

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 7, 2019

Mr. Stephen Wassell (swassell@southernco.com)
VP Storage Peaking & Ops
Southern Company
10 Peachtree Place NE, Suite 1000
Atlanta, GA 20209

GI-2018-11-CVS-39

Re: SED's closure letter for the General Order 112 Gas Inspection of Central Valley Gas Storage

Dear Mr. Wassell:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Central Valley Gas Storage's (CVGS) response letter dated January 17, 2019 for the findings identified during the General Order (GO) 112 inspection of CVGS on November 5 – 8, 2018.

A summary of the inspection findings documented by the SED, CVGS's response to our findings, and SED's evaluation of CVGS's response taken for each finding are outlined for each identified Violation.

This letter serves as the official closure of the 2018 GO 112 inspection of CVGS and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. Please contact Wai Yin (Franky) Chan at (415) 703-2482 or by email at Wai-Yin.Chan@cpuc.ca.gov if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc: Robert Cornell, CVGS Director – Western Region Storage (rcornell@southernco.com)
Dennis Chappell, CVGS Manager – Storage Ops (dchappell@southernco.com)
Claudia Almengor, SED
Kenneth Bruno, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 11/5/2018 – 11/8/2018

Operator: CENTRAL VALLEY GAS STORAGE, LLC

Operator ID: 32603 (primary)

Inspection Systems: Central Valley Gas Storage

Assets (Unit IDs): Central Valley Gas Storage (39)

System Type: GT

Inspection Name: CVGS Comprehensive Standard Transmission

Lead Inspector: Wai-Yin Chan

Operator Representative: Dennis Chappell

Unsatisfactory Results

1. Facilities and Storage : Compressor Station System Protection (FS.CSSYSROT)

Question Text Do records document that all compressor station gas detection and alarm systems are being maintained and tested as required?

References 192.709(c) (192.736(c))

Assets Central Valley Gas Storage (86918 (39))
Covered

Issue Title 49 CFR §192.605(a) states in part:
Summary "Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."

CVGS's Procedure 10.03, Compressor Station Gas Detection and Alarm System, Section 7.1, states:

“Record results of all gas detection and alarm system tests on Form 10.03A.”

SED reviewed CVGS’s gas detection and alarm system tests records and found that CVGS did not use Form 10.03A to record the tests in 2015, 2016, and 2017. However, CVGS was able to provide supporting documents to demonstrate that these tests were done in each year.

CVGS’s Response:

In response to the Summary Findings, CVGS has enhanced its documentation to properly record the results of each of the tests in question on Form 10.03A as discussed in the Procedure and has attached a Form 10.03A record of each of the tests for your review. CVGS will maintain these records as specified by the Procedure.

SED’s Conclusion:

SED has opted not to impose a fine or penalty at this time since the violations did not result in a hazardous condition to PG&E employees and the public.