

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 26, 2024

Non-DOT NOPV Q2-2022

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 incident issued in second quarter (Q2) 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 July 25, 2022, to the Notice of Probable Violations (NOPV) forwarded to PG&E on July 19, 2022, for incidents that occurred during the second quarter Q2 of 2022 (Q2-2022).

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-Q2 Non-DOT NOPV letter for incident G20220129-3330 in Sonoma, 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 (415) 471-9289 or by email at [ma5@cpuc.ca.gov](mailto: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  
Kristina Castrence / PG&E  
Frances Yee / PG&E  
Terence Eng / SED-GSRB  
Mohammad Ali / SED-GSRB

## SUMMARY OF INVESTIGATION FINDINGS

**SED Finding: SED identified 4 probable violations as described 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.....”*

**2. Title 49 Code of Federal Regulations (CFR), Part 192, §192.605(b)(3) states in part:**

*“(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.”*

**3. G.O. 112-F, Reference Title 49 CFR, Part 192, §192.740 (b) states in part:**

*(b) Each pressure regulating or limiting device, relief device (except rupture discs), automatic shutoff device, and associated equipment must be inspected and tested at least once every 3 calendar years, not exceeding 39 months, to determine that it is:*

*(1) In good mechanical condition.*

*(2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed.*

*(3) Set to control or relieve at the correct pressure consistent with the pressure limits of § 192.197; and to limit the pressure on the inlet of the service regulator to 60 psi (414 kPa) gauge or less in case the upstream regulator fails to function properly; and*

*(4) Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.*

**4. California Public Utilities (PU) Code §451 states:**

*"Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities, including telephone facilities, as defined in Section 54.1 of the Civil Code, as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public."*

On January 29, 2022, at approximately 1300 hours, PG&E identified an overpressure event that occurred at 721 Leveroni Road in Sonoma due to a farm tap leak by malfunctioning equipment. The highest pressure reached was 75 PSIG, which was 25% above the maximum allowable operating pressure (MAOP) of 60 PSIG. There were no reports of injuries, fatalities, or customer impact regarding this incident. This incident is being reported due to exceeding MAOP plus allowable build up. Based on the information gathered, SED found PG&E in violation of Title 49 CFR, Part 192, §192.605(a) for failing to follow Utility Standards, §192.605(b)(3) for failing to make construction records, maps, and operating history available to appropriate operating personnel, § 192.740(b) for failing to test the farm tap regulator set every 3 calendar years, not exceeding 39 months, and PU Code §451 for failing to maintain the farm tap regulator set.

**Response to G20220129-3330:**

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 15520-02 Supp02\_122903182 OP Leveroni Rd Final 040122\_CONF”, submitted on 4/7/2022.

Below, please find the table for an update on all corrective actions from PG&E’s Causal Evaluation related to this OP event.

**Progress of Causal Evaluation 122903182 Corrective Actions**

<i>Corrective Action ID</i>	<i>Description</i>	<i>Status</i>
ICA-1	Shut in and put on alternate source. Place 721 Leveroni customer on Compressed Natural Gas (CNG)	Complete
ICA-2	Correct location address from 701 to 721 Leveroni Road in SAP	Complete
CA-1	Create a strategy and seek management approval to provide guidance on how to onboard and resolve unlocatable assets requests, including Farm Taps.	In Progress. Due Date 9/30/22
CA-2	Owner to confirm in SAP that the below statement is correct:  Since this error occurred in 2019-2020, a new consistent process has been developed and implemented. The process was a successful barrier and identified the lack of assigned maintenance on this asset.  Other enhancements include dedicated asset strategists to workgroups, and the use of electronic requests (Pronto form) that are routed to the appropriate reviewers.	Complete
CA-3	Communicate expectations via 5-minute meeting for workers to first use system of record mapping data when trying to locate assets and not rely on customer or functional location descriptions unless mapping data is insufficient.	Complete

On 3/4/2022, PG&E completed work to replace the Farm Tap, including new High-Pressure Regulation (HPR) and relief equipment, and installed a new service line for the customer. The temporary Compressed Natural Gas (CNG) tank was removed and the single customer at 721 Leveroni Road returned to service.

**SED's Conclusion:**

Upon review of PG&E's response, SED agrees that all violations were self-identified, and PG&E adopted all necessary corrective actions including replacing the Farm Tap with High-Pressure Regulation (HPR) and relief equipment.

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