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June 8, 2022

By Email

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: Response to Notice of Gas Incident Probable Violations by Pacific Gas and Electric Company (PG&E) – Department of Transportation (DOT) Incident # 1314710

Dear Mr. Eng:

This letter is in response to the Safety and Enforcement Division's (SED) letter dated May 9, 2022 regarding a DOT reportable incident (#1314710) that occurred on August 25, 2021 at the intersection of Race St and Park Ave, San Jose.

In its letter, SED found PG&E in probable violation of the following regulations:

General Order (G.O.) 112-F, Reference Title 49 Code of Federal Regulations (CFR) Part 192, §192.605(b)(3) states:

- (b) "Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.*
- (3) "Making construction records, maps, and operating history available to appropriate operating personnel."*

G.O. 112-F, Reference Title 49 CFR Part 192, §192.614(c)(5) states in part:

- (c) "The damage prevention program required by paragraph (a) of this section must, at a minimum..."*
- (5) "Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins."*

More specifically, SED found PG&E in violation of G.O. 112-F, Reference Title 49 CFR §192.605(b)(3) "for not making accurate maps available to PG&E's operating personnel. PG&E's Plat map did not show the 3-inch gas main damaged by the third-party excavator in this incident. PG&E believes that this is a possible reason its locate-and-mark personnel missed the 3-inch gas main." SED also found PG&E in violation of G.O. 112-F, Reference Title 49 CFR Part 192, §192.614(c)(5) "for failing to provide accurate temporary markings of buried pipelines within the delineated area of excavation before the activity began. PG&E admitted in its investigation that its locate and mark personnel did not mark the damaged 3-inch gas main due to the incorrect Plat map."

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PG&E’s Response: The damaged 3-inch main was installed in June 1930, more than 30 years before the California Public Utilities Commission implemented General Order 112 to codify pipeline regulations and recordkeeping requirements. Since pipeline regulations were enacted, PG&E has performed its due diligence and made its best efforts to accurately map all known assets with their corresponding configurations, and to make these maps available to its operating personnel. When PG&E responded to USA ticket #X118101646, PG&E marked all assets per the mapped configurations, which unfortunately did not accurately reflect how the subject 3-inch dead-end main tied into adjacent facilities.

As indicated in the dig-in investigation report that was previously provided, PG&E believes that this incident could have been avoided if the third-party excavator (Lightwave Construction) had exposed the gas facility with hand tools before using power-driven equipment as required by California Government Code 4216.4(a)(1). PG&E’s investigation found that Lightwave Construction failed to pothole and visually locate PG&E’s adjacent 8-inch main within its tolerance zone and at the location where the horizontal directional drilling (HDD) path crosses this pipeline. The requirement of exposing these pipeline crossings in the HDD path is also in the excavation permit issued by the City of San Jose (see Figure 1 below). Had Lightwave Construction taken this critical step, the subject 3-inch dead-end main may have been exposed along with the 8-inch main, helping to avoid this dig-in incident.



**MAJOR (FIBER)
 UTILITY EXCAVATION PERMIT**

DEVELOPMENT SERVICES – UTILITIES SECTION
 DEPARTMENT OF PUBLIC WORKS
 200 E. Santa Clara St., San Jose, CA 95113
 TEL (408) 975-7455
 PWUtilityPermits@SanJoseCA.gov

Public Work Utility Job No.
F20783W
Permit No
20-147349 UT
Issue Date:
Dec 02, 2020
Expiration Date:
Jun 02, 2021
City Project Charge Number
060189
Thomas Guide Coordinates
833 J 7

<p>PERMITTEE: BANDWIDTH IG 333 W San Carlos Street San Jose, CA 95110</p> <p>CONTACT: Leonard Ortega (408) 207-2479 lortega@lotus-eng.com</p> <p>PURPOSE: Place new underground conduits along with associated manholes per attached plans.</p>	<p>BANDWIDTH JOB NUMBER: SOW 003-2020d</p> <p>COORDINATION: AMANDA</p> <p>LOCATION: Race St. from The Alameda to Park Ave. Park Ave. from Race St. to Lincoln Ave.</p>	<p>This Permit is Issued Under the Authority Established by Title 15, Chapter 15.50, Sections 15.50.100 - 15.50.700 of the San Jose Municipal Code as Amended. All provisions of the Municipal Code Title 15, Chapter 15.50, Sections 15.50.100 - 15.50.700, inclusive, are incorporated into this permit by reference.</p>
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NO.	EXTENSIONS	DATE	APPROVAL
1	Extended to December 2, 2021	5/13/21	
2			

DIRECTIONAL DRILLING OR BORING

1. The permittee/contractor shall coordinate with the City Inspector before the start of any directional boring operation.
2. If these methods are utilized, all utility crossings in the proposed bore alignment shall be potholed and exposed to verify depth prior to commencing with the boring operation. Potholes shall then remain open until the bore has passed the exposed utility to verify that no damage has occurred.

Figure 1. Excerpt of Excavation Permit from City of San Jose

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Since the incident, PG&E has made the original 1930 and post-incident as-built packages available to its operating personnel, mapped the subject 3-inch dead-end main as a deactivated pipeline and mapped the cutoff location as a response to the incident (see yellow highlight in Figure 2 below).



Figure 2. Updated map from post-incident

This response contains information that should remain confidential and not be subject to public disclosure; see attached for PG&E's declaration supporting confidential designation for additional detail ("*Index 15864_Confidentiality Declaration.pdf*"). Confidential information is highlighted yellow or outlined red within the referenced document(s).

Please contact Anthony Kwong at 415-238-4080 or Anthony.Kwong@pge.com if you have any questions regarding this response.

Sincerely,

A handwritten signature in black ink, appearing to be 'D. Lee', written over a horizontal line.

Director of Risk, Compliance and Standards Engineering

cc: Dennis Lee, CPUC
Mahmoud Intably, CPUC
Joel Tran, CPUC
Kai Cheung, CPUC
Janisse Quinones, PG&E
Susie Richmond, PG&E