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**Non-DOT NOPV Q3 - 2022**

November 3, 2022

Mr. Dennis Lee, P.E.  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: Notice of Gas Incident Violations (NOPV) for Pacific Gas and Electric Company (PG&E)

Dear Mr. Lee:

Pacific Gas and Electric Company (PG&E) submits this response to the Safety and Enforcement Division’s (SED) Notice of Probable Violations (NOPV) letter dated October 5, 2022, associated with non-DOT reportable incident investigations completed as of the third quarter of 2022 – Q3 2022. For clarity, Attachment A of SED’s NOPV letter is repeated below followed by PG&E’s responses. A table of PG&E attachments is included at the end of this document.

**PUC ID: G20211217-3308:**

Date 12/17/21  
Address [redacted] Laguna Station Rd, Elk Grove, Sacramento County  
Code Reference GO 112-F 122.2(b)(1)

**Investigative Findings:**

On Friday 12/17/21, PG&E reported that the outlet of the [redacted] 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 [redacted] 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 [redacted] 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.

**Response to G20211217-3308:**

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 [REDACTED] Cogen Station. The [REDACTED] 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.

**Attachments 1, 2, 3, 5, 6**

**PUC ID: G20220224-3341**

Date 2/24/2022  
Address Avenida Grande, San Jose, Santa Clara County  
Code Reference Title 49 CFR §192.605(a)

**Investigative Findings**

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.

**Response to G20220224-3341**

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 3/4" – 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 3/4" – 4" was re-instated.

**Attachment 4**

**PUC ID: G20220318-3358**

Date 3/18/2022  
Address [REDACTED] Old Stage Road, Salinas, Monterey County  
Code Reference Title 49 CFR §192.605(a)

**Investigative Findings**

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.

**Response to G20220318-3358**

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.

**Attachment 7**

Please contact Susie Richmond at (925)-786-0267 or [Susie.Richmond@pge.com](mailto:Susie.Richmond@pge.com) for any questions you may have regarding this response.

Sincerely,

/s/ Kristina Castrence

Director, Gas Regulatory and Risk

cc: Terence Eng, SED-GSRB  
 Mohammad Ali, SED-GSRB  
 Joel Tran, SED-GSRB  
 Hengyao Chen, SED-GSRB  
 Christine Cowsert, PG&E  
 Frances Yee, PG&E

**Attachment Table:**

Issue ID	Document Title	Attachment Number	Description
PUC ID: G20211217-3308	CPUC ID no 211217-15043_CONF.pdf	1	Gas Safety Incidents & Emergencies Sheet
PUC ID: G20211217-3308	CPUC Reportable Incident 12_17_21 - OP Event in Elk Grove_CONF.pdf	2	Email Communication
PUC ID: G20211217-3308	OP Event Report_2021_12_17_Quick_Hit_CONF.pdf	3	OP Event Quick Hit
PUC ID: G20220224-3341	Suspension and Requalification System Documentation_CONF.pdf	4	Qualifications Document
PUC ID: G20211217-3308	SVCEM Tool ePage_CONF.pdf	5	Email Communication
PUC ID: G20211217-3308	Utility Procedure TD 4413P 01.pdf	6	Reporting Process
PUC ID: G20220318-3358	Utility Bulletin TD-G-11B-001	7	Instruction to Stop Sulfur Filter Installation