



Wild Goose Storage, LLC
A Rockpoint Gas Storage Company

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June 23, 2023

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue, 2nd Floor
San Francisco, CA 94102-3298
terence.eng@cpuc.ca.gov

VIA ELECTRONIC MAIL

RE: General Order 112-F Inspection of Wild Goose Storage

Dear Mr. Eng:

Wild Goose Storage, LLC (WGS) submits this written response to the Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission). On behalf of the SED, Anthony Phu and Aleksandr Fastovich conducted a General Order 112-F inspection of WGS on April 10 – 14, 2023. The inspection findings identified by SED were provided to WGS on May 26, 2023. WGS addresses the inspection findings as noted by SED in the “Post-Inspection Written Findings” in the following enclosed document:

- **Attachment #1** – WGS Responses to “Post-Inspection Written Findings”

If you have any questions, or require more information, please contact me at greg.clark@rockpointgs.com or at (209) 368-9277.

Sincerely,



Gregory N. Clark
Senior Compliance Manager

Enclosures

cc: C. Almengor (claudia.almengor@cpuc.ca.gov)
D. Lee (dennis.lee@cpuc.ca.gov)
J. McMillan (jason.mcmillan@cpuc.ca.gov)
A. Phu (anthony.phu@cpuc.ca.gov)
A. Anderson, G. Bozarth, M. Fournier, H. Gold (via e-mail)

Attachment #1



WGS Responses to “Post-Inspection Written Findings”



Post-Inspection Written Findings

Unsatisfactory Results

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

Question 21. Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?

References 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)

49 CFR §192.615(c) states that "Each operator must establish and maintain liaison with the appropriate public safety answering point (i.e., 9-1-1 emergency call center) where direct access to a 9-1-1 emergency call center is available from the location of the pipeline, as well as fire, police, and other public officials."

WGS did not establish a documented ongoing relationship with emergency and public officials during the 2020-2022 period. Therefore, WGS is in violation of 49 CFR §192.615(c).

WGS Response:

WGS is committed to maintaining liaison with the local public emergency responders including fire, police, and other public officials. Prior to the pandemic, Wild Goose Storage ensured that direct, in-person liaison was performed. During the pandemic, (May 2020 – December 2022) it was decided, to ensure safety and health of our operations staff and that of the emergency responders, to replace the in-person contact with a mailout that requested the same information be provided and then returned to WGS. The number of returned responses was deemed insufficient during this audit. As the pandemic is now over, WGS has resumed in-person liaison activities.