

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 8, 2016

GI-2016-07-ANG35-04

Mr. Mike Lamond (mike@alpinenaturalgas.com)  
Administration/CFO  
Alpine Natural Gas  
15 St. Andrews Road  
P.O. Box 550  
Valley Springs, CA 95252

**SUBJECT:** General Order 112 Inspection of Alpine Natural Gas Emergency Management Program

Dear Mr. Lamond:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112<sup>1</sup> and CA Public Utilities Code Sections 950, 955, 956, 956.5 inspection of Alpine Natural Gas (ANG) from July 12 through 14, 2016. The inspection included a review of Emergency Management procedures and records for the year 2015.

A Summary of Inspection Findings (Summary), which contains areas of concerns and recommendations identified by SED staff, is included as an attachment to this letter.

Please provide a written response indicating the measures taken by ANG to address the areas of concerns and recommendations within 30 days from the date of this letter. SED will notify ANG if the measures taken sufficiently address the areas of concerns identified.

If you have any questions, please contact Alin Podoreanu at (916) 928-2552 or by email at [alin.podoreanu@cpuc.ca.gov](mailto:alin.podoreanu@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Enclosure: Summary of Inspection Findings

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<sup>1</sup> General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.

## SUMMARY OF INSPECTION FINDINGS

### **A. Areas of Concern and Recommendations**

1. Title 49 CFR §192.615 states:

*“(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:*

*... (4)The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.*

Appendix F – Emergency Response Equipment List Operations Maintenance & Emergency Plan listed the emergency equipment found on board service trucks. SED observed that service trucks were already equipped with emergency valve keys. Additional emergency equipment was available at other storage locations. SED recommends that ANG update Appendix F to include emergency valve keys to the on board service truck equipment list and revise Appendix F to specify the location of emergency equipment available at other storage locations.

2. Title 49 CFR §192.615 states in part:

*“(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.”*

ANG’s Emergency Plan states: *“The administrator and the employees will also participate in a table top exercise of an emergency scenario and or review an actual post emergency review that occurred during the year under review.”*

ANG’s annual tabletop exercise is documented on the Annual Safety Plan Review Form. The documentation reviewed by SED did not contain specific information about the tabletop scenario and post emergency review. SED recommends that ANG formalize the documentation process for tabletop exercises by documenting the incident scenario, documenting the company emergency response action, creating an after action report, and reviewing activities performed during a tabletop to determine if procedures and training were effective.

3. Title 49 CFR §192.616 states in part:

*“(b) The operator's program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.”*

API Recommended Practice 1162, First Edition, December 2003, Section 2.3.2 Emergency Responder Liaison Activities (49 CFR Parts 192.615 and 195.402) states:

*“These regulations require that operators establish and maintain liaison with fire, police and other appropriate public officials and coordinate with them on emergency exercises or drills and actual responses during emergency.”*

ANG explained that tabletops exercises are performed internally. SED recommends that ANG coordinate with fire, police, and other appropriate public officials on emergency exercises or drills.

4. Title 49 CFR §192.615 states in part:

*“(b) Each operator shall:*

*...*

*(2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.”*

ANG explained it performs a tabletop exercise and a review of actual emergencies annually. SED reviewed documentation for tabletop exercises and a review of actual emergencies. SED recommends that ANG document its review of activities after exercises and actual emergencies to determine if training and procedures were effective.

5. Title 49 CFR §192.615 states in part:

*“(c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:*

- (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;*
- (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;*
- (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and*
- (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.”*

ANG explained it conducted liaison activities; however documentation did not indicate what was discussed during the meetings. SED recommends that ANG documents how it meets the requirements in c(1) through c(4) during liaison activities.