



## Wild Goose Storage LLC

### Safety Plan Policy

#### SCOPE

Wild Goose Storage, LLC (WGS), a Rockpoint Gas Storage company, is committed to the safe and reliable operation of its facilities and confirms that the safety of the public, our employees and the environment, is a core value of the company.

The Wild Goose Safety Plan is comprised of:

- An Integrity Management Plan which describes WGS's Pipeline Integrity Management Program and the processes used to maintain compliance with Department of Transportation 49 CFR 192, Subpart O - Pipeline Integrity Management.
- An Operations and Maintenance Manual containing basic operating, maintenance and inspection procedures for natural gas pipelines and associated facilities and includes instructions necessary for compliance with Department of Transportation regulations.
- An Emergency Response Plan to ensuring that response to emergencies is timely, effective and minimizes loss and to enhance the safety of the public, public property, WGS personnel, the environment and WGS operations.
- A Control Room Management Plan detailing the roles and responsibilities of WGS controllers working in the control room and how they will monitor and control the pipeline.
- The Rockpoint Environmental, Health and Safety Handbook outlining minimum standards for safety and supplements federal Occupational Safety and Health Administration Regulations and Codes.
- Additional documents, policies and procedures that WGS uses to continually maintain extremely high safety standards.

#### COMMITMENT

WGS, and specifically its management team, emphatically approve the WGS Safety Plan and all of its components and are committed to ensuring it will be reviewed annually. The components of the WGS Safety Plan have all been implemented and are currently being adhered to by WGS and its' employees.

WGS will meet or exceed the minimum standards for safe design, construction, installation, operation and maintenance of our facilities.

WGS will comply with all applicable health, safety and environmental laws and regulations and is in compliance with all state and federal regulations related to our business including the California Public Utilities Code and United States Department of Transportation Regulations. Recommendations made by the California Public Utilities Commission will be added to this Plan when the Commissions deem it necessary.

WGS will provide continual training and orientation to the workforce on operations, environmental and safety matters. In addition, WGS reviews its manpower plan annually and compares it with operational requirements to ensure an adequately sized, qualified and properly trained gas corporation workforce to carry out the WGS Safety Plan.

WGS will make the WGS Safety Plan available to employees in both electronic and hard copy formats and as part of the annual review of the WGS Safety Plan invites employees to provide comments and suggestions and WGS retains a log of those comments and suggestions, including the disposition of the comment or suggestion.

Whistleblower notices are posted at prominent locations throughout the facility as well as on the main page of the Environmental, Health and Safety page of the Rockpoint intranet.

As well, per Public Utilities Code 961 (d) (11), WGS will ensure that any additional matters that the Commission determines should be included in the Safety Plan, will be included in the Safety Plan.

WGS shall strive to protect the health and safety of employees, the public and the environment through the WGS Safety Plan.

A black ink signature of Simon Dupere.

Simon Dupere  
President and Chief Executive Officer  
Rockpoint Gas Storage  
June 2017

A blue ink signature of Mathieu Fournier.

Mathieu Fournier  
V.P. Engineering & Operations  
Rockpoint Gas Storage  
June 2017

**NATURAL GAS SYSTEM  
OPERATOR SAFETY PLAN**

**WILD GOOSE STORAGE, LLC**

**JUNE 8, 2017**

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**CALIFORNIA PUBLIC UTILITIES CODE §§ 961 and 963**

## **I. INTRODUCTION**

This Natural Gas System Operator Safety Plan (Safety Plan) is submitted by Wild Goose Storage, LLC (Wild Goose) as required by General Order 112-F Section 123.2(k) and Public Utilities Code §§ 961 and 963.

Wild Goose achieved the status of being the first independent storage provider in California in June 1997, upon receiving its certificate of public convenience and necessity from the California Public Utilities Commission (Commission).<sup>1</sup> At that time, Wild Goose became authorized to provide firm and interruptible storage services from storage facilities to be constructed in Butte County, California. Since that time, Wild Goose has twice received Commission authorization to expand the size of its storage facility,<sup>2</sup> such that the Wild Goose facility currently has an inventory capacity 75 Bcf.

As an independent storage provider operating in California, Wild Goose falls within the Public Utilities Code definition of natural gas corporation<sup>3</sup> and thus is subject to the Code's requirement to develop and submit for Commission approval "a plan for the safe and reliable operation of its commission regulated gas pipeline facility."<sup>4</sup>

## **II. SAFETY PLAN**

The Safety Plan consists of the Table of Concordance (Table) beginning at page 5 and supporting documentation, which, through its various elements demonstrates, consistent with Public Utilities Code Section 963(b) (3), that Wild Goose places the safety of the public and its employees as its top priority. In this regard, the Safety Plan achieves each of the specific criteria

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<sup>1</sup> See Commission Decision 97-06-091.

<sup>2</sup> See Commission Decision 02-07-036 and Decision 10-12-025.

<sup>3</sup> California Public Utilities Code Section 222.

<sup>4</sup> *Id.*, Section 961.

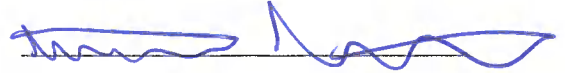
required in Public Utilities Code §§961 (c) and (d) (1-11). The Safety Plan is consistent with industry best practices and with federal pipeline safety statutes as set forth in Chapter 601 of Subtitle VIII of United States Code Title 49 and the implementing regulations adopted by the United States Department of Transportation. Wild Goose maintains a rigorous schedule for the periodic review and updating of the Safety Plan. As well, per Public Utilities Code 961 (d) (11), Wild Goose will ensure that any additional matters that the Commission determines should be included in the Safety Plan, will be included in the Safety Plan.

In accordance with Public Utilities Code Section 961(e) Wild Goose provides meaningful, substantial and ongoing employee participation in the development and implementation of its Safety Plan. Moreover, Wild Goose's Public Awareness Program (PAP), which has been approved by the Commission's Gas Safety and Reliability Branch, details Wild Goose's commitment to its policy that the safety of the public and its employees are its top priority. Finally, for the purpose of reporting perceived safety violations to the Commission, Wild Goose confirms that it has provided its employees with the contact coordinates of the Director of the Commission's Consumer Safety and Protection Division and the designation "Safety Breach Notification from Gas System Operator Employee-Confidentiality Requested." In addition, this information has been posted in a public area at the Wild Goose facility.

As set forth in this submission, Wild Goose's Safety Plan is currently fully implemented.

Respectfully submitted June 8, 2017 at San Francisco, California.

In accordance with General Order 112-F section 123.3, I verify that the facts contained in this Safety Plan are correct to the best of my knowledge:



Mathieu Fournier  
VP, Engineering & Operations

### Revision History

<b>June 2017</b>	
Added statement regarding 961 (d) (11) that any additional matter that the Commission determines should be included in the plan, will be included in the plan.	
<ol style="list-style-type: none"><li>1. Updated Safety Plan statement</li><li>2. Updated Table of Concordance</li><li>3. Updated Safety Plan Policy</li></ol>	
<b>Approved by: Gary Theberge</b>	<b>Date: June 8, 2017</b>
<b>Approved by: Mathieu Fournier</b>	<b>Date: June 8, 2017</b>

## **Table of Contents**

1. Appendix 1 – Wild Goose Storage, LLC Signed Safety Plan Policy – June 2017
2. Appendix 2 – Emergency Response Plan – July 2016
3. Appendix 3 – Gas Integrity Management Program Manual – January 2016
4. Appendix 4 – Operator Qualification for Pipeline Personnel – May 2013
5. Appendix 5 – Operator Qualifications Table – July 2016
6. Appendix 6 - Operations and Maintenance Procedures Manual – June 2013
7. Appendix 7 – Control Room Management Plan – January 2012
8. Appendix 8 – Whistleblower Notice - February 2017
9. Appendix 9 – Health, Safety & Environmental (HSE) Policy – July 2016
10. Appendix 10 – Corporate Public Awareness Program – January 2017
11. Appendix 11 – Health, Safety and Environmental Handbook for US Operations – Version 2, May 2013
12. Appendix 12 – WGS Training Matrix – June 2016
13. Appendix 13 – Anti-Drug and Alcohol Misuse Prevention Plan – January 2011
14. Appendix 14 – Incident Reporting and Investigation Guideline – January 2017
15. Appendix 15 - Incident and Service Interruption Report - Form 100
16. Appendix 16 – Notice and Disposition of Reported Incident – Form 101
17. Appendix 17 – Safety Related Conditions Report – Form 108
18. Appendix 18 – Pipeline Leak Repair Report – Form 109
19. Appendix 19 – Leak Investigation Report – Form 115
20. Appendix 20 – Safety Plan Feedback Form
21. Appendix 21 – Safety Plan Feedback Log

**Table of Concordance**

PU Code Section	Requirement	Specific area of Wild Goose's Safety Plan that addresses PU Code Section	Summary of Wild Goose's Safety Plan that addresses the deficiencies identified by the PUC
<u>Sec. 961</u> <u>Subdivision</u> <u>(b)</u>			
-3	Each gas corporation shall implement its approved plan	<ul style="list-style-type: none"> <li>• WGS Safety Plan Policy Statement</li> </ul>	Please refer to the Wild Goose Storage, LLC -- Safety Plan Policy signed by the President and Chief Executive Officer of Wild Goose Storage, LLC at Appendix 1.
-4	The Commission shall require each gas corporation to periodically review and update the plan	<ul style="list-style-type: none"> <li>• Safety Plan Table</li> </ul>	<p>The Safety Plan as a whole is reviewed annually by the Legal Department, Manager EH&amp;S, Engineering &amp; Operations and the Production Coordinator.</p> <p>In addition, various components of the Safety Plan are reviewed as follows:</p> <p style="padding-left: 40px;">Appendix 2 – The Emergency Response Plan (ERP) is reviewed and revised annually by the Manager EH&amp;S.</p> <p style="padding-left: 40px;">Appendix 3 – The Integrity Management Plan (IMP) is reviewed annually by Engineering and Operations.</p> <p style="padding-left: 40px;">Appendix 4 – The Operator Qualifications for Pipeline Personnel (OQPP) is reviewed annually by Engineering and Operations.</p> <p style="padding-left: 40px;">Appendix 5 – The Operator Qualifications Training Matrix is reviewed every three years by Engineering and Operations in accordance with Department of Transportation regulations.</p> <p style="padding-left: 40px;">Appendix 6 – The Operations &amp; Maintenance Manual (O&amp;MM) is reviewed annually by Engineering and Operations.</p>



			<p>Appendix 7 – The Control Room Management Plan (CRM) is reviewed annually by Engineering and Operations.</p> <p>Appendix 8 – The Whistleblower Protection Program is reviewed annually and updated in accordance with PUC requirements.</p> <p>Appendix 9 – The Health, Safety and Environmental Policy is reviewed annually by the President /CEO.</p> <p>Appendix 10 – The Public Awareness Program (PAP) is reviewed annually by the Manager EH&amp;S and the VP, Engineering &amp; Operations.</p>
<p><u>Sec. 961</u>  <u>Subdivision (c)</u></p>	<p>The Plan developed, approved and implemented pursuant to subdivision (b) shall be consistent with best practices in the gas industry and with deferral pipeline safety statutes as set forth in Chapter 601 (commencing with section 60101) of Subarticle VIII of Title 49 of the United States Code and the regulations adopted by the United States</p>	<ul style="list-style-type: none"> <li>• Safety Plan Table</li> <li>• HSE Handbook</li> </ul>	<p>Wild Goose’s Environmental Health and Safety Handbook (HSE Handbook), at Appendix 11, specifies that Wild Goose is committed to the best practices.</p> <p>Regulatory counsel Goodin, MacBride, Squeri &amp; Day, LLP is retained to provide Wild Goose with any and all relevant state regulatory updates.</p> <p>Wild Goose works with consultants, regulators and contractors every day to continually engage in best practices. Wild Goose notes that in the gas storage industry every plant has very specific attributes and can ultimately run very differently depending on a wide variety of factors.</p>

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	<p>Department of Transportation pursuant to those statutes.</p>		
<p><u>Sec 961.</u>  <u>Subdivision (d)</u>    -1 and -2</p>	<p>Identify and minimize hazards and systematic risks in order to minimize accidents, explosions, fires, and dangerous conditions, and protect the public and the gas corporation workforce.</p> <p>Identify the safety-related systems that will be deployed to minimize hazards, including adequate documentation of the commission-regulated gas pipeline facility history and capability.</p>	<ul style="list-style-type: none"> <li>• Safety Plan Table</li> <li>• IMP Sections 2.0, 5.0, 6.0, 7.0, 8.0 and 17.0</li> <li>• Control Room Management Plan</li> <li>• Training Matrix</li> <li>• ERP Sections 2.4, 7.0 and 12.0</li> </ul>	<p>Wild Goose maintains numerous safety systems designed to identify and minimize hazards and systematic risks, including:</p> <ul style="list-style-type: none"> <li>▪ IMP: <ul style="list-style-type: none"> <li>▪ Pipeline System Description – Section 2.0: the pipeline system is maintained in compliance with 49 CFR Part 192 and was placed under cathodic protection shortly after commissioning</li> <li>▪ Condition Discovery and Remedial Action – Section 5.4: integrity assessments in accordance with this Section help prioritize and evaluate remediation of anomalous conditions; reductions in operating pressure are determined using ASME/ANSI B31G or AGA Pipeline Research Committee Project PR-3-805 and notifications are made to the Pipeline and Hazardous Materials Safety Administration and the Commission Utilities Safety and Reliability Branch as required</li> <li>▪ Preventative and Mitigative Measures – Section 6.0: provides detailed measures to protect High Consequence Areas and to enhance public safety, including measures for outside force damage threats, corrosion threats and the need for automatic shut-off or remotely operated valves</li> <li>▪ Program Management – Section 7.0: performance measures are reported and submitted to Pipeline and Hazardous Materials Safety Administration (PHMSA) by March 15 of each year; Program Management also includes Record Keeping, Management of Change and Internal and External Communications</li> <li>▪ Quality Assurance – Section 8.0: includes the appropriate documentation, training, assigned</li> </ul> </li> </ul>

			<p>responsibilities, program reviews and audits to ensure success and continued improvement of the IMP</p> <ul style="list-style-type: none"> <li>▪ Program Management – Section 7.0 provides methods for measuring performance, recordkeeping, guidelines for internal and external communication, and utilization of management change process.</li> <li>▪ ERP:             <ul style="list-style-type: none"> <li>▪ Risk Matrix – Section 2.4 – assessment matrix to aid in classifying emergency level, which leads to risk analysis performed by EH&amp;S and Eng and Ops to minimize hazard and potential for future similar incident from occurring</li> <li>▪ Section 7.0 Facility Sample Response Strategies, subsections 7.1 – 7.9 identifies specific emergency response procedures for: facility process fires, loss of well control, pipeline rupture, escaping gas including gas detected inside a building, natural disasters, major fires &amp; explosions, civil disturbance. In addition, annual site inspections are conducted by the Manager, EH&amp;S and where deficiencies, if any, are identified, potential risk is ranked for severity and probability.</li> <li>▪ Hazardous Materials Information – Section 12.0: WGS has an online database, accessible by all employees, detailing all hazardous materials used in its operations deals extensively with Hazardous Materials Information</li> </ul> </li> <li>▪ Training Matrix includes the following topics which also address hazard identification:             <ul style="list-style-type: none"> <li>▪ Operator Qualifications Table                 <ul style="list-style-type: none"> <li>▪ WGS has employees that are qualified for tasks that are directly related to the identification of hazards, including the following Covered Tasks: Valve Inspection, Pressure Vessel Inspection &amp; Repair, Control Room Operations of a Pipeline, Gas Leak Survey,</li> </ul> </li> </ul> </li> </ul>
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			<p style="text-align: center;">Prevention of Accidental Ignition, and Gas Detection and Alarms</p> <ul style="list-style-type: none"> <li>▪ CRM Plan deals extensively with the identification of hazards as well as safety -related systems to minimize hazards, specifically: <ul style="list-style-type: none"> <li>▪ Section III: ensure control room staff know roles and responsibilities</li> <li>▪ Section IV and VI: adequately spaced shift change ensures alertness when monitoring SCADA system by avoiding fatigue</li> <li>▪ Section VII: Management of incoming alarms</li> <li>▪ Section VIII: ensure changes to system settings are well documented</li> <li>▪ Sections IX and X: ensure personnel working in control room have proper experience and training</li> <li>▪ Fire Protection and Prevention, Hazard Communication, Injury and Illness Prevention Plan, Machine Guarding, Personal Protective Equipment and Respiratory Protection.</li> </ul> </li> </ul>
-3	<p>Provide adequate storage and transportation capacity to reliably and safely deliver gas to all customers consistent with rules authorized by the commission governing core and noncore replacement, preventive maintenance, and reactive maintenance and repair of its commission-regulated gas pipeline facility.</p>	<ul style="list-style-type: none"> <li>▪ Safety Plan Table</li> <li>▪ PAP</li> <li>▪ ERP Section 8.0</li> <li>▪ HSE Sections' 4.2, 4.3, 5.0, 8.0, 8.3, 8.5, 8.9, 8.10</li> <li>▪ IMP Sections' 4.0, 5.0, 6.0</li> </ul>	<ul style="list-style-type: none"> <li>▪ Wild Goose's Public Awareness Program (PAP) has been submitted and approved by the California Public Utilities Commission and complies with the American Petroleum Industry Public Awareness Programs (APIRP 1162) for Pipeline Operators Recommended Practice and is designed to enhance public environmental and safety property protection through increased public awareness.</li> <li>▪ The PAP focuses on safety communication to four main groups: residents; emergency response officials; public officials and excavators and will provide the public, appropriate government organizations, persons engaged in excavation, public/private utility companies, and related activities with information on how to identify the location of underground pipelines owned and operated by Wild Goose and how to recognize and report a natural gas pipeline emergency.</li> <li>▪ ERP Communication – Section 8.0: <ul style="list-style-type: none"> <li>▪ Outlines the communication plan to the affected public in the event of an emergency</li> <li>▪ Employees attend extensive training and orientation on Wild Goose operations and</li> </ul> </li> </ul>

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			<p>environmental and safety matters this orientation given by the Manager Environment Health &amp; Safety in accordance with Section 1.0 of the HSE Handbook</p> <ul style="list-style-type: none"> <li>▪ Employees are required to comply with numerous policies, procedures and guidelines in place to ensure that safety is the top priority, including the Anti-Drug and Alcohol Misuse Prevention Plan developed in accordance with the DOT and acknowledged by each employee at Section VIII.</li> <li>▪ HSE Handbook: <ul style="list-style-type: none"> <li>▪ Incident Reporting and Legislative Requirements – Section 4.2</li> <li>▪ Near Miss Reporting – Section 4.3</li> <li>▪ Hazard Assessment and Control – Section 5.0</li> <li>▪ Work Site Safe Work Practices – Section 8.0</li> <li>▪ Building Entry – Section 8.3</li> <li>▪ Confined Space Entry – Section 8.5</li> <li>▪ Energy Isolation and Lock-out Tag Out – Section 8.9</li> <li>▪ Excavation and Trenching – Section 8.10</li> </ul> </li> <li>▪ The Engineering and Operations group monitors reservoir capacity, well behavior, and pipeline/plant operating conditions on a regular basis. They also are in communication with the transmission company daily to check on their system pressures, hydraulics, etc. Any bottlenecks or deficiencies are quickly identified and rectified. The group also implements a preventative maintenance program to reduce risk of equipment failure, ensuring reliability is high. Flow performance curves are generated that reflect overall facility capability at various levels of reservoir inventory.</li> <li>▪ IMP: <ul style="list-style-type: none"> <li>▪ Threats, Data Integration, and Risk Assessment – Section 4.0 details the process for threats and detection of leaks including time dependent threats; static or resident threats; time-independent threats or any additional threats</li> </ul> </li> </ul>
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			<ul style="list-style-type: none"> <li>▪ Integrity Assessment – Section 5.0 – Pipeline integrity is evaluated periodically based on data integration and risk assessment of the entire pipeline to identify the threats specific to each covered segment and the risk represented by these threats.</li> <li>▪ Preventive and Mitigative Measures – Section 6.0 – additional measures for third party damage, outside force damage, and corrosion threats.</li> </ul>
-4	<p>Provide for effective patrol and inspection of the commission-regulated gas pipeline facility to detect leaks and other compromised facility conditions and to effect timely repairs</p>	<ul style="list-style-type: none"> <li>▪ Safety Plan Table</li> <li>▪ IMP Section 4.0, 5.0</li> <li>▪ O&amp;MM Section 3.9</li> </ul>	<ul style="list-style-type: none"> <li>▪ IMP: <ul style="list-style-type: none"> <li>▪ Threats, Data Integration, and Risk Assessment – Section 4.0 - details of the process for threats identification and detection of leaks.</li> <li>▪ Integrity Assessment - Section 5.0 – routine evaluation and re-assessment of pipeline condition. A Smart pig run In-Line Inspection Survey is conducted every seven years on the High Consequence Area/ Class 3 Location line</li> </ul> </li> <li>O&amp;MM <ul style="list-style-type: none"> <li>▪ Section 3.9 – Pipeline Patrolling – allows operations staff to observe surface conditions on and adjacent to, pipelines that may affect the safe operation of the system. Ensuring the patrolling of pipelines enables the correction of potentially hazardous conditions affecting the system.</li> </ul> </li> </ul> <p>In addition, Wild Goose completes the following:</p> <ul style="list-style-type: none"> <li>▪ An aerial survey of the complete Wild Goose system every two weeks</li> <li>▪ Weekly drive by inspection of remote locations</li> <li>▪ Ionized gas detection on the High Consequence Area which includes a walk around with a flame ionization unit, conducted at least every 6 months depending on weather and land conditions</li> <li>▪ Various forms referenced at Appendix 1 of the O&amp;MM to detail any reported leak including: <ul style="list-style-type: none"> <li>• WGS Form 100: Incident and</li> </ul> </li> </ul>

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			<p>Service Interruption Report</p> <ul style="list-style-type: none"> <li>• WGS Form 101: Notice and Disposition of Reported Incident</li> <li>• WGS Form 108: Safety Related Conditions Report</li> <li>• WGS Form 109: Pipeline Leak Repair Report</li> <li>• WGS Form 115: Leak Investigation Report</li> </ul> <ul style="list-style-type: none"> <li>▪ A Leak Compliant Form in the form of the template provided in the O&amp;MM manual to the detail any reported leak</li> </ul>
-5	<p>Provide for appropriate and effective system controls, with respect to both equipment and personnel procedures, to limit the damage from accidents, explosions, fires, and dangerous conditions Safety</p>	<ul style="list-style-type: none"> <li>• Safety Plan Table</li> <li>• ERP Sections' 6.0 and 9.0</li> <li>• IMP Sections' 3.0 to 8.0</li> <li>• CRM Sections' III, VI, VII, VIII</li> <li>• O&amp;MM Sections' 2.0, 3.0, 4.0</li> <li>• HSE Handbook Sections' 2.0 to 12.0</li> </ul>	<p>WGS has extensive systems and procedures in place to limit damage from accidents, explosions, fires, and dangerous conditions. For Example:</p> <ul style="list-style-type: none"> <li>▪ Emergency Response Plan (ERP)</li> <li>▪ Site Specific Information – Section 6.0, provides details regarding the WGS facility including: <ul style="list-style-type: none"> <li>• Emergency Control Systems – Section 6.1.2</li> <li>• Emergency Communications – Section 6.1.3</li> <li>• Safety Equipment -Section 6.1.4</li> <li>• Emergency Materials &amp; Equipment Resources 6.1.5</li> <li>• Hazardous Materials Storage - Section 6.1.6</li> <li>• Tank Listing 6.1.7</li> <li>• Location Directions 6.1.8</li> <li>• Site Plans 6.1.9</li> <li>• Well Pad Site Plans 6.1.10</li> <li>• Emergency Response Maps 6.1.11</li> <li>• High Consequence Area – Section 6.1.12</li> <li>• Emergency Planning Zones – Section 6.1.13</li> </ul> </li> </ul>

			<ul style="list-style-type: none"> <li>• Resident Lists – Section 6.1.14</li> <li>• Site Specific Medical Emergencies – Section 6.1.15</li> </ul> <p>▪ Niska Facility Sample Response Strategies – Section 7.0, including strategies for:</p> <ul style="list-style-type: none"> <li>• Facility Process Fire – Section 7.1</li> <li>• Loss of Well Control - Section 7.2</li> <li>• Pipeline Rupture - Section 7.3</li> <li>• Emergency Pipeline Pressure Reduction 7.4</li> <li>• Escaping Gas Including Gas Detected Inside a Building - Section 7.5</li> <li>• Natural Disasters - Section 7.6</li> <li>• Major Fires and Explosions - Section 7.7</li> <li>• Civil Disturbance 7.8</li> <li>• Response to Discharge (Spill or Release) of Hydrocarbons 7.9</li> </ul> <p>▪ Section 9.0 EPZ Evacuation Procedures provides extensive evacuation procedures to ensure the timely and effective evacuation of residents within the Emergency Planning Zone and to limit damage from accidents to equipment and personnel including:</p> <ul style="list-style-type: none"> <li>• Evacuation Centers - 9.1</li> <li>• Evacuation Criteria – 9.2</li> <li>• Evacuation Procedures – 9.3</li> <li>• Facility Evacuation – 9.4</li> </ul> <p>In addition, WGS has the following preventative, monitoring, and mitigative measures in place:</p> <p>1) Preventative - WGS has the following in place to prevent accidents, explosions, fires and dangerous conditions:</p> <p>- IMP:</p> <ul style="list-style-type: none"> <li>▪ High Consequence Areas – Section 3.0</li> <li>▪ Threats, data integration, and risk assessment – Section 4.0</li> <li>▪ Preventive and mitigative measures (measures for 3rd party; outside force and corrosion threats) – Section 6.0</li> </ul>
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			<ul style="list-style-type: none"> <li>- CRM: <ul style="list-style-type: none"> <li>▪ Understanding roles and responsibilities – Section III</li> </ul> </li> <li>- O&amp;MM: <ul style="list-style-type: none"> <li>▪ Normal Operations – Section 2.0 <ul style="list-style-type: none"> <li>• Damage prevention – Section 2.8</li> <li>• Operating within maximum allowable operating pressure – Section 2.10</li> <li>• Pipeline isolation with lock and tagout – Section 2.12</li> <li>• Pipeline purging – Section 2.16</li> </ul> </li> <li>▪ Pipeline Maintenance – Section 3.0 <ul style="list-style-type: none"> <li>• Corrosion control – Section 3.5</li> <li>• Valve inspection – Section 3.16</li> </ul> </li> </ul> </li> <li>- OQPP – Section 3 <ul style="list-style-type: none"> <li>• Task identification and analysis - training programs in the Training Matrix (previously submitted) are geared towards prevention and monitoring, such as rectifier inspection, external pipe surface inspection, maintain valves, gas leak survey)</li> </ul> </li> <li>- HSE Handbook: <ul style="list-style-type: none"> <li>▪ Health, Safety and Environmental (HS&amp;E) Responsibilities – Section 2.0</li> <li>▪ Master Service &amp; Supply Agreement (MSSA) – Section 3.0</li> <li>▪ Emergency Planning and Reporting – Section 4.0</li> <li>▪ Hazard Identification, Assessment and Control – Section 5.0</li> <li>▪ Health, Safety and Environmental (HSE) Orientations &amp; Meetings – Section 6.0</li> <li>▪ General Personal Safety Practices – Section 7.0</li> <li>▪ Work Site Safe Work Practices – Section 8.0</li> <li>▪ Chemicals and Materials – Section 9.0</li> </ul> </li> </ul>
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			<ul style="list-style-type: none"> <li>▪ Fire prevention – Section 10</li> <li>▪ Other Safety Practices – Section 11</li> <li>▪ Environmental Responsibilities – Section 12</li> </ul> <p>2) Monitoring - WGS has the following in place to monitor potential accidents, explosions, fires and dangerous conditions:</p> <p>- IMP:</p> <ul style="list-style-type: none"> <li>▪ Integrity assessment: baseline; continual evaluation; condition discovery; classification of anomalies – Section 5.0</li> <li>▪ Program management: performance measures; record keeping; MOC; communications – Section 7.0</li> <li>▪ Quality Assurance: program documentation; ensuring properly trained personnel and 3rd party contractors / inspectors; clear/concise roles and responsibilities – Section 8.0</li> </ul> <p>- CRM:</p> <ul style="list-style-type: none"> <li>▪ Alarm management – Section VII <ul style="list-style-type: none"> <li>● Control Room systems allow for constant monitoring of all systems and alerts WGS personnel immediately when there is a failure of any kind</li> </ul> </li> <li>▪ Change management – Section VIII <ul style="list-style-type: none"> <li>● the Control Room Management Plan governs the procedures to be taken in the event any failure is detected, giving guidance to personnel on next steps</li> </ul> </li> </ul> <p>- O&amp;MM:</p> <ul style="list-style-type: none"> <li>▪ Normal Operations – Section 2.0 <ul style="list-style-type: none"> <li>● Continuing surveillance – Section 2.7</li> </ul> </li> <li>▪ Pipeline Maintenance – Section 3.0 <ul style="list-style-type: none"> <li>● Leak surveys: Repairing and Reporting Leaks – Section 3.6</li> <li>● Pipeline patrolling – Section 3.9</li> </ul> </li> </ul> <p>OQPP:</p> <ul style="list-style-type: none"> <li>▪ Task identification and analysis –</li> </ul>
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			<p style="text-align: center;">Section 3.0</p> <p>3) Mitigation - WGS has the following in place to mitigate any possible accidents, explosions, fires and dangerous conditions:</p> <p>- IMP:</p> <ul style="list-style-type: none"> <li>▪ Integrity assessment - remediation schedule – Section 5.5</li> <li>▪ Preventive and mitigative measures - dealing with incidents associated with 3rd party, outside force and corrosion; safely and efficiently shutting down PL system – Section 6.0</li> </ul> <p>- CRM:</p> <ul style="list-style-type: none"> <li>▪ Fatigue Mitigation – Section VI</li> </ul> <p>- O&amp;MM</p> <ul style="list-style-type: none"> <li>▪ Normal Operations – Section 2.0 <ul style="list-style-type: none"> <li>● Incident – reporting and control - Section 2.2</li> <li>● Investigation of failures and serious incidents – Section 2.3</li> </ul> </li> <li>▪ Pipeline Maintenance – Section 3.0 <ul style="list-style-type: none"> <li>● Abandonment or Inactivation of facilities – Section 3.1</li> <li>● Blowdown of pipelines – Section 3.2</li> <li>● Clearing pipeline freezes and Ice Blocks– Section 3.3</li> </ul> </li> <li>▪ Abnormal operations – Section 4.0 <ul style="list-style-type: none"> <li>● Flowrate Increase / Flowrate Decrease – Sections 4.2 &amp; 4.3</li> <li>● Pressure Increase / Pressure Decrease – Sections 4.4 &amp; 4.5</li> <li>● Unintended shutdown/Unintended valve closure – Sections 4.6 &amp; 4.7</li> </ul> </li> </ul> <p>- ERP:</p> <ul style="list-style-type: none"> <li>▪ ERP provides specific information on emergency control systems, emergency communications, safety equipment</li> <li>▪ WGS Incident Investigation and Reporting Guideline, at Appendix II, specifically identifies what type of</li> </ul>
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			<p>incidents are to be reported, including Reporting Near Miss Incidents</p> <ul style="list-style-type: none"> <li>▪ Site Specific Information – Section 6.0: <ul style="list-style-type: none"> <li>• Emergency Control Systems – Section 6.1.2</li> <li>• Emergency Communications – Section 6.1.3</li> <li>• Safety Equipment -Section 6.1.4</li> <li>• Emergency Materials &amp; Equipment Resources 6.1.5</li> <li>• Hazardous Materials Storage - Section 6.1.6 <ul style="list-style-type: none"> <li>• Tank Listing 6.1.7</li> <li>• Location Directions 6.1.8</li> <li>• Site Plans 6.1.9</li> <li>• Well Pad Site Plans 6.1.10</li> <li>• Emergency Response Maps 6.1.11</li> <li>• High Consequence Area – Section 6.1.12 <ul style="list-style-type: none"> <li>• Emergency Planning Zones – Section 6.1.13</li> <li>• Resident Lists – Section 6.1.14</li> <li>• Site Specific Medical Emergencies – Section 6.1.15</li> </ul> </li> </ul> </li> </ul> </li> <li>▪ Niska Facility Sample Response Strategies <ul style="list-style-type: none"> <li>• Facility Process Fire – Section 7.1</li> <li>• Loss of Well Control - Section 7.2</li> <li>• Pipeline Rupture - Section 7.3</li> <li>• Emergency Pipeline Pressure Reduction 7.4 <ul style="list-style-type: none"> <li>• Escaping Gas Including Gas Detected Inside a Building - Section 7.5 <ul style="list-style-type: none"> <li>• Natural Disasters - Section 7.6</li> <li>• Major Fires and Explosions - Section 7.7</li> <li>• Civil Disturbance 7.8</li> <li>• Response to Discharge (Spill or Release) of Hydrocarbons 7.9</li> </ul> </li> </ul> </li> </ul> </li> </ul>
			- HSE Handbook:

			<ul style="list-style-type: none"> <li>▪ Emergency Response Planning and Reporting, which includes Incident Reporting and Legislative Requirements – Section 4.2 and Near Miss Reporting - Section 4.3</li> </ul>
-6	<p>Provide timely response to customer and employee reports of leaks and other hazardous conditions and emergency events, including disconnection, reconnection, and pilot-lighting procedures.</p>	<ul style="list-style-type: none"> <li>▪ Safety Plan Table</li> <li>▪ ERP Sections’ 6.0, 7.0, 9.0, 12.0, 13.0</li> <li>▪ IMP Sections’ 3.0, 4.0</li> <li>▪ HSE Handbook Sections’ 4.0, 5.0, 10.0</li> <li>▪ O&amp;MM Forms’ 100, 101, 108, 109, 115</li> </ul>	<p>WGS provides extensive training to its employees to ensure that the response to any emergency or abnormal situation is answered in a timely and effective manner:</p> <ul style="list-style-type: none"> <li>▪ ERP: <ul style="list-style-type: none"> <li>▪ Site Specific Information – Section 6.0 details extensive evacuation procedures to ensure the timely and effective evacuation of residents within the Emergency Planning Zone and to limit damage from accidents to equipment and personnel: <ul style="list-style-type: none"> <li>● Emergency Control Systems - Section 6.1.2</li> <li>● Emergency Communications - Section 6.1.3</li> <li>● Safety Equipment - Section 6.1.4</li> <li>● Hazardous Materials Storage - Section 6.1.6</li> <li>● High Consequence Area - Section 6.1.12</li> <li>● Emergency Planning Zones - Section 6.1.13</li> </ul> </li> <li>▪ Facility Sample Response Strategies – Section 7:0 provides emergency response procedures including strategies for: <ul style="list-style-type: none"> <li>● Facility Process Fire – Section 7.1</li> <li>● Loss of Well Control - Section 7.2</li> <li>● Pipeline Rupture - Section 7.3</li> <li>● Escaping Gas Including gas detected inside a building - Section 7.5</li> <li>● Natural Disasters - Section 7.6</li> <li>● Major Fires and Explosions - Section 7.7</li> </ul> </li> <li>▪ EPZ Evacuation Procedures – Section 9.0 includes extensive evacuation procedures and details on how to limit</li> </ul> </li> </ul>

			<p>damage from accidents</p> <ul style="list-style-type: none"> <li>▪ Hazardous Materials Information – Section 12.0</li> <li>▪ Post Emergency Procedures – Section 13.0 outlines procedures to follow post incident including: <ul style="list-style-type: none"> <li>● Post Incident Appraisal – Section 13.2</li> <li>● Report Documentation – Section 13.5</li> <li>● Critical Incident Stress Management – Section 13.6</li> </ul> </li> <li>▪ IMP: <ul style="list-style-type: none"> <li>▪ High Consequence Areas – Section 3.0</li> <li>▪ Threats, Data Integration, and Risk Assessment – Section 4.0</li> </ul> </li> <li>▪ HSE Handbook provides for: <ul style="list-style-type: none"> <li>▪ Emergency Response Planning and Reporting – Section 4.0</li> <li>▪ Hazard Identification, Assessment and Control – Section 5.0</li> <li>▪ Fire Prevention – Section 10.0</li> </ul> </li> </ul> <p>In the event of a report of a leak or incident of any kind, Wild Goose dispatches the appropriate person(s) to investigate immediately. Depending on the result of this initial investigation, further action is taken as required.</p> <p>Various forms are referenced at Appendix 1 of the O&amp;MM to detail any reported leak including:</p> <ul style="list-style-type: none"> <li>▪ Wild Goose Form 100: Incident and Service Interruption Report</li> <li>▪ Wild Goose Form 101: Notice and Disposition of Reported Incident</li> <li>▪ Wild Goose Form 108: Safety Related Conditions Report</li> <li>▪ Wild Goose Form 109: Pipeline Leak Repair Report</li> <li>▪ Wild Goose Form 115: Leak Investigation Report</li> </ul>
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-7	<p>Include appropriate protocols for determining maximum allowable operating pressures on relevant pipeline segments, including all necessary documentation affecting the calculation of maximum allowable operating pressures</p>	<ul style="list-style-type: none"> <li>▪ Safety Plan Table</li> </ul>	<p>During design stage of the project, Wild Goose determines what pressure is best suited for the operation. This is based on:</p> <ul style="list-style-type: none"> <li>▪ Maximum operating pressure of reservoir, staying within Division of Oil, Gas and Geothermal Resources pressure gradient requirement</li> <li>▪ Maximum operating pressure of the transmission system that the new facility will be tied into, which for California has been Pacific Gas and Electric Company</li> <li>▪ Hydraulic study of various piping size systems is performed by third party professional engineering firm to determine pressure loss in system, and operating pressure/ temperature requirements for piping/ equipment to satisfy needs</li> <li>▪ The optimum sized equipment, and piping size is selected. The pressure at which this equipment / pipe will operate at is confirmed</li> </ul> <p>A professional engineering firm utilizes this information to determine pipe specification requirements to safely satisfy the maximum allowable operating pressure (MAOP). They look closely at pipe classification, crossings, pipe stresses, hydrotest requirements, terrain/ environment, and other criteria for which the pipe will be utilized, to ensure proper design detail is applied to the MAOP calculation (49CFR192). This in turn, ensures that the required pipe specifications/ wall thickness is selected for all Sections of the pipe.</p> <p>The process of determination and substantiation of the MAOP for the Wild Goose pipelines is as follows:</p> <p>The design operating pressure of the pipeline is determined using volume throughput, upstream pressure, desired downstream pressure, velocity restrictions, and compression requirements to optimize the pipeline diameter. With the optimal pipeline diameter determined, the pipeline wall thickness and steel yield strength are calculated to provide for the required design operating pressure by using the following design formula for steel pipe. (The actual wall thickness / yield strength combination is influenced by construction variables, material availability, and cost.)</p>
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			<p> <math>P = (2 S t / D) \times F \times E \times T</math> </p> <p> <i>P</i> = Design pressure in pounds per square inch gauge.         </p> <p> <i>S</i> = Yield strength of the steel in pounds per square inch.         </p> <p> <i>D</i> = Nominal outside diameter of the pipe in inches.         </p> <p> <i>t</i> = Nominal wall thickness of the pipe in inches.         </p> <p> <i>E</i> = Longitudinal joint factor (1.00 for DSAW and ERW pipe)         </p> <p> <i>T</i> = Temperature derating factor (1.00 for 250° F or less)         </p> <p> <i>F</i> = Design factor determined in accordance with the following:         </p> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Class location</th> <th style="text-align: center;">Design factor ( <i>F</i> )</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td style="text-align: center;">0.72</td> </tr> <tr> <td style="text-align: center;">2</td> <td style="text-align: center;">0.60</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">0.50</td> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">0.40</td> </tr> </tbody> </table> <p>           A design factor of 0.60 or less must be used in the design formula in steel pipe in Class 1 locations that:         </p> <ul style="list-style-type: none"> <li>▪ Crosses the right-of-way of an unimproved public road, without a casing;</li> <li>▪ Crosses without a casing, or makes a parallel encroachment on, the right-of-way of either a hard surfaced road, a highway, a public street, or a railroad;</li> <li>▪ Is supported by a vehicular, pedestrian, railroad, or pipeline bridge; or</li> <li>▪ Is used in a fabricated assembly, (including separators, mainline valve assemblies, cross-connections, and river crossing headers) or is used within five pipe diameters in any direction from the last fitting of a fabricated assembly, other than a transition piece or an elbow used in place of a pipe bend which is not associated with a fabricated assembly.</li> </ul> <p>           For Class 2 locations, a design factor of 0.50, or less, must be used in the design formula for uncased steel pipe that crosses the right-of-way of a hard surfaced         </p>	Class location	Design factor ( <i>F</i> )	1	0.72	2	0.60	3	0.50	4	0.40
Class location	Design factor ( <i>F</i> )												
1	0.72												
2	0.60												
3	0.50												
4	0.40												



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		<p>road, a highway, a public street, or a railroad.</p> <p>For Class 1 and Class 2 locations, a design factor of 0.50, or less, must be used in the design formula in for steel pipe in a compressor station, regulating station, or measuring station.</p> <p>The MAOP is obtained by dividing the pressure to which the segment was tested after construction by a factor determined in accordance with the following table:</p> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Class location</th> <th style="text-align: center;">Factors</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td style="text-align: center;">1.1</td> </tr> <tr> <td style="text-align: center;">2</td> <td style="text-align: center;">1.25</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">1.5</td> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">1.5</td> </tr> </tbody> </table> <p>The test medium is water and the test is conducted in accordance with CFR 49 PART 192—  TRANSPORTATION OF NATURAL AND OTHER GAS BY PIPELINE: MINIMUM FEDERAL SAFETY STANDARDS. The test pressure can nowhere along the pipeline exceed 100% of SMYS of the steel. The maximum allowable operating pressure cannot exceed the design pressure determined by the above design formula for steel pipe.</p> <p>The IMP was developed to address the High Consequence Area that exists along one of the pipelines Wild Goose operates. The IMP includes the requirement to perform in line inspection on the pipeline with a smart pig tool, with intent of identifying size/ type/ location of any defects. Wild Goose recognizes the importance of maintaining pipeline integrity, and performs periodic in line inspection on their other gas pipelines too.</p> <p>Wild Goose carefully selects their In Line Inspection (ILI) contractors by first identifying which ones can perform the desired services and level of inspection that's required. The contractor that's awarded the contract is determined after going through a request for quote/ bid analysis process. Each bid is evaluated in detail, which involves discussion with each ILI company clarifying various components of their tender. Preparation of the ILI program, selection of contractor, and analysis of inspection data, is performed by Wild Goose in conjunction with a</p>	Class location	Factors	1	1.1	2	1.25	3	1.5	4	1.5
Class location	Factors											
1	1.1											
2	1.25											
3	1.5											
4	1.5											

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			<p>pipeline engineering company that possesses technical experts and software that aids in the assessment.</p> <p>Wild Goose complies with all state and federal regulations including:</p> <ul style="list-style-type: none"> <li>▪ California Public Utilities Code</li> <li>▪ Department of Transportation (DOT) Regulations</li> <li>▪ Pipeline and Hazardous Materials Safety Administration</li> <li>▪ Department of Transportation, Commission and any permitting agency that could require some pipeline/ safety related actions as part of the condition for permit</li> <li>▪ We utilize GTS Engineering and Consulting services to update the IMP, and perform annual IMP review;</li> </ul> <p>Wild Goose's commitment to best practices is also stated at page 5 of the EHS Handbook.</p>
-8	<p>Prepare for, or minimize damage from, and respond to, earthquakes and other major events.</p>	<ul style="list-style-type: none"> <li>▪ Safety Plan Table</li> <li>▪ ERP Sections 6.0 and 7.0</li> <li>▪ IMP Sections' 3.0, 4.0</li> <li>▪ HSE Handbook Sections 4.0, 5.0, 10.0</li> </ul>	<p>Wild Goose has a comprehensive ERP and provides extensive training to its employees to ensure that the response to any emergency or abnormal situation is answered in a timely and effective manner:</p> <ul style="list-style-type: none"> <li>▪ ERP: <ul style="list-style-type: none"> <li>▪ Site Specific Information – Section 6.0: extensive evacuation procedures to ensure the timely and effective evacuation of residents within the Emergency Planning Zone and to limit damage from accidents to equipment and personnel: <ul style="list-style-type: none"> <li>● Emergency Control Systems - Section 6.1.2</li> <li>● Emergency Communications - Section 6.1.3</li> <li>● Safety Equipment - Section 6.1.4</li> <li>● Hazardous Materials Storage - Section 6.1.6</li> <li>● High Consequence Area - Section 6.1.12</li> </ul> </li> </ul> </li> </ul>

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			<ul style="list-style-type: none"> <li>● Emergency Planning Zones - Section 6.1.13</li> <li>▪ Facility Sample Response Strategies -- Section 7:0: provides emergency response procedures including strategies for: <ul style="list-style-type: none"> <li>● Facility Process Fire – Section 7.1</li> <li>● Loss of Well Control - Section 7.2</li> <li>● Pipeline Rupture - Section 7.3</li> <li>● Escaping Gas Including Gas Detected inside a Building - Section 7.5</li> <li>● Natural Disasters - Section 7.6</li> <li>● Major Fires and Explosions - Section 7.7</li> </ul> </li> <li>▪ IMP: <ul style="list-style-type: none"> <li>▪ High Consequence Areas – Section 3.0</li> <li>▪ Threats, Data Integration, and Risk Assessment – Section 4.0</li> </ul> </li> <li>▪ HSE Handbook: <ul style="list-style-type: none"> <li>▪ Emergency Response Planning and Reporting –Section 4.0</li> <li>▪ Hazard Identification, Assessment and Control - Section 5.0\</li> <li>▪ Fire Prevention -Section 10.0</li> </ul> </li> </ul> <p>Employee training includes emergency response table top exercises for WGS employees, including the Manager EH&amp;S, Manager E&amp;O and Production Coordinator, and are often facilitated by professional ERP exercises facilitators and included a table top exercise.</p> <p>A tabletop exercise was held at the Biggs Gridley Memorial Hospital on June 12, 2013 and representatives from the following attended: CAL/FIRE, Butte County Sheriff's Department, the California Public Utilities Commission and the Butte County Emergency Response Coordinator.</p> <p>An emergency response tabletop exercise was conducted at the Colusa County Sheriff's office on the 3<sup>rd</sup> of May, 2016. Representatives from the</p>
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			<p>following agencies attended: Colusa County OES, Sheriff's Department, Public Works, CPUC, Colusa FD, Sacramento River FD, Maxwell FD</p> <p>An emergency response tabletop exercise was conducted at the Gridley City Hall on the 5<sup>th</sup> of May, 2016. Representatives from the following agencies attended: Butte County OES, CHIP, Sheriff's Department, Public Works, CPUC, CALFIRE,</p>
-9	<p>Meet or exceed the minimum standards for safe design, construction, installation, operation, and maintenance of gas transmission and distribution facilities prescribed by regulations issued by the United States Department of Transportation in Part 192 (commencing with Section 192.1) of Title 49 of the Code of Federal Regulations.</p>	<ul style="list-style-type: none"> <li>▪ Safety Plan Table</li> </ul>	<p>Wild Goose will comply with all state and federal regulations including the California Public Utilities Code and United States Department of Transportation Regulations. Wild Goose utilizes GTS Engineering and Consulting Services to help with their integrity management program.</p> <p>Wild Goose's IMP includes requirements for performing in-line inspections with a smart pig tool. Preparation of the InLine Inspection program, selection of contractor, and analysis of inspection data, is performed by Wild Goose in conjunction with a pipeline engineering company.</p> <p>Please refer to the Wild Goose Storage, LLC – Safety Plan Policy signed by the President and Chief Executive Officer.</p>
-10 and Sec. 963 Subdivision (b)(3)	<p>Ensure an adequately sized, qualified, and properly trained gas corporation workforce to carry out the plan.</p>	<ul style="list-style-type: none"> <li>▪ Safety Plan Table</li> <li>▪ Operators Qualifications Table</li> </ul>	<p>Wild Goose provides training and orientation to the workforce on operations, environmental, and safety matters. Wild Goose requires their workforce to comply with various policies such as the Anti-Drug and Alcohol Misuse Prevention Program and other programs detailed in the HSE handbook. The Training Matrix provides details regarding the different training given and the frequency at which they are administered.</p> <p>The Wild Goose Engineering and Operations Manager works with Human Resources and the Wild Goose Production Coordinator annually to assess the operational needs of the facility with a view to the safety of employees and the public.</p>

-11	Any additional matter that the commission determines should be included in the plan.	<ul style="list-style-type: none"> <li>▪ Whistleblower Protection Program</li> <li>▪ Safety Plan Policy</li> </ul>	<ul style="list-style-type: none"> <li>▪ Whistleblower Protection Program consists of the following: <ul style="list-style-type: none"> <li>▪ A Whistleblower Notice posted on the main page of the Environmental, Health and Safety page of the employee intranet.</li> <li>▪ A Whistleblower Notice prominently placed in a location noticeable to employees at the facility.</li> <li>▪ An employee reporting hotline is third party service provider that allows employees to anonymously report sensitive work related issues, including safety concerns. The service is available to all employees 24 hours a day, 365 days a year via a toll-free phone line within North America. Interpreters are available for over 150 languages. The information related to this service is provided to all employees in their new hire package and is posted in several predominant locations throughout the facility.</li> </ul> </li> <li>▪ The Safety Plan Policy contains statement confirming Wild Goose's commitment to including any additional matters in the Plan, as required / requested by the commission.</li> </ul>
Sec. 961 Subdivision (e)	The commission and gas corporation shall provide opportunities for meaningful, substantial, and ongoing participation by the gas corporation workforce in the development and implementation of the plan, with the objective of developing an industry wide culture of safety that will minimize	<ul style="list-style-type: none"> <li>▪ Safety Plan Table</li> </ul>	<p>Wild Goose is committed to ensuring an engaged and responsive workforce to maintain the highest safety environmental standards, examples include, but are not limited to:</p> <ul style="list-style-type: none"> <li>▪ Reporting hotline - a well publicized third party communications program that allows employees to anonymously report sensitive work related issues</li> <li>▪ HSE Handbook - offers an extensive resource for employees on environmental and safety issues including: <ul style="list-style-type: none"> <li>▪ Health and Safety Meetings</li> <li>▪ Health and Safety Responsibilities</li> <li>▪ General Safety Practices</li> <li>▪ Work Site Safety Practices</li> <li>▪ Other Safety Practices</li> </ul> </li> </ul>

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	<p>accidents, explosions, fires, and dangerous conditions for the protection of the public and the gas corporation workforce.</p>		<p>Employees actively participate in the update and maintenance of TIPS (Training Information Practice System) providing over 100 safe work procedures, including equipment operation safety and standards, on an accessible share drive.</p> <p>Wild Goose provides to the workforce a confidence line, a third party communication program that allows employees to anonymously report sensitive work related issues. Employees are also allowed active participation in the update of the Training Information Practice System (TIPS), which provides work procedures and standards on a shared drive.</p> <p>An electronic version of the Safety Plan is available to all employees through the employee accessible intranet and hard copies are available in the control room. When the Safety Plan is reviewed annually the Engineering and Operations Manager will require employees to acknowledge via email their commitment to the Safety Plan and provide all employees with a form for feedback to the Safety Plan. The Engineering and Operations Manager is responsible for the distribution of the Safety Plan Feedback Form and will retain a log for comments and suggestions including the disposition of the comment or suggestion, with a summary of the rationale for the disposition.</p>
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