

Safety and Enforcement Division



Safety and Enforcement Division

2016 Annual Plan

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MISSION AND VISION

The mission of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) is to work diligently to ensure that regulated services are delivered in a safe manner. In July 2014 the CPUC adopted a Safety Policy Statement, which further clarified the CPUC's overall safety strategy. Ultimately, we are striving to achieve a goal of zero accidents and injuries across all the utilities and businesses we regulate, and within our own workplace. In February 2016, the CPUC adopted a Safety Action Plan; we highlight in this document new work for SED to carry out the deliverables of the Safety Action Plan and the objectives of the Safety Policy Statement.

SED CHARTER

Safety and Enforcement Division Charter

Mission

The Safety and Enforcement Division protects utility workers and the public by ensuring that regulated entities maintain and provide safe services.

We Are:

➤ Safety professionals	➤ Dedicated public servants
➤ Protectors of consumers and the public	➤ Leaders by example
➤ Technical experts in our fields	➤ Tough, but fair
➤ Agents of change by promoting a culture of safety	➤ Committed and resilient
➤ A team that values each other	➤ Skilled and innovative
➤ Supportive coworkers who have each other's back	➤ Open, honest and caring
➤ Enforcement professionals	➤ Teachers of best practices
	➤ Promoters of workplace safety

Goals

- Create a management culture focused on ethical action, personal accountability, and public service leadership
- Regulated entities address and resolve safety issues in a timely manner
- Strive for and achieve excellence
- Working in SED is seen as a professional badge of honor by those inside and outside of the organization
- Be an organization that creates industry leaders
- Promote a strong enforcement culture at the CPUC
- Be early adopters of best practices
- Raise public awareness, empowering Californians to own their own safety

Values

Accountability | Excellence | Integrity | Open Communication | Stewardship

VISION OF HIGH PERFORMANCE ORGANIZATION

SED has developed a vision for what optimum performance of SED would look like. The elements of this vision are present in the organization, but our goal is to achieve holistic adoption and continuous high performance.

CLARITY OF MISSION AND GOALS

- The public that we serve, California residents and ratepayers, have a high level of trust that the CPUC protects the public interest and ensures the safety and reliability of utility services.
- Missions of all organizations within SED are aligned with the mission of the CPUC. The mission of SED is known and understood by all members of SED, and ultimately by everyone at the CPUC.
- There are clear goals, priorities and measurements for success at all levels of the organization. Goals are S.M.A.R.T. (Specific; Measurable; Attainable; Relevant and Trackable). Everyone is aligned towards achieving organizational goals.

LEADERSHIP AND TEAM CULTURE

- There is open and clear communication that enables and fosters trust.
- Leadership at all levels recognizes staff expertise and the value of individuals, and appreciates the collective intelligence of the team.
- The team makes decisions when there is natural agreement. In cases where agreement is elusive, a decision is made by the team lead or executive decision-maker.
- The leadership of the team shifts from time to time, as appropriate, to drive results. No individual members are more important than the team. No single individual holds all critical knowledge – the team must be able to function with or without high-performing individuals. This builds in team resiliency.
- There is opportunity for professional growth for individuals, based on their performance. Leaders identify individual potential and work to develop skills.
- Everyone is held accountable to performance standards and leadership expectations. Each team knows how they are performing and are supported in their opportunities for growth.
- Senior members of the team coach and train. The environment is supportive and members of the team know where to turn for help.

EFFECTIVE PROCESSES

- Common language and terminology is shared across all teams and programs.
- Processes, procedures and documentation are consistent, with differences only where needed for program reasons. Processes and procedures are thoroughly and consistently documented.
- Workload and performance are accurately tracked, in order to support measurement against established goals.
- There is regular reporting that tracks performance and informs decision-makers and other stakeholders.

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- Continuous improvement is embedded in all processes and organizational functions. Benchmarking and industry best practices are used to identify areas of improvement. After action reporting/analysis, peer review and root cause analysis are consistently implemented.

QUALITY OF WORK PRODUCTS AND EXECUTION

- Work products demonstrate rigorous, multi-faceted analysis. All relevant aspects are considered: technical, policy, economics, process etc. Analysis leverages industry best practices.
- Work products are produced and completed in a timely manner, meeting or exceeding set targets.
- Documents are of consistently high quality, with consistent format and style across all programs, sections, regions, etc.
- Standard work products, such as audit reports, require minimal iterations for revision. The person responsible for the work product knows the expectations of management and has the training to deliver to those standards. The supervisor performs validation and guidance on issues that may have been overlooked.

EXCELLENCE IN TECHNICAL SKILLS

- Members of the team seek new knowledge and stay up to date on latest industry developments.
- Industry best practices are leveraged in work products and analysis.
- Individuals develop industry recognized expertise in their fields, including presentations at conferences, writing white papers, etc.
- Ideas for improving codes and regulations are constantly brought forward. The Commission policies are externally recognized by the industry as leading and reflective of latest industry knowledge.

ENGAGEMENT OF STAKEHOLDERS

- The mission and work performed by SED is well understood by the Commission.
- Commission leadership feels well informed and appropriately engaged in decision making.
- The work being performed by SED is transparent, and information about it is easily accessible.
- The public has a high level of trust in the information being provided.
- The reputation of SED is that of a highly professional organization that leads the industry in the issues of safety and enforcement.

SED is a place that creates industry leaders. Working here is seen as a professional badge of honor by those inside and outside of the organization.

SED STRATEGIC INITIATIVES AND GENERAL OPERATIONS

STRATEGIC PLANNING

The CPUC is going through a strategic planning effort. Commissioners have developed a draft Strategic Directive for Safety. In 2016, SED will assist Commissioners in finalizing the strategic directive and will develop an Action Plan to comply with the Directive.

SAFETY ACTION PLAN

In February 2016, the Commission adopted a Safety Action Plan and Regulatory Strategy, organized around four functional areas of safety management or “pillars”:

- I. **Safety Policy:** Commission decision-making and development of rules and regulations
- II. **Safety Compliance and Enforcement:** Audit, investigation and penalty assessment activities
- III. **Risk Management:** Risk assessment and risk mitigation strategies
- IV. **Safety Promotion:** Communication, collaboration and outreach

The Safety Action Plan has a total of nine deliverables, two of which are assigned to SED for completion. These deliverables are summarized below.

RISK MANAGEMENT: ACTION ITEM 6: SAFETY REVIEW IN GENERAL RATE CASES – ACTIVITY REPORTING

SED will continue implementation of Commission Decision D.14-12-025 and will incorporate status updates into the SED monthly report. The SED Director is responsible for this action item and will ensure that SED monthly reporting covers work pertaining to GRCs, including reviewing safety related testimony.

SAFETY PROMOTION: ACTION ITEM 9: FORMALIZING COORDINATION WITH STATE AGENCIES – DEVELOPING MEMORANDA OF UNDERSTANDING CONCERNING SAFETY ISSUES

To further integrate safety into management practices, SED will work with Legal division to establish formal coordination processes with other state agencies responsible for inspection and safety. The MOU with DOGGR shall be revised by March 25, 2016. The MOU with CalOES shall be completed by May 27, 2016. The agreements with other agencies shall be revised on an as needed basis, depending on the level of coordination required.

SED GENERAL OPERATIONS

CPUC EXECUTIVE SAFETY COUNCIL

The CPUC Executive Safety Council’s mission is to promote safety across the Commission, breaking down organizational silos. The Executive Safety Council discusses safety issues identified by staff, challenges facing the Commission and major risks facing the regulated entities. The SED Director and Deputy Directors attend Executive Safety Council and provide staff support as needed.

SUPPORTING OFFICE OF GOVERNMENTAL AFFAIRS

There are several activities that are required in order to support the Commission's Office of Governmental Affairs. SED analyzes approximately 20-30 bills every legislative cycle, but there are also other important activities including answering questions from the legislature.

INTERNAL CROSS-DIVISION COORDINATION

The Utility Risk Assessment section supervisor reviews the list of new natural gas and electric proceedings on a recurring basis, flagging anything that has potentially significant safety implications. If safety issues are identified for a proceeding, the Utility Risk Assessment supervisor notifies impacted branch, industry division and Administrative Law Judges Division.

CPUC INTERNAL AUDITS

SED is participating in CPUC internal audits and respective implementation of recommendations. Currently, SED is implementing recommendations from vehicle maintenance audit and is participating in the document management audit.

PREPARATION OF BUDGET CHANGE PROPOSALS

Budget Change Proposals (BCPs) need to be prepared annually per the fiscal year cycle and occasionally off-cycle for emergent needs. There are several resource needs in SED that require BCP development.

PERFORMANCE REVIEW AND INDIVIDUAL DEVELOPMENT PLANS

The goal for SED is to perform all performance reviews by the end of February every year.

COMPLIANCE WITH ORDERING PARAGRAPHS SYSTEM (COPS)

In 2015, the CPUC implemented an internal process to track industry compliance with ordering paragraphs from CPUC decisions. SED has designated COPS officers, who track the ordering paragraphs and provide updates to the status.

DATABASE UPGRADE PROJECTS

SED has two IT projects to perform database upgrades. Office of Utility Safety is working with a consultant to update the audit and incident databases. The databases are being migrated to improve performance. Staff will continue to work with IT and the consultant to add more features and analysis tools in the next phase in 2016. Office of Rail Safety is working on an ongoing effort to improve the Rail Safety and Security Management Information System (RSSIMS), including implementing a solution to allow for bulk uploads and downloads of data.

REPORTING

SED's goal is to keep internal and external stakeholders updated on work planned, work accomplished and key developments. The reports include:

- The annual plan
- Monthly progress reports to the Executive Director

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- P.U. Code Section 911 (Safety: Gas/Electric) - annual summary of investigations.
- P.U. Code Sections 765 & 911.1 - NTSB recommendations and CPUC actions.
- P.U. Code Section 916 (Safety: Rail): General Rail Safety Report. This report includes info from sections 916.1, 916.2, 916.3, 916.4

SAFETY ALERT PROCESS

SED has a “Safety Alert” process to notify Commission leadership of important safety events as they take place. A Safety Alerts are sent out based at management’s discretion. Typical situations that warrant a safety alert include:

- Incident involving a fatality
- Incidents involving major injuries
- Incidents which are likely to involve major news coverage (local TV news networks, major newspapers including San Francisco Chronicle, Los Angeles Times, Sacramento Bee etc.)
- Significant emergency situations (e.g. fires, earthquakes etc.)
- Activation of utility Emergency Operations Center (EOC)
- Activation of CalOES EOC

TRAINING

Each program has specific requirements for training. Additionally, staff complete state mandated classes on Ethics, Defensive Driver Training, Sexual Harassment Prevention, and Privacy Training.

OFFICE OF UTILITY SAFETY

The mission of the Office of Utility Safety is to provide leadership in the energy and utilities industry and to develop, implement and enforce best in class safety programs within the regulated entities.

UTILITY RISK ASSESSMENT

The mission of the Risk Assessment section is to promote safety by ensuring that the regulated entities integrate risk analysis and risk management practices into their operational, planning and other decision-making processes. The section's professional engineers and analysts apply technical and regulatory policy expertise to a wide variety of Commission proceedings and initiatives in order to:

- Identify, analyze, and mitigate present and potential risks in the natural gas & electric systems;
- Promote risk-informed decision-making in Commission proceedings, particularly General Rate Cases;
- Suggest improvements in audits and inspections performed by SED;
- Coordinate with other Commission divisions and/or State agencies to promote safety in regulated utility operations and research expenditures;
Identify and promote new approaches to Risk Assessment and energy policy development through whitepapers, reports and presentations at industry conferences.

The Risk Assessment section is specifically tasked with monitoring proceedings and rate case testimony to ensure that relevant Safety concerns are adequately considered:

- Identify safety concerns and issues that should be considered in new applications, rulemakings or investigations and provide recommendations to Commission decision-makers;
- Refer to appropriate agencies with overlapping or parallel jurisdiction any Safety concerns that arise in proceedings
- Monitor compliance with Commission decisions and Ordering Paragraphs that provide specific directions to SED.

PROCEEDINGS

The Risk Assessment section serves as an advisory team on safety/risk related matters for the Commission and its decision-makers. While not comprehensive, below is a list of major proceedings being supported by the Risk Assessment Team:

- PG&E 2017 General Rate Case (A.15-09-001) (President Picker/ALJ Roscow) (Advisory)
- SDG&E/SoCal Gas General Rate Case (A.14-11-003/004) (President Picker/ALJs Wong and Lirag) (Advisory)
- PG&E Gas Transmission and Storage Application (A. 13-12-012) (Commissioner Peterman/ALJ Yip-Kikugawa) (Advisory)

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- Safety Model Assessment Proceeding (A.15-05-002, et al) (President Picker/ALJ Kersten) (Advisory)
- Gas Leak Abatement OIR (R.15-01-008) (President Picker/ALJ Kersten) (Advisory)
- Investigation into Safety Culture of Pacific Gas and Electric Company and PG&E Corp. (I.15-08-019) (President Picker/ALJ Bushey) (Advisory)
- Improving Access to Public Records (R.14-11-001) (Commissioner Picker/ALJ Lirag)
- Electric Storage Procurement (R.15-03-011) (Commissioner Peterman/ALJ Halligan) (Advisory)
- Physical Security of the Electric Supply System (R.15-06-009) (President Picker/ALJ Kelly) (Advisory)

INDUSTRY OUTREACH

Risk Assessment staff are sought-after speakers at regulatory forums and industry conferences and seminars, explaining Commission policies and proceedings related to utility safety and risk. Where appropriate and within a limited travel budget, Risk staff will seek opportunities to participate in such industry forums.

GAS UTILITY SAFETY PLANS

The Risk Assessment section has accepted responsibility for review of Gas Safety Plans as codified by Pub. Util. Code §§ 961 and 963, and as ordered by the Commission in D.12-04-010. Each Utility Operator must notify SED of any modifications to its Gas Safety Plan. Pacific Gas & Electric filed a revised Gas Safety Plan on December 29, 2015.

GAS SAFETY AND RELIABILITY BRANCH

The mission of the Gas Safety and Reliability Branch (GSRB) is to ensure that the state's natural gas pipeline systems are designed, constructed, operated, and maintained according to safety standards set by the CPUC and the Federal Government. The GSRB strives to promote a culture that inspires and institutes the values of natural gas safety and reliability throughout the nation by providing leadership and technical expertise through an ever expanding scope of new regulatory methods and ideas.

CONTINUOUS IMPROVEMENT

Each year, the Gas Safety Program is audited by the U S Department of Transportation's (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA). Major Program modifications were made in 2014/2015 and overall, the program experienced significant improvement in its 2015 annual evaluation – GSRB will continue to incorporate feedback from PHMSA and refine Gas Safety Processes and Procedures. In addition, in March 2015, GSRB received the results of the Crowe Horwath independent audit of the Gas Safety program. Status of both the Crowe recommendations and PHMSA evaluations are provided in the accompanying section.

PHMSA – State Pipeline Safety Program Related Activities

The California legislature, through agreement with the Department of Transportation's Office of Pipeline Safety has empowered the CPUC to enforce federal pipeline safety laws as well as its

own General Order for operators of intrastate natural gas and liquefied petroleum gas systems. The CPUC is certified under 60105 of the Federal Pipeline Safety Statutes (49 U.S.C. § 60101 et Seq.)¹ The safety standards apply to the design, construction, operations, and maintenance of pipeline facilities. GSRB staff are trained and qualified in Oklahoma City, OK by the DOT's PHMSA. The core training is included in the Table below. Core courses must be completed within 36 months from completion of the first training course. There are additional courses for integrity management certifications, Liquefied Natural Gas inspections, Operator Qualification, Control Room Management, Drug & Alcohol testing, and SCADA.

Table 1 – PHMSA Core Training	
Mandatory Course Codes	Mandatory Courses - Title
PHMSA-PL1250	<i>Safety Evaluation of Gas Pipeline Systems</i>
PHMSA-PL1255	<i>Gas Pressure Regulation & Overpressure Protection</i>
PHMSA-PL1310	<i>Plastic and Composite Materials</i>
PHMSA-PL3242	<i>Welding and Welding Inspection of Pipeline Materials</i>
PHMSA-PL3256	<i>Failure Investigation Pipeline Failure Investigation Techniques</i>
PHMSA-PL3293	<i>Corrosion Control of Pipeline Systems</i>
PHMSA-PL3257	<i>Pipeline Safety Regulation Application and Compliance Procedures</i>

The CPUC follows the DOT Grant-in-Aid Program and must adhere to strict application and submission procedures, and exercise good grant management practices to receive the benefits of the federal grant. The scope of the grant is to support up to 80% of the cost of personnel, equipment and activities reasonably required to carry out inspection and enforcement activities of intrastate pipeline facilities as necessary per the applicable chapters of Title 49 of the Code of Federal Regulations. Grant support is provided to SED by the CPUC's Administrative Services Division. Below are some additional requirements of the CPUC certification:

- Response to Program Evaluation
- Year End Payment Requests (due February 24, 2016)
- Progress Report (due March 2, 2016)
- Annual CPUC Gas Safety Program Evaluation by PHMSA, August 22-26, 2016
- Prepare and send an update letter to NTSB on recommendations by August 31, 2016
- Base Grant Application September 2016

¹ California does not exercise jurisdiction over municipalities.

- Attendance at NAPS Regional meeting St. George, UT May 2016
- Attendance at annual NAPS National meeting
- Submit quarterly enforcement reports to the Director of State programs
- Ensure each inspector has a minimum of 85 inspection days / year
- Ongoing entry into PHMSA Database all Protocols (OQ, TIMP, DIMP, PAP, and CRM)
- State Hosted TQ Seminar (All Operators) September 26-30, 2016 (Location TBD)

PHMSA Annual Evaluation

PHMSA performs an annual audit of the GSRB. There are both follow-up activities from the previous audit CY-2014 and preparation for the next audit CY-2015 which is expected in August 2016. The table below details the areas for continuous improvement in program performance.

Table 2 – PHMSA Feedback from Evaluation & Internal efforts	
Area	Status
Continue to improve GSRB recordkeeping practices including QA/QC, digitizing reports, and completing requisite uploads.	In Process / Continuous Improvement
Adjust investigation practices and procedure for additional and better management review and one to one correspondence between DOT incidents and letters to the operator as opposed to quarterly review of 112 reportables.	Completed
Incorporate Appendix S of the State Program Manual guidance in inspection practices and procedure.	In Process
The PM will closely monitor program performance to prevent the formation of new backlogs and effectively and efficiently carry out our Safety Assurance responsibilities.	In Process / Continuous Improvement
Conduct and document at least 50 service line installation inspections in 2016, and will continue to maintain a strong regulatory inspection presence in the field during transmission and distribution pipelines construction.	On Pace
Enhance investigation go-team preparedness by addressing lessons learned in Fresno, Bakersfield, and Aliso Canyon incidents.	In Process / Continuous Improvement

Independent Gas Program Evaluation (Crowe Horwath)

After the San Bruno incident, the CPUC was required to conduct an independent evaluation of the GSRB. The review commenced in April 2014 and was performed by Crowe Horwath, LLP. The report was finalized in March 2015 and is available on the CPUC website.

Crowe made 33 recommendations to GSRB and GSRB has slated the following 15 for implementation in 2015. Table 3 summarizes the status of the Crowe recommendations:

Table 3 – Crowe Horwath Management Review of GSRB		
Crowe #	Crowe Recommendation	Status
U-1	Incorporate enhanced risk assessment into utility inspection selection	Planned
U-2	Conduct topic-specific standard inspections	Completed
U-3	Evaluate approaches to increase the number and thoroughness of inspections	Completed / Continuous Improvement
U-4	implement utility inspection case management tools	Completed / Continuous Improvement
U-5	incorporate clear performance metrics for utility inspections	Completed
U-6	schedule time for resources to prepare inspection report within 30 days	Completed
U-7	redefine utility inspection information request expectations	Planned
U-8	Prepare CPUC-specific customized inspection forms	Completed / Continuous Improvement
U-9	Prepare inspection letter and report templates	Completed / Continuous Improvement
U-10	Develop training and tools	Planned
U-11	Increase pre-inspection planning	Completed / Continuous Improvement
U-12	Conduct pre-inspection field reviews and unannounced field inspections	Completed / Continuous Improvement
U-13	consider assigning a supervisor to focus on utility inspections	Completed
U-14	utilize integrity issues checklist	Planned

Table 3 – Crowe Horwath Management Review of GSRB

U-15	conduct enhanced sampling approach for records review	Planned
U-16	increase supervisors' time in the field	Completed / Continuous Improvement
U-17	Establish and implement a procedure to ensure utility compliance	Planned
I-1	implement a redesigned incident process	completed
I-2	create templates with boiler plate language for incident reports	Completed / Continuous Improvement
I-3	develop a root cause analysis template	Planned
I-4	obtain enforcement authority against excavators for dig-ins	Partially Completed / Continuous Improvement
I-5	evaluate safety hotline / whistleblower CPUC system	Completed / Continuous Improvement
W-1	implement specialized staff assignments with rotations	Completed / Continuous Improvement
W-2	provide additional specialized training	Completed / Continuous Improvement
W-3	create and hire staff for two new position categories	Partially Completed / Continuous Improvement
T-1	implement data visualization tools for risk assessment and analysis	Not Implemented
T-2	implement a management solution, leveraging and extending xRM	Not Implemented
T-3	implement a SharePoint site for managing GSRB documents	Not Implemented
T-4	Evaluate use of tablets for utility and MHP/propane inspections	Planned
T-5	obtain and deploy mobile leak detection technology	Planned
C-1	implement a communication strategy	Partially Completed / Continuous Improvement
C-2	institute change management process	Support CPUC efforts
R-1	analyze incidents, violations, and findings to guide utility and field inspections	Planned

GSRB will continue to incorporate the recommendations from Crowe Horwath into ongoing operations and use them as guidance for making further improvements to the program.

CORE ACTIVITIES: INSPECTIONS (AUDITS); INCIDENT INVESTIGATION; VIOLATIONS

GSRB core activities include inspections and incident investigations. In addition GSRB staff participates in natural gas related proceedings, and actively participate in various National Association of Pipeline Representatives technical committees.

Inspections (Audits)

GSRB will conduct 80 inspections of the major gas utilities in 2016, including integrity management program and operator qualification plan inspections.

Table 5: 2016 Planned Inspections (Audits)	
Week of	Inspection
1/11/2016	Sempra OM&E
	PG&E O&M
1/25/2016	SoCalGas T: South Desert
	Central Valley Gas Storage
	West Coast Gas Emergency Response and Plan (1/25-1/27)
2/1/2016	PG&E Tracy District & McDonald Island
	SoCalGas T: Basin
2/8/2016	SoCalGas T: SJV
	PG&E Willow District
2/15/2016	Southern California Edison Emergency Response and Plan
2/22/2016	T: SDG&E Trans.
	Southwest Gas O&M
2/29/2016	PG&E Fresno Division
	SoCalGas T: Coastal

Table 5: 2016 Planned Inspections (Audits)	
	Wild Goose Storage Emergency Response and Plan (3/2-3/4)
3/7/2016	SoCalGas T: North Desert
	Gill Ranch Storage
3/14/2016	SoCalGas D: SE - Inland East
	PG&E Hinkley District
3/21/2016	SoCalGas D: NW - Harbor Corridor
	Alpine - Regs . & Valves and DIMP
4/4/2016	PG&E Sonoma Division
	SoCalGas D: SE - OC Coast
4/11/2016	Lodi Gas Storage Emergency Response and Plan (4/11-4/13)
	SoCalGas D: NW - North Valley
	West Coast Gas
	PG&E North Valley Division
4/18/2016	D: SE - Mountain Pass
	PG&E Kettleman District
4/25/2016	Sempra CRM
	PG&E Humboldt Division
5/2/2016	PG&E Yosemite Division
	SoCalGas D: NW - Mid City LA
5/9/2016	West Coast Gas OQ
	SoCalGas D: SE - San Gabriel Valley
	PG&E Burney District

Table 5: 2016 Planned Inspections (Audits)	
5/16/2016	PG&E Sacramento Division
	SoCalGas D: NW - San Joaquin Valley
	Wild Goose Storage
5/23/2016	SoCalGas D: SE - Inland South
	Southwest Gas OQ
6/6/2016	SoCalGas D: NW- San Fernando Valley
	PG&E Peninsula Division
6/13/2016	Southwest Gas North & South Tahoe and Incline Village
	SoCalGas D: SE - Orange North
	PG&E DeAnza Division
6/20/2016	PG&E Gas TIMP Field Verification / Check-in
	Sempra Emergency Response and Plan (6/20-6/24)
6/27/2016	SoCalGas S: Goleta (Full Std audit)
	Lodi Gas Storage
7/11/2016	PG&E Mission Division
	D: SDG&E - South
	Alpine Emergency Response and Plan (7/13-7/15)
7/18/2016	SoCalGas D: NW - North Coast
	PG&E San Jose Division
7/25/2016	PG&E Milpitas District
	Central Valley Gas Storage Emergency Response and Plan (7/25-7/29)
8/1/2016	PG&E Emergency Response & Plan (8/1-8/5)

Table 5: 2016 Planned Inspections (Audits)	
	SoCalGas D: NW - South Coast
8/8/2016	PG&E Kern Division
	Sempra TIMP document review
	Southwest Gas Emergency Response & Plan (8/8-8/12)
8/15/2016	Central Valley Gas Storage TIMP
	Sempra TIMP document review
	PG&E Hollister District
8/22/2016	SoCalGas OQ
	PG&E San Francisco Division
8/29/2016	SDG&E OQ
	PG&E East Bay Division
9/12/2016	West Coast Gas DIMP
	Southwest Gas DIMP
	PG&E Meridian District
9/19/2016	SoCalGas D: SDG&E - North
	PG&E Rio Vista& Los Medanos Districts
10/3/2016	PG&E Stockton Division
	Sempra TIMP field
	Gill Ranch Storage Emergency Response and Plan (10/3-10/5)
10/10/2016	Wild Gosse Storage TIMP
	D&T: Southwest Gas - Victorville
	PG&E Sierra Division

Table 5: 2016 Planned Inspections (Audits)

10/17/2016	SDG&E Drug & Alcohol
	PG&E Topock District
10/24/2016	SoCalGas D: NW - Central Coast
	PG&E North Bay Division
10/31/2016	SoCalGas D: SE - Desert Valley
	PG&E Welding and Joining
11/14/2016	PG&E Diablo Division
11/28/2016	PG&E PAP Effectiveness
12/5/2016	SoCalGas Drug & Alcohol
	PG&E Central Coast Division

Incident Investigations

- GSRB investigates more than 200 incidents a year. For latest statistics, please see SED monthly report.

Utility Self-Identified Violations Reports

- ALJ-274 mandate that all regulated gas utilities in California report to SED upon discovery of a violation of General Order (GO) 112 or Title 49 Code of Federal Regulations (CFR) Part 192, report the violation as self-identified violations (SIVs).
- SED performs an investigation of the highest risk SIVs meeting its internal investigation criteria.
- SIVs not included as an immediate investigation are included in the annual review and then elevated to an investigation or closed. SIV investigations are also considered for citations where warranted.

PROCEEDINGS

The following CPUC proceedings are natural gas related in which GSRB is involved in:

- PG&E Distribution Recordkeeping OII (I. 14-11-008) (Commissioner Peterman/ALJ Bushey) (Advocacy)
- Gas Safety OIR (R.11-02-019) (Commissioner Florio/ALJ Bushey) (Advisory)
- Citation Program OIR (R.14-05-013) (President Picker/ALJ Burcham) (Advisory)

- Sempra PSEP Application (A.14-12-016) (Commissioner Peterman/ALJs Long & Mason) (Advisory)
- SoCalGas North-South Project (A.13-12-013) (Commissioner Florio / ALJ Long) (Advisory)

SPECIAL PROJECTS

Post San Bruno PG&E Special Audits

- PG&E MAOP Audit (2nd Quarter 2016)
- PG&E Mariner Audit (3rd Quarter 2016)
- PG&E Recordkeeping Audit (3rd Quarter 2016)
- PHMSA Staffing Formula (2nd Quarter 2016)

NTSB recommendations on Integrity Management

In early 2015, NTSB issued a report on transmission pipeline integrity management with 22 applicable recommendations. GSRB will continue to consider the best way to implement these requirements in our IM program and determine which items require a Commission action.

Natural Gas Storage

After the root cause and contributing factors are understood for the October 2015 SoCalGas Aliso Canyon well failure on well SS-25, have the operators conduct risk assessments and mitigation plans for all storage fields in California to prevent recurrence. SED will review the content of these plans and provide feedback after consulting with industry experts and our own determination.

Enforcement of 811 “Call before you dig” program

Excavation damages are the most frequent cause of incidents on the natural gas pipeline system. There are several issues with how the excavation damage prevention and enforcement currently works.

Mobile Home Park (MHP) and Propane Inspection and Enforcement Programs

- Conduct at least 360 MHP and 94 propane inspections based on a risk-based inspection schedule
- Master Meter Transfer Program: The three-year pilot program began January 1, 2015.
- Transfer propane billing & collections to the CPUC’s Fiscal Office

ELECTRIC SAFETY AND RELIABILITY BRANCH

The mission of the Electric Safety and Reliability Branch (ESRB) is to facilitate an environment inside and outside of the Commission that increases the safety of electric and communications systems in California

AUDIT PLANS FOR 2016

ESRB plans to conduct the following facilities audits during 2016:

- Eighteen (18) Electric Distribution Audits
- Six (6) Electric Transmission Audits
- Seven (7) Substation Audits
- Twenty-two (22) Communication Infrastructure Provider Audits

ESRB's ability to conduct comprehensive audits of Generating Asset Owners in 2016 will depend on staffing levels. If staffing in the Generation section remains at current levels, about six comprehensive audits could be performed. Otherwise, a limited number of targeted audits of generating facilities with identified problems might be conducted, if specific problem areas are identified and staffing levels permit.

Work remains to be done in 2016 related to 11 audits performed in 2015:

- Three facilities audits performed in 4Q2015 required submission of additional data from the audited entity. These audit reports are near completion and will be submitted to the audited entity, whose responses will then need to be reviewed. Depending on the responses, additional follow-up work might be needed.
- For four other facilities audits, the audit reports have been sent to the audited entity, and the entities' responses are all due by mid-March 2016. The responses will be reviewed and some additional follow-up work might be needed.
- For the 2015 Gateway and Redondo Beach power plant audits, audit reports were sent, and responses and corrective action plans were received and reviewed during 2015. Some corrective action work is still being performed in 2016, and will need to be verified this year.
- For the Los Esteros and Inland Empire power plant audits, audit reports were sent in 2015. The plants' responses and corrective action plans were submitted in January 2016, and are still being evaluated.

INCIDENT INVESTIGATION S

Electric utilities and Generating Asset Owners are required to report incidents that meet specified criteria, to the Commission. These incidents typically are reported via a Commission online safety incident and emergency reporting portal.

ESRB investigates all reportable incidents. Based on historical volumes, electric utilities can be expected to report about 150 incidents in 2016 and Generating Asset Owners can be expected

to report about 7 incidents. While the numbers are less, investigation of GAO incidents tends to be relatively complex.

ESRB prepares an incident report for each investigation, including an assessment of whether the utility or GAO violated any General Order or other requirements. ESRB typically notifies the utility or GAO of any violations and requires that a corrective action plan be submitted. Notable incident investigations that are underway include the following:

- October 18, 2015 Moss Landing transmission tower failures
- September 9, 2015 Butte Fire
- Long Beach power outages on July 15, July 30, and August 15, 2015

INVESTIGATION OF OUTAGES AT POWER PLANTS

Pursuant to Public Utilities Code Section 761.3(a), ESRB investigates planned and forced outages at Generating Asset Owner facilities. Due to stabilization of the electric market over the past decade, the focus is shifting to critical safety and reliability aspects of the power production infrastructure. As a result, inspection of outages will be reduced in 2016. Procedures are being developed, and investigations might be limited to lengthy forced outages of significant capacity, and perhaps limited to utility-owned plants, plants in transmission constrained areas, and/or plants in non-CAISO control areas.

ENFORCEMENT ACTIVITIES

Incident investigations and facility audits include an assessment of whether the utility or GAO violated any General Order or other requirements. ESRB typically notifies the utility or GAO of any violations and requires that a corrective action plan be submitted. ESRB then monitors and works with the utility or GAO to ensure that the violations are corrected.

SED now has authorization to issue citations to electric utilities, effective January 1, 2015 (see R.14-05-013 discussion below). In addition to monetary penalties, a citation requires the utility to correct the identified violations. Two electric citations were issued during 2015, and another was issued on February 12, 2016. It is likely that SED will issue additional electric citations during 2016.

Additionally, SED can request that the Commission issue Orders Initiating Investigation (OIs) to enforce Commission and statutory requirements through formal OIs. ESRB is a party in one active OI that will continue into 2016, and ESRB is monitoring compliance with several Commission enforcement decisions in earlier OIs:

- PG&E Kern Power Plan Incident (I.14-08-022)
- SCE San Bernardino electrocution (I.14-03-004)
- Malibu Canyon fires (I.09-01-018)

PROCEEDINGS

Main Proceedings with ESRB participation:

- SCE Subcontractor Fatality I.15-11-006 (Commissioner Randolph and ALJ Kimberly) (Advocacy)
- Fire Safety Rulemaking R.15-05-006 (successor to R.08-11-005) (Commissioner Florio and ALJ Kenney) (Advocacy)
- Applicability of Right-of-Way Rules to Commercial Mobile Radio Service Carriers R.14-05-001 (Commissioner Randolph and ALJ Kenney) (Advocacy)
- Citation Program R.14-05-013 (President Picker and ALJ Burcham) (Advisory)
- Physical Security of the Electric System R.15-06-009 (President Picker/ALJ Kelly) (Advocacy)

Other Rulemakings: ESRB will continue to monitor proceedings in which safety issues might arise, and expects to act in an advisory role if needed:

- R.15-03-011: Electric Storage Procurement
- R.14-08-013: Distribution Resources Plans
- R.14-07-002: Net Energy Metering
- R.12-11-005: California Solar Initiative
- R.11-09-011: Distribution Level Interconnection

OTHER ACTIVITIES

Caltrain Modernization Project: Caltrain plans to electrify its operation in Northern California along the Peninsula Corridor between the City of San Jose and downtown San Francisco, a distance of 51.4 track-miles. Caltrain plans to build two traction substations, one in South San Francisco and the other in San Jose, which will be connected to PG&E's 115 kV system. ESRB, Rail Safety, Energy Division, and staff from Legal have met with Caltrain and reviewed documents related to the design and construction of the 25 kV electrification project. ESRB is reviewing Caltrain's proposed electrification operating procedures and proposed rules. A meeting with Caltrain is planned for March, to discuss ESRB's review and next steps for this project.

Modification of GO 95, Rule 18: ESRB is working on a proposal for modification or removal of Rule 18 in GO 95, to be filed as either a petition for rulemaking or a petition for modification. Rule 18 allows violations to be treated as "nonconformances" to be scheduled for repair by the utility. The rule creates an enforcement challenge as some utilities don't consider violations to be in noncompliance with GO 95 as long as they have plans to correct the violations.

General Order 174 Substation Program: D.12-10-029, which adopted substation inspection programs, requires the electric utilities to hold annual best practice workshops in 2014, 2015 and 2016, and for ESRB staff to attend the workshops and to report on them in 2016. ESRB attended the final meeting on January 29, 2016, and will issue a report on the status of the GO

174 inspection program and the best practices meeting by the end of Q2 2016, as required by D.12-10-029. SED is planning to seek modification of GO 174 to remove its exemption for facilities subject to CAISO operational control and/or subject to FERC reliability standards.

Transmission Maintenance Coordination Committee (TMCC): TMCC is an advisory committee to help the CAISO develop, review and revise Transmission Maintenance Standards. ESRB is a member and attends quarterly meetings (most recently, on January 21, 2016).

Power Plant Fact Sheet: The Generation section maintains profiles of over 50 large generators, which contain ownership information, technology and configuration, operating parameters, regulatory constraints, and more. As staffing levels permit, ESRB may contact the generators to update the profiles. The set of plant profiles is shared with Energy Division staff and others within the Commission to assist in their analyses and studies.

Compliance filings: Electric facility and generating plant owners must make several filings each year in compliance with General Order requirements. ESRB tracks timely submission, and reviews documents for completeness and accuracy, as staffing permits.

Coordination and cooperation: ESRB will pursue increased coordination with the Energy Division, the CEC, CAISO, CalOSHA, and other entities to improve the efficiency of our operations and activities.

OFFICE OF RAIL SAFETY

The mission of the Office of Rail Safety is to protect the public, rail workers, and the environment from unsafe rail operations and practices in the state. The Office of Rail Safety strives to proactively and effectively enforce state and federal laws, regulations, orders, and directives relating to transportation of persons or commodities by rail.

RAILROAD OPERATIONS AND SAFETY BRANCH

PROGRAM SUMMARY

The CPUC Railroad Operations and Safety Branch (ROSB) advises the Commission on matters relating to freight and intercity passenger railroad safety. ROSB Railroad Safety Inspectors examine railroad tracks, signaling systems, rail cars and locomotives, hazardous materials, railroad operating practices, and railroad bridges to detect, assess and, where appropriate, mitigate risks associated with railroads that operate in California. As well as dealing with violations of existing regulations, Inspectors also carry out proactive assessments of potential risks before dangerous conditions are created, e.g., as manifested in near-misses. In addition, ROSB personnel may provide comments on major pending federal and state legislation, regulations, and other rail-related policies.

GOALS FOR 2016

1. Roll out a new training program, which is called the **General Order Training Program (GOTP)**. This new training, which has been under development for several months, will involve more individualized General Order and Public Utility Code training for all staff by incorporating more sophisticated and engaging field and classroom exercises in smaller student / instructor groupings.
2. Continue the use of ROSB's **Risk Management Status Reports (RMSRs)** to document risks either not covered by existing regulations, or which despite prior regulatory action, have not been resolved. Apart from documenting ROSB's risk management efforts, RMSRs are used to notify railroads and other responsible parties of risks, which frequently results in actions being taken by these parties to prevent their recurrence
3. Continue the activities of the **Crude Oil Reconnaissance Team (CORT)**. CORT Inspectors, who are comprised of Inspectors from several different railroad disciplines, inspect crude oil railroad infrastructure projects, e.g., transfer structures and tracks, for compliance with applicable regulations, with a focus on proactive risk assessments.
4. Continue the **Railroad Bridge Evaluation Program (RBEP)**. In 2016, the RBEP inspectors (2) goal is to
 - Increase observations (inspections) from 100 bridges in 2015;
 - To **150 bridges** in 2016;
 - Re-evaluate RBEP current bridge priority list;

- Continue to work cooperatively with Federal Railroad Administration (FRA) bridge inspection program and assist FRA in their evaluation of railroad bridge regulatory compliance with FRA regulations.
5. Increase hazardous materials inspections at Los Angeles, Long Beach and Oakland California sea ports.
 - 471 inspection days in 2015 to **500** inspection days.
 6. Increase oversight participation of the federally-required implementation of Positive Train Control (PTC) via our PTC Specialists (2) who comprise ROSB's **Positive Train Control Program** (PTCP), by:
 - Attending FRA PYC Training classes in 2016
 - Seeking more training opportunities in 2016..
 7. Increase walking track inspections miles, especially along crude oil-train routes.
 - Average of 35 miles per inspector in 2015;
 - Increase to 40 miles average per inspector.
 8. Further develop or redefine program fundamentals for the future, such as opportunities for training new staff, cross-disciplinary training, and classroom and field exercises for the RBEP, CORT and PTC teams.
 9. Review and refine management team organizational roles and responsibilities. Clarify the responsibilities of Supervisors and develop processes that will train subordinates to fill minor leadership roles, thus creating more staff ownership of overall Branch operational responsibilities and building new leaders for the future.
 10. Create opportunities to integrate PURAs, inspection staff and branch supervisors to develop a more effective working cooperative that allows closer communication, builds trust, and generates confidence among different types and levels of ROSB personnel.

EFFECTIVE PROCESSES

1. Identify key types of work products and institute consistent tracking of performance against targets and goals.
2. Develop consistent documentation of all key internal processes. Standardize format and content. Develop glossary to ensure consistent usage of industry-specific terminology.
3. Continue to work towards resolving uncertainties associated with ongoing issues with RSSIMS. Participate in meetings and/or workshops with the RCSB and RTSB Branches to identify the optimal approach to identify RSSIMS issues for continuous improvements.
4. Continue document migration of current and past risks (RMSRs), accident/incident reports, program project updates along with various other informational documents, not kept on the RSSIMS data base, to Content Server.

QUALITY OF WORK PRODUCTS

5. For all major types of ROSB work products, further develop consistent templates and examples of completed work products that represent the quality of execution that meets or exceeds expectations.

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6. Raise the overall quality and integrity of work products being produced. Develop clear management expectations, re-communicate to staff and hold staff accountable.
7. Provide railroad safety inspectors and analysts with thought-provoking assignments that identify the greatest public, rail employee, and environmental risks, and propose recommendations that would most effectively mitigate those risks.

EXCELLENCE IN TECHNICAL SKILLS

8. Each team (e.g.: Section, RBEP, CORT, risk management teams) to seek and identify training opportunities to be incorporated into team goals.
9. Supervisors and management to research more training opportunities; seek staff input to assist by searching for and identifying new training opportunities.
10. Encourage staff to take on more leadership roles commensurate with their duties, skills, talents and abilities.
11. Implement the developing General Order Training Program (GOTP) throughout ROSB in 2016.

ENGAGEMENT OF STAKEHOLDERS

12. When reports are published, Deputy Director and/or designee will present a summary of the salient findings to Commissioners and targeted members of the Administration and Legislature. If BCPs are imminent, present reports to Department of Finance, the Legislative Analyst, and targeted Legislative members of budget and policy committees to lay the foundation for budget augmentations or proposed legislation.
13. Continue to engage the railroads and labor in quarterly meetings and interim meetings when issues arise.

ROSB REPORTS

ROSB produces various reports, some of which are mandated by California law. Statutorily required documents include a report on the Local Safety Hazard Sites in California and an Annual Report to the Legislature. ROSB also publishes “Inside Track,” a quarterly publication that highlights noteworthy events and provides statistical results of the safety measures performed by Inspectors.

RAIL CROSSINGS AND ENGINEERING BRANCH

The mission of Rail Crossings and Engineering Branch (RCEB) is to improve the safety of the public and rail employees by evaluating and recommending appropriate safety measures at highway-rail crossings

SECTION 130 PROGRAM

California receives about \$16 million from the federal government that Caltrans allocates each year to improve crossing safety. RCEB conducts the data analysis and development of

prioritization lists of projects meeting the requirements for the Section 130 Program. The last completed cycle was for 2013. RCEB nominated 17 projects totaling just over \$17 million. Caltrans funded 16 projects and RCEB withdrew one project later. RCEB has preliminarily identified 15 locations for diagnostic reviews for the 2015 cycle that it will conduct this year.

SECTION 190 PROGRAM

The State of California, through Caltrans, allocates \$15 million of dedicated annual state funding to assist local agencies in developing projects to grade separate crossings. The process involves a formal CPUC proceeding where local agencies nominate projects to receive funding. For fiscal year 2014, Caltrans allocated all the funds available to five projects. For fiscal years 2016 and 2017, the CPUC received 38 nominations.

OFFICE OF RAIL SAFETY ANNUAL ACCIDENT REPORT

- Annual Accident Report (2010 - 2014): The Risk Management Unit completed the report. The final version is under management review and RCEB plans to post the report on the CPUC web site by March for public review.
- Annual Accident Report (2015): RCEB will work with the Risk Assessment Unit to determine what improvements need to be included in the 2015 report. The goal of RCEB is to produce a report that staff can refer to that clearly defines the hazards of highway-rail crossings and other related railroad safety issues.

CROSSING ACCIDENTS

A priority of RCEB is to complete the investigation/evaluation of crossing accidents that RCEB staff has not completely closed, to determine if any recommendations are necessary or appropriate:

Year	Reported	Injuries	Fatalities	Open (5/20/2014)
2012	107	72	44	0
2013	131	47	54	0
2014	143	37	51	1
2015	150	57	54	54
2016	7	2	3	7

RAILROAD PREEMPTION

In 2016, RCEB plans to complete guidelines for railroad preemption at signalized crossings. RCEB also plans to notify all local highway authorities that they should conduct joint inspections with the railroads of all their crossings with traffic signal preemption interconnections and to correct all deficiencies found as a result of those inspections.

EMERGENCY NOTIFICATION SYSTEM (ENS)

All railroads were required to post ENS signs at all their at-grade crossings by September 1, 2015. In 2016, RCEB will determine the railroad, which will include some transit systems, that is responsible for the ENS sign at crossings in a shared rail corridor. Once RCEB determines the responsible railroads, the data will be included in the RSSIMS database.

GENERAL ORDER (GO) 145

GO 145 explains the process in which vehicles may become exempt from the mandatory stop requirement at crossings of Section 22454 of the Vehicle Code. It appears that the last time the CPUC published the list was in 1977. In 2016, RCEB plans to update the list and publish it. RCEB also needs to determine which crossings shall no longer remain exempt based on the criteria listed in GO 145.

APPLICATION 15-05-014, JENNINGS AVENUE, SANTA ROSA

On May 14, 2015 the City of Santa Rosa filed A.15-05-014 to construct a pedestrian crossing at Jennings Avenue. RCEB protested the application. Proceedings will commence in 2016.

STOP / YIELD SIGNS

In 2016, RCEB will be directing and managing a contractor to complete a comprehensive analysis project at approximately 2,500 existing passive crossings throughout the State to determine if the crossings need a STOP or YIELD sign. RCEB will manage and direct the project. RCEB anticipates that the project will utilize 1-4 staff at various times throughout the year and the work will carry into 2017. The project will use Section 130 funds.

INVENTORY CONTRACT

RCEB selected a contractor to conduct field inventory of 1,556 active crossing locations and entering the corresponding data into RSSIMS. RCEB anticipates that this project will utilize 1-4 staff at various times throughout the year and the work will carry into 2017. The project will use Section 130 funds.

CROSSING MAINTENANCE PROGRAM

California established the Grade Crossing Protection Maintenance Fund to pay to the railroads the local roadway authority's (city or county) share of the cost of maintaining automatic warning devices at highway-rail crossings. RCEB will start processing and evaluating new claims in March 2016 for the following fiscal year. In 2015, the California Transportation Commission, at the request of the CPUC, increased the funds from \$2 million to \$3.765 million.

CALIFORNIA ENVIRONMENTAL REVIEW ACT (CEQA)

California has a statutory requirement that development and planning of future development is subject to public review under CEQA. RCEB reviews CEQA documents to identify impacts to rail

crossings and corridors during development. RCEB reviews about 300 projects a month and issues comment letters where the proposed developments affect the crossings. In 2015, RCEB sent out 51 comment letters.

PROCEEDINGS

RCEB receives, reviews, and processes approximately 20 formal applications a year. Normally, local highway agencies submit these applications to the CPUC for approval to construct new at-grade or grade-separated crossings. In 2015, RCEB protested one application to construct a pedestrian crossing.

GENERAL ORDER 88-B APPLICATIONS

GO 88-B contains the CPUC's rules for altering public highway-rail crossings. GO 88-B applications are reviewed and processed at the RCEB level and do not require a formal CPUC proceeding. RCEB anticipates that it will receive and process approximately 100 GO 88-B applications in 2016.

CALIFORNIA OPERATION LIFESAVER PROGRAM

Operation Lifesaver Inc. (OLI) is dedicated to promoting rail safety education. RCEB, along with other CPUC staff contribute significantly to the educational efforts of OLI. The CPUC has staff members that are qualified as Operation Lifesaver Authorized Volunteer. In 2015, RCEB OLAV staff performed 34 OLI presentations. In 2016, RCEB will continue working with OLI Inc., provide safety presentations, and participate in community outreach programs.

ADDITIONAL WORK ITEMS

In 2016, if time permits, RCEB would like to work on the following items. If it cannot get to these items in 2016, RCEB plans to work on them in 2017.

- Increase Section 190 Funding: RCEB would like to seek legislation to increase the funding. The current cost to construct a grade-separation is about \$50 million.
- Revise General Order 75-D: The CPUC needs to revise the GO to reflect the latest trends and issues affecting crossing safety such as pedestrian safety and railroad preemption and to remedy the gaps and deficiencies with current laws and regulations.
- Revise General Order 22-B and 164-D: The general orders provide requirements for the reporting of accidents on railroads and Rail Transit Agencies occurring in the state.
- San Diego Pedestrian Crossings: RCEB may seek approval from the CPUC to open an OII against the San Diego Metropolitan Transit System (MTS) regarding its concerns with the safety and CPUC authorization of pedestrian crossings located in MTS stations along its Blue Line.

RAIL TRANSIT SAFETY BRANCH

The Rail Transit Safety Branch (RTSB) mission is to ensure that California rail transit systems are designed, constructed, maintained, and operated in a safe and secure manner for passengers, employees, and the general public.

PROGRAM SUMMARY

The Rail Transit Safety Branch (RTSB) is responsible for implementing the rail transit and other fixed guideways safety program for the State. The Commission has been designated by the Governor's office as the State Safety Oversight Agency for participation in the Federal Transit Administration (FTA) State Safety Oversight program.

The SED RTSB staff performs inspections, audits and investigations and advises management and the Commission of their recommendations regarding rail transit and other fixed guideway system safety matters. RTSB staff receive incident notices and investigate accidents and conduct inspections of rail transit and other fixed guideway systems. RTSB also conducts comprehensive Triennial Safety and Triennial Security Audits; develop new or modified Commission General Orders; monitors transit agency operational and safety activities and analyze and evaluate new project safety certification plans.

FTA CERTIFICATION AND GRANT FUNDING OF RAIL TRANSIT STATE SAFETY OVERSIGHT AGENCIES

In September of 2013, CPUC submitted documentation pursuant to FTA requirements to seek certification of the CPUC rail transit safety oversight program, as well as grant funding made available by Congress for up to 80% of a state's rail transit safety oversight program costs. The CPUC program was one of only two programs nationwide to be initially "certified".

During 2014 and 2015 RTSB completed a Federal Transit Administration grant application and was approved for grant funding. RTSB has developed internal tracking mechanisms and has worked with IT, HR, Fiscal and the other administrative staff at CPUC to monitor and track eligible expenses to complete reimbursement requests to tap those grant funds.

A number of internal processes and procedures have been changed and may need to be further modified and tracked differently to assure only eligible costs are included in the grant reimbursement requests. As we develop and submit reimbursement requests we will determine adequacy of existing processes and the advisability of making further changes. Tracking eligible costs and staff time, as well as submitting reimbursement requests will present a significant work element for the transit safety program in the future.

TRIENNIAL AUDITS AND REPORTS

RTSB staff continues to finalize triennial safety and triennial security audit reports for the audits performed in 2014-2015. These comprehensive and detailed triennial audit reports are projected to be completed and placed before the Commission for their approval during the first quarter of 2016. Each triennial audit report requires the development of the report along with a

Resolution offering staff's report and findings for the Commission's consideration. Resolutions with Security Audit Reports require a "public-redacted" version and a "confidential" version, so as not to divulge sensitive security information in the report.

Reports and Resolutions bringing these triennial audits before the Commission are complete or being finalized and placed on the Commission meeting agenda

- Bay Area Rapid Transit District triennial safety audit conducted in January of 2014.
- Sacramento Regional Transit District triennial safety audit and triennial security conducted in May 2014.
- Santa Clara Valley Transportation Authority triennial safety audit and triennial security audit was performed in October of 2014.

Reports are currently in development for:

- San Diego Trolley triennial safety audit and triennial security conducted in June 2015.
- North (San Diego) County Transit District triennial safety audit and triennial security conducted in August 2015.
- San Francisco Metropolitan Transportation Agency triennial safety audit and triennial security conducted in October 2015.

TRIENNIAL AUDIT SCHEDULE 2016

The triennial audit schedule for 2016 includes at least four, and possibly 5, triennial audits:

Los Angeles County Metropolitan Transportation Authority (LA Metro)

The LA Metro triennial audit was last conducted in 2013 and is therefore due in 2016. It is tentatively scheduled for schedule for the August-September time period.

BART Oakland Airport Connector (BART OAC)

The Oakland Airport Connector of BART is a new system placed in service in November 2014. The system is not traditional BART service, but is instead an automated people mover with the line running from the BART Coliseum Station to the Oakland Airport. This is a turnkey operation operated by Doppelmayr for BART. The line has been in operation for over a year now, and RTSB has agreed with BART a full triennial audit should be done after about a year of operations. Thus RTSB will schedule a triennial audit of the BART OAC system during 2016.

San Francisco Airport AirTrain system APM (SFO)

The last triennial audit of the SFO AirTrain system was conducted in 2013. The triennial safety and triennial security audits of the system will be scheduled in 2016.

Sacramento Airport Automated People Mover (SMF)

The last triennial audit of the Sacramento Automated People Mover (APM) system was conducted in 2013. The triennial safety and triennial security audits of the system will be scheduled in 2016.

The Getty Museum APM

The Getty Museum APM transports the public from the Getty parking lot up the hill to the museum. This is a system that the Commission exerted safety jurisdiction over during the summer of 2013. Although not specifically required for the smaller non-FTA funded systems, staff has discussed performing a full triennial audit of the system during 2016 if time permits.

INSPECTIONS

RTSB's RTOSS performs continuous and ongoing inspections of the transit agency facilities, operations, and construction to assure compliance with regulations and industry standards. Additionally the RTOSS inspectors participate in accident investigations and triennial audits. Participate and provide essential input to the Transit Rail Advisory Committee (TRACs), at the national level.

ACCIDENTS

Staff continues to track accident closures by rail transit agencies and any corrective action plans associated with them. In some cases staff conducts supplemental on-site investigations of accidents or conducts on-site follow-up investigations. Workload associated with this element is highly variable due to numerous factors and complexity of the investigation. Staff tracks all reportable accidents to conclusion.

NTSB ACCIDENT INVESTIGATIONS

Staff continues to work with National Transportation Safety Board (NTSB) and the involved transit agencies to complete accident investigations and address accident findings. Open NTSB investigations that CPUC staff are involved in include the Angel's Flight funicular derailment of September 5, 2013. CPUC Staff worked with NTSB on that investigation and provided much of the investigation detail. Angel's flight personnel understand what is necessary to reinstate service and professes to be developing designs responsive to the NTSB recommendations.

CORRECTIVE ACTION PLAN TRACKING

Staff continues to review, evaluate and either approve or reject transit agency corrective action plans resulting from internal audits, triennial audits, inspections and accident findings. Routine meetings are held with transit agencies to assess status and update records regarding investigation and findings.

GENERAL ORDER REVISIONS

- General Order 143-B: Safety Rules and Regulations Governing Light-Rail Transit.

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- General Order 175: Rules And Regulations Governing Roadway Worker Protection Provided By Rail Transit Agencies And Rail Fixed Guideway Systems.
- GO 172: Rules and Regulations Governing the Use of Personal Electronic Devices by Employees of Rail Transit Agencies and Rail Fixed Guideway Systems.
- Revise GO 172 based on the final outcome of GO 175.
- General Order 164: Rules and Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems.

RESPONSES TO FEDERAL NOTICE OF PROPOSED RULEMAKINGS (NPRM)

- In 2015 staff has expanded considerable time reviewing and preparing comments in reply to NPRMs. Staff also worked with Legal Division to draft memos for the Commission to authorize staff to submit comments. FTA has plans to issue additional NPRMs in 2016, and considering the significant impact these new rules have on our program, it is critical that we review each NPRM and determine if we need to submit comments.

MEETINGS

- RTSB participates and provides essential input to the Transit Rail Advisory Committee (TRACs), at the national level, to assure state's rights are maintained and California priorities are addressed as the FTA develops a more active role in relation to State Safety Oversight activities.
- RTSB attends and participates in the Annual meeting of State Safety Oversight Agencies (SSOA), along with FTA, as part of our participation in rail transit safety as a SSOA.

TRAINING

- Continue to develop staff expertise in rail transit safety oversight by attending FTA sponsored training and achieving certification of all staff in the core FTA safety oversight courses.
- Seek and send appropriate staff to training on overhead catenary power systems for transit agencies.
- Identify attend other training to develop staff's technical and writing skills.
- As part of the FTA certification and grant program requirements, technical personnel of state safety oversight agencies are required to meet training requirements established by the FTA. During 2016, RTSB staff will complete a combined total of 1,556 staff hours taking required training classes. This number will go up based on number of additional classes that will be made available.