

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 4, 2021

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 Violation for Pacific Gas and Electric Company

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 in fourth quarter (Q4) of 2020. This letter serves as notification to you that as a result of our investigation, SED found Pacific Gas and Electric Company (PG&E) in violation of the following:

**1. Title 49 Code of Federal Regulations (CFR) §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.”*

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 questions, please contact Mohammad Ali at (916) 928-2109 or by email at 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

ATTACHMENT: List of Incidents with Probable Violations

**Attachment A**  
**List of Incident(s) with Probable Violation(s)**

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Findings	Code Violation(s)
G 20200306-3011	3/6/2020	<div style="background-color: black; width: 20px; height: 10px; display: inline-block; vertical-align: middle;"></div> Santa Anna Rd., Hollister	PG&E	N/A	<p>On March 6, 2020, PG&amp;E experienced an overpressure event at the at the Hollister Gas Metering Station in Hollister, San Benito County. Line 301A is fed from the Hollister Gas Metering Station. Line 301A reached a maximum pressure of 569.29 psig from Hollister Station at MP 0.00 to Moss Landing Station at MP 10.00. This event is considered a large over-pressure (OP) event, exposing the piping and equipment to undesired operating conditions and risk. PG&amp;E’s action led to the overpressure, including: bypassed over-pressure protection without using additional safeguards, failure to provide adequate span-of-control oversight of an unqualified technician operating valves, performing leak repair work without an appropriate clearance, and lack of supervisor awareness of the tasks being performed on the day of the event. Therefore, SED finds PG&amp;E in violation of 49 CFR §192.605(a).</p>	49 CFR §192.605(a)