

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 5, 2022

Non-DOT NOPV Q3 - 2022

Ms. Christine Cowsert  
VP, Gas Asset Management and System Operations  
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 third quarter of 2022 – Q3 2022. This letter serves as notification to you that as a result of our investigations, SED found PG&E in violation of the following:

**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.”*

**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.....”*

The summary of the identified violations 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 question, please contact Mohammad Ali at (916) 928-2109 or at [ma5@cpuc.ca.gov](mailto:ma5@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee". The signature is written in a cursive style with a blue dot above the 'i' in "Dennis".

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  
Victor Muller / SED-GSRB  
Hengyao Chen / SED-GSRB

ATTACHMENT: Incidents with Probable Violations

**Attachment A**  
**Incidents with Probable Violations**

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Findings	Code Violation(s)
G20211217-3308	12/17/21	8541 Laguna Station Rd, Elk Grove, Sacramento County	PG&E	N/A	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's) 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.	GO 112-F 122.2(b)(1)

G20220224-3341	2/24/2022	Avenida Grande, San Jose, Santa Clara County	PG&E	N/A	<p>On February 24, 2022, at approximately 1230 hours PG&amp;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 25<sup>th</sup> 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&amp;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.</p>	Title 49 CFR §192.605(a)
G20220318-3358	3/18/2022	11771 Old Stage Road, Salinas, Monterey County	PG&E	N/A	<p>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&amp;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&amp;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&amp;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.</p>	Title 49 CFR §192.605(a)