



Public Utilities Commission
STATE OF CALIFORNIA

Citation Date: January 10, 2025
Citation #: D.16-09-055 G.25-01-002
Utility/Operator ID#: 15007

CITATION
ISSUED PURSUANT TO DECISION 16-09-055

Gas Corporation (Utility) To Which Citation is Issued:

Pacific Gas and Electric (Operator ID# 15007)

OFFICER OF THE RESPONDENT:

Mr. Austin Hastings
Vice President, Gas Engineering
Pacific Gas and Electric Company
6121 Bollinger Canyon Road
San Ramon, CA 94583

CITATION:

Pacific Gas and Electric Company (PG&E or Utility) is cited for five violations resulting in a financial penalty of \$1,600,000. The Safety and Enforcement Division (SED) discovered these violations in its investigation of Incident Number G20220523-3385, which occurred on April 29, 2022. A PG&E Foreman sustained fatal injuries, and a PG&E Construction Operator sustained facial fractures while attempting to dislodge two cleaning pigs that became stuck during a drying pipeline operation and ejected out of a launcher. SED's investigation revealed that PG&E failed to follow its internal procedures TD-4137P-03 and T-1448B which could have prevented the injury and fatality.

VIOLATIONS:

PG&E is cited for violating G.O. 112-F, which incorporates by reference Title 49 Code of Federal Regulations (CFR) Part 192, Section 192.13(c), five times as itemized in this citation.

General Order (GO) 112-F, Rule 101.2, states in part:

These rules are incorporated in addition to the Federal Pipeline Safety Regulations, specifically, Title 49 of the Code of Federal Regulations (49 CFR), Parts 191, 192, 193, and 199, which also govern the Design, Construction, Testing, Operation, and Maintenance of Gas Piping Systems in the State of California.

Title 49 Code of Federal Regulations (CFR) Part 192, Section 192.13(c) states:

Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.



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ENCLOSURES:

The following enclosures were used to establish the findings of fact:

Enclosure 1 – SED Incident Investigation Report, dated April 2, 2024

Enclosure 2 – SED Notice of Probable Violation (NOPV), dated April 29, 2024

Enclosure 3 – PG&E Response to SED’s NOPV, dated May 29, 2024

Enclosure 4 – Root Cause Evaluation (RCE) Report, GO Calistoga Pigging SIF-A Incident

Enclosure 5 – PG&E Utility Procedure: TD-4137P-03 Drying Procedure for Pipelines

Enclosure 6 – PG&E DFM-0405-01, T-1448B Hydrostatic Test Procedure with Cleaning

STATEMENT OF FACTS

The above violations are documented in the attached *Enclosure 1 – SED Incident Investigation Report* which is based on the following: SED interviews with witnesses and SED’s review of PG&E’s records and data request responses.

BACKGROUND

On May 2, 2022, PG&E personnel reported a non-DOT reportable incident to the California Public Utilities Commission, Safety and Enforcement Division (SED). The incident occurred on April 29, 2022, during a Strength Test Project T-1448B, in the City of Calistoga, Napa County, California.

From April 18 to 29, 2022, PG&E took a pipeline segment “Out-of-Service” to perform a hydrotest to ensure pipeline integrity of the pipeline segment that ran along St. Helena Highway in Calistoga (2.4 miles in length). As part of the hydrotest, PG&E subsequently began a drying operation with a foam pig. The purpose of the drying operation was to remove the water and moisture from the pipeline segment that was recently hydrotested before returning the pipeline segment into service. Strength Test Project T-1448B was split into two segments. Segment #1 spanned from Location K to Location H and Segment #2 spanned from Location H to Location A. PG&E’s Root Cause Evaluation (RCE) report indicated a seven-person Gas Transmission General Construction (GTGC) crew was assigned to conduct the drying pig operation. The GTGC crew was split into a team of four people, who oversaw the launching of the pig from one end while another team of three people oversaw receiving of the pig at the other end. The launching team consisted of a Foreman (Foreman H), a Construction Operator (Construction Operator-H), Utility Worker (Utility Worker-H), and contract laborer (Contract Laborer-H). The receiving team consisted of a Working Leader (Working Leader-A),



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Construction Operator (Construction Operator-A), and a Backhoe Operator (Backhoe Operator-A). One contract inspector was assigned to be at each location (Inspector-A and Inspector-H).

The crew completed the drying pig operation of Segment #1 and began the drying pig operation on Segment #2. The GTGC crew completed the 11th pig run on Segment #2 when the crew ran out of foam pigs. The Foreman-H ordered additional pigs from the PG&E's stockyard and they were delivered.

The GTGC crew resumed the drying pig run after receiving additional pigs. On the 12th pig run, the crew decided to run two drying pigs in quick succession instead of a single pig at a time. The crew immediately identified that the two pigs were stuck in the pipeline. The GTGC crew developed a plan to dislodge the stuck pigs. PG&E's internal RCE report indicated that one of the plans the crew developed was to reverse the launcher and receiver roles and the GTGC crew responsibilities.

To carry out this plan, PG&E installed an air compressor at location A to push the foam pig in the reverse direction of what the GTGC crew had done in the previous 11 pig runs. Location H was to serve as the foam pig receiver and Location A was to serve as the launcher. Although the functions of the receiver and the launcher were to be reversed, the GTGC crew members' locations did not change.

Foreman-H at location H instructed one of the GTGC crew members (the Construction Operator-H) to open the blow-down valve on location H which was subsequently serving as a receiver. After opening the blowdown valve, Construction Operator-H, accompanied by Foreman-H, walked to the receiver door. Foreman-H opened the launcher (serving as receiver) door to look inside the receiver with a flashlight. While Foreman-H and Construction Operator-H were looking inside the launcher, the pigs became dislodged, ejected out of the receiver, and struck both workers. Foreman-H and Construction Operator-H were airlifted to local hospitals. Construction Operator-H sustained facial injuries and Foreman-H sustained fatal injuries.

SED's investigation revealed that the drying pig operation techniques used by PG&E's GTGC crew failed to comply with PG&E's policy TD 4137P-03 and T-1448B. PG&E's internal procedures outline specific safety procedures for PG&E personnel to follow when conducting drying pig operations. These safety requirements are outlined below for each of the five violations.

First Violation

PG&E's Procedure TD-4137P-03, Section 2.5.4 states:

If running multiple consecutive pigs, space out pigs by a mile (or approximately one pig every 20 minutes). Do not exceed launcher pressure limitation when running multiple pigs.



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PG&E launched two pigs in tandem (one immediately following the other) during pig runs 1, 3, and 12. PG&E failed to space out pigs by a mile (or approximately one pig every 20 minutes) as required by PG&E Procedure TD-4137P-03, Section 2.5.4. PG&E is in violation of GO 112-F, referenced Title 49 CFR Part 192 Section 192.13(c), for failing to follow its internal procedure TD-4137P-03, Section 2.5.4. This violation occurred in three (3) separate instances.

Second Violation

PG&E's Procedure TD-4137P-03, Section 3.5 states in part:

"3.5 If other pigs are following in the pipeline, they may create differential pressures and therefore might move at any time. Before opening the receiver door, an isolation valve on the receiver must be closed or a pig stop safety mechanism must be pinned securely in place.

Before opening the receiver door, PG&E failed to close the isolation valve on the receiver during pig runs 2, and 4 through 12 as required by PG&E Procedure TD-4137P-03, Section 3.5. PG&E is in violation of GO 112-F, referenced Title 49 CFR Part 192 Section 192.13(c), for failure to follow its internal procedure TD-4137P-03, Section 3.5. This violation occurred in ten (10) separate instances.

Third Violation

PG&E's Procedure TD-4137P-03 Section 3.4 states in part:

When a pig reaches the receiver, stop the flow in the line.

- 1. Since the venting exhaust air will have an assortment of pressure surges as the pig negotiates through various bends and grade changes, before stopping the flow, confirm that the pig is actually in the receiver. (A tripped pig indicator or the noises of the pig hitting the snubber are evidence that the pig is in the receiver.)*
- 2. The differential pressure that drove the pig into the receiver will dissipate through the vent. Allow the pressure to dissipate completely until the pressure gauge is reading 0 psig and no flow is coming out of the receiver vent.*

The crew brought the pressure up to approximately 70 psig and maintained pressure at around 70 psig until the incident occurred. PG&E failed to allow the pressure to dissipate completely until the pressure gauge was reading 0 psig and no flow was coming out of the receiver vent as required by PG&E Procedure TD-4137P-03 Section 3.4. PG&E's is in violation of GO 112-F, referenced Title 49 CFR Part 192 Section 192.13(c), for failure to follow its internal procedure TD-4137P-03 Section 3.4.



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Fourth Violation

PG&E's Procedure T-1448B, page 7 states, in part, that 1lb (light density) drying pigs should be used.

According to the RCE Report, page 10, Table 1, PG&E launched a medium-density poly pig during Run #12. PG&E is in violation of GO 112-F, referenced Title 49 CFR Part 192 Section 192.13(c), for failure to follow its internal procedure T-1448B when using a medium-density poly pig instead of a light density drying pig during its Run #12.

Fifth Violation

PG&E's Procedure T-1448B, page 16 states, in part:

“NOTE: If any abnormal pigging conditions are discovered, notify the Project Engineer and Test Procedure Lead.”

According to the RCE, page 40, PG&E's "Field Engineer was made aware when the pigs got stuck, but this was not relayed to the Project Engineer." In addition, the GTGC crew failed to consult with either their supervisor, or any other subject matter expert, when they encountered the abnormal pigging condition of a stuck pig and developed the plan to unstick the pigs. PG&E failed to follow its internal procedures T-1448B when it did not consult with the Project Engineer before proceeding with the GTGC crew's plan to unstick the pigs. PG&E is in violation of GO 112-F, referenced Title 49 CFR Part 192 Section 192.13(c), for failure to follow its internal procedures.

PG&E failed to: 1) space out pigs by a mile (or approximately one pig every 20 minutes); 2) close the isolation valve on the receiver before opening the receiver door; 3) allow the pressure to dissipate completely until the pressure gauge was reading 0 psig and no flow was coming out of the receiver vent; 4) use 1 lb (light density) drying pigs; and 5) consult with the Project Engineer regarding the abnormal pigging conditions. PG&E could have prevented the injury of one of its employees and the fatality of one of its employees had PG&E followed its internal procedures.



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SED CITATION ANALYSIS

Factor	Staff Finding
<p>Number of violation(s) and duration of violation(s)</p>	<p>Five violations of General Order 112-F, all beginning on April 29, 2022, and ending on the day of the incident (one day). In some instances, PG&E committed multiple offenses of a single violation. As a result, PG&E committed a total of 16 violations.</p> <p><u>The five violations of General Order 112-F are:</u></p> <ol style="list-style-type: none"> 1. Space out pigs by a mile (or approximately one pig every 20 minutes) as required by TD-4137P-03. <ol style="list-style-type: none"> a. Number of Violations: 3 (pig runs 1, 3 and 12) 2. Close the isolation valve on the receiver before opening the receiver door as required by TD-4137P-03. <ol style="list-style-type: none"> a. Number of Violations: 10 (pig runs 2, and 4 through 12) 3. Allow the pressure to dissipate completely until the pressure gauge was reading 0 psig and no flow was coming out of the receiver vent as required by TD-4137P-03. <ol style="list-style-type: none"> a. Number of Violations: 1 (pig run 12) 4. Use 1 lb (light density) drying pigs as required by T-1448B. <ol style="list-style-type: none"> a. Number of Violations: 1 (pig run 12) 5. Consult with the Project Engineer if any abnormal pigging conditions are discovered as required by T-1448B. <ol style="list-style-type: none"> a. Number of Violations: 1 (pig run 12) <p>Total Violations: 16</p>



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Factor	Staff Finding
Severity or gravity of the offense	<p>Physical Harm: The incident resulted in one injury and one fatality.</p> <p>Regulatory Harm and Number of Violations: SED identified five violations of GO 112-F, Reference Title 49 CFR Part 192, Section 192.13(c) during the course of its investigation. Some of these violations occurred more than once, resulting in a total of 16 violations.</p>
Conduct of the utility	<p>This incident did not meet the federal Department of Transportation (DOT) Reportable Incident requirement for reporting because it does not involve the release of natural gas. Although the event was not DOT reportable, PG&E reported the incident to SED on May 2, 2022, per the GO 112-F, Section 122.2(a)(1)(iii).</p> <p>PG&E indicated that it identified and established the following corrective actions through its investigation and analysis of several factors such as extent of cause, human factors, etc.:</p> <ol style="list-style-type: none"> 1) Develop a standalone out-of-service pigging field operations procedure, which will include controls similar to what is outlined in a Gas Clearance. 2) Design universal temporary out-of-service launcher/receivers which can be used bi-directionally, based on industry best practices. Include installation of pressure alert valve (PAV) and evaluate the potential to include an engineered control (interlock) with isolation valve and door. 3) Develop a plan to fund and build /purchase universal temporary out-of-service launcher/receivers designed to specifications identified in #2 above to meet project portfolio needs. 4) Complete a Job Hazard Analysis (JHA) on out-of-service pigging operations to identify safeguards/mitigations required to safely perform this operation (complete before developing procedure in item #1).



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Factor	Staff Finding
	<ol style="list-style-type: none">5) Develop a Job Hazard Analysis (JHA) program to provide the framework and guidance to perform and complete risk assessments for tasks that expose coworkers to high energy/high consequences within Gas Operations to ensure that effective controls are in place to mitigate the risks.6) Develop a formalized training program for pigging operations (both in-service and out-of-service).7) Develop Operator Qualifications (OQ) for pigging operations, including stuck pig mitigation.8) Evaluate the need to establish specialized out-of-service pigging GTGC crew(s).9) Develop curriculum for foreman and leads training for Gas Construction workers. This training includes a focus on using human performance tools, stop-work conditions (stop-points) and when stop-work authority should be used, and safety and leadership communication methods (three-way communication, visual communication).10) Develop implementation plan to roll out Human Performance Tools to GTGC crews.



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Factor	Staff Finding
Prior history of similar violations	<p>SED's incident investigations have found that PG&E failed to follow its procedures in one other instance:</p> <p>G20171127-2428 – During a gas service abandonment in 2003, PG&E inserted an expander plug into the service tee to temporarily halt the flow of gas. The service tee was not permanently capped after the customer's service line was disconnected. The expander plug contained gas from 2003 to 2013 while the main functioned as a low-pressure distribution main. In 2013, the main was updated to high pressure distribution and the plug did not dislodge until 2017. After the failure of the expander plug, gas was able to migrate from the abandoned service tee into the structure, which later resulted in an explosion. The estimated cost of property damage was \$409,000. SED's investigation found PG&E committed two violations of General Order 112-F, Title 49 CFR §192.13(c) by: 1) failure to follow PG&E's Procedure C-36.1 Rev #00 Grunsky Bag Method for Stopping Off Low Pressure Service Tees when it failed to remove the X-pando plug from the service tee, and 2) failure to follow PG&E's Procedure A-93.2 when failing to use approved methods to seal the cut end.</p>
Self-reporting of the violation	N/A
Financial resources of the utility	Approximately 4.6 million gas customers, \$7.0 billion gas revenue in 2023.



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Factor	Staff Finding
<p>The totality of the circumstances</p>	<p>Aggravating factors include:</p> <ul style="list-style-type: none"> • The death of one PG&E employee • The injury of one PG&E employee <p>Mitigating factors include:</p> <p>PG&E indicated that it took these actions immediately after the incident to ensure the safety of employees, contractors, and the public:</p> <ol style="list-style-type: none"> 1) Communication sent via email to all Gas coworkers to indicate a pause to all non-emergency work, until a safety standdown had been conducted for both Gas Operations and Gas Engineering. 2) Held all-Gas coworkers (Engineering, Operations and Contractors) standdown reviewing the event, preliminary findings, and call to action. Work stoppage communicated for all pigging activities to be paused until interim controls are developed. 3) Held enterprise-wide standdown for all coworkers and contractors. 4) Performed a procedural Process Hazard Analysis (PHA) review of the existing pipeline drying procedure (TD-4137P-03). 5) Performed a review of existing gas design standards associated with pigging operational controls and identified engineering controls that can be implemented immediately to the IFC design packages and project documents. 6) Resumed in-service pigging operations based on results of preventative controls assessment.



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Factor	Staff Finding
	<p>7) Developed interim controls to allow for resumption of out-of-service pigging by contractors, following an internal review of their procedures.</p> <p>8) Develop/implement pilot out-of-service pigging procedure to re-start operations at Location H, which includes levels of control similar to those used in the Clearance process.</p> <ul style="list-style-type: none"> • PG&E self-reported this incident under the criterion set forth in GO 112-F, Section 122.2(a)(1)(iii).
The role of precedent	The CPUC previously issued citation G.20-04-001 to PG&E for failing to follow its procedures.
Resultant Citation Taking All Of These Factors Into Account	<p>The penalty is \$1,600,000 (One million, six hundred thousand dollars).</p> <p>The per day penalty in this case is a maximum of \$100,000 per each offense and a minimum of \$500 per each offense under California Public Utilities Code Section 2107 (applicable at the time the incident occurred). M-4846 and D.16-09-055 provide the factors to apply to determine the appropriate penalty within that range, which are discussed in this citation analysis section. SED applies these factors for each of the five violations of GO 112-F, Reference Title 49 CFR Part 192, Section 192.13(c), resulting in 16 offenses and determines each one has a penalty of \$100,000 per offense.</p>



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RESPONSE:

Respondent is called upon to provide a response to this Citation by: **5:00 PM on February 10, 2025**. By way of such response, Respondent, **within 30 calendar days**, must either pay the amount of the penalty set forth in this citation¹, or appeal² the citation. In addition, the Respondent must do one of the following:

- (1) For violations constituting immediate safety hazards: Respondent must immediately correct the immediate safety hazards.
- (2) For violations that do not constitute immediate safety hazards: Violations that do not constitute immediate safety hazards must be corrected within 30 days after the citation is served. If said violations that do not constitute immediate safety hazards cannot be corrected within 30 days, then the Respondent must submit a detailed Compliance Plan to the Director of SED within 30 days after the citation issues, unless the utility and the Director of SED, before the expiration of the 30 day period, agree in writing to another date, reflecting the soonest that the Respondent can correct the violations. The Compliance Plan must provide a detailed description of when the violation will be corrected, the methodology to be utilized, and a statement supported by a declaration from the Respondent's Chief Executive Officer or appropriate designee (CEO Declaration) stating that in the Respondent's best judgment, the time that will be taken to correct the violation will not affect the safety or integrity of the operating system or endanger public safety.

Note: Respondent will forfeit the right to appeal the citation by failing to do one of the options outlined above within 30 days. Payment of a citation or filing a Notice of Appeal does not excuse the Respondent from curing the violation. The amount of the penalty may continue to accrue until a Notice of Appeal is filed. Penalties are stayed during the appeal process. A late payment will be subject to a penalty of 10% per year, compounded daily and to be assessed beginning the calendar day following the payment-due date. The Commission may take additional action to recover any unpaid fine and ensure compliance with applicable statutes and Commission orders.

¹ For fines paid pursuant to Pub. Util. Code §2107 and D.16-09-055, Respondent shall submit a certified check or wire transfer payable to California Public Utilities Commission using the attached Citation Payment Form. Upon payment, the fine will be deposited in the State Treasury to the credit of the General Fund and this citation will become final.

² Respondent may Appeal this citation by completing and submitting a Notice of Appeal Form. Please see the attached document, "Directions For Submitting An Appeal To A Citation Issued Pursuant to Decision 16-09-055" for information on the appeals process and the attached "Notice of Appeal Of Citation Form."



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NOTIFICATION TO LOCAL AUTHORITIES:

As soon as it is reasonable and necessary, and no later than 10 calendar days after service of the citation is effected, the Respondent must provide a notification to the Chief Administrative Officer or similar authority in the city and county where the violation occurred. Within 10 days of providing such notification, the Respondent must serve an affidavit to the Director of SED, at the mail or e-mail address noted below, attesting that the local authorities have been notified; the date(s) for when notification was provided; and the name(s) and contact information for each local authority so notified.

The CPUC expects the Utility to take actions, as soon as feasible, to correct, mitigate, or otherwise make safe all violations noted on the Citation regardless of the Utility's intentions to accept or appeal the violation(s) noted in the Citation.

Leslie L Palmer

Digitally signed by Leslie L
Palmer
Date: 2025.01.10 10:45:21
-08'00'

Lee Palmer

Director

Safety and Enforcement Division

California Public Utilities Commission

505 Van Ness Avenue

San Francisco, CA 94102

Leslie.palmer@cpuc.ca.gov



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CITATION PAYMENT FORM

I (we) _____ hereby agree to comply with this citation dated _____, and have corrected/mitigated the violation(s) noted in the citation on _____ and no later than _____, all work to make permanent corrections to any mitigated, or otherwise remaining concerns related to the violation(s) will be completed as noted in the Compliance Plan we have submitted to the Director of SED and, herewith, pay a fine in the amount of \$ _____ included in the citation.

Signature of Electrical Corporation’s Treasurer, Chief Financial Officer, or President/Chief Executive Officer, or delegated Officer thereof

(Signature) (Date)

(Printed Name and Title)

Payment must be with a certified check made or wire transfer payable to the **California Public Utilities Commission** and sent to the address below. Please include the citation number on the memorandum line to ensure your payment is properly applied.

California Public Utilities Commission
Attn: Fiscal Office
505 Van Ness Avenue
San Francisco, CA 94102-3298

NOTE: A copy of the completed Citation Payment Form must be sent to the Director of the Safety and Enforcement Division, via email or regular mail, to the address provided on the Citation.



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DIRECTIONS FOR SUBMITTING AN APPEAL TO A CITATION ISSUED PURSUANT TO DECISION 16-09-055

Within 30 calendar days of the Respondent being served with a **CITATION ISSUED PURSUANT TO DECISION 16-09-055**, Respondent may appeal the citation. Beyond 30 calendar days of being served with the citation, Respondent is in default and, as a result, is considered as having forfeited rights to appeal the citation. The Respondent must still correct the violation(s) as instructed in the Response section of this citation.

To appeal the citation, Appellant must file a Notice of Appeal (including a completed title page complying with Rule 1.6 of the Commission's Rules of Practice and Procedure, and attached Notice of Appeal Form) along with copies of any materials the Appellant wants to provide in support of its appeal with the Commission's Docket Office **and** must serve the Notice of Appeal, at a minimum, on

- 1) The Chief Administrative Law Judge (with an electronic copy to: [ALJ Div Appeals Coordinator@cpuc.ca.gov](mailto:ALJ_Div_Appeals_Coordinator@cpuc.ca.gov)),
- 2) The Director of the Safety and Enforcement Division
- 3) The Executive Director
- 4) General Counsel
- 5) The Director of the Public Advocates Office at the California Public Utilities Commission

at the address listed below within 30 calendar days of the date on which the Appellant is served the Citation. The Appellant must file proof of service to this effect at the same time the Appellant files the Notice of Appeal. The Notice of Appeal must at a minimum state: (a) the date of the citation that is appealed; and (b) the rationale for the appeal with specificity on all grounds for the appeal of the citation.

***California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
Attn: Lee Palmer***

NOTE: Submission of a *Notice of Appeal Form* in no way diminishes Appellant's responsibility for correcting the violation described in the citation, or otherwise ensuring the safety of facilities or conditions that underlie the violations noted in the Citation.

Ex Parte Communications as defined by Rule 8.1(c) of the Commission's Rules of Practice and Procedure are prohibited from the date the citation is issued through the date a final order is issued on the citation appeal.



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After receipt of the Appellant's *Notice of Appeal Form*, a hearing will be convened before an Administrative Law Judge. At least ten days before the date of the hearing, the Appellant will be notified and provided with the location, date, and time for the hearing. At the hearing,

- (a) Appellant may be represented by an attorney or other representative, but any such representation shall be at the sole expense of the Appellant;
- (b) Appellant may request a transcript of the hearing, but must pay for the cost of the transcript in accordance with the Commission's usual procedures;
- (c) Appellant is entitled to the services of an interpreter at the Commission's expense upon written request to the Chief Administrative Law Judge not less than five business days prior to the date of the hearing;
- (d) Appellant is entitled to a copy of or electronic reference to "Resolution ALJ-299 Establishing Pilot Program Citation Appeal and General Order 156 Appellate Rules (Citation Appellate Rules)"; and
- (e) Appellant may bring documents to offer in evidence (Rule 13.6 (Evidence) of the Commission's Rules of Practice and Procedure applies) and/or call witnesses to testify on Appellant's behalf. At the Commission's discretion, the hearing in regard to the Appellant's appeal can be held in a CPUC hearing room at either of the following locations:

San Francisco:

505 Van Ness Avenue
San Francisco, CA 94102

Los Angeles:

320 West 4th Street, Suite 500
Los Angeles, CA 90013

The hearing(s) held in regard to the Appellant's appeal will be adjudicated in conformance with all applicable Public Utilities Code requirements.



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Enclosures to Accompany Utility Appeal

Utility to add list of Enclosures as appropriate: