

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 31, 2024

Ms. Christine Cowsert
Senior Vice President, Gas Engineering
Pacific Gas and Electric Company
6121 Bollinger Canyon Road
San Ramon, CA 94583

SUBJECT: Notice of Probable Violations – June 8, 2023 Gas Pipeline Incident in San Jose

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission investigated a gas leak incident that occurred on PG&E's gas pipeline in San Jose, CA on June 8, 2023. This letter serves as notification to you that as a result of our investigation, SED found PG&E in probable violation of several gas safety regulations as listed in Attachment A. SED's investigation report is also attached for your reference.

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 and its plans to prevent recurrence.

Please contact Hengyao Chen at (415) 214-4173 or by email at Hengyao.Chen@cpuc.ca.gov if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng".

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

CC: [REDACTED] / PG&E
[REDACTED] / PG&E
[REDACTED] / PG&E
Dennis Lee / SED
Joel Tran / SED
Hengyao Chen / SED

Attachments:

Attachment A: Summary of Incident and Probable Violations
CPUC Incident Investigation Report

Attachment A – Summary of Incident and Probable Violations

Summary of Incident

On June 8, 2023, an unplanned release of gas from a distribution gas main without ignition resulted in an injury necessitating in-patient hospitalization during a scheduled leak repair due to dislodgment of a Mueller 4-inch completion plug from a 4-inch steel Mueller line stopper (M2) fitting, which was caused by PG&E field personnel's improper operation. The responding PG&E field crew remediated the issue and ensured the pipeline was returned to service safely on the same day.

Probable Violations

- 1) **G.O. 112-F Referenced Title 49 CFR, Part 192, Section 192.605(a) Procedural manual for operations, maintenance, and emergencies.**

§192.605(a) Procedural manual for operations, maintenance, and emergencies states:

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. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

PG&E's Utility Procedure TD-4150P-202, section 7 "Inserting Completion Plug" required employees to physically check and visually confirm thread engagement when installing or inserting completion plugs after the first few turns. At least two PG&E employees (foreman/injured coworker (ICW) and gas mechanic/coworker #2 (CW2)) did not check and confirm thread engagement on the completion plugs. PG&E employee ICW acknowledged that there was leaking gas but failed to follow utility procedures for the Abnormal Operating Condition (AOC) (i.e. gas leak) which required a work stoppage.

Therefore, PG&E is in probable violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a) for failing to follow Utility Procedure TD-4150P-202.

- 2) **G.O. 112-F Referenced Title 49 CFR, Part 192, Section 192.605(b)(1) Maintenance and normal operations.**

§192.605(b)(1) Maintenance and normal operations states:

The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

- (1) *Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.*

PG&E's Cause Evaluation team identified that the Utility Procedure TD-4150P-202 only recommends employees to "consider using additional levels of PPE such as face shields and flash suits when encountering an abnormal operating condition (AOC)." The use of additional levels of Personal Protective Equipment (PPE) should be a requirement for PG&E workers who may be

exposed to leaking gas, including but not limited to, during the insertion of completion plugs. Standard PPE safety glasses are not sufficient to provide safety against metal shavings when an AOC (i.e. gas leak) is present.

Therefore, PG&E is in probable violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(b)(1) for failing to provide adequate written procedures or instructions for the use of additional PPE when its employees encounter an AOC while operating a Mueller machine.