PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

January 15, 2026

Scott Aycock
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GI-2025-11-WGS-36-03-07-10

SUBJECT: SED's Inspection Letter for the General Order (GO) 112-F Inspection of Wild Goose Storage

Dear Mr. Aycock:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112-F inspection of Wild Goose Storage (WGS) during November 3 – 7, 2025. The inspection included a review of the Operations and Maintenance (O&M) Plan, Operator Qualification (OQ) Program, and Control Room Management (CRM) Program.

SED staff identified seven (7) violations and four (4) concerns, which are described in the attached "Post-Inspection Written Preliminary Findings". The Summary reflects only those plans, procedures, and records that SED reviewed during the inspection.

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

If you have any questions, please contact Anthony Phu at (916) 531-1016 or by email at anthony.phu@cpuc.ca.gov.

Sincerely,

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

Enclosure: Post-Inspection Written Preliminary Findings

cc: Greg Clark, Rockpoint Gas Storage
Andy Anderson, Rockpoint Gas Storage
Grant Bozarth, Rockpoint Gas Storage
Jason McMillan, CPUC Gas Safety and Reliability Branch
Claudia Almengor, CPUC Gas Safety and Reliability Branch

Post-Inspection Written Preliminary Findings

Dates of Inspection: 11/03/2025 – 11/07/2025

Operator: WILD GOOSE STORAGE LLC

Operator ID: 31287 (primary)

Inspection Systems: Wild Goose Storage

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

System Type: Gas Transmission

Inspection Name: 2025 Wild Goose Storage - O&M, OQ, CRM Programs

Lead Inspector: Anthony Phu

Operator Representative: Greg Clark

Unsatisfactory Results

CRM, SCADA, and Leak Detection : Supervisory Control and Data Acquisition (CR.SCADA)

Question Title, ID	Point-to-Point Verification Extent, CR.SCADA.POINTVERIFYEXTENT.P
Question	**12. Are there adequate processes for the thoroughness of the point-to-point verification?**
References	192.631(c)(2)
Assets Covered	Wild Goose Storage (88673 (36))
Issue Summary	CFR 192.631(c)(2) states in part:

"(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

...

(2) Conduct a point-to-point verification between SCADA displays and related field equipment when field equipment is added or moved and when other changes that affect pipeline safety are made to field equipment or SCADA displays"

Wild Goose Storage's Control Room Management Plan (CRMP) (plan version 10/09/2024) Section 3.3 Point-To-Point Verification states:

"The WGS SCADA Operations Manual (Appendix E-4) contains the steps required for conducting a point-to-point verification. WGS follows an established MOC process when SCADA change procedures are initiated. Section 6.3 of this Plan describes the MOC process in detail."

At the time of inspection, WGS did not have a SCADA Operations Manual ('Appendix E-4') as referenced in their CRM plan; however, they noted that they are currently drafting the manual.

WGS did not have an implemented written process defining how point-to-point verification is conducted within the WGS CRM Plan. Therefore, SED finds WGS in violation of CFR 192.631(c)(2).

Question Title, ID Point-to-Point Verification Interval, CR.SCADA.POINTVERFIYINTVL.P

Question **14. Is there an adequate process for defining when the point-to-point verification must be completed?**

References 192.631(c)(2)

Assets Covered Wild Goose Storage (88673 (36))

Issue Summary CFR 192.631(c)(2) states in part:

"(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

...

(2) Conduct a point-to-point verification between SCADA displays and related field equipment when field equipment is added or moved and when other changes that affect pipeline safety are made to field equipment or SCADA displays"

Wild Goose Storage's Control Room Management Plan (CRMP) (plan version 10/09/2024) Section 3.3 Point-To-Point Verification states:

"The WGS SCADA Operations Manual (Appendix E-4) contains the steps required for conducting a point-to-point verification. WGS follows an established MOC process when SCADA change procedures are initiated. Section 6.3 of this Plan describes the MOC process in detail."

At the time of inspection, WGS did not have a SCADA Operations Manual ('Appendix E-4') as referenced in their CRM plan; however, they noted that they are currently drafting the manual.

WGS did not have an implemented written process defining the frequency that point-to-point verification is to be conducted within the WGS CRM Plan. Therefore, SED finds WGS in violation of CFR 192.631(c)(2).

Question Title, ID Backup SCADA Verification, CR.SCADA.BACKUPSCADAVERIFY.P

Question **23. Is testing required to verify adequate processes are in place for decision-making and internal communications to successfully implement a transition from primary SCADA to backup SCADA, and back to primary SCADA?**

References 192.631(c)(4)

Assets Covered Wild Goose Storage (88673 (36))

Issue Summary CFR 192.631(c)(4) states in part:

"(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

...

(4) Test any backup SCADA systems at least once each calendar year, but at intervals not to exceed 15 months"

Wild Goose Storage's Control Room Management Plan (CRMP) (plan version 10/09/2024) Section 3.5 Backup Systems Testing states:

"WGS tests their Emergency Response activities and backup system annually (where applicable) in accordance with the WGS Emergency Response Plans and procedures and the WGS SCADA Operations Manual to ensure effectiveness and identify potential improvements."

At the time of inspection, WGS did not have a SCADA Operations Manual ('Appendix E-4') as referenced in their CRM plan; however, they noted that they are currently drafting the manual.

WGS did not have an implemented written process defining how backup SCADA operations and testing is conducted within the WGS CRM Plan. Therefore, SED finds WGS in violation of CFR 192.631(c)(4).

Question Title, ID Backup SCADA Transfer, CR.SCADA.BACKUPSCADATRANSFER.P

Question **26. Do processes adequately address and test the logistics of transferring control to a backup control room?**

References 192.631(c)(4)

Assets Covered Wild Goose Storage (88673 (36))

Issue Summary CFR 192.631(c)(4) states in part:

"(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

….(4) Test any backup SCADA systems at least once each calendar year, but at intervals not to exceed 15 months"

Wild Goose Storage's Control Room Management Plan (CRMP) (plan version 10/09/2024) Section 3.5 Backup Systems Testing states:

"WGS tests their Emergency Response activities and backup system annually (where applicable) in accordance with the WGS Emergency Response Plans and procedures and the WGS SCADA Operations Manual to ensure effectiveness and identify potential improvements."

At the time of inspection, WGS did not have a SCADA Operations Manual ('Appendix E-4') as referenced in their CRM plan; however, they noted that they are currently drafting the manual.

WGS did not have a written process to adequately address and test the logistics of transferring control to a backup control room within the WGS CRM Plan. Therefore, SED finds WGS in violation of CFR 192.631(c)(4).

Question Title, ID Backup SCADA Return to Primary, CR.SCADA.BACKUPSCADARETURN.P

Question **27. Do procedures adequately address and test the logistics of returning operations back to the primary control room?**

References 192.631(c)(4)

Assets Covered Wild Goose Storage (88673 (36))

Issue Summary CFR 192.631(c)(4) states in part:

"(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

...(4) Test any backup SCADA systems at least once each calendar year, but at intervals not to exceed 15 months"

Wild Goose Storage's Control Room Management Plan (CRMP) (plan version 10/09/2024) Section 3.5 Backup Systems Testing states:

"WGS tests their Emergency Response activities and backup system annually (where applicable) in accordance with the WGS Emergency Response Plans and procedures and the WGS SCADA Operations Manual to ensure effectiveness and identify potential improvements."

At the time of inspection, WGS did not have a SCADA Operations Manual ('Appendix E-4') as referenced in their CRM plan; however, they noted that they are currently drafting the manual.

WGS did not have a written process to adequately address and test the logistics of returning operations back to the primary control room within the WGS CRM Plan. Therefore, SED finds WGS in violation of CFR 192.631(c)(4).

Time-Dependent Threats : External Corrosion - CP Monitoring (TD.CPMONITOR)

Question Title, ID Extent of Corrosion Control Deficiencies for Onshore Gas Transmission, TD.CPMONITOR.DEFICIENCYEXTENT.P (also presented in: SP.CL-A-CP)

Question **12. For onshore gas transmission pipelines, does the process require that the operator develop a remedial action plan to determine the extent of the area affected when low cathodic protection levels are detected?**

References 192.605(b)(2) (192.465(d), 192.465(f))

Assets Covered Wild Goose Storage (88673 (36))

Issue Summary CFR 192.465(d) states in part:

"(d) Each operator must promptly correct any deficiencies indicated by the inspection and testing required by paragraphs (a) through (c) of this section. For onshore gas transmission pipelines, each operator must develop a remedial action plan and apply for any necessary permits within 6 months of completing the inspection or testing that identified the deficiency. Remedial action must be completed promptly, but no later than the earliest of the following: prior to the next inspection or test interval required by this section; within 1 year, not to exceed 15 months, of the inspection or test that identified the deficiency; or as soon as practicable, not to exceed 6 months, after obtaining any necessary permits."

CFR 192.465(f) states in part:

"(f) An operator must determine the extent of the area with inadequate cathodic protection for onshore gas transmission pipelines where any annual test station reading (pipe-to-soil potential measurement) indicates cathodic protection levels below the required levels in appendix D to this part."

SED reviewed the following sections of Wild Goose Storage's O&M Manual (dated October 2025):

- CATHODIC PROTECTION/EXTERNAL CORROSION CONTROL page 119, 120
- ELECTRICAL ISOLATION, Repairs on page 124
- IMPRESSED CURRENT POWER SOURCE – INSPECTION page 127

WGS did not have an adequate written process requiring that the operator develop a remedial action plan to determine the extent of the area affected when low cathodic protection levels are detected. Therefore, SED finds WGS in violation of CFR 192.465(d) and 192.465(f).

Time-Dependent Threats : Internal Corrosion - Preventive Measures (TD.ICP)

Question Title, ID Corrosion Control Records, TD.ICP.DESIGN.P

Question **16. Does the process require new transmission pipelines or replacement segments to be designed to reduce the risk of internal corrosion?**

References 192.605(b)(2) (192.476(a), 192.476(b), 192.476(c))

Assets Covered Wild Goose Storage (88673 (36))

Issue Summary CFR 192.476(a) states:

"(a) Design and construction. Except as provided in paragraph (b) of this section, each new transmission line and each replacement of line pipe, valve, fitting, or other line component in a transmission line must have features incorporated into its design and construction to reduce the risk of internal corrosion. At a minimum, unless it is impracticable or unnecessary to do so, each new transmission line or replacement of line pipe, valve, fitting, or other line component in a transmission line must:

(1) Be configured to reduce the risk that liquids will collect in the line;

(2) Have effective liquid removal features whenever the configuration would allow liquids to collect; and

(3) Allow use of devices for monitoring internal corrosion at locations with significant potential for internal corrosion."

SED reviewed Wild Goose Storage's O&M Manual (dated October 2025) and the WGS Design and Construction Considerations (DR24) and found that WGS did not have an adequate written process requiring new or replacement pipe to be designed to reduce the risk of internal corrosion. Therefore, SED finds WGS in violation of CFR 192.476(a).

Concerns

CRM, SCADA, and Leak Detection : CRM Roles and Responsibilities (CR.CRMRR)

Question Title, ID	Roles and Responsibilities, CR.CRMRR.RESPONSIBLE.P
Question	**1. Are there clear processes to describe each controller's physical domain of responsibility for pipelines and other facility assets?**
References	192.631(b)
Assets Covered	Wild Goose Storage (88673 (36))
Issue Summary	WGS did not include CFR 192.631(b)(5) (effective 03/24/2017) into its CRMP updates. SED recommends WGS to update their procedure and integrate changes from Title 49 CFR 192.631(b).

CRM, SCADA, and Leak Detection : Change Management (CR.CRMCMGT)

Question Title, ID	Controller Participation in System Changes, CR.CRMCMGT.CONTROLLERPARTICIPATE.P
Question	**2. Are control room representative(s) required to participate in meetings where changes that could directly or indirectly affect the hydraulic performance or configuration of the pipeline (including routine maintenance and repairs) are being considered, designed and implemented?**
References	192.631(f)(1) (192.631(f)(3))
Assets Covered	Wild Goose Storage (88673 (36))
Issue Summary	SED reviewed Wild Goose Storage's Control Room Management Plan (CRMP) (plan version 10/09/2024) Section 6.3 WGS Management of Change Process and Integrity Management Plan (IMP) (plan version 10/24/24) Section 7.3.3. WGS Integrity Management Plan (IMP) (plan version 10/24/24) Section 7.3.3 states in part: "3) MOC Review Process MOC Coordinator will coordinate the entire review process, including arranging review meetings with subject matter experts (if applicable)." Wild Goose Storage's Control Room Management Plan (CRMP) and Integrity Management Plan (IMP) do not contain adequate processes to include control room representative(s) required to participate in meetings regarding changes that could directly or indirectly affect the hydraulic performance or configuration of the pipeline (including routine maintenance and repairs) are being considered, designed and implemented. SED requests WGS to update their procedure to include control room representative(s) required to participate in meetings regarding changes that could directly or indirectly affect the hydraulic performance or configuration of the pipeline (including routine maintenance and repairs) are being considered, designed and implemented per CFR 192.631.

Reporting : Regulatory Reporting (Traditional) (RPT.RR)

Question Title, ID Immediate Reporting: Incidents, RPT.RR.IMMEDREPORT.P

Question **3. Is there a process to immediately report incidents to the National Response Center?**

References 191.5(b) (191.7, 191.1(a), 192.8(c)(3))

Assets Covered Wild Goose Storage (88673 (36))

Issue Summary SED reviewed Wild Goose Storage's O&M Manual (dated October 2025), Section 2.0 - Normal Operations and found the following hyperlinks were not working:

- Section 2.1 Pipeline Reporting, Subsection CPUC Incident Reports PHMSA F7100.1 (http://ops.dot.gov/library/forms/forms.htm#7100.1) page 23
- Section 2.2 Incidents - Reporting and Control, Subsections GENERAL - D.O.T. / PHMSA Reporting (http://pipelineonlinereporting.phmsa.dot.gov/) page 30

SED requests WCG repair the above hyperlinks so that operator personnel may reference the listed materials or provide other directions on how to access the referenced materials.

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

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

Question **3. Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion?**

References 192.605(b)(2) (192.481(a), 192.481(b), 192.481(c), 192.481(d), 192.9(f)(1), 192.453)

Assets Covered Wild Goose Storage (88673 (36))

Issue Summary SED reviewed Wild Goose Storage's O&M Manual (dated October 2025) Section 3.5 Corrosion Control, ATMOSPHERIC CORROSION on page 104.

The text describing abnormal operating conditions (AOCs) includes two examples that are not AOCs:

- Coating is in good condition with no evidence of disbondment or corrosion.
- Normal surface rust arises on uncoated piping that can be cleaned and painted.

SED requests that WGS review its list of AOCs to ensure that all the listed examples are relevant.