

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 10, 2023

Non-DOT NOPV Q4-2022

Ms. Christine Cowsert, Vice President
Pacific Gas and Electric Company
Gas Asset Management and System Operations
6121 Bollinger Canyon Road
San Ramon, CA 94583

SUBJECT: Closure letter for Notice of Probable Violations for Non-DOT Reportable incidents issued in fourth quarter (Q4) of 2022

Dear Ms. Cowsert,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) has reviewed the Pacific Gas & Electric Company's (PG&E) response of February 24, 2023, to the Notice of Probable Violations (NOPV) forwarded to PG&E on January 26, 2023, for incidents that occurred during the fourth quarter Q4 of 2022 (Q4-2022).

A summary of findings documented by SED, PG&E's responses to SED's findings, and SED's evaluation and conclusion of PG&E's responses taken for each finding is attached with this letter.

This letter serves as an official closure of the 2022-Q4 Non-DOT NOPV letter for incident G20220901-3422 in Eureka, and any matters that are being recommended for enforcement will be processed through the Commission's Citation program or a formal proceeding. Pursuant to Commission Decision 16-09-055, SED has the authority to issue citations for each violation found.

If you have any questions, please contact Mohammad Ali at (916) 928-2109 or by email at ma5@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

CC:

Susie Richmond / PG&E
Terence Eng / SED-GSRB
Mohammad Ali / SED-GSRB

SUMMARY OF INVESTIGATION FINDINGS

SED Finding: SED identified 1 probable violation as described below:

- I. In the NOPV letter dated 1/26/2023, the violation SED found was that PG&E violated Title 49 CFR §192.605(a) as shown below:

- 1. General Order (G.O.) 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, §192.605(a) states in part:**

“(a) General. 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.....”

On September 1, 2022, an overpressure event occurred on a section of the pipeline inside the distribution regulator station (HU_EUR_RR30) due to a leaking by-pass valve (V-3) and PG&E field crew’s incorrect operation. The highest pressure reached 127.3 PSIG which was 154.6% above the maximum allowable operation pressure (MAOP) of 50 PSIG. The overpressure pipe section was vented to 0 PSIG and the leaking valve was repaired before field crew contacted gas distribution control center (GDCC). A post-incident leak survey was conducted on the same day, and no leak was found. SED found PG&E in violation of Title 49 CFR, Part 192, §192.605(a) for failing to follow Utility Procedure TD-4441P-01.

PG&E’s Response to G20220901-3422:

PG&E notes that bypass valve V-3 is a plug valve. Plug valves rely on lube/sealant injected under high pressure into the annular space between the plug and valve body to keep from leaking. The leak was internal to the valve, from upstream to downstream inside the pipe. Pressurized gas worked its way around the plug and plug sealant into the downstream piping at a slow but steady rate. When the field crew discovered the over-pressured piping, they vented the trapped overpressure gas and took steps to slow/eliminate the weep by injecting lube/sealant into V-3, to create a good dispersion of lube/sealant onto all surfaces of the plug. The injection process took place on September 1, 2022, at 0800, immediately after the discovery and venting of the over-pressured section of piping.

PG&E notes that a “Quick Hit” email was sent to Gas Operations system-wide, which includes Gas Control, on September 1, 2022, with a brief description of the over pressure event and the initial corrective actions taken.

The PG&E employee responsible for the incorrect operation was counseled immediately after the incident. Furthermore, PG&E’s clearance writing team has been advised to ensure that there is not a ‘bottle’ situation when a clearance is created to avoid recurrence of a similar incident. Going forward, PG&E is planning to replace plug valves, that are slated for replacement, with ball valves that allows for utilizing the body cavity to create a double block and bleed. This action will also help prevent a similar incident in the future. Finally, PG&E plans to remove by-pass valve V-3 and replace 4” valve T79 at the regulator station to improve the conditions. Please see **Attachment 1** (PG&E Job ID V-968) for a copy of 60% design of the project that is currently under review.

SED’s Conclusion:

Upon review of PG&E's response, SED agrees that PG&E adopted the immediate corrective actions by venting the over-pressured section of piping and counselling the employee.

SED has opted not to impose a fine or penalty at this time.