

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 9, 2022

G20210825-3258-DOT

Ms. Janisse Quinones  
Senior Vice President, Gas Engineering  
Pacific Gas and Electric Company  
Gas Transmission and Distribution Operations  
6121 Bollinger Canyon Road  
San Ramon, CA 94583

SUBJECT: Notice of Gas Incident Violations by Pacific Gas and Electric Company (PG&E) –  
Department of Transportation (DOT) Incident # 1314710

Dear Ms. Quinones:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following Notice of Probable Violation (NOPV) letter as part of its investigation of DOT reportable incident (DOT#1314710) that occurred on August 25, 2021, at the intersection of Race Street & Park Avenue, in San Jose, Santa Clara County, CA. Lightwave Construction, a third-party excavator, struck a PG&E facility (3-inch dead-end steel gas main, herein referred to as “3-inch gas main”) with a horizontal boring machine, resulting in property damage to PG&E’s 3-inch gas main and unintentional release of natural gas into the atmosphere. This letter serves as a notification to you that as a result of our investigation, SED found PG&E in violation of the following:

**General Order (G.O.) 112-F, Reference Title 49 Code of Federal Regulations (CFR) Part 192, §192.605(b)(3) states:**

- (b) *“Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.*
- (3) *“Making construction records, maps, and operating history available to appropriate operating personnel.”*

**G.O. 112-F, Reference Title 49 CFR Part 192, §192.614(c)(5) states in part:**

- (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.”*

The summary of the identified violations is 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 identified in the "Attachment A". Pursuant to Commission Decision 16-09-055, SED staff has the authority to issue citations for each violation found.

Thank you for your cooperation in these investigations. If you have any questions, please contact Kai Cheung at (415) 940-8836 or by email at [Kai.Cheung@cpuc.ca.gov](mailto:Kai.Cheung@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

Terence Eng, P.E.  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Incident with Probable Violations

cc: Susie Richmond / PG&E  
Dennis Lee / SED  
Joel Tran / SED  
Kai Cheung / SED

**Attachment A  
Incident with Probable Violations**

<b>CPUC Incident ID</b>	<b>Incident Date</b>	<b>Address</b>	<b>Utility</b>	<b>Investigative Findings</b>	<b>Code Violations</b>
G20210825-3258	8/25/2021	Race Street & Park Avenue San Jose Santa Clara County	PG&E	<p>1. SED found PG&amp;E in violation of G.O. 112-F, Reference Title 49 CFR §192.605(b)(3) for not making accurate maps available to PG&amp;E’s operating personnel. PG&amp;E’s Plat map did not show the 3-inch gas main damaged by the third-party excavator in this incident. PG&amp;E believes that this is a possible reason its locate-and-mark personnel missed the 3-inch gas main.</p>	<p>G.O. 112-F, Reference Title 49 CFR Part 192, §192.605(b)(3)</p>
				<p>2. SED found PG&amp;E in violation of G.O. 112-F, Reference Title 49 CFR Part 192, §192.614(c)(5) for failing to provide accurate temporary markings of buried pipelines within the delineated area of excavation before the activity began. PG&amp;E admitted in its investigation that its locate and mark personnel did not mark the damaged 3-inch gas main due to the incorrect Plat map.</p>	<p>G.O. 112-F, Reference Title 49 CFR Part 192, §192.614(c)(5)</p>