

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 17, 2022,

Non-DOT NOPV Q3-2022

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 third quarter (Q3) of 2022

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 November 3, 2022, to the Notice of Probable Violations (NOPV) forwarded to PG&E on October 5, 2022, for incidents that occurred during the quarter Q3 of 2022 (Q3-2022).

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 2022-Q3 Non-DOT NOPV letter for incidents G20211217-3308 in Elk Grove, G20220224-3341 in San Jose and G20220318-3358 in Salinas, 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:

Susie Richmond / PG&E
Terence Eng / SED-GSRB
Mohammad Ali / SED-GSRB

SUMMARY OF INVESTIGATION FINDINGS

SED Findings: SED identified 3 probable violations as described below:

- I. In the NOPV letter dated 10/5/2022, the violations SED found were that PG&E violated GO 112-F §122.2(b)(2)(1), and Title 49 CFR §192.605(a) as shown below:

1. General Order (G.O.) 112-F, §122.2(b)(1) states in part:

“(b) In the event of an incident listed in 122.2(a) above, an Operator shall go to the Commission’s website, select the link to the page for reporting emergencies and follow the instructions thereon. If internet access is unavailable, the Operator may report using the backup telephone system.

1. If the Operator is notified of the incident during its normal working hours, the report should be made as soon as practicable but no longer than 2 hours after the Operator is aware of the incident and its personnel are on the scene.”

On Friday 12/17/21, PG&E reported that the outlet of the Carson Ice Cogen Station had experienced pressures of up to 620 psig, which exceeded the station's 412 psig Maximum Allowable Operating Pressure (MAOP). PG&E's investigation determined that Sacramento Municipal Utility District's (SMUD) cogeneration plant back fed gas through a PG&E check valve and a closed PG&E block valve at the outlet of the station. PG&E isolated SMUD's cogeneration plant and returned the facilities to service once normal operating conditions and pressures could be restored. This incident was reported due to exceedance of MAOP plus allowance. SED observed that PG&E personnel failed to recognize that this overpressure event was a reportable incident until the Facilities Integrity Management Program (FIMP) Risk team received the pressure data four days after PG&E technicians had downloaded and viewed it. SED found that PG&E was in violation of General Order 112-F 122.2(b)(1) for failure to report this incident as soon as practicable after being notified.

PG&E’s Response:

On Monday, December 13, 2021, PG&E personnel identified a leaking check valve and block valve resulting in pressure of 620 psig at the meter set in the Carson Ice Cogen Station. The Carson Ice Cogen Meter and Regulator Station was tested to a 720 psig MAOP upon installation and had been lowered based on the operational history of L-108 (MAOP of 412 psig). PG&E personnel did not identify the MAOP delineation discrepancy until Friday, December 17, 2021, during Facilities Integrity Management Program’s (FIMP) review. Upon becoming aware of a potential reportable event, FIMP communicated to the Gas Control Center (GCC) at approximately 20:15, resulting in an EPage notification being sent at approximately 20:30. In alignment with section 4 of PG&E procedure TD-4413P-01, the CPUC/DOT on-call representative provided a notification of the event to CPUC via the Commission’s website no longer than four hours (during non-working hours) after PG&E confirmed discovery of the incident.

SED’s Conclusion:

Upon review of PG&E’s response, SED agrees with the PG&E’s explanation of their personnel’s failure to identify MAOP delineation discrepancy between the tested MAOP of 720 psig and the operational history of L108 with a MAOP of 412 psig, that resulted in the violation of reporting the incident. SED has opted not to impose a fine or penalty for this event.

2. 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.....”

On February 24, 2022, at approximately 1230 hours PG&E personnel identified and reported to SED an under-pressure event occurred on the distribution main along Avenida Grande Street in San Jose. Approximately 93 residential customers were impacted for 12 hours. Relights continued until February 25th at 0000 hours to ensure no customer was left without gas. The event occurred during a clearance to deactivate a 2” main where a solid plug was used instead of a ported plug. Plug was replaced, and gas was restored at 2258 hours. There were no reports of injuries or fatalities, and no media or local law enforcement were seen at the site. 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 Standard TD-4441S Rev.2, which required to port plug the main in preparation to deactivate the old section of pipeline resulting in an under-pressure condition.

PG&E’s Response:

The under-pressure event was investigated and determined to be caused by human error, inattention, and complacency. Use of the ported plug was communicated correctly in PG&E’s TD-4441S Rev.2, but the employee selected the wrong plug and proceeded to install the plug without proper verification. The employee’s OQ-0602 Operate Line Stopper M2 Tap/Plug ¾” – 4” was suspended on March 2, 2022. After passing the written and performance exams on April 11, 2022, the employee’s OQ-0602 Operate Line Stopper M2 Tap/Plug ¾” – 4” was re-instated.

SED’s Conclusion:

Upon review of PG&E’s response, SED agrees that PG&E adopted the corrective actions by suspending and requalifying the employee by written test and performance exam.

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

3. 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...”.

On March 16, 2022, an overpressure event occurred on the meter-set assembly which serve the large volume customer (LVC) GCUST5870. The overpressure was due to gas contaminants in the regulation equipment. On March 17, 2022, PG&E performed a Class A inspection, replaced the regulation component, and installed a thermal relief valve (TRV) as a preventative measure. On March 18, 2022, PG&E conducted a special leak survey and conducted a MOC211 MAOP evaluation resulting in an increase to delivery pressure from 60 psig to 75 psig. SED found PG&E in violation of Title 49 CFR, Part

192, §192.605(a) for failing to follow Utility Procedure TD- 4540P-02., which requires to create a corrective notification to install Sulfur-Gon filters. SED found that PG&E was in violation of General Order 112-F 122.2(b)(1) for failure to report this incident as soon as practicable after being notified.

PG&E's Response:

On May 20, 2020, PG&E published Utility Bulletin TD-G-11B-001, which was effective on that date. The "Sulfur Filter Installation Stand Down" bulletin communicated that sulfur filter cartridges should not be installed due to liquid release and freezing which creates an over-pressurization risk. As a result of that bulletin, the employee misunderstood the requirements and did not create a corrective notification to install the Sulfur-Gon filter housing without the sulfur cartridge as directed by the bulletin. The bulletin is still in effect currently. While the employee did not create the corrective notification, the system did not experience negative consequences as a result of the misunderstanding. The Causal Evaluation reference number is SAPN 123152084, which is included as a part of our standard data requests associated with reportable incidents

SED's Conclusion:

Upon review of PG&E's response, SED agrees with PG&E's explanation of the situation of their employee's misunderstanding the requirement of installing Sulfur-Gon filters with the recently published PG&E Utility Bulletin TD-G-11B-001- "Sulfur Filtration Stand Down".

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