Central Valley Gas Storage

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January 30, 2020

Mr. Edward Randolph, Energy Division Director
California Public Utilities Commission
4th Floor, Energy Division
505 Van Ness Avenue
San Francisco, CA 94102

Submitted via e-mail

Subject: **Annual Report – Safety Model Assessment Proceeding metrics**

Dear Mr. Randolph,

Central Valley Gas Storage, LLC ("CVGS") hereby submits its annual report in accordance with Ordering Paragraph 30 in Decision 19-09-025 authorizing Pacific Gas and Electric Company's 2019-2022 Revenue Requirement for Gas Transmission and Storage Service[1].

The attached report includes metrics using the format from Attachment 1 in the April 25, 2019 Phase Two Decision in the Safety Model Assessment Proceeding (A.15-05-002 et al.) that specified safety performance metrics for the investor owned utilities[2]. Not all of the metrics specified for the investor owned utilities apply to natural gas storage operations and thus are not measured or tracked by CVGS. Metrics that are not measured or tracked by CVGS are reported as N/A (not applicable).

If you have any questions regarding the information in this report, please e-mail John Boehme, Manager Regulatory Affairs for CVGS at jboehme@southernco.com.

Sincerely,

Stephen L. Wassell, PE
Vice President
Storage and Peaking Operations

cc: Steve Haine, CPUC Safety and Enforcement Division
David Ashuckian, CPUC Safety and Enforcement Division

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[1] D.19-09-025, Ordering Paragraph 30: "On an annual basis, Central Valley Gas Storage, LLC, Lodi Gas Storage, LLC, Wild Goose Storage, LLC, and Gill Ranch, LLC, shall submit to the Commission's Safety and Enforcement Division and Energy Division the Safety Model Assessment Proceeding metrics related to their storage operations, starting on January 30, 2020."

[2] D.19-04-020, Ordering Paragraph 1: "The Safety Performance Metrics contained in Attachment 1 of this decision are adopted..."

Metric Name	Risks	Category	Units	Metric Description	Leading or lagging indicator?	CVGS Results for 2019
1. Transmission & Distribution (T&D) Overhead Wires Down	Wildfire Transmission Overhead Conductor Distribution Overhead Conductor Primary	**Electric**	Number of wire down events	Number of instances where an electric transmission or primary distribution conductor is broken and falls from its intended position to rest on the ground or a foreign object; excludes down secondary distribution wires and "Major Event Days" (typically due to severe storm events) as defined by the IEEE.	Lagging	**N/A**
2. Transmission & Distribution (T&D) Overhead Wires Down - Major Event Days	Wildfire Transmission Overhead Conductor Distribution Overhead Conductor Primary	**Electric**	Number of wire down events	Number of instances where an electric transmission or primary distribution conductor is broken and falls from its intended position to rest on the ground or a foreign object; includes down secondary distribution wires. Includes "Major Event Days" (typically due to severe storm events) as defined by the IEEE.	Lagging	**N/A**
3. Electric Emergency Response	Wildfire Overhead Conductor Public Safety Worker Safety	**Electric**	Percentage of time response is within 60 mins	The percent of time utility personnel respond (are on-site) within one hour after receiving a 911 (electric related) call, with on-site defined as arriving at the premises to which the 911 call relates.	Lagging	**N/A**
4. Fire Ignitions	Overhead Conductor Wildfire Public Safety Worker Safety Catastrophic Event Preparedness	**Electric**	Number of ignitions	The number of powerline-involved fire incidents annually reportable to the CPUC per Decision 14-02-015. A reportable fire incident includes all of the following: 1) Ignition is associated with a utility's powerlines and 2) something other than the utility's facilities burned and 3) the resulting fire traveled more than one meter from the ignition point.	Lagging	**N/A**

Metric Name	Risks	Category	Units	Metric Description	Leading or lagging indicator?	CVGS Results for 2019
5. Gas Dig-in	Transmission Pipeline Failure - Rupture with Ignition Distribution Pipeline Rupture with Ignition (non- Cross Bore) Catastrophic Damage involving Gas Infrastructure (Dig-Ins)	Gas	The number of 3rd party gas dig-ins per 1,000 USA tags/tickets	The number of 3rd party gas dig-ins per 1,000 Underground Service Alert (USA) tags/tickets for gas. Excludes fiber and Electric tickets. A gas dig-in refers to any damage (impact or exposure) that results in a repair or replacement of underground gas facility as a result of an excavation. A third party dig-in is damage caused by someone other than the utility or a utility contractor.	Lagging	**0**
6. Gas In-Line Inspection	Catastrophic Damage Involving High-Pressure Pipeline Failure	Gas	Reported two ways: 1. Miles Inspected 2. Total number of inspections scheduled/ Total number of targeted inspections	Total miles of transmission pipe inspected by inline inspection	Leading	**0 miles inspected;** **0 inspections scheduled/ targeted**
7. Gas in-Line Upgrade	Catastrophic Damage Involving High-Pressure Pipeline Failure	Gas	Miles	Miles upgraded	Leading	**0**

Metric Name	Risks	Category	Units	Metric Description	Leading or lagging indicator?	CVGS Results for 2019
8. Shut In The Gas Average Time - **Mains**	**Distribution** Pipeline Rupture with Ignition (non-Cross Bore)	Gas	Average (median) time in minutes required to stop the flow of gas	The average time (in minutes) required for the utility to stop the flow of gas during incidents involving mains when responding to any unplanned/uncontrolled release of gas. The timing for the response starts when the utility first receives the report and ends when the utility's qualified representative determines, per the utility's emergency standards, that the reported leak is not hazardous or the utility's representative completes actions to mitigate a hazardous leak and render it as being non-hazardous (i.e., by shutting-off gas supply, eliminating subsurface leak migration, repair, etc.) per the utility's standards.	Lagging	N/A
9. Shut In The Gas Average Time **- Services**	Pipeline Rupture with Ignition (non-Cross Bore)	Gas	Average (median) response time in minutes	The average time (minutes) that a Gas Service Representative (GSR) or qualified first responder (Crew, Leak Surveyor, etc.) takes to respond and stop gas flow during incidents involving services. The timing for the response starts when the utility first receives the report and ends when the utility's qualified representative determines, per the utility's emergency standards, that the reported leak is not hazardous or the utility's leak and render it as being non-hazardous (i.e., by shutting-off gas supply, eliminating subsurface leak migration, repair, etc.) per the utility's standards.	Lagging	N/A

Metric Name	Risks	Category	Units	Metric Description	Leading or lagging indicator?	CVGS Results for 2019
10. Cross Bore Intrusions	Catastrophic Damage Involving **Medium Pressure Pipeline Failure**	Gas	Number of cross bore intrusions per 1,000 inspections	Cross bore intrusions found per 1,000 inspections	Leading	**N/A**
11. Gas Emergency Response	**Distribution** Pipeline Rupture with Ignition	Gas	Average response time in minutes, additionally: response times in five-minute intervals, segregated first by business hours (0800 – 1700 hours), after business hours and weekends/legal state holidays. The intervals start with 0-5 minutes, all the way to 40-45 minutes, an interval of 45-60 minutes and then all response times greater than 60 minutes.	The average time that a Gas Service Representative or a qualified first responder takes to respond after receiving a call which results in an emergency order.	Lagging	**N/A**
12. Natural Gas Storage Baseline Inspections Performed	Gas storage	Gas	Number of Inspections	Tracks the progress of completing baseline and reassessment inspections that were expected to be completed within a given year	Lagging	**0 pipeline baseline inspections;** **5 well casing baseline inspections**

Metric Name	Risks	Category	Units	Metric Description	Leading or lagging indicator?	CVGS Results for 2019
13. Percentage of the Gas System that can be Internally Inspected	Catastrophic Damage Involving High-Pressure Pipeline Failure	Gas	Percentage	The ratio of transmission pipe miles that can be inspected internally to all transmission pipe	Leading	100%
14. Employee Serious Injuries and Fatalities	Employee Safety	Injuries	Number of Serious Injuries and Fatalities	A work-related injury or illness that results in a fatality, inpatient hospitalization for more than 24 hours (other than for observation purposes), a loss of any member of the body, or any serious degree	Lagging	0
15. Employee Days Away, Restricted and Transfer (DART) Rate	Employee Safety	Injuries	DART Cases times 200,000 divided by employee hours worked	DART Rate is calculated based on number of OSHA-recordable injuries resulting in Days Away from work and/or Days on Restricted Duty or Job Transfer, and hours worked.	Lagging	0
16. Employee Lost Workday Case Rate	Employee Safety	Injuries	Number of LWD Cases / productive hours worked x 200,000.	This measures the number of LWD cases incurred for employees and staff augmentation (excluding contractors) per 200,000 hours worked, or for approximately every 100 employees. A LWD Case is a current year OSHA Recordable incident that has resulted in at least one lost workday. An OSHA Recordable incident is an occupational (job related) injury or illness that requires medical treatment beyond first aid, or results in work restrictions, death or loss of consciousness. The formula is: LWD Case Rate = Number of LWD Cases / productive hours worked x 200,000.	Lagging	0
17. Employee OSHA Recordables Rate	Employee Safety	Injuries	Rate; OSHA recordables times 200,000 divided by employee hours worked.	An OSHA recordable incident is an occupational (job-related) injury or illness that requires medical treatment beyond first aid, or results in work restrictions, death or loss of consciousness. OSHA recordable rate is calculated as OSHA recordable times 200,000 divided by employee hours worked.	Lagging	0

Metric Name	Risks	Category	Units	Metric Description	Leading or lagging indicator?	CVGS Results for 2019
18. Contractor OSHA Recordables Rate	Contractor Safety	Injuries	OSHA recordable times 200,000 divided by contractor hours worked associated	An OSHA recordable incident is an occupational (job-related) injury or illness that requires medical treatment beyond first aid, or results in work restrictions, death or loss of consciousness. OSHA recordable rate is calculated as OSHA recordable times 200,000 divided by contractor hours	Lagging	0
19. Contractor Days Away, Restricted Transfer (DART)	Contractor Safety	Injuries	OSHA recordable times 200,000 divided by contractor hours worked associated with work for the reporting utility.	DART Rate: Days Away, Restricted and Transfer (DART) Cases include OSHA-recordable Lost Work Day Cases and injuries that involve job transfer or restricted work activity. DART Rate is calculated as DART Cases times 200,000 divided by contractor hours worked.	Lagging	0
20. Contractor Serious Injuries and Fatalities	Contractor Safety	Injuries	Number of work-related injuries or illnesses associated	A work-related injury or illness that results in a fatality, inpatient hospitalization for more than 24 hours (other than for observation purposes), a loss of any member of the body, or any serious degree of permanent disfigurement.	Lagging	0
21. Contractor Lost Work Day Case Rate	Contractor Safety	Injuries	Number of Lost Workday (LWD) cases incurred for contractors per 200,000	This measures the number of Lost Workday (LWD) cases incurred for contractors per 200,000 hours worked (for approximately every 100 contractors). A Lost Workday Case is a current year OSHA Recordable incident that has resulted in at least one lost workday. An OSHA Recordable incident is an occupational (job related) injury or illness that requires	Lagging	0
22. Public Serious Injuries and Fatalities	Public Safety	Injuries	Number of Serious Injuries	A fatality or personal injury requiring in-patient hospitalization involving utility facilities or equipment. Equipment includes utility vehicles used during the course of	Lagging	0

Metric Name	Risks	Category	Units	Metric Description	Leading or lagging indicator?	CVGS Results for 2019
23. Helicopter/ Flight Accident or Incident	Aviation Safety Helicopter Operations Public Safety Worker Safety Employee Safety	Vehicle	Number of accidents or incidents (as defined in 49 CFR Section 830.5 "Immediate Notification") per 100,000 flight hours.	Defined by Federal Aviation Regulations (FARs), reportable to FAA per 49-CFR-830.	Lagging	0
24. Percentage of Serious Injury and Fatality Corrective Actions Completed on Time	Employee Safety Contractor Safety Public Safety	Injuries	Total number of SIF corrective actions completed on time (as measured by the due date accepted by Line of Business Corrective Action Review Boards (CARB)) divided by the total number of SIF corrective actions past due or completed.	The percentage of SIF corrective actions completed on time. A SIF corrective action is one that is tied to a SIF actual or potential injury or near hit.	Leading	N/A
25. Hard Brake Rate	Motor Vehicle Safety	Vehicle	Total number of hard braking events per thousand miles driven in a given period	The total number of hard braking events (>=8 mph per second decrease in speed) per thousand miles driven in a given period.	Leading	N/A
26. Driver's Check Rate	Motor Vehicle Safety	Vehicle	Total number of Driver Check complaint calls received per 1 million miles driven	This measures the total number of Driver Check complaint calls received per 1 million miles driven by vehicles included in the Driver Check program.	Leading	N/A