

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 8, 2024,

Non-DOT NOPV Q3-2023

Ms. Christine Cowsert,
Senior Vice President, Gas Engineering
Pacific Gas and Electric Company
6121 Bollinger Canyon Road
San Ramon, CA 94583

SUBJECT: Closure letter for Notice of Probable Violations for Non-DOT Reportable incidents issued in third quarter (Q3) of 2023

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 April 11, 2024, to the Notice of Probable Violations (NOPV) forwarded to PG&E on March 12, 2024, for incidents that occurred during the third quarter Q3 of 2023 (Q3-2023).

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 2023-Q3 Non-DOT NOPV letter for incidents G20220829-3421 in Fresno, and G20230316-3510 in Needles, 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.

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: [REDACTED] / PG&E
Kristina Castrence / PG&E
[REDACTED] / PG&E
Mohammad Ali / SED-GSRB
Terence Eng / SED-GSRB
Wilson Lule / SED-GSRB

SUMMARY OF INVESTIGATION FINDINGS

SED Finding: SED identified 5 probable violations as described below:

I. In the NOPV letter dated 3/12/2024, the violations SED found were that PG&E violated Title 49 CFR §192.603(a), §192.605(a) §192.619(a) and §192.13(c) as shown below:

1. General Order (G.O.) 112-F, Reference Title 49 Code of Federal Regulations (49 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.”

2. G.O. 112-F, Reference 49 CFR, Part 192, §192.603(a) states in part:

“(a) No person may operate a segment of pipeline unless it is operated in accordance with this subpart.”

3. G.O. 112-F, Reference 49 CFR, Part 192, §192.619(a) states in part:

“(a) No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure (MAOP)... ”

4. G.O. 112-F, Reference 49 CFR, Part 192, §192.13(c) states in part:

“(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.”

On August 29, 2022, at approximately 1300 hours, PG&E personnel confirmed the discovery of an overpressure event at the Fresno Gas Load Center, Fresno, Fresno County during a "B-inspection" of the regulator station GS-07. The current temporary MAOP of the outlet of GS-07 is 495 psig. GS-07 is under a temporary reduction of pressure. The pressure at the time of discovery by PG&E employees was 612 psig. PG&E employees performed the necessary valving to reduce the outlet pressure to below the temporary 495 PSIG MAOP. The design MAOP at the outlet of the regulator station is 650 psig, so a leak survey was not conducted on all facilities downstream of GS-07. PG&E identified the overpressure (Exceeding the current temporary MAOP of 495 psig) was caused by two of its employees' failure to follow the gas clearance procedure written for the B-inspection. Title 49 CFR Part 192 Section 192.13(c) states: " Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.". Therefore, SED found PG&E in violation of G.O.112-F, Reference 49 CFR, Part 192, Sections 192.13(c), 192.619(a), 192.603(a) and 192.605(a) for failing to follow gas clearance procedure for B-inspection.

PG&E Response to PUC ID: G20220829-3421:

PG&E acknowledges SED’s findings. Note that all causes (apparent and contributing), with associated corrective actions were self-identified by PG&E in the previously provided Causal Evaluation, “Final 420 Report - 2022 08 29 Fresno, OP Event” attachment “Index 16055-02 Supp01_Final Fresno GLC OP ACE report_CONF.pdf”, submitted on 12/19/2022. Note that the PG&E personnel involved will complete training and recertification before they can perform similar work in the future.

Please see below for an update on all corrective actions from PG&E’s Causal Evaluation related to this OP event.

Progress of Causal Evaluation 124391351 Corrective Actions:

Corrective Action (CA) ID	Description	Status
CA-1	Type of Control: Administrative Action: The following operator qualifications were revoked for the Clearance Supervisor: - OQ1401 and 1402 Regulators / Monitors - 15.04 – SCADA - OQ1701 – Valves - Clearance approve / write / endorse – was revoked from SAP Deliverables to show completion: Updated OQ and SAP record.	Complete
CA-2	Type of Control: Administrative Action: The following operator qualifications were revoked for the GPOM crew member: - OQ1701 – Valves Deliverables to show completion: Updated OQ record	Complete

SED’s Conclusion:

Upon review of PG&E’s response, SED noted that PG&E acknowledged the findings and indicated that causes with associated corrective actions were self-identified by PG&E in the Causal Evaluation report of 8/29/2022, submitted on 12/19/2022. Also, PG&E personnel involved will complete training and certification before they can perform similar work in future.

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

II. In the NOPV letter dated 3/12/2024, the violation SED found were that PG&E violated Title 49 CFR §192.605(a) as shown below:

5. General Order (G.O.) 112-F, Reference Title 49 Code of Federal Regulations (49 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.”

On March 16, 2023, at about 0726 hours, PG&E confirmed an overpressure condition at the Topock natural gas compressor Station in Needles, California. The suction side equalized with the discharge side through open bypass valves and the pressure increased to 735.2 psig, exceeding the 660 psig MAOP of the suction side by 11%. SED’s investigation found that the over pressure event was caused by PG&E’s lack of a power outage response plan to provide PG&E’s personnel with practical steps to take in the event of a power outage, and PG&E’s personnell’s failure to follow procedures to ensure correct relief valve configuration during station operation. Therefore, SED found PG&E in violation of G.O. 112-F,

Reference 49 CFR, Part 192, Section 192.605(a) for failing to follow procedures to correct relief valve configuration during station operation.

PG&E Response to PUC ID: G20230316-3510:

PG&E acknowledges SED’s findings. Note that all causes (apparent and contributing), with associated corrective actions were self-identified by PG&E in the previously provided Causal Evaluation, “Final 420 Report - Gas Reportable Incident: 2023 03 16 Topock - Index 16389” attachment “Index 16389-02 Supp01_Topock OP ACE Final_CONF.pdf”, submitted on 6/14/2023.

Please see below for an update on all corrective actions from PG&E’s Causal Evaluation related to this OP event.

Progress of Causal Evaluation 125668382 Corrective Actions:

Corrective Action (CA) ID	Description	Status
CA-1	<p>Type of Control: Engineering Action: Engineer a solution in which the pneumatically controlled units can safely shut down by engaging the Emergency Safety Device (ESD), even in the event that there is no station power. Deliverables to show completion: A project scope that identifies an engineered solution with a project and order number.</p>	Complete
CA-2	<p>Type of Control: Administrative Action: Develop a power outage response plan to ensure safe operation in the event of a loss of station power. Deliverables to show completion: Provide a guidance document for station operators.</p>	Complete/see Attachment 1
CA-3	<p>Type of Control: Administrative Action: Develop a job aid that describes how to operate and maintain both pressure safety valve (PSV) control racks. Deliverables to show completion: Provide a guidance document for GPOM station technicians.</p>	Complete/see Attachment 2

SED’s Conclusion:

Upon review of PG&E’s response, SED noted that PG&E acknowledged the findings and indicated that causes with associated corrective actions were self-identified by PG&E in the Causal Evaluation report of 3/16/2023, submitted on 6/14/2023.

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