

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 1, 2020

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

SUBJECT: Notice of Gas Incident Violations by Pacific Gas and Electric Company (PG&E) -  
DOT Incident #1206479

Dear Ms. Cowsert,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following revised Notice of Probable Violation (NOPV) regarding a DOT reportable incident (#1206479) that occurred on March 10, 2018. This incident resulted in approximately \$638,472 in property damage, and one injury requiring in-patient hospitalization. This revised NOPV letter is to provide clarity to SED's letter dated September 6, 2019.

**U.S. Department of Transportation Title 49 CFR §192.605 states in part:**

*“(b) 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.”*

In 1951, PG&E installed a service line at [REDACTED] and created Gas Service Order #6798 LW indicating that this service line was partially copper.

In 2006, PG&E initiated its Copper Service Replacement Program (CSRP) as part of PG&E's Gas Pipeline Replacement Program. Copper service lines are at greater risk for internal corrosion, and PG&E sought to proactively remove and replace them from their system.

Instead of using information from PG&E's Gas Service Order #6798 LW as required by §192.605(b)(3), PG&E relied solely on paper maps to develop its CSRP. However, PG&E's paper maps did not indicate the service line at [REDACTED] as being partially copper. Therefore, PG&E failed to make all construction records, particularly the Gas Service Order #6798 LW, available to the appropriate personnel when identifying copper service lines for the CSRP.

As a result, PG&E failed to identify the partial copper service line at [REDACTED] for inclusion in its CSRP. The partial copper service line remained in service where it developed internal corrosion, a known threat to copper service lines. As internal corrosion over time led to

a leak at the transition fitting, natural gas migrated into [REDACTED] and subsequently ignited causing approximately \$638,472 in property damage, and one injury requiring in-patient hospitalization.

Therefore, SED found that PG&E failed to make construction records available to the appropriate operating personnel and thus violated Title 49 CFR, Part 192, Section 192.605(b)(3).

Within 30 days, please provide your response to the violation listed in this letter.

For any questions, please contact Joel Tran (415) 703-1508 or by email at [joel.tran@cpuc.ca.gov](mailto:joel.tran@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Terence Eng", with a long horizontal flourish extending to the right.

Terence Eng  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

CC: Vincent Tanguay / PG&E  
Susie Richmond / PG&E  
Dennis Lee / SED-GSRB  
Joel Tran / SED-GSRB