



**Pacific Gas and
Electric Company®**

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June 7, 2013

Brigadier General Jack Hagan, Director
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue, Room 2205
San Francisco, CA 94102-3298

Re: CPUC Resolution ALJ-274 Self-Identified Non-Compliance Notification
Over-pressure Event in Fresno County

Dear Brigadier General Hagan:

Pursuant to Resolution ALJ-274, PG&E is providing notification of a self-identified non-compliance issue regarding an over-pressure event that occurred on April 30, 2013 in an unincorporated area in Fresno County. The gas distribution system affected by this over-pressure event serves an unincorporated area south of the City of Firebaugh.

This small gas distribution system that feeds the unincorporated area south of the City of Firebaugh has a Maximum Allowable Operating Pressure (MAOP) of 60 pounds per square inch (psig). The source of gas into this system normally comes from the Firebaugh Distribution system via a 3-inch distribution main at the Brittan Ranch Pressure Regulator Station. The Brittan Ranch Pressure Regulator Station is fed from the Distribution Feeder Main (DFM) 7209-02 (MAOP is 120 psig), which originates from Brittan "Y" Pressure Regulator Station. However, the Brittan Ranch Pressure Regulator Station had not been feeding the small distribution system for years because the 3-inch distribution main from the Firebaugh Distribution System was supplying gas. PG&E deactivated this 3-inch distribution main in December 2012 and lowered the pressure in DFM 7209-02 to 57 psig on December 12, 2012. This allowed the small distribution system to be fed until the relocation of the Brittan Ranch Pressure Regulator Station could be planned and constructed. Once pressure in DFM 7209-02 had been lowered to 57 psig on December 12, 2012, the bypass run at Brittan Ranch Pressure Regulator Station was opened. While performing maintenance at Brittan Ranch Pressure Regulator Station on April 30, 2013, PG&E's Yosemite Division Transmission & Regulation (T&R) mechanics observed the pressure in the small distribution system at 101 psig. The pressure in the Firebaugh Distribution System was unaffected because its 3-inch distribution main tie to this small distribution system had been cut and deactivated in December 2012.

The T&R Mechanics immediately lowered pressure in the distribution system to 50 psig. Upon inspection of the equipment at Brittan "Y" Pressure Regulator Station, it was determined that a leaking station bypass valve had allowed the downstream pressure to build up to 101 psig.

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A leak survey of the distribution system began on April 30, 2013, and completed on May 1, 2013. No leaks were found. The leaking Brittan "Y" station bypass valve was lubricated, and as a precautionary measure, a relief valve has temporarily been installed on DFM 7209-02 at Brittan "Y" Pressure Regulator Station. Per 49 CFR 191.23(b)(4), this Safety Related Condition on the distribution system was corrected within five working days, and therefore a Safety Related Condition Report was not submitted.

Having the pressure in the distribution system reach a pressure of 101 psig exceeds 110% of the MAOP, and is therefore a violation of 49 CFR 192.621(a). PG&E is conducting an evaluation of this event and based on the results of the evaluation, will develop the appropriate corrective actions to address this event on a longer term or system-wide basis, if warranted.

PG&E will notify the local authorities in Fresno County of this issue and will provide confirmation of notification as a supplement to this letter.

Please feel free to contact [Redacted] at [Redacted] or [Redacted] for any additional questions you may have regarding this notification.

Sincerely,



Frances Yee
Acting Director, Regulatory Compliance and Support

cc: Dennis Lee, CPUC
Liza Malashenko, CPUC
Mike Robertson, CPUC
Sunil Shori, CPUC

[Redacted]
Shilpa Ramaiya, PG&E