

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 6, 2021

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: Notice of Gas Incident Violations for Pacific Gas and Electric Company (PG&E)

Dear Ms. Cowsert:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following Notice of Probable Violations (NOPV) for non-DOT reportable incident investigations completed as of the first quarter of 2021- Q1 2021. This letter serves as notification to you that as a result of our investigations, SED found Pacific Gas and Electric Co. (PG&E) in violation of the following:

1. Title 49 Code of Federal Regulations (CFR) §192.201(a)(2)(i) states in part:

*(a) Each pressure relief station or pressure limiting station or group of those stations installed to protect a pipeline must have enough capacity, and must be set to operate, to insure the following:
(2) In pipelines other than a low pressure distribution system:*

(i) If the maximum allowable operating pressure is 60 p.s.i. (414 kPa) gage or more, the pressure may not exceed the maximum allowable operating pressure plus 10 percent, or the pressure that produces a hoop stress of 75 percent of SMYS, whichever is lower;

The summary of the identified violation is listed in Attachment A of this letter. Please provide a written response within 30 days of the date of this letter indicating the measures taken by PG&E to address the violation.

For 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
Mohammad Ali / SED-GSRB
Terence Eng / SED-GSRB

ATTACHMENT: Single Incident with Probable Violation

Attachment A
Single Incident with Probable Violation

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Findings	Code Violation(s)
G20200804-3102	8/4/2020	Fresno Gas Load Center Fresno	PG&E	N/A	On August 5, 2020, at approximately 1224 hours, PG&E confirmed an overpressure event within the Fresno Gas Load Center in Fresno, Fresno County. This condition occurred after a clearance associated with scheduled maintenance on Distribution Regulation Station GS-03. Transmission regulation Station GS-07 is connected to GS-03 by a header and uses 10-inch Mooney regulators. When the inlet valve (V-120) to GS-03 was being opened, it caused a low demand situation in the header. The 10-inch Mooney regulators have been known to not provide adequate control in low demand situations since 2017. The pressure in the header increased to approximately 597.8 psig, exceeding the header's MAOP of 400 psig. The 10-inch Mooney regulators used by GS-07 failed to control the downstream pressure. There are no known injuries, no fatalities, and no media on site. There was no customer impact. SED found PG&E in violation of 49 CFR, 192, Section 192.201(a)(2)(i) for allowing the pressure to increase above the MAOP plus 10 percent.	49 CFR §192.201(a)(2)(i)