

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 26, 2023

Non-DOT NOPV Q4 - 2022

Ms. Christine Cowsert  
VP, Gas Asset Management and System Operations  
Pacific Gas and Electric Company  
Gas Transmission and Distribution Operations  
6121 Bollinger Canyon Road  
San Ramon, CA 94583

**SUBJECT:** Notice of Gas Incident Violation (NOPV) for Pacific Gas and Electric Company (PG&E)

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following Notice of Probable Violation (NOPV) for Non-DOT reportable incident investigation completed as of the fourth quarter of 2022 – Q4 2022. This letter serves as notification to you that as a result of our investigation, SED found PG&E in violation of the following:

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

*“(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.....”*

The summary of the identified violation 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 violation.

For any question, please contact Mohammad Ali at (916) 928-2109 or at [ma5@cpuc.ca.gov](mailto:ma5@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

CC: Susie Richmond / PG&E  
Mohammad Ali / SED-GSRB  
Terence Eng / SED-GSRB  
Hengyao Chen / SED-GSRB

ATTACHMENT: Incident with Probable Violation

**Attachment A**  
**Incident with Probable Violation**

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Finding	Code Violation
G20220901-3422	9/1/22	Union Street and Sea Avenue, Eureka, Humboldt County	PG&E	N/A	On September 1, 2022, an overpressure event occurred on a section of the pipeline inside the distribution regulator station (HU_EUR_RR30) due to a leaking by-pass valve (V-3) and PG&E field crew's incorrect operation. The highest pressure reached 127.3 PSIG which was 154.6% above the maximum allowable operation pressure (MAOP) of 50 PSIG. The overpressure pipe section was vented to 0 PSIG and the leaking valve was repaired before field crew contacted gas distribution control center (GDCC). A post-incident leak survey was conducted on the same day, and no leak was found. SED found PG&E in violation of Title 49 CFR, Part 192, §192.605(a) for failing to follow Utility Procedure TD-4441P-01.	Title 49 CFR §192.605(a)