

Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

CITATION ISSUED PURSUANT TO DECISION 16-09-055

Gas Corporation (Utility) To Which Citation is Issued:

Pacific Gas and Electric Company (Operator ID# 15007)

OFFICER OF THE RESPONDENT:

Mr. Austin Hastings Vice President, Gas Engineering Pacific Gas and Electric Company 6121 Bollinger Canyon Road San Ramon, CA 94583

CITATION:

Pacific Gas and Electric Company (PG&E or Utility) is cited for four violations resulting in a financial penalty of \$400,000. The California Public Utilities Commission's Safety and Enforcement Division (SED) discovered these violations in its investigation of an incident (Incident Number 20240710-3702) which occurred on July 10, 2024. A PG&E employee received 2nd and 3rd degree burns when an air-gas plume ignited during a purging operation. SED's investigation revealed that PG&E failed to follow its internal procedures Gas Design Standard (GDS) A-38, A-38.3, Code of Safe Practices (CSP) Section 1304 and 1305, and Work Clearance Document (WCD) # 80252165, which may have been a contributing factor to the injury.

VIOLATIONS:

PG&E is cited for violating General Order (G.O.) 112-F, which incorporates by reference Title 49 Code of Federal Regulations (CFR) Part 192, Section 192.13(c) four times as itemized in this citation.

General Order (GO) 112-F, Rule 101.2, states in part:

These rules are incorporated in addition to the Federal Pipeline Safety Regulations, specifically, Title 49 of the Code of Federal Regulations (49 CFR), Parts 191, 192, 193, and 199, which also govern the Design, Construction, Testing, Operation, and Maintenance of Gas Piping Systems in the State of California.



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

Title 49 Code of Federal Regulations (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.

ENCLOSURES:

The following enclosures were used to establish the findings of fact:

Enclosure 1 – SED Incident Investigation Report, dated April 7, 2025

Enclosure 2 – SED Notice of Probable Violation (NOPV), dated April 7, 2025

Enclosure 3 – PG&E Response to SED's NOPV, dated May 7, 2025

Enclosure 4 – Root Cause Evaluation (RCE) Report, GO Kettleman Compressor Station Ignition RCE Evaluation Report

Enclosure 5 – PG&E's Gas Design Standard (GDS), A-38-1h, "Purging Gas Facilities"

Enclosure 6 – PG&E's Gas Design Standard (GDS), A-38.3-0a, "Temporary Vent Stacks"

Enclosure 7 – PG&E's Code of Safe Practices (CSP) Section 1304, "Vent Stacks" and 1305, "Sources of Ignition or Fire Near Escaping Gas"

Enclosure 8 – PG&E's Work Clearance Document (WCD) # 80252165

STATEMENT OF FACTS

The above violations are documented in the attached *Enclosure 1 – SED Incident Investigation Report* which is based on the following: SED's field observations; SED interviews with PG&E personnel; and SED's review of PG&E's records and data request responses.



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

BACKGROUND

On July 10, 2024, PG&E personnel reported a DOT-reportable incident to the Department of Transportation (DOT) and the California Public Utilities Commission (CPUC). The incident involved a release of gas at Kettleman Compressor station resulting in serious burn injuries to a PG&E employee requiring in-patient hospitalization and at least one overnight hospital stay, and minor injuries to others nearby. The incident occurred during clearance operations when an ignition occurred during a purging sequence. PG&E crews closed the valve immediately after the ignition to stop the flow of gas. Emergency services were called. The injured PG&E employee was transported in an ambulance to Hanford, and eventually was flown on a helicopter to a hospital in Fresno, California. On November 6, 2024, PG&E submitted its Root Cause Evaluation (RCE) report to SED, which is PG&E's investigation of this incident by a cross-functional team of its Subject Matter Experts. PG&E's RCE report provides a comprehensive and detailed identification of relevant data.

At the time of the incident, the PG&E personnel and contractors were supporting the valve replacement work at Kettleman Compressor Station under Project S-1391 and work clearance document (WCD) #80252165 according to the RCE report. The clearance included blowing down and purging gas from the PG&E system (establishing clearance), to allow the PG&E contractors to perform construction work, then purging air from and reintroducing gas back into the system (removing clearance to restore the system). PG&E's Gas Operations team conducts clearance and purging work per PG&E's TD-4441S Gas Clearances and A-38 Purging Gas Facilities, respectively.

On the morning of July 9, 2024, the day before the incident, while purging out-of-service (clearing the system) in preparation for construction, the RCE report indicated that the project crew members were concerned about reaching acceptable gas-in-air levels and deviated from the clearance document steps. During troubleshooting, a blind flange, downstream of Valve 78 (V-78), was removed to provide an additional fresh air source for the air movers. The RCE report indicated that this blind flange was ultimately not reinstalled, and the flange removal was neither a step in the existing clearance, nor was it added using the red line clearance revision process detailed in TD-4441P-10 "System New Clearances for Gas Transmission Facilities" Section 3.8 for Revising an Active Clearance.



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

On July 10, 2024, following completion of construction, clearance activities to re-introduce gas and purge air from the system were initiated. PG&E's RCE report identified the following important events leading to the incident:

- The approved clearance required Valve 56 (V-56) to be "checked open" (fully open) for purging, however, it had been closed for stem seal replacement work on July 8, 2024 and only partially opened prior to the purge operations that had not been documented nor approved as part of the sequence of operations in the clearance.
- Gas was re-introduced to the system from a 34-inch control valve (V-90), a clearance point with 618 psig differential. There are two ways to operate V-90, manual hydraulic and manual pneumatic. When attempting to manually operate V-90 hydraulically, oil unexpectedly discharged from the actuator's manual hydraulic override system relief valve and the valve failed to operate. V-90 was then partially opened using the manual pneumatic controls. This method is not effective for fine throttling as required for purging in Design Standard A-38.

Gas from V-90 began to displace air at multiple vent locations per the established clearance plan. According to the RCE report, it is suspected that because of the partial open position of V-56, a greater amount of gas flow was directed toward V-78. Instead of gas exiting the halfinch diameter vertical vent valve downstream of V-78 as approved in the clearance, gas exited the full 6-inch pipe opening horizontally where the blind flange had been removed on July 9, 2024. The RCE report indicated that gas flowed directly into an opposing blind flange 18inches away at V-79, and this resulted in deflection in all directions, including into the excavation below. Within minutes, a hazardous air-gas plume developed. At approximately 1842, the air-gas plume ignited, resulting in serious burns to one PG&E employee and minor injuries to others nearby. Another PG&E employee in the area immediately responded, attending to the seriously injured employee, and extinguishing various spot fires using prestaged fire extinguishers. According to the RCE report, the PG&E personnel at V-90 closed the valve to shut in the gas shortly before ignition, allowing the flame to extinguish within about one minute. The RCE report indicated that the seriously injured employee received 2nd and 3rd degree burns and was airlifted to a specialized burn unit. The employee has since been released.

SED investigated the incident and concluded that PG&E committed probable violations of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, Section 192.13(c). These safety requirements are outlined below for each of the four violations.



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

First Violation

PG&E's Gas Design Standard (GDS), A-38-1h, "Purging Gas Facilities" (Publication Date: 04/12/2023, Effective Date: 07/01/2023)

According to PG&E's Root Cause Evaluation (RCE) report, the following items in PG&E's GDS A-38 were not addressed:

- The required purge drive pressure. If the purge will be done in multiple segments, include the purge drive pressure for each segment.
- The expected duration of each segment of the purge, as well as the overall purging operation.

The RCE report indicated that the purge drive pressure is critical to ensure an adequate and safe purge velocity and flowrate. If purge velocity is too low, stratification and excessive mixing could occur. If purge velocity is too high, other hazards (projectiles, increased range of flammability, etc.) could occur. The expected purge duration is critical as well, as it allows for the identification of potential abnormal operating conditions (AOCs) when purge end points do not meet the expectation. According to the RCE report, without the ability to monitor purge drive pressure and expected duration, the clearance team was severely limited in their capacity to identify hazards, apply essential controls, and fail safely.

According to the RCE report, PG&E Gas Design Standard A-38 requires the use of a drive pressure gauge, so the crew understands how much gas is being introduced into the system while "purging into service." However, the RCE report indicated that there was no gauge installed, so the only indicator of the amount of gas being introduced would be through sound or feel at a purge point. Because a gauge was not installed, SED found that the following requirements in PG&E's GDS A-38 were not followed:

- On the section to be purged and near the upstream mainline valve, install a pressure gauge that is accurate and readable within 1 psi so that the inlet pressure can be observed. (The gauge should be connected through several feet of flexible tubing to minimize vibration.)
- Open throttle control valve steadily while monitoring the inlet pressure gauge. Continually monitor the pressure and gradually adjust the throttle control valve throughout the purge.

PG&E's failure to follow its procedure A-38 is a violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section 192.13(c).



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

Second Violation

PG&E's Gas Design Standard (GDS), A-38.3-0a, "Temporary Vent Stacks" (Publication Date: 12/16/2020, Effective Date: 03/16/2021)

According to the RCE report, PG&E's GDS A-38.3 covers the installation of vent stacks to allow gas and air/gas mixtures to escape into the atmosphere without hazard during purging and blowdown operations. The RCE report indicated that temporary vent stacks are a key safety control to protect coworkers and the public in the vicinity of the escaping gas or air/gas mixture from the associated noise, dust/debris, and odor as well as allowing the operation to "fail safely" if an unintended ignition should occur. SED found that the purge vent location at V-78 during the purge into service lacked the necessary vent stacks because the 6-inch blind flange was removed and not reinstalled. PG&E did not meet the following requirements in PG&E's GDS A-38.3-0a:

- Vent stacks must be of adequate height to provide enough clearance out of the excavation, and pointed in a safe direction away from any potential hazards. If it is not feasible to extend stack above the excavation due to depth, ensure personnel are at a safe distance away from the location and height of the stack.
- Flanged connections must be fully bolted and tightened with appropriately rated gasket and welded per appropriate weld procedure. If there are any threaded connections in assembly, follow requirements for threaded components.

PG&E's failure to follow its procedure A-38.3-0a is a violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section 192.13(c).

Third Violation

PG&E's Code of Safe Practices (CSP) Section 1304, "Vent Stacks" and 1305, "Sources of Ignition or Fire Near Escaping Gas"

According to the RCE report, PG&E's CSP Section 1304 and 1305 also cover the installation of vent stacks to allow gas and air/gas mixtures to escape to the atmosphere without hazard during purging and blowdown operations. SED found that the purge vent location at V-78 during the purge into service, where the 6-inch blind flange was removed and not reinstalled, did not meet the following requirements in PG&E's CSP Section 1304 and 1305:



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

- Vent stacks shall be of sufficient size and height to minimize the hazard of releasing gas in the work area...
- Gas shall not be blown against the side of an excavation; it must be vented upward.

PG&E's failure to follow its procedures in CSP Sections 1304 and 1305 is a violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section 192.13(c).

Fourth Violation

PG&E's Work Clearance Document (WCD) # 80252165

According to the RCE report, employees failed to adhere to the following steps in PG&E's Work Clearance Document and failed to maintain worker safety and system configuration control.

- PG&E employees removed the Valve-78 (V-78) downstream flange on July 9, 2024, that also removed a vertical vent valve downstream of V-78 (VENT D/S of V-78) as it was mounted to the face of the blind flange.
- PG&E employees did not fully open Valve-56 (V-56) on July 8, 2024, per the WCD after maintenance was performed.
- PG&E employees did not fine throttle Valve-90 (V-90) or monitor purge drive pressure on July 10, 2024.

Based on the above, SED found that the following sequence of operations in PG&E's WCD # 80252165 were not followed:

- Operation No. 18 Operation: CHECK OPEN Technical Object: V-56
- Operation No. 38 Operation: OPEN Technical Object: VENT D/S V-78
- Operation No. 52 Operation: POSITION Technical Object: V-90 Remarks: R/MOL, SLOWLY PURGE PER A-38

PG&E's failure to follow its procedures in WCD #80252165 is a violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section 192.13(c)



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

SED CITATION ANALYSIS

Factor	Staff Finding			
Number of violation(s) and duration of violation(s)	Four violations of General Order 112-F, all beginning on July 10, 2024, and ending on the day of the incident (one day). The four violations of General Order 112-F, which incorporates by reference Title 49 Code of Federal Regulations Part 192, are:			
	1. Failure to ensure PG&E's Gas Design Standard (GDS), A-38-1h, "Purging Gas Facilities" was properly followed. (192.13(c))			
	2. Failure to ensure PG&E's Gas Design Standard (GDS), A-38.3-0a, "Temporary Vent Stacks" was properly followed. (192.13(c))			
	3. Failure to ensure PG&E's Code of Safe Practices (CSP) Section 1304, "Vent Stacks" and 1305, "Sources of Ignition or Fire Near Escaping Gas" were properly followed. (192.13(c))			
	4. Failure to ensure PG&E's Work Clearance Document (WCD) # 80252165 was properly followed. (192.13(c))			



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

OF CALIFOR			
Factor	Staff Finding		
Severity or gravity of the offense	Physical Harm: The incident resulted in one injury.		
	Regulatory Harm and Number of Violations: SED identified four violations of GO 112-F, Reference Title 49 CFR Part 192, Section 192.13(c) during the course of its investigation.		
Conduct of the utility	PG&E reported this incident to DOT and CPUC due to a release of gas resulting in an injury requiring hospital admission and at least one overnight stay. PG&E submitted its RCE report to SED on November 6, 2024, which is PG&E's investigation of this incident by a cross-functional team of its Subject Matter Experts.		
	PG&E indicated that it identified and established the following corrective actions through its investigation and analysis of several factors such as extent of cause, extent of condition, human factors, etc.:		
	Develop Safety and Culture Achievement Plan		
	Establish Exclusion Zones		
	Install and Stage Vent Stacks		
	Implement Risk Identification and Readiness Reviews		
	Develop Configuration Control Devices		
	 Evaluate Clearance Supervisor Roles and Responsibilities 		
	Implement Clearance and Tagging Event Monitoring Process		
	Implement Training for Clearance Operations		
	Develop A-38 Job Aid and Purging Training		
	Implement Trending and Performance Monitoring		
	Establish Quality Improvement for High-Risk Programs		
	<u> </u>		



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

2. G20171127-2428 – During a gas service abandomment in 2003, PG&E inserted an expander plug into the service tee to temporarily halt the flow of gas. The service tee was not permanently capped after the customer's service line was disconnected. The expander plug contained gas from 2003 to 2013 while the main functioned as a low-pressure distribution main. In 2013, the main was uprated to high pressure distribution and the plug did not dislodge until 2017. After the failure of the expander plug, gas was able to migrate from the abandoned service tee into the structure, which later resulted in an explosion. The estimated cost of property damage was \$409,000. SED's investigation found PG&E committed two violations of General Order 112-F, Title 49 CFR §192.13(c) by: 1) failure to follow PG&E's Procedure C-36.1 Rev #00 Grunsky Bag Method for Stopping Off Low Pressure Service Tees when it failed to remove the X-pando plug from the service tee, and 2) failure to follow PG&E's Procedure A-93.2 when failing to use approved methods to seal the cut end. Self-reporting of the violation N/A Approximately 4.6 million gas customers, \$6.6 billion gas revenue in 2024.	OF CALL	11
Financial resources of the utility Approximately 4.6 million gas customers, \$6.6 billion gas		plug into the service tee to temporarily halt the flow of gas. The service tee was not permanently capped after the customer's service line was disconnected. The expander plug contained gas from 2003 to 2013 while the main functioned as a low-pressure distribution main. In 2013, the main was uprated to high pressure distribution and the plug did not dislodge until 2017. After the failure of the expander plug, gas was able to migrate from the abandoned service tee into the structure, which later resulted in an explosion. The estimated cost of property damage was \$409,000. SED's investigation found PG&E committed two violations of General Order 112-F, Title 49 CFR §192.13(c) by: 1) failure to follow PG&E's Procedure C-36.1 Rev #00 Grunsky Bag Method for Stopping Off Low Pressure Service Tees when it failed to remove the X-pando plug from the service tee, and 2) failure to follow PG&E's Procedure A-93.2 when failing to use approved
1 maneral resources of the admity	Self-reporting of the violation	N/A
	Financial resources of the utility	



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

OF CALIFO				
Factor	Staff Finding			
The totality of the circumstances	Aggravating factors include:			
	 The injury to the PG&E employee necessitating in- patient hospitalization. 			
	Mitigating factors include:			
	PG&E indicated that it took the following actions immediately after the incident to ensure the safety of its employees, contractors, and the public:			
	 Stand Down on horizontal Purging and venting activities unless authorized per Engineering and O&M Director approval. 			
	 Publish interim field guide and training on A-38 (Blowdown and Purging). 			
	 Eliminate horizonal purging and venting. 			
	 Approve pre-engineered vent stack use for depressurizing blowdown. 			
	 Eliminate pneumatic operated valves during manual purging (non-automatic). 			
	Circumstantial factors include:			
	PG&E self-reported this incident to DOT and CPUC due to a release of gas resulting in an injury requiring hospital admission and at least one overnight stay.			



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

OF CALIF			
Factor	Staff Finding		
The role of precedent	The CPUC previously issued citations G.25-01-001,		
	G.25-01-002, and G.20-04-001 to PG&E for failing to		
	follow its procedures.		
Resultant Citation Taking All Of	The penalty is \$400,000.00 (Four hundred thousand		
These Factors Into Account	dollars).		
	The per day penalty in this case is a maximum of \$100,000 per each offense and a minimum of \$500 per each offense under California Public Utilities Code Section 2107 (applicable at the time the incident occurred). M-4846 and D.16-09-055 provide the factors to apply to determine the appropriate penalty within that range, which are discussed in this citation analysis section. SED applies these factors for each of the four violations of GO 112-F, Reference Title 49 CFR Part 192, and determines each one has a penalty of \$100,000 per offense.		



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

RESPONSE:

Respondent is called upon to provide a response to this Citation by: **5:00 PM on October 26, 2025**. By way of such response, Respondent, **within 30 calendar days**, must either pay the amount of the penalty set forth in this citation¹, or appeal² the citation. In addition, the Respondent must do one of the following:

- (1) <u>For violations constituting immediate safety hazards</u>: Respondent must immediately correct the immediate safety hazards.
- (2) For violations that do not constitute immediate safety hazards: Violations that do not constitute immediate safety hazards must be corrected within 30 days after the citation is served. If said violations that do not constitute immediate safety hazards cannot be corrected within 30 days, then the Respondent must submit a detailed Compliance Plan to the Director of SED within 30 days after the citation issues, unless the utility and the Director of SED, before the expiration of the 30 day period, agree in writing to another date, reflecting the soonest that the Respondent can correct the violations. The Compliance Plan must provide a detailed description of when the violation will be corrected, the methodology to be utilized, and a statement supported by a declaration from the Respondent's Chief Executive Officer or appropriate designee (CEO Declaration) stating that in the Respondent's best judgment, the time that will be taken to correct the violation will not affect the safety or integrity of the operating system or endanger public safety.

Note: Respondent will forfeit the right to appeal the citation by failing to do one of the options outlined above within 30 days. Payment of a citation or filing a Notice of Appeal does not excuse the Respondent from curing the violation. The amount of the penalty may continue to accrue until a Notice of Appeal is filed. Penalties are stayed during the appeal process. A late payment will be subject to a penalty of 10% per year, compounded daily and to be assessed beginning the calendar day following the payment-due date. The Commission may take additional action to recover any unpaid fine and ensure compliance with applicable statutes and Commission orders.

¹ For fines paid pursuant to Pub. Util. Code §2107 and D.16-09-055, Respondent shall submit a certified check or wire transfer payable to California Public Utilities Commission using the attached Citation Payment Form. Upon payment, the fine will be deposited in the State Treasury to the credit of the General Fund and this citation will become final.

² Respondent may Appeal this citation by completing and submitting a Notice of Appeal Form. Please see the attached document, "Directions For Submitting An Appeal To A Citation Issued Pursuant to Decision 16-09-055" for information on the appeals process and the attached "Notice of Appeal Of Citation Form."



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

NOTIFICATION TO LOCAL AUTHORITIES:

As soon as it is reasonable and necessary, and <u>no later than 10 calendar days</u> after service of the citation is effected, the Respondent must provide a notification to the Chief Administrative Officer or similar authority in the city and county where the violation occurred. <u>Within 10 days of providing such notification</u>, the Respondent must serve an affidavit to the Director of SED, at the mail or e-mail address noted below, attesting that the local authorities have been notified; the date(s) for when notification was provided; and the name(s) and contact information for each local authority so notified.

The CPUC expects the Utility to take actions, as soon as feasible, to correct, mitigate, or otherwise make safe all violations noted on the Citation regardless of the Utility's intentions to accept or appeal the violation(s) noted in the Citation.

LEE PALMER
Director

Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Leslie.palmer@cpuc.ca.gov



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

CITATION PAYMENT FORM

I (we)	hereby agree to comply with this citation dated			
	, and have corrected	/mitigated the violation(s)	noted in the citation on	
	and no later than	, all work	, all work to make permanent	
corrections to an	ny mitigated, or otherwise re	emaining concerns related	to the violation(s) will	
be completed as	s noted in the Compliance Pl	lan we have submitted to t	he Director of SED and,	
herewith, pay a	fine in the amount of \$	included in the	citation.	
	Financia	re of Electrical Corporational Officer, or President/Ch or delegated Officer there	ief Executive	
	_	(Signature)	(Date)	
	_	(Printed Name and Title)		

Payment must be with a certified check made or wire transfer payable to the *California Public Utilities Commission* and sent to the address below. Please include the citation number on the memorandum line to ensure your payment is properly applied.

California Public Utilities Commission Attn: Fiscal Office 505 Van Ness Avenue San Francisco, CA 94102-3298

NOTE: A copy of the completed Citation Payment Form must be sent to the Director of the Safety and Enforcement Division, via email or regular mail, to the address provided on the Citation.



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

DIRECTIONS FOR SUBMITTING AN APPEAL TO A CITATION ISSUED PURSUANT TO DECISION 16-09-055

Within 30 calendar days of the Respondent being served with a <u>CITATION ISSUED</u> <u>PURSUANT TO DECISION 16-09-055</u>, Respondent may appeal the citation. Beyond 30 calendar days of being served with the citation, Respondent is in default and, as a result, is considered as having forfeited rights to appeal the citation. The Respondent must still correct the violation(s) as instructed in the Response section of this citation.

To appeal the citation, Appellant must file a Notice of Appeal (including a completed title page complying with Rule 1.6 of the Commission's Rules of Practice and Procedure, and attached Notice of Appeal Form) along with copies of any materials the Appellant wants to provide in support of its appeal with the Commission's Docket Office **and** must serve the Notice of Appeal, at a minimum, on

- 1) The Chief Administrative Law Judge (with an electronic copy to: ALJ Div Appeals Coordinator@cpuc.ca.gov),
- 2) The Director of the Safety and Enforcement Division
- 3) The Executive Director
- 4) General Counsel
- 5) The Director of the Public Advocates Office at the California Public Utilities Commission

at the address listed below within 30 calendar days of the date on which the Appellant is served the Citation. The Appellant must file proof of service to this effect at the same time the Appellant files the Notice of Appeal. The Notice of Appeal must at a minimum state: (a) the date of the citation that is appealed; and (b) the rationale for the appeal with specificity on all grounds for the appeal of the citation.

California Public Utilities Commission 505 Van Ness Ave. San Francisco, CA 94102 Attn: Lee Palmer

NOTE: Submission of a *Notice of Appeal Form* in no way diminishes Appellant's responsibility for correcting the violation described in the citation, or otherwise ensuring the safety of facilities or conditions that underlie the violations noted in the Citation.

Ex Parte Communications as defined by Rule 8.1(c) of the Commission's Rules of Practice and Procedure are prohibited from the date the citation is issued through the date a final order is issued on the citation appeal.



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

After receipt of the Appellant's *Notice of Appeal Form*, a hearing will be convened before an Administrative Law Judge. At least ten days before the date of the hearing, the Appellant will be notified and provided with the location, date, and time for the hearing. At the hearing,

- (a) Appellant may be represented by an attorney or other representative, but any such representation shall be at the sole expense of the Appellant;
- (b) Appellant may request a transcript of the hearing, but must pay for the cost of the transcript in accordance with the Commission's usual procedures;
- (c) Appellant is entitled to the services of an interpreter at the Commission's expense upon written request to the Chief Administrative Law Judge not less than five business days prior to the date of the hearing;
- (d) Appellant is entitled to a copy of or electronic reference to "Resolution ALJ-299 Establishing Pilot Program Citation Appeal and General Order 156 Appellate Rules (Citation Appellate Rules)"; and
- (e) Appellant may bring documents to offer in evidence (Rule 13.6 (Evidence) of the Commission's Rules of Practice and Procedure applies) and/or call witnesses to testify on Appellant's behalf. At the Commission's discretion, the hearing in regard to the Appellant's appeal can be held in a CPUC hearing room at either of the following locations:

San Francisco:

Los Angeles:

505 Van Ness Avenue San Francisco, CA 94102 320 West 4th Street, Suite 500 Los Angeles, CA 90013

The hearing(s) held in regard to the Appellant's appeal will be adjudicated in conformance with all applicable Public Utilities Code requirements.



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

Notice of Appeal Form Appeal from Citation issued by Safety and Enforcement Division (Pursuant to Decision 16-09-055)

Appellant:

Mr. Austin Hastings Vice President, Gas Engineering Pacific Gas & Electric Company 6121 Bollinger Canyon Road San Ramon, CA 94583

Citation Date: September 26, 2025
Citation #: <u>D.16-09-055 G.25-09-001</u>
Utility/Operator ID#: <u>15007</u>
Appeal Date:

"Appeal of		from		issued by Safety
	[Utility/Operator Name]		[Citation Number]	
and Enforce	ment Division"			

Statements supporting Appellant's Appeal of Citation (You may use additional pages if needed and/or attach copies of supporting materials along with this form).



Citation Date: September 26, 2025 **Citation #:** D.16-09-055 G.25-09-001

Utility/Operator ID#: 15007

Enclosures to Accompany Utility Appeal

Utility to add list of Enclosures as appropriate: