



Vincent Tanguay
Director
Regulatory Compliance
Gas Operations

6111 Bollinger Canyon Road
San Ramon, CA 94583
Phone: 925-244-3466
E-mail: Vincent.Tanguay@pge.com

May 24, 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 – NOPV for non-DOT incident investigations completed as of the first quarter of 2021- Q1 2021

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to the Notice of Probable Violations (NOPV) letter dated May 06, 2021, associated with non-DOT reportable incident investigations completed as of the first quarter of 2021- Q1 2021. For clarity, the item identified in Attachment A of the NOPV letter will be repeated followed by PG&E's response.

PUC ID: G20200804-3102:

Date	08/04/2020
Address	Fresno Gas Load Center, Fresno
Code References	49 CFR §192. 201(a)(2)(i)
Investigation Findings	On August 5, 2020, at approximately 1224 hours, PG&E confirmed an overpressure event within the Fresno Gas Load Center in Fresno, Fresno County. This condition occurred after a clearance associated with scheduled maintenance on Distribution Regulation Station GS-03. Transmission regulation Station GS-07 is connected to GS-03 by a header and uses 10-inch Mooney regulators. When the inlet valve (V-120) to GS-03 was being opened, it caused a low demand situation in the header. The 10-inch Mooney regulators have been known to not provide adequate control in low demand situations since 2017. The pressure in the header increased to approximately 597.8 psig, exceeding the header's MAOP of 400 psig. The 10-inch Mooney regulators used by GS-07 failed to control the downstream pressure. There are no known injuries, no fatalities, and no media on site. There was no customer impact. SED found PG&E in violation of 49 CFR, 192, Section 192.201(a)(2)(i) for allowing the pressure to increase above the MAOP plus 10 percent.

Response to G20200804-3102:

PG&E recognizes SED's findings. Please note that all causes, (apparent and contributing) with associated corrective actions were self-identified by PG&E in the previously provided Causal Evaluation, "Index 14147-02 Supp01 - Fresno OP Cause Evaluation", submitted 11/10/2020. Below, please find Attachment 1 for an update on

all corrective actions from the Causal Evaluation related to this OP event. The project to replace the existing regulator and monitor was completed on April 19, 2021. The Maximum Allowable Operating Pressure (MAOP) has returned to its previous value of 400 pounds per square inch gauge (psig) based on Conditional Reduction of Operating Pressure (CROP) conditions being met. Setpoints have been reduced from their previous value to allow for a larger operating band between the monitor and downstream MAOP. PG&E will evaluate these setpoints again during our winter planning process which occurs in August-September and only raise the setpoints to a value necessary to maintain adequate service to our downstream customers during our Cold Winter Day (CWD) and Abnormal Peak Day (APD) design conditions. This will help mitigate the overpressure issues at Fresno Gas Load Center until the station is rebuilt in 2022-2023.

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 Causal Evaluation 119567547 Corrective Actions

Corrective Action ID	Description	Status
CA-1	Replace 10-inch Mooney valve with a 6-inch FC Reflux Regulator and 6-inch FC Reflux Monitor. This equipment model is designed to accommodate drastic downstream load changes and should reduce the OP risk during downstream maintenance.	COMPLETE
CA-2	<p>Reduce regulator and monitor setpoints to provide a larger operating band between monitor set point and downstream MAOP. The monitor is currently set at MAOP.</p> <p>*The regulator is currently set at 284 psig and the monitor is set for 299 psig. The CROP has been lifted returning the MAOP to 400 psig. Setpoints will continue to be evaluated through normal processes to maintain adequate service to downstream customers during Cold Winter Day (CWD) and Abnormal Peak Day (APD) design conditions.</p>	COMPLETE*
CA-3	Tailboard the Fresno GPOM crew to request Regulation Engineering and Measurement and Control Test Lab assistance prior to any operational changes or maintenance activities at the Fresno Gas Load Center to identify potential risks and implement mitigations as needed. As part of this tailboard, share the changes from CA-4.	COMPLETE
CA-4	Develop and implement a visual indicator (folder/electronic) to flag for requirement to work with the Regulation Engineering and Measurement and Control Test Lab, as noted in CA-3, prior to next scheduled annual maintenance.	COMPLETE
CA-5	Develop process and controls to identify and mitigate where concurrent clearances may exist in a system or station which when combined create the risk of an OP event.	COMPLETE