

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's Own
Motion to Adopt New Safety and Reliability
Regulations for Natural Gas Transmission and
Distribution Pipelines and Related Ratemaking
Mechanisms.

Rulemaking 11-02-019
(Filed February 24, 2011)

**NOTICE OF AVAILABILITY OF CALIFORNIA
SAFETY PLAN OF WEST COAST GAS COMPANY
2017 GAS SAFETY PLAN UPDATE AND
COMPLIANCE STATEMENT, AND APPENDIX A
WEST COAST GAS COMPANY, INC. SAFETY
PLAN REVISED 3-15-2017**

In accordance with Rule 1.9(d) of the Commission's Rules of Practice and Procedure, West Coast Gas Corporation (WCG) hereby provides notice of the availability of the California Safety Plan of West Coast Gas Company 2017 Gas Safety Plan Update and Compliance Statement, and its Appendix A West Coast Gas Company, Inc. Safety Plan Revised 3-15-2017, which are being filed today with the Commission.

As of today's date, access to the California Safety Plan of West Coast Gas Company 2017 Gas Safety Plan Update and Compliance Statement, and its Appendix A West Coast Gas Company, Inc. Safety Plan Revised 3-15-2017 are available via the following link: <https://goodinmacbride.sharefile.com/d-sb2f35020f9b4af8a>

Respectfully submitted this 15th day of March 2017 at San Francisco, California.

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Company



WEST COAST GAS
INCORPORATED

EMERGENCIES
961 & 963

SAFETY PLAN

03.15.17

ATTESTATION

The WCG plan was prepared by several members of WCG staff, both administrative and field personnel. The overall co-ordination of its preparation was performed by Mark Williams. WCG will review and revise its Safety Plan each year but not less than every 18 months.

Mark Williams

Mark Williams
President

Dated: March 15, 2017



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SAFETY PLAN

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Attachments:

- Castle Commercial DIMP 09.26.16
- Herlong DIMP 09.26.16
- Mather Commercial DIMP 09.26.16
- Mather Residential DIMP 09.26.16



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A. SCOPE AND PURPOSE

West Coast Gas Company Inc. (WCG) is committed to providing safe and reliable natural gas service. The safety of our customers and their property, the safety of our employees and the public is and will continue to be the top priority of WCG. While we have an excellent safety record, we continuously strive to improve our operations by acquiring new technology and equipment and through continuous employee training.

In order to protect people and property, WCG is proactive in identifying and resolving potential problems before they occur. The reliability of our distribution systems is ensured through proper design, safe construction practices, integrity management programs, routine patrolling, inspection, maintenance and through improvement projects. The continuous interaction between management and our employees regarding the safe and reliable operation of the WCG natural gas distribution system is a key element of WCG's overall safety plan.

WCG maintains a relationship with public safety and emergency response agencies within the communities we serve. These partnerships help to ensure immediate and effective emergency response in the event of a natural gas related incident.

WCG developed this Safety Plan to help communicate our various policies, procedures, standards and manuals to support our commitment to safety. The continued commitment to safety depends not only on abilities, knowledge, skills and work performance, but on the identification of potential issues and the swift and specific reaction to any emergency situation that may arise.

WCG is proud of our safe operating history. We continue to strive to maintain this history that does not include gas emergencies that have resulted in injuries or loss of life.

B. REGULATION REQUIREMENTS

1) WCG's Safety Plan (Plan) was prepared in order to comply with the California Public Utility Commission (CPUC) requirements as set forth in R.11-02-019 and the mandates of Senate Bill (SB) 705 as codified in the CPUC Code Sections 961 and 963.

a) WCG shall implement and utilize its Plan upon CPUC approval. The Plan will clearly document and define the WCG policies and procedures related to the Commissions five topics identified in R.11-02-019 Section 2.6 as:

Safety Systems {CA Public Utilities Code §961(d)(1)(2)} are those policies and procedures that identify and minimize hazard and system risk.

Emergency Response {CA Public Utilities Code §961(d)(5)(6)(8)} are those policies and procedures that limit the damage from accidents, provide for timely response to reports of



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leaks, hazardous conditions and emergency events and prepare for and response to earthquakes and other major events.

State and Federal Regulations {CA Public Utilities Code §961(d)(7)(9),(c)} establish a minimum baseline for pipeline safety in the United States.

Continuing Operations {CA Public Utilities Code §961(b)(3),(d)(3)(4)(10)} are those that ensure the safety of the public and WCG employees, provide for transportation capacity to safely and reliably deliver gas to all customers, provide for effective patrol and inspection to detect leaks, and to ensue an adequately sized, qualified and properly trained WCG workforce.

Emerging Industry Issues {CA Public Utilities Code §961(d)(11)} are any additional matters that the CPUC or WCG determines should be included in this Plan.

b) WCG shall review and update the Plan annually and submit it to the CPUC by March 15.

c) The Plan shall be consistent with federal pipeline safety statues as set forth in Chapter 601 of Subtitle VIII of Title 49 of the United States Code and the regulations and the best practices in the natural gas industry. DOT CFR 49 changes PHMSA Bulletins are received and reviewed by the COO for the purpose of updating where appropriate this Plan.

d) The Plan shall set forth how WCG will implement the Plan.

e) WCG shall provide opportunities for ongoing participation by WCG workforce in the development and implementation of the Plan, with the objective of creating a culture of safety within WCG and to minimize the potential for accidents, explosions, fires and dangerous conditions.

2) WCG's natural gas distribution system at Castle and Mather were originally designed and installed by the USAF. Subsequent facility installation and operations are performed by Qualified Operators with industry "Best Practices" as guidance. WCG's ongoing training and implementation of operations policies are guided by various industry organizations including: Common Ground Alliance as well as guidance bulletins from DOT-PHMSA, CPUC, American Petroleum Institute (API-1162), Gas Technology Institute (GTI), Gas Transmission Systems (GTS) and Corpro Companies Inc..



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WCG's Operations Manager is charged with the ongoing monitoring of regulatory changes. In addition, the operations manager's commitment to quality improvement and safety is demonstrated by continuous evaluation of WCG procedures and operational performance.

Periodic meetings and discussions are conducted by WCG's workforce to continually improve operations and procedures. WCG's core belief is that regulatory compliance and operational improvements lead WCG to achieve its goal to provide a safe reliable natural gas distribution system.

C. OBJECTIVES

1) {CA Public Utilities Code §961(d)(1)}

Protect people and property by identifying and minimizing hazards and risks in order to minimize the likelihood of accidents, explosions, fires and dangerous conditions

WCG's Public Awareness Program (PAP) is designed to communicate information to WCG's customers, excavators who perform digging within the WCG service area and the general public. The seven elements of the PAP program related to the requirement of **§961(d)(1)** are as follows:

Program Elements

There are seven (7) program elements that WCG's PAP must address:

- 1) General Information on the Natural Gas Distribution System; its Purpose and Reliability. This was done through the distribution of Important Things To Know About Natural Gas Pamphlets.
- 2) Use of the One-Call notification system prior to excavation and other damage prevention activities,
- 3) The possible hazards associated with the unintended release of natural gas from a pipeline.
- 4) Physical indications that a release of gas has occurred. This is done through the distribution of our Scratch-N-Sniff Cards.
- 5) Steps that should be taken for Public Safety in the event of a gas leak.
- 6) Procedures for the public to report a gas leak to WCG.
- 7) Establishing and maintaining lines of communication with emergency responders and local public officials.



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WCG's Emergency Response Plan and Operating, Maintenance and Emergency Plan address practices and procedures designed to minimize the risk of accidents, explosions, fires and dangerous conditions. The following sections of this Plan contain practices and procedures specifically designed to prevent dangerous conditions.

Maintenance 707, Line Markers: Identify underground gas facilities

Maintenance 721, Facility Patrolling: Proactive monitoring of the system

Maintenance 723, Leakage Surveys: Identify and classify gas leaks, repairing Class 1 leaks immediately, scheduling the repair of Class 2 leaks and monitoring Class 3 leaks.

Maintenance 747, Key & 2nd Valves: Insuring valve operations during an emergency

Corrosion Control 465/459, External Corrosion Control: Protecting steel pipe from corrosion

Maintenance 605-B1, General Pipeline Repair: This procedure is to ensure the safe and proper general repair of the distribution pipeline system as required by 49 CFR 192.605(b)(1).

Maintenance 739, Regulator Station - Testing & Inspection: Periodic inspection and testing of regulation stations.

WCG's DIMP process has identified third party excavators as the primary risk to WCG's distribution system. Our "Call Before You Dig" public awareness program combined with aggressive patrolling and monitoring of our system, has and will continue to limit the potential threat that unsupervised excavation can cause.

2) {CA Public Utilities Code §961(d)(2)}

Identify and implement improvements to pipeline safety systems that may be deployed to minimize hazards, including adequate documentation of gas pipeline facility history and capability.

WCG has in place a series of "key", "in-line" and "curb" valves that are critical to minimize hazards to residents, businesses and the public within WCG service area. WCG maintains over 250 valves at Castle, Herlong and Mather. We have developed a comprehensive valve maintenance program. Each WCG field technician is trained in locating and operating system valves in case of an emergency.



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WCG has invested in modern, state of the art impressed current cathodic protection (ICCP) systems to protect steel pipe from galvanic corrosion that can lead to gas leaks. Ground beds and rectifiers were installed in the commercial and housing area of Mather in 1998. A similar ICCP system was installed at Castle in 2003.

3) {CA Public Utilities Code §961(d)(3)}

Provide adequate transportation and storage capacity to reliably and safely deliver gas to all customers consistent with rules authorized by the CPUC governing core and noncore reliability and curtailment, including provisions for expansion, replacement, preventative maintenance and reactive maintenance and repair of gas piping facilities.

WCG receives its gas supply via a gas transportation agreement with PG&E. WCG does not store gas only provides to its customers via its distribution system. Ongoing monitoring of regulator station pressure as well as periodic measurement of pressure at the systems terminal end help insure adequate operating pressures throughout.

It is management's responsibility to respond immediately to all scenarios either catastrophic or non-catastrophic, that would negatively impact the integrity and reliability of the system. Management actively works with its gas suppliers and agents to restore any major disruption in gas flow. OME procedures including the **Emergencies 615: Emergency Plan, Maintenance 709: Record Keeping** provide the processes that help assure system integrity and proper operating pressures.

WCG's distribution system's Regulator Station allows for manual by-pass of the Regulator Station so as to not interrupt service to customers, OME procedure **Maintenance 739: Regulator Station Testing and Inspection**. In addition the system has multiple main line valves that allow specific isolation of gas delivery to particular locations during valve maintenance, OME procedure **Maintenance 747: Valve Inspection and Maintenance** or **Emergencies 615: Emergency Plan**.

4) {CA Public Utilities Code §961(d)(4)}

Perform effective patrols and inspections of gas pipeline facilities to detect leaks and other compromised facility conditions and make timely reports.

Maintenance 721, Facility Patrolling: Addresses WCG's system patrolling protocol including frequency. In addition, covered employees are trained in identifying "Abnormal Operating Conditions" as defined in the 49 CFR Part 192, Subpart N.

Maintenance 723, Leakage Surveys: Contains description of WCG's detailed procedures for performing leak surveys, classifying detected leaks, timing of leak repair and monitoring Class 3



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leaks. In addition to the leak surveys conducted by WCG covered employees, WCG periodically contracts with independent leak survey firms to confirm the efficacy of its own in-house surveys.

5) {CA Public Utilities Code §961(d)(5)}

Provide appropriate and effective system controls, with respect to both equipment and personnel procedures, to limit the likelihood of damage from accidents, explosions, fires and dangerous conditions.

In order to identify and minimize hazards and systemic risks, WCG various operation and maintenance programs as well as proactive activities. WCG OME Plan includes the following activities and programs that address the requirements.

Operation and Maintenance Programs

- Emergency Response Procedure (OME 615)
- Line Markers (OME 707)
- Pipeline Patrols (OME 721)
- Leak Surveys (OME 723)
- Testing-Reinstating Service Lines and Piping (OME 725)
- Prevention of Accidental Ignition of Gas (OME 751)
- Valve Maintenance Program (OME 747)
- Odorization of Gas (OME 625)
- Leak Repairs and Construction (OME 303 & 605-B1)
- Upgrading Procedures
- Inspection of Regulation Stations (OME 739)
- Operator Qualification Program
- Employee Drug and Alcohol Testing Program (OME 199)
- MSA Inspections During Meter Reading
- Constant Surveillance of Distribution System (OME 613)
- Notices to Customers On Gas Safety (OME 616)
- USA Underground Membership
- Inspection of Contract Excavations
- DIMP

Proactive Activities

- WCG has a relationship with Corpro (Cathodic Protection Surveys of WCG ICCP)
- Installation of new 1804 PFM American Meter Regulators in WCG Regulator Station
- WCG leak surveys entire distribution system every year
- WCG inspects, maintains and exercises every valve once each year, not to exceed 15 months.



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- WCG's Scheduled General Maintenance Program for Castle, Herlong and Mather show maintenance activity and time periods when these activities are performed.

6) {CA Public Utilities Code §961(d)(6)}

Provide timely response to customer and employee reports of leaks or abnormal operating conditions and emergency events.

WCG's OME procedures outline WCG's quick response to all leak or odor calls immediately upon report, **General C: Customer Odor/Leak/Service Calls, Normal Operations 614: Damage Prevention and Emergencies 615: Emergency Plan.** Additionally, the quick repair of any leak or odor detected during investigation, we believe only enhances WCG's ability to maintain a safe reliable distribution system.

WCG's Leak Reports are reviewed and have been determined to historically be minimal, however by category the primary types are excavation and threaded pipe leaks on homeowners own piping.

- a) The process of promoting our Public Awareness Plan (PAP) has improved Damage Prevention and subsequently we see a decrease in leaks caused by excavation activities.

Annual review of leak data and reporting allows management to monitor trends and areas in need of improvement regarding incidence of gas leak reporting.

WCG's Response Protocol for Reported Leaks, Abnormal Operating Conditions and Emergencies

Significant odor of gas in or near building - unconfirmed or undetermined leak source	Call 911 and request fire department assistance, if not on scene. Identify affected area and close valves. Evacuate buildings as necessary.	Co-ordinate with emergency services and customers as necessary. Monitor for gas accumulations and ventilate as necessary. Eliminate sources of ignition. Check all piping and appliances for leaks.
Transient or occasional light odor of gas in or near a building - unconfirmed leak source.	Identify affected area and close valves. Evacuate buildings as necessary.	Co-ordinate with emergency services and customers as necessary. Monitor for gas accumulations and ventilate as necessary. Eliminate sources of ignition. Check all piping and appliances for leaks.
Odor of gas emanating from single appliance.	Identify affected appliance and close appliance valves. Evacuate buildings as necessary.	Co-ordinate with customer as necessary. Monitor for gas accumulations and ventilate as necessary. Repair leaks.
Suspected leaking gas meter.	Isolate meter by closing gas valve.	Co-ordinate with emergency services



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		and customers as necessary. Monitor for gas accumulations and ventilate as necessary. Eliminate sources of ignition.
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7) {CA Public Utilities Code §961(d)(7)}

Include appropriate protocols for determining maximum allowable operating pressures for pipeline segments.

The WCG gas distribution system at Mather consists of two separate systems. In the commercial area of Mather, the MAOP is 10 psig and the operating pressure is 7 psig. The residential housing area is supplied by PG&E at distribution pressure of 50 psig. The MAOP in the housing area is 60 psig and the operating pressure is 42 to 49 psig. One section of the housing area operates at a lower pressure of 9 to 12 psig and had a MAOP of 17psig.

The MAOP and operating pressure in both the commercial area and housing area was established by the USAF when Mather was a military base.

All new service line connections in the commercial area are PE pipe pressure tested at 100 psig. Service regulators located at meters and meter manifold reduce the pressure from 7 psig down to 1/4 psig. During this same time period, WCG replaced all the existing meter set assemblies, including regulators and meters to insure that the operating pressure would be maintained and that the MAOP would not be exceeded.

The MAOP and operating pressure in the housing area was established by PG&E when it operated the gas distribution system under contracts with the U.S.A.F. Between 2002 and 2005, WCG replaced about 30% of all gas mains with pressure tested PE pipe. All 1,232 gas service lines were replaced with pressure tested PE Pipe and every regulator and meter was replaced with new equipment.

The MAOP of Castle is 20 psig and the operating pressure is 17 psig. The U.S.A.F. established both the MAOP and operating pressure at 10 psig. WCG uprated the MAOP and the operating pressure to 20 psig in November 2002. The Castle uprate was performed using the requirement of 49 CFR Part 192, Subpart N.

Under Federal Regulations 49 CFR §192 (Part 192), a pipeline's MAOP may be governed by several factors, including the highest actual operating pressure to which the segment was subjected during the five-year period preceding November 12, 1970. The effect of this clause - which is commonly referred to as the "Grandfather Clause" - is to allow operators to maintain the MAOP of pipelines that were installed prior to 1970 without having to pressure test or derate them. It is thus not surprising (and would be expected) that a pipeline operator would not have documentation of a strength test for pipelines installed before regulations requiring these tested



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were adopted. Both Mather gas systems and Castle's gas systems were operated before 1970 and the previous operators established the MAOP.

WCG performs numerous maintenance activities to validate the integrity of the distribution system, including leak surveys, pipeline patrols, damage prevention programs, corrosion control measures, pressure monitoring, valve maintenance program and an operator qualification program. The gas leak history is consistent with the expectations of a safely operated distribution system. A majority of gas leaks consist of gas odor calls that typically require customer attention because the leak source is after the gas meter. The remedial and preventative work activities performed to operate, maintain, and ensure the integrity and security of facilities are scheduled, performed and tracked and documented by WCG.

8) {CA Public Utilities Code §961(d)(8)}

Prepare for and respond to earthquakes and other major events to minimize damage.

WCG various plans; OME Maintenance 723: Leakage Surveys, PAP, OQ and OME Emergencies 615: Emergency Plan; contain procedures that provide for; the ongoing monitoring, response to and subsequent remediation or repairs required for any event that impacts or potentially impacts WCG's distribution system.

The key components of WCG's Emergency Plan (OME Emergencies 615) include:

- Receiving, identifying and classifying emergency notices.
- A potential versus an actual emergency notice
- Instructions to callers
- Prompt and effective response by WCG's workforce
- Notifying fire, law enforcement and other public officials
- Reporting requirements
- Minor gas leak field response
- Major gas leak field response
- Leaks inside buildings
- Fire, explosions
- Media notification, inquiries
- Natural disasters, earthquakes, wildfires
- Gathering emergency data
- Post emergency review
- Annual plan review and employee training



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9) {CA Public Utilities Code §961(d)(9)}

Meet or exceed the minimum standards for safe design, construction, installation, operation and maintenance of gas transmission and distribution facilities prescribed by regulations issued by the United States Department of Transportation in Part 192 (commencing with Section 192.1 of Title 49 of the Code of Federal Regulations as well as the CPUC Safety Division.

The DIMP plan addressed the design and ongoing monitoring of the distribution system . The following OME sections pertain to compliance with this regulation:

Safe Design

- Design/Construction 303: Constructions
- Design/Construction 503: Facility Leak Test Requirements
- Design/Construction 503: Pre Tested Pipe
- Design/Construction 619: Maximum Allowable Operating Pressure
- Maintenance 725: Testing for Service Line Reinstatement

Installation

- Maintenance 225: Welding Procedure
- Maintenance 281: Plastic Fusion Procedure

Operations and Maintenance

- Maintenance 605-B-1: General Pipeline Repair
- Normal Operations 605-B5: Startup / Shutdown / Purge
- Maintenance 613: Continuing Surveillance
- Normal Operations 614: Damage Prevention
- Normal Operations 616: Public Awareness
- Maintenance 721: Facility Patrolling
- Maintenance 723: Leakage Surveys
- Maintenance 751: Prevention of Accidental Ignition

10) {CA Public Utilities Code §961(d)(10)}

Ensure an adequately sized, qualified and properly trained gas corporation workforce to carry out the Plan.

WCG ensures the qualification and training of the workforce through the Operator Qualification Plan (OQ). A qualified individual will possess the appropriate combination of information (knowledge), craftsmanship (skills) and proficiency (ability or capabilities) that allows the individual to perform covered tasks and recognize and react to abnormal operating conditions.



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OME General 605-A1: O&M Manual Review/Revision and OME General 605-B8: O&M Manual Work Review gives management opportunity to review size and qualifications of the workforce.

11) {CA Public Utilities Code §961(d)(11)}

Include any additional matters that the CPUC determines should be included in the Plan.

New regulatory matters and/or issues are reviewed by management in a timely fashion and then communicated to staff. Any operational changes required are then developed and implemented.

12) {CA Public Utilities Code §963(b)(3) and §961(c)&(e)}

Place safety of the public and employees as the top priority; take all reasonable and appropriated actions consistent with the principle of just and reasonable cost-based rates.

Employees are expected to work according to the guidelines for safety as put forth in all plans and manuals. Employees participated in the development of all plans and manuals. Periodic staff meetings provide a forum where operations are actively discussed and revision or changes are developed.

Safety concerns (OME General 605-D: Safety Related Conditions/Reporting) that employees have for either themselves, fellow workers, customers or the public can be communicated either in the staff meeting forum or privately without fear of reprisal from management.

Industry Best Practices are adhered to during operations and training. PHMSA guidelines and other regulatory guidelines are reviewed and changes to operations are developed and implemented as appropriate. Employees and Administrators actively evaluate operations to strive for continuous improvement and achieve goals of running a safe reliable natural gas distribution company.

D. APPLICABILITY, IMPLEMENTATION AND REVISION

1) This Plan applies to all WCG and contractor personnel who perform covered tasks. This includes, but is not limited to field employees, field supervision and contractors.

2) WCG's Plan will be effective upon CPUC approval. Implementation of the Plan is through application of reference documents which address all of the elements set forth in the regulation. Initial implementation will occur through specific overview training with all affected personnel identified in the Plan. Training will be documented in accordance with DOT and CPUC guidelines. Annual review of the Plan will involve Company management and affected covered employees. Each new employee will receive training on the purpose, scope and detailed policies and procedures contained in the WCG Plan.



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3) The Plan references other existing WCG policies, procedures, programs and plans. These referenced documents are reviewed annually and updated as needed. The Plan will be reviewed annually in conjunction with these referenced documents. In addition, the Plan will be revised based upon changes to regulatory requirement, policies or procedural changes, editorial changes or as determined by WCG.

MANUAL/PROGRAM/PLAN	CA PUBLIC UTILITIES CODE	R.11-02-019 TOPIC
OME Manual - All Parts of the Manual	CA Public Utilities Code §961(d)(1)-(9), §963(b)(3)	Safety Systems Emergency Response State & Federal Regulations Continuing Operations
Distribution Integrity Management Program (DIMP) - Shrimp Threat Assessment	CA Public Utilities Code §961(d)(1)(2)(9), §963(b)(3)	Safety Systems State & Federal Regulations Continuing Operations
Damage Prevention Program – OME 614	CA Public Utilities Code §961(c), (d)(1)(2)(9)	Safety Systems State & Federal Regulations
Public Awareness Program - OME 616	CA Public Utilities Code §961(d)(1)(2)(5)(9)	Safety Systems Emergency Response State & Federal Regulations
Emergency Plan – OME 615	CA Public Utilities Code §961(d)(2)(5)(6)(8)(9)	Safety Systems Emergency Response State & Federal Regulations
Operator Qualification Plan (OQ)	CA Public Utilities Code §961(c), (d)(10)	State & Federal Regulations Continuing Operations
Drug and Alcohol Plan – OME 199.1-9, 199.100-119, 199.200-245	CA Public Utilities Code §961(c), (d)(10)	State & Federal Regulations Continuing Operations



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E. PLAN PROVISIONS

The WCG Plan embodies the policies and procedures specified in the WCG's manuals, plans and programs listed below.

Operations, Maintenance and Emergencies Procedural Manual

WCG's OME Manual contains policies and procedures for the operations and maintenance of WCG's distribution system meeting or exceeding the minimum standards set forth in US Department of Transportation Regulations title 49 CFR Part 192.

The OME Manual contains procedures for leak survey and leak detection (Maintenance 723: Leakage Surveys), patrolling requirements (Maintenance 721: Facility Patrolling), emergency response requirements (Emergencies 615: Emergency Plan), identification of abnormal and unusual operating conditions (Emergencies 615: Emergency Plan), corrosion control requirements (Corrosion Control 465/459: External Corrosion Control-Monitoring), measurement and control requirements (Maintenance 739: Regulator Station - Testing & Inspection), design standards and general operational standards for WCG's distribution facilities.

Distribution Integrity Management Program (DIMP)

WCG's Distribution Integrity Management Program (DIMP) is based on a risk based process that attempts to identify and prioritize the risks in order to insure the safety and integrity of the WCG distribution systems.

WCG has acquired and used a web based DIMP analysis program called SHRIMP. SHRIMP was developed by the American Public Gas Association for its members who are predominately small natural gas distribution entities.

Damage Prevention Program

"Call Before You Dig" call center along with a vigilant program to monitor all excavation is the key to prevent damage to underground distribution facilities (Normal Operations 614: Damage Prevention). WCG has an aggressive program to monitor all excavations within its service territory and to continuously inform its customers to the dangers of excavating on their property without first requesting WCG to locate its gas facilities. WCG has increased its contact with its stakeholders by providing in person meetings with facilities managers of commercial buildings and by testing the impact of our residential safety awareness program by conducting customer surveys. WCG also created a web site that contains all of our safety messages including "Call Before You Dig".

WCG is committed to designing, constructing, operating and maintaining its pipelines in a manner that ensures long-term safety and product reliability to the public, its customers, contractors and



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employees. This includes minimizing service interruptions and negative impacts caused by excavation damage.

Public Awareness Program – OME Normal Operations 616: Public Awareness

WCG developed a Public Awareness Program to comply with the American Petroleum Institute (API) recommended practice RP1162. WCG's Public Awareness Program includes requirements from US Department of Transportation Regulation Title 49 CFR Parts 192.605, 192.614, 192.615 and 192.616 to enhance messages, methods, procedures and documentation.

Emergency Procedures – OME Emergencies 615: Emergency Plan

When any emergency arises that affects the normal, safe distribution of gas to customers, it is essential that a predetermined course of action and the means necessary to accomplish these actions be immediately taken to protect customers and their property, employees, contractors, first responders and the public in general. WCG's Emergency Response Plan describes the procedures and policies for accomplishing these objectives. All personnel are trained, drilled and critiqued on emergency preparedness in order to maintain effective and timely responses to natural gas related emergencies.

Operator Qualification Plan (OQ)

GTS worked with WCG on the development and implementation of an OQ Plan that meets or supersedes the Title 49 CFR Part 192, Subpart N, Qualification of Pipeline Personnel. This plan was effective May 20, 2016.

The WCG Safety Plan embodies the policies and procedures specified in WCG manuals, plans and programs listed above.