

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 24, 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: Closure letter for Notice of Probable Violations for Non-DOT Reportable incidents issued in first quarter (Q1) of 2021

Dear Ms. Cowsert,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) has reviewed the Pacific Gas & Electric Company's (PG&E) response of May 24, 2021, to the Notice of Probable Violation (NOPV) forwarded to PG&E on May 1, 2021, for incidents that occurred during the quarter Q1 of 2021.

A summary of findings documented by SED, PG&E's responses to SED's findings, and SED's evaluation and conclusion of PG&E's responses taken for each finding is attached with this letter.

This letter serves as an official closure of the 2021-Q1 Non-DOT NOPV letter for incident G20200804-3102 in Fresno and any matters that are being recommended for enforcement will be processed through the Commission's Citation program or a formal proceeding. Pursuant to Commission Decision 16-09-055, SED has the authority to issue citations for each violation found.

If you have 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: Vincent Tanguay / PG&E
Susie Richmond / PG&E
Terence Eng / SED-GSRB
Mohammad Ali / SED-GSRB

SUMMARY OF INVESTIGATION FINDINGS

SED Findings: SED identified 1 probable violation as described below:

- I. In the NOPV letter dated 5/1/2021, the violation SED found was that PG&E violated 49 CFR §192.201(a)(2)(i) as shown below:

- 1. Title 49 Code of Federal Regulations (CFR) §192.201(a)(2)(i) states in part:**

(a) Each pressure relief station or pressure limiting station or group of those stations installed to protect a pipeline must have enough capacity, and must be set to operate, to insure the following:

(2) In pipelines other than a low pressure distribution system:

(i) If the maximum allowable operating pressure is 60 p.s.i. (414 kPa) gage or more, the pressure may not exceed the maximum allowable operating pressure plus 10 percent, or the pressure that produces a hoop stress of 75 percent of SMYS, whichever is lower;

On August 5, 2020, at approximately 1224 hours, PG&E confirmed an overpressure event within the Fresno Gas Load Center in Fresno, Fresno County. This condition occurred after a clearance associated with scheduled maintenance on Distribution Regulation Station GS-03. Transmission regulation Station GS-07 is connected to GS-03 by a header and uses 10-inch Mooney regulators. When the inlet valve (V-120) to GS-03 was being opened, it caused a low demand situation in the header. The 10-inch Mooney regulators have been known to not provide adequate control in low demand situations since 2017. The pressure in the header increased to approximately 597.8 psig, exceeding the header's MAOP of 400 psig. The 10-inch Mooney regulators used by GS-07 failed to control the downstream pressure. There are no known injuries, no fatalities, and no media on site. There was no customer impact. SED found PG&E in violation of 49 CFR, 192, Section 192.201(a)(2)(i) for allowing the pressure to increase above the MAOP plus 10 percent.

PG&E's Response:

PG&E recognizes SED's findings. Please note that all causes, (direct, root and contributing) with associated corrective actions were self-identified by PG&E in the previously provided Causal Evaluation, "Index 13866 Supp02_Hollister OP Event RCE Final Draft", submitted 9/10/2020. Below, please find Attachment 1 for an update on all corrective actions from the Causal Evaluation (RCE) related to this OP event. In addition, in September 2020, PG&E introduced training on our revised Operations and Maintenance manual, GAS-0174WBT, to reinforce that our Operations and Maintenance manual is a legal commitment and to reinforce that all procedures must be followed as written. This training is required for all gas employees and contractors who work on PG&E facilities. As of January 2021, a total of 4,867 individuals have completed training for GAS-0174WBT. This includes 3,799 Employees and Contractors who have LANIDs and 1,068 external Contractors. In addition, 100% of the current Gas Pipeline Operations & Maintenance (GPOM) employees have completed the training.

SED's Conclusion:

Upon review of PG&E's response, SED agrees that PG&E adopted the corrective actions by self-identifying the incident and performing causal evaluation, updating the Operations and Maintenance Manual with training all GPOM employees to address this over pressure event and to prevent future occurrence.

SED has opted not to impose a fine or penalty at this time.