



December 22, 2016

Mr. Ken Bruno, Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

SUBJECT: General Order 112 Inspection of Alpine Natural Gas-Emergency Plan

Dear Mr. Bruno,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112 inspection of Alpine Natural Gas (ANG) from July 12 through 14, 2016. The inspection reviewed Alpine's Emergency Plan.

SED did not observe any violations. A Summary of Issues which contains areas of concerns and recommendations were identified by SED staff. Alpine provides a written response to these findings by indicating the measures taken by ANG to address the areas of concerns and recommendations.

SUMMARY OF ISSUES

1. Update the Emergency Equipment list, Alpine's form Appendix F, to include equipment or materials on the service trucks and other locations as well.

Response: *Alpine corrected Appendix F to correct list of materials and equipment and additional locations where emergency equipment is located.*

2. Title 49 CFR §192.615; Procedures for a Table Top Emergency Response Exercise and review of actual post emergency should be completed and documented in a separate form.

Response: *Alpine has developed form 615-C to conduct and document a table top exercise including:*

- *Scenario*
- *Response*
- *After Action Report*
- *Document Effectiveness*
- *Review of training needs-lessons learned*

3. 49 CFR §192.616; Establish and maintain liaison with public officials and coordinate with them on emergency exercises or drills and actual responses during emergency.

ENERGY FOR YOUR NEIGHBORHOOD

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Response: *Calaveras County Sheriff Office coordinates the Department of Emergency Services. May 2017 is a county wide drill/exercise Alpine has been invited to participate in this disaster scenario of a community wide fire. During this event Alpine, will be afforded the opportunity to run an exercise of a gas Emergency Response scenario. This training will also be documented on form 615-C*

4. 49 CFR §192.615; Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify training is effective.

Response: *Alpine operating personnel reviewed the procedures and emergency incidence during the past year and determined response and training was appropriate. Mike Lamond completed Incident Command System Training in September and determined it would be beneficial for the two operators to also complete this course and has them scheduled to complete by the end of January. This review is documented on form 615-B*

5. 49 CFR §192.615; Maintain Liaison with Fire, Police and other Public Officials to:
- *Learn the Responsibilities of each organization*
 - *Acquaint the officials with Alpine's ability to respond to gas pipeline emergency*
 - *Identify the types of gas pipeline emergencies of which Alpine notifies the officials*
 - *Plan how Alpine and the officials can engage in mutual assistance to minimize hazards to life or property.*

Response: *Calaveras County Sheriff Office and Calaveras Consolidated Fire participated in an annual review of Alpine's Emergency Plan and our ability to respond to gas emergencies. Public works was invited but did not attend. Sheriff Department coordinates emergency services in Calaveras county. They have the resources to assist us with mutual aid and additional resources during an incident. We reviewed house fire incidents during the year and Alpine's response. Alpine also determined that it would be appropriate, to, in the future include California Highway Patrol in this exercise. This meeting is documented in form 615-4.*

Sincerely,



Mike Lamond, Administration/CFO
Alpine Natural Gas

By E-mail: