



GILL RANCH STORAGE®

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January 18, 2024

VIA U.S. & ELECTRONIC MAIL [Terence.eng@cpuc.ca.gov]

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

RE: General Order (G.O.) 112-F Inspection of Gill Ranch Storage's Damage Prevention & Public Awareness Programs

Dear Mr. Eng,

Gill Ranch Storage, LLC ("GRS") operates the Gill Ranch Storage Facility ("Gill Ranch"). GRS is committed to a culture and operation that values public and worker safety as a first priority. GRS appreciated the opportunity to demonstrate its commitment to actively and aggressively pursue safe and reliable operations during the 2023 Safety and Enforcement Division ("SED") General Order 112-F Inspection of Gill Ranch Storage's Damage Prevention and Public Awareness Programs.

GRS has carefully reviewed the SED's General Order 112-F Inspection Report and has addressed the concerns listed by the SED below.

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GRS takes safety very seriously and continuously seeks to improve its practices. GRS appreciates SED's input on our Pipeline Safety programs, and we look forward to working with the SED over the years to come. Please contact me if you have any questions about this response or require additional information.

Sincerely,

A handwritten signature in cursive script that reads "Richard Gonzalez".

Richard Gonzalez
Chief Operations Officer

I. Concerns

Public Awareness and Damage Prevention: Public Awareness (PD.PA)

Issue Summary: Section 8.4.4 of API RP 1162 states in part:

“As a baseline, the operator should track the number of incidents and consequences caused by third-party excavators. This should include reported near misses...”

Section 8.4 of API RP 1162 establishes requirements for measuring public awareness program effectiveness. SED reviewed GRS documentation showing the tracking of near miss data. This data was not included in GRS’s 2022 4-year effectiveness evaluation.

SED recommends that near miss data be included in future public awareness program effectiveness evaluation documents to maintain compliance with Section 8.4.4 of API RP 1162.

GRS Response: As mentioned in the “Issue Summary” above, GRS does already track near misses as part of its Safety Management System metrics. GRS will incorporate this data into its next 4-year effectiveness evaluation to be completed no later than 2026.

Issue Summary: During this inspection, GRS provided evidence that they had made multiple efforts to reach out to public officials but had not received meaningful feedback from any members of the stakeholder group. GRS’s 2022 4-year effectiveness survey stated that GRS had received no survey responses from public officials. GRS stated in the Finding/Corrective Actions section of the report that, “In the future, Gill Ranch will increase outreach with Public Officials, and emphasize the importance of the information for continual improvement of safety and public knowledge at Gill Ranch.”

SED recommends that GRS write and implement specific and actionable plans to increase outreach to public officials to ensure that this finding from their 4-year effectiveness survey is addressed by program improvements.

GRS Response: GRS has historically mailed its 4-year effectiveness surveys to all stakeholder groups (including Public Officials). In an effort to receive better feedback from the Public Officials group, GRS will attempt to collect survey responses in future effectiveness evaluations via an initial mailing (as it has done historically), and for those Public Officials for which a response is not received, attempt to visit them in person to secure a response. This attempt to meet with Public Officials in person shall be documented on the GRS Public Awareness Meeting form. GRS will update its 2022 4-year effectiveness report in the “Finding/Corrective Actions” section to reflect this commitment.