

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 13, 2023

GI-2023-04-LGS-37-01ABC

Mathieu Fournier ([Mathieu.fournier@rockpointgs.com](mailto:Mathieu.fournier@rockpointgs.com))

Vice President, Operations

Lodi Gas Storage, L.L.C.

400 – 607 8<sup>th</sup> Ave SW

Calgary, AB T2P 0A7

SUBJECT: General Order 112-F Gas Inspection of Lodi Gas Storage

Dear Mr. Fournier,

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Randy Fienberg & Kai Cheung conducted a General Order 112-F inspection of Lodi Gas Storage (LGS) from April 24<sup>th</sup> through April 28<sup>th</sup>, 2023. The inspection included a review of the LGS's records for the period of 2018 through 2022, as well as a representative field sample of the facilities. SED staff also reviewed the operator qualification (OQ) records, which included field observations of randomly selected individuals performing covered tasks.

SED's findings are noted in the Post-Inspection Written Preliminary Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records and pipeline facilities that SED inspected during the inspection. SED discovered two (2) concerns during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by LGS to address the concerns noted in the Summary.

If you have any questions, please contact Randy Fienberg at (415) 416-4409 or by email at [Randy.Fienberg@cpuc.ca.gov](mailto:Randy.Fienberg@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng".

Terence Eng, P.E.  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Post-Inspection Written Preliminary Findings

cc: Greg Clark, LGS Compliance ([greg.clark@rockpointgs.com](mailto:greg.clark@rockpointgs.com))

Dennis Lee, SED

Claudia Almengor, SED

# Post-Inspection Written Preliminary Findings

**Dates of Inspection:** 04/24/2023-04/28/2023

**Operator:** LODI GAS STORAGE, LLC

**Operator ID:** 31697 (primary)

**Inspection Systems:** Lodi Gas Storage

**Assets (Unit IDs) with results in this report:** Lodi Gas Storage (86920)

**System Type:** GT

**Inspection Name:** 2023 Lodi Gas Storage Standard Transmission

**Lead Inspector:** Randy Fienberg

**Operator Representative:** Greg Clark

## Unsatisfactory Results

*No Preliminary Findings.*

## Concerns

### Emergency Preparedness and Response : Emergency Response (EP.ERG)

Question Title, ID Emergency Response, EP.ERG.RESPONSE.P

Question 8. Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, operational failure (including Cyber-attacks), or a natural disaster?

References 192.615(a) (192.615(a)(3), 192.615(a)(11), 192.615(b)(1))

Assets Covered Lodi Gas Storage (86920 (37))

Issue Summary LGS's Emergency Response Plan does not include Cyber-attacks as a type of emergency.

### Time-Dependent Threats : Atmospheric Corrosion (TD.ATM)

Question Title, ID Atmospheric Corrosion Monitoring, TD.ATM.ATMCORRODEINSP.O

Question 5. Is pipe that is exposed to atmospheric corrosion protected?

References 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192.481(d))

Assets Covered Lodi Gas Storage (86920 (37))

Issue Summary During field observation, SED noted surface corrosion and disbonded coating on the Wagenet inlet piping at the Birds Landing metering site.