

December 12, 2024

Terence Eng
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Mr. Eng,

Alpine Natural Gas response to the following findings from the October 14-18, 2024 Inspection. Also attached are the corresponding documents reflecting changes and revisions addressing SED recommendations.

- 1) Question Public Official Notification, EP.ERG.AUTHORITIES.P
Title, ID

Question 8. Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency?

References 192.615(a) (192.615(a)(8))

Assets Covered Alpine (87544 (35))

Issue Summary SED called several phone numbers listed in Alpine Natural Gas' Procedural Manual for Operations; Maintenance & Emergencies Form 615-2 (Revision date 10/09/2024) to verify that the listed emergency phone numbers are still in service. SED noted that the phone number listed for CAL FIRE was disconnected. SED verified the emergency phone numbers listed for PG&E, California Department of Forestry & Fire Protection, and Calaveras County Sheriff's Department Valley Springs (non-emergency), but these numbers did not connect to each respective office's emergency services. Instead, the calls rolled over to the public business numbers that presented callers with menu choices rather than connecting the caller directly to dispatch or emergency personnel.

Therefore, SED recommends that Alpine Natural Gas update its emergency contact telephone numbers to ensure accuracy for both local and out-of-area calls to each Federal, State, and local government organization that may respond to a pipeline emergency.

Any time there is an actual Emergency we would advise caller to call 911 (updated Form 615-2 stating this). The Emergency telephone list (Form 615-2) is for office use and is a guideline that is updated when or if Alpine Natural Gas tries calling that specific phone number that is listed and it does not work. Previously, Alpine Natural Gas has not had to call most of the phone numbers listed.

CALFIRE (209)754-1330 that was on Emergency Telephone list (Form 615-2) – CPUC found that the number was disconnected. Alpine Natural Gas updated Form 615-2, now reads CALFIRE (Tuolumne/Calaveras Unit) with new phone number listed (209)754-3831.

Emergency phone numbers listed for PG&E, California Department of Forestry & Fire Protection (Alpine changed phone number on Form 615-2 to (209)772-1330 per discussion with CALFIRE) and Calaveras County Sheriff's Department Valley Springs (Non- Emergency) are verified phone numbers to call if not an Emergency (if Emergency call 911).

- 2) Question Receiving Notices, EP.ERG.NOTICES.P
Title, ID

Question 1. Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?

References 192.615(a)(1)

Assets Covered Alpine (87544 (35))

Issue Summary SED reviewed pages 132-137 of the Alpine Natural Gas' Procedural Manual for Operations, Maintenance & Emergencies dated 01/09/2024 (SED AUDIT OCT. 2024-SUBMITTED DOCS.pdf) and noted that the Identification & Classification of Emergencies are defined as "An actual emergency" but do not include fire or explosions. Furthermore, under "Instructions to Callers," there is no provision for recording Fire, Explosions &/or Natural Disaster on the caller intake form, as the Instructions to Callers provided instructions only when encountering leaks.

SED requests that ANG revise this procedure and provide an update after completing the corrective actions.

Alpine Natural Gas updated customer service intake form Appendix B-1 (Customer Service Report – Work Order) to Identify/Classify what type of Emergency occurred, also states to advise caller to call if actual Emergency.

3) Question Emergency Response - Designated Persons Notify 911, EP.ERG.NOTIFY911.P
Title, ID

Question 9. Does the emergency plan define the operator's designated person(s) (e.g., controller or other personnel) responsible to directly notify 911 or the phone number of appropriate local emergency officials to report emergencies and possible pipeline ruptures to first responder agencies/authorities?

References 192.615(a) (192.615(a)(8), NTSB P-11-9)

Assets Covered Alpine (87544 (35))

Issue Summary Page 133 of the Alpine Natural Gas Procedural Manual for Operations, Maintenance & Emergencies dated 01/09/2024 states in part "The Answering Service shall send a fax of all information taken after hours to the Alpine Natural Gas office." Under "Prompt and effective response" the Emergency Plan states in part "...the employee receiving such notice will transfer all pertinent information to all appropriate company officials."

1. The after-hours procedure requires a fax to be sent to the Alpine Natural Gas Office rather than notify officials immediately of reported emergencies, however, the answering service takes the following steps (per Alpine Natural Gas) which are not included in the procedure:

"If the call is during business hours we reach out to one of the OQ Operators, if the call is after hours, then answering service dispatches call to OQ Operator that is on call (we currently have two OQ Operators employed) and sends them to the scene. If Emergency officials need to be contacted there is a list of phone numbers available on Form 615-2. The OQ Operator needs to fill out Appendix B-2 (Gas Leak Report) and pass that to Plan Administrator that reviews and signs Form 615-1 (Incident/Accident Investigation Review)."

2. There is no identification of "all appropriate individuals" in the event of an emergency

SED requests that ANG revise its Procedural Manual for Operations, Maintenance & Emergencies and provide an update after completing the corrective actions.

Updated Emergencies 615 (page 133-134):

Employee or Answering Service receiving the Emergency notification will then immediately contact an OQ Operator by telephone and dispatch them to the scene. If call was taken after hours, the Answering Service will also send a follow up email to Alpine Natural Gas office with the reported incident. Office staff, will fill out Appendix B-1 with reported information and then give to the assigned OQ Personnel to complete and sign.

4) Question Emergency Response Training, EP.ERG.TRAINING.P
Title, ID

Question 12. Does the process include training of the appropriate operating personnel to assure they are knowledgeable of the emergency procedures and verifying that the training is effective?

References 192.615(b)(2)

Assets Covered Alpine (87544 (35))

Issue Summary The Emergency Plan does not specify which employees must be trained. Per page 138 of the Alpine Natural Gas Procedural Manual for Operations, Maintenance & Emergencies dated 01/09/2024:

"The administrator and the employees will also participate in a table top exercise of an emergency scenario and or review an actual post emergency

review that occurred during the year under review."

SED requests that ANG revise its Procedural Manual for Operations, Maintenance & Emergencies and provide an update after completing the corrective actions.

Changed page 138 to: The System Administrator oversees training of all OQ Personnel for emergency scenario's or review of an actual post emergency that occurred during the year under review via Table Top Exercise (Form 615-C).

5) Question Liaison with Public Officials, EP.ERG.LIAISON.R (also presented in:
Title, ID MISCTOPICS.PUBAWARE)

Question 8. Do records indicate liaisons established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers in accordance with procedures?

References 192.603(b) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-2005-03)

Assets Covered Alpine (87544 (35))

Issue Summary SED reviewed the records provided on pdf pages 40-52 of the Alpine Natural Gas Procedural Manual for Operations; Maintenance & Emergencies dated 01/09/2024 & found the following issues:

1. The Emergency Response Agency Liaison Record for years 2018-2020 (pdf p.40) included entries without the year with one date extended across two attendee entries.
2. The Emergency Response Agency Liaison Record for 2021 noted "Did not meet - Covid" without further explanation or indication of an attempt to meet remotely. In response to a follow-up data request, ANG clarified that no waiver or notification was submitted to the CPUC, stating, "The officials did not want to meet with us because of COVID."

SED requests that ANG revise its Procedural Manual for Operations, Maintenance & Emergencies and provide an update after completing the corrective actions.

Going forward, if there is any reason cannot meet with Official's in person, we will make sure we file for a waiver with CPUC or try to meet via zoom meeting.

Sincerely,

Michael Lamond, Administrator
Alpine Natural Gas

By email:

Attachments:

Appendix B-1
Form 615-2
Emergency Plan