



October 12, 2022

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Gas Safety and Reliability Branch
Safety and Enforcement Division

Re: The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) conducted a **General Order (G.O.) 112-F Comprehensive Review and Inspection of Alpine Natural Gas' (ANG) Damage Prevention Program (DPP) and the Section 114 Procedures, (the Protecting our Infrastructure of Pipelines and Enhancing Safety Act of 2020 (PIPES Act of 2020))** on April 25, 26, 28, and 29, 2022.

Alpine's Response to the findings follows. Attached are some forms that may not have been reviewed during the inspections. Also attached are policies that were revised, to address concerns, these changes are highlighted.

Alpine appreciates the opportunity to review and respond to the "Post-Inspection Written Preliminary Findings".

Thank-you,

Michael Lamond, Administrator
Alpine Natural Gas Operating Company No. 1, LLC (909-G)

CC: Sann Naing, SED/GSRB
Kan Wai Tong, SED/GSRB
Claudia Almengor, SED/GSRB
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Concerns

Public Awareness and Damage Prevention: Damage Prevention (PD, DP)

Question 4.

Does the process specify how reports of Third-Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?

ANG's process needs to specify how reports of Third-Party Activity and the names of associated contractors or excavators should be included in the mail-outs and communications with excavators.

Revisions to Damage Prevention Plan (614-A) and Public Awareness Plan (616) to improve clarity in how Alpine updates its excavator listing and communicates with known third party excavators.

Section 114: Section 114 - Gas Distribution (114.GD)

Question 5.

Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?

ANG's procedures did not address how to identify sources of natural gas fugitive emissions. SED recommends that ANG to include its fugitive emission identification methods in its written procedures

Revisions to Methane Leakage Abatement Plan (1371), Integrity Management Plan (1005) and Leak Investigation -Odor or Gas Leak (605-B11) to improve clarity in how Alpine operations detect emissions and by what method. Fugitive emissions have been indicated in form B-2 Reporting document. Improved identification of fugitive emissions will be achieved via use of the revised B-2 reports. Gas Leak Report (Appendix B-2) Binder provided this incident documentation, and it is sub-divided by type of emission.

Question 6.

Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?

ANG's procedures should identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance.

Revisions to Methane Leakage Abatement Plan (1371), Integrity Management Plan (1005) Leak Investigation to improve clarity in how Alpine operations include identification of fugitive emissions and the use of the following revised reports to document such efforts. Gas Leak Report (Appendix B-2) binder and Monthly Emissions Log (Appendix AC) which was developed to improve quantifying leak emissions by logging operations events by type where emissions occurred. This data is reviewed annually by ANG Administrator to improve leak abatement by revising operation procedures as appropriate.

Question 8.

Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?

SED recommends that ANG's procedure include a process to collect and maintain records of small leaks that are remediated by lubrication, adjustment or tightening in its methane emissions analysis and prioritization.

Revisions to Methane Leakage Abatement Plan (1371), Integrity Management Plan (1005) Leak Investigation to improve clarity in how Alpine procedures include identification of fugitive emissions. These emissions have been documented as MSA "non-leaks" Gas Leak Report (Appendix B-2) Binder where these incidents have its own section. In addition, the number of these events are quantified in Integrity Management Appendix R-7 "Threat Assessment". This is an annual summary, so a Monthly Emissions Log (Appendix AC) was developed to improve ongoing efforts to reduce emissions.

Question 9.

Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?

SED recommends ANG include a requirement that its personnel walk around the stations and specifically look for signs of potential gas leaks and take all measures to reduce natural gas releases from regulator station devices. ANG's procedure should state the techniques it uses to detect potential leaks.

Revisions to Regulator Station Operation, Maintenance, and Inspection (739), Regulator Station Inspection Records (739-A, 739-B and 739-C) System Patrolling (721) Identify problem areas by visually inspecting actual or potential leaks.

Question 11.

Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?

ANG's current procedures do not explicitly state its review process for LAUF and do not specify actions to reduce the associated volume. Attention to LAUF is an area for potential improvement in natural gas emissions and it can indicate progress in reducing natural gas emissions. SED recommends that ANG should modify its written procedure to include the review process for LAUF and specify actions to reduce the associated volume and minimize the emissions.

LAUF was always calculated and reviewed for trends by the ANG Administrator. Integrity Management Plan (1005) Threat Assessment (Appendix R-7) was revised to Include tracking of both past year LAUF and Leak Emissions rates for the current reporting year, we added to the form, the previous year rates to readily assess emission trends.

Question 17.

What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?

Pipe leaks should not be considered only as a function of material; leaks could result from other factors such as design, construction, and location. Past operating and maintenance history should be used to identify leak-prone pipelines. SED recommends ANG to include a process in its written procedures and designate roles and responsibilities to identify systemic problem areas.

All factors of possible leaks are considered. While presently no design, construction or location factors have been identified as problem areas. The Integrity Management Plan is one way Alpine assess its facilities for leak prone or systemic problematic areas. Revisions to Methane Leakage Abatement Plan (1371), Monthly Emissions Log (Appendix AC), Leak Investigation - Odor or gas leak (605-B11), Gas Leak Repot (Appendix B-2), Incident/Accident Investigation review (615-1), System Patrolling (721), Threat Assessment (Appendix R-7) have been revised to assist Alpine in its continued efforts to maintain a safe reliable gas distribution system and minimize leak emissions.