

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 5, 2024

GI-2023-10-WGS-36-04-05-06

Mathieu Fournier, VP of Eng/Ops ([Mathieu.Fournier@rockpointgs.com](mailto:Mathieu.Fournier@rockpointgs.com))  
Wild Goose Gas Storage, LLC  
400, 607 – 8th Avenue S.W.  
Calgary, Alberta, Canada T2P 0A7

SUBJECT: SED's Closure Letter for General Order 112-F Inspection of Wild Goose Gas Storage's Emergency Response, Public Awareness, Anti-Drug, and Alcohol Misuse Prevention Program

Dear Mr. Fournier:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Wild Goose Gas Storage Company's (WGS) response letter dated December 1, 2023, for the findings identified during the General Order 112-F inspection of WGS's Emergency Response, Public Awareness, Anti-Drug, and Alcohol Misuse Prevention Program from October 30 to November 3, 2023.

A summary of the inspection findings documented by SED, WGS's response to our findings, and SED's evaluation of WGS's response taken for each identified Area of Concern is attached.

This letter serves as the official closure of the 2023 GO 112-F inspection of WGS's Emergency Response, Public Awareness, Anti-Drug, and Alcohol Misuse Prevention Program and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. If you have any questions, please contact Wai Yin (Franky) Chan at (415) 471-4306 or by email at [wai-yin.chan@cpuc.ca.gov](mailto:wai-yin.chan@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Post-Inspection Written Findings

cc:

Greg Clark, WGS ([greg.clark@rockpointgs.com](mailto:greg.clark@rockpointgs.com))  
Claudia Almengor, SED  
Terence Eng, SED

# Post-Inspection Written Preliminary Findings

**Dates of Inspection:** 10/30/2023 – 11/03/2023

**Operator:** WILD GOOSE STORAGE LLC

**Operator ID:** 31287 (primary)

**Inspection Systems:** Anti-Drug and Alcohol Misuse Prevention Program

**Assets (Unit IDs) with results in this report:** Wild Goose Storage (88673)

**System Type:** DA

**Inspection Name:** 2023 Anti-Drug and Alcohol Misuse Plan 31287 WILD GOOSE STORAGE LLC CPUC GT

**Lead Inspector:** Wai-Yin Chan

**Operator Representative:** Greg Clark

## Unsatisfactory Results

*No Preliminary Findings.*

## Concerns

### Drug and Alcohol : General Program Requirements (DA.GENERAL)

Question Title, ID Reporting of Annual D&A Test Results to PHMSA, DA.GENERAL.MISREPORTS.P

Question 7. Does the process ensure D&A MIS reports are submitted annually to PHMSA as required?

References 199.119(a) (199.3, 199.119(f), 199.229(a), 199.229(d), 40.26)

Assets Covered Wild Goose Storage (88673 (36))

Issue Summary SED reviewed Wild Goose Storage's (WGS) Anti-Drug and Alcohol Misuse Prevention Plan and section VII.6 states that:

"The Company will prepare and maintain the DOT Management Information System (MIS) report for its drug and alcohol testing program. This report will be submitted to PHMSA in accordance with annual submission requirements... The MIS report will be submitted electronically through the DAMIS portal on or before March 15th."

According to §199.119(a), each large operator (having more than 50 covered employees) is required to submit an annual Management Information System (MIS) report to PHMSA of its anti-drug testing, but each small operator (50 or fewer covered employees) is only required by notice from PHMSA to submit an annual MIS report. Because WGS is a small operator and is not required to submit an MIS report to PHMSA unless it receives a notice in the PHMSA Portal (<https://portal.phmsa.dot.gov/phmsaportallanding>), SED recommends

WGS to include clarification in its plan on the MIS report submission procedure for a small operator.

**WGS's Response:**

WGS has updated its Anti-Drug and Alcohol Misuse Prevention Plan section VII.6 to address MIS reporting for small operators. Please see Attachment #2.

**SED's Conclusion:**

SED has reviewed the response from WGS and determined that the corrective actions articulated by WGS sufficiently address SED's concern.

# Post-Inspection Written Preliminary Findings

**Dates of Inspection:** 10/30/2023 – 11/03/2023

**Operator:** WILD GOOSE STORAGE LLC

**Operator ID:** 31287 (primary)

**Inspection Systems:** Emergency Plan and Public Awareness Program

**Assets (Unit IDs) with results in this report:** Wild Goose Storage (88673)

**System Type:** GT

**Inspection Name:** 2023 Emergency Plan and Public Awareness Program 31287  
WILD GOOSE STORAGE LLC CPUC GT

**Lead Inspector:** Wai-Yin Chan

**Operator Representative:** Greg Clark

## Unsatisfactory Results

*No Preliminary Findings.*

## Concerns

*No Preliminary Concerns.*