li> </ul>
G20180216-2497	2/16/2018	[REDACTED] Street, San Francisco	PG&E	Mitchell Engineering	On 02/16/2018, a third-party contractor struck a gas service line with a mini excavator, resulting in an unintentional release of gas. The contractor had a valid Underground Service Alert (USA) ticket (W734700952), however according to PG&E, due to a weak locating signal, a PG&E locator was required to use maps to determine the location of the service, resulting in markings that were off by approximately 5 feet. PG&E's map for this service line incorrectly indicated a 1/2" plastic service instead of 1" plastic service, and did not indicate an offset of approximately 5 feet east of the actual service line marking. Based on SED's investigation, this incident was caused by PG&E's violation of Title 49 CFR § Part 192.605(b)(3) for failing to provide their Mark and Locate personnel with accurate information which contributed to the mismarking of the gas service line.	49 CFR §192.605(b)(3)	<p>PG&amp;E agrees with the SED's finding. PG&amp;E has taken the following corrective actions to prevent future occurrences:</p> <p>At the time of this dig-in, the locator called Gas Mapping for a verbal confirmation of the Gas Service Record, which confirmed his signal findings and map information in the field. The following actions have been taken:</p> <ul style="list-style-type: none"> <li>Gas service records and an updated App (Maps+) are now available to locators in the field. This additional information allows locators to further research maintenance history before marking.</li> <li>When service orders are found to be in conflict with the signal the locator receives on his/her device, the map correction form is to be submitted via the Corrective Action Program.</li> <li>CAP114560761 was created to perform a map correction on the above mentioned incorrectly mapped service. Map correction is completed and updated to reflect the correction.</li> </ul>