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January 27, 2021

Mr. Terence Eng
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 for Pacific Gas and Electric Company – NOPVs for non-DOT incident investigations completed Q4 of 2020

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to the Notice of Probable Violations (NOPVs) letter dated January 04, 2021, associated with non-DOT reportable incident investigations completed in the fourth quarter (Q4) of 2020. For clarity, the item identified in Attachment A of the NOPV letter will be repeated followed by PG&E's response.

PUC ID: G20200306-3011:

Date	03/06/2020
Address	██████ Santa Anna Rd., Hollister
Code References	49 CFR §192.605(a)
Investigation Findings	On March 6, 2020, PG&E experienced an overpressure event at the at the Hollister Gas Metering Station in Hollister, San Benito County. Line 301A is fed from the Hollister Gas Metering Station. Line 301A reached a maximum pressure of 569.29 psig from Hollister Station at MP 0.00 to Moss Landing Station at MP 10.00. This event is considered a large over-pressure (OP) event, exposing the piping and equipment to undesired operating conditions and risk. PG&E's action led to the overpressure, including: bypassed over-pressure protection without using additional safeguards, failure to provide adequate span-of-control oversight of an unqualified technician operating valves, performing leak repair work without an appropriate clearance, and lack of supervisor awareness of the tasks being performed on the day of the event. Therefore, SED finds PG&E in violation of 49 CFR §192.605(a).

Response to G20200306-3011:

PG&E recognizes SED's findings. Please note that all causes, (direct, root and contributing) with associated corrective actions were self-identified by PG&E in the previously provided Causal Evaluation, "Index 13866 Supp02_Hollister OP Event RCE Final Draft", submitted 9/10/2020. Below, please find Attachment 1 for an update on all corrective actions from the Causal Evaluation (RCE) related to this OP event. In addition, in September 2020, PG&E introduced training on our revised Operations and Maintenance manual, GAS-0174WBT, to reinforce that our Operations and Maintenance manual is a legal commitment and to reinforce that all procedures must be

followed as written. This training is required for all gas employees and contractors who work on PG&E facilities. As of January, 2021, a total of 4,867 individuals have completed training for GAS-0174WBT. This includes 3,799 Employees and Contractors who have LANIDs and 1,068 external Contractors. In addition, 100% of the current Gas Pipeline Operations & Maintenance (GPOM) employees have completed the training.

Please contact Glen Allen at (925) 278-3462 or Glen.Allen@pge.com for any questions you may have regarding this response.

Sincerely,

/s/ Vincent Tanguay

Director, Risk, Compliance, & Oper. Qual.

cc: Dennis Lee, SED
Joel Tran, SED
Jason McMillan, SED
Mohammad Ali, SED
Vince Tanguay, PG&E
Susie Richmond, PG&E

Progress of RCE (dated September 3, 2020) Corrective Actions

Corrective Action ID	Description	Status
CAPR-1	<p>Develop curriculum to ensure clearance supervisors are appropriately trained to complete critical job tasks and enhanced rigor to avoid OP events. As part of this action, develop OQs for Supervisor (category 1&2).</p> <p><u>Deliverable:</u> Developed training and OQ requirements for clearance Supervisors (Category 1 & 2)</p>	On Track for 08/31/2021 completion
CAPR-2	<p>Implement Field assessment requirement for Clearance Supervisors. Develop Field Training Outlines and Job Performance Measures to ensure potential clearance supervisors are evaluated. This corrective action includes understanding current clearance Supervisor gaps and strengths, to identify OJT trainers and assessors. Incorporate normal assessments through field QC team</p> <p><u>Deliverable:</u> Assessment checklists to be used by field QC team</p>	Completion Extended to 09/30/2021
CAPR-3	<p>Create a technical review committee comprised of experienced and knowledgeable SME's to create human performance related leading indicators, review event evaluations (ACE's, RCE's) and assist in ensuring corrective actions are effective. As part of this corrective action develop an intake process that reviews all events, determines level of risk, identifies and tracks root causes, leading and lagging indicators with SMART (Specific, Measurable, Achievable, Relevant, & Time-Bound) corrective actions.</p> <p><u>Deliverable:</u> Documented intake process</p>	COMPLETE
CAPR-4	<p>Create a simulated, lessons learned training at the Winters Flow Lab from this event to drive continuous improvement and to allow for cause and effect training in a control-based environment into our apprenticeship program. This include building out scenarios from previous over-pressure events as well.</p> <p><u>Deliverable:</u> Documented simulated lessons learned plans</p>	On Track for 02/26/2021 completion
CAPR-5	<p>Develop and implement a clearance auditing protocol to be utilized by Supervisors, Quality Control, and Quality Assurance creating more effective controls on tasks that have OP potential.</p> <p><u>Deliverable:</u> A formal report that provides guidance on how to analyze/audit compliance of critical steps being performed.</p>	On Track for 03/31/2021 completion

Attachment 1

Corrective Action ID	Description	Status
CAPR-6	<p>Create and communicate detailed animation that highlights the actions from this event to ensure lessons learned are understood by all employees so reoccurrences can be prevented.</p> <p><u>Deliverable</u>: An animated video of steps taken and steps that should have been taken to prevent incident from occurring.</p>	COMPLETE
CA-1	<p>Evaluate Current Supervisor Onboarding Program and revise program design for GPOM to include focusing on mentoring around over-pressure events, oversight and controls, leading indicators, effective huddle facilitation, and resource planning. This corrective action includes developing and implementing set of key leading event indicators for supervisory level focused on identifying deviations from procedures in to provide coaching to employees.</p> <p><u>Deliverable</u>: Ensure each identified Supervisor requiring training is assigned a Sr. GPOM Supervisor as a mentor until Supervisor has completed the necessary identified training. List of key indicators.</p>	COMPLETE
CA-2	<p>Develop curriculum utilizing classroom training and the winters flow lab to educate nontraditional supervisors about the gas system, regulation, qualifications, and clearance requirements.</p> <p><u>Deliverable</u>: Course curriculum detailing the course overview and key subject areas. Finalized Course being in My Learning.</p>	On Track for 09/13/2021 completion
CA-3	<p>Develop and Implement process that identifies leading indicators through data mining of SCADA and uses those indicators to identify coaching opportunities, where we need to enhance controls or evaluate our training effectiveness.</p> <p><u>Deliverable</u>: Process map that identifies the data sources, key performance indicators and roles and responsibilities.</p>	COMPLETE
CA-4	<p>Revise response to OP event procedure (TD-4911P-02) to have guidelines on the response to OP based on time and severity.</p> <ul style="list-style-type: none"> • Ensure timeline and decision-making authority are clear in the procedure around how to bring the pipeline pressure back down to normal operating procedure. • Communicate updated procedure with all impacted parties to understand and implement the change for future OP events. <p><u>Deliverable</u>: Revised TD-4911P-02 Standard.</p>	On Track for 12/15/2021 completion