

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 19, 2022

Non-DOT NOPV Q2 - 2022

Ms. Christine Cowsert
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 (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 Violations (NOPV) for non-DOT reportable incident investigations completed as of the second quarter of 2022 - Q2 2022. This letter serves as notification to you that as a result of our investigations, SED found Pacific Gas and Electric Co. (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.....”

2. Title 49 Code of Federal Regulations (CFR), Part 192, §192.605(b)(3) states in part:

“(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.”

3. G.O. 112-F, Reference Title 49 CFR, Part 192, §192.740 (b) states in part:

(b) Each pressure regulating or limiting device, relief device (except rupture discs), automatic shutoff device, and associated equipment must be inspected and tested at least once every 3 calendar years, not exceeding 39 months, to determine that it is:

(1) In good mechanical condition.

(2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed.

(3) Set to control or relieve at the correct pressure consistent with the pressure limits of § 192.197; and to limit the pressure on the inlet of the service regulator to 60 psi (414 kPa) gauge or less in case the upstream regulator fails to function properly; and

(4) Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.

4. California Public Utilities (PU) Code §451 states:

"Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities, including telephone facilities, as defined in Section 54.1 of the Civil Code, as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public."

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 violations.

For any questions, please contact Mohammad Ali at (916) 928-2109 or by email at ma5@cpuc.ca.gov.

Sincerely,



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
Joel Tran / SED-GSRB
Hengyao Chen / SED-GSRB

ATTACHMENT: Single Incident with Probable Violations

Attachment A
Single Incident with Probable Violations

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Findings	Code Violation(s)
G20220129-3330	1/29/2022	700/721 Leveroni Road, Sonoma, County: Sonoma	PG&E	N/A	On January 29, 2022, at approximately 1300 hours, PG&E identified an overpressure event occurred at 721 Leveroni Road in Sonoma due to a farm tap leak by malfunctioning equipment. The highest pressure reached was 75 PSIG, which was 25% above the maximum allowable operating pressure (MAOP) of 60 PSIG. There were no reports of injuries, fatalities, or customer impact regarding this incident. This incident is being reported due to exceeding MAOP plus allowable build up. Based on the information gathered, SED found PG&E in violation of Title 49 CFR, Part 192, §192.605(a) for failing to follow Utility Standards, §192.605(b)(3) for failing to make construction records, maps, and operating history available to appropriate operating personnel, § 192.740(b) for failing to test the farm tap regulator set every 3 calendar years, not exceeding 39 months, and PU Code §451 for failing to maintain the farm tap regulator set.	Title 49 CFR §192.605(b)(3), §192.605(a) and §192.740(b), PU Code §451