

January 17, 2019

Mr. Kenneth Bruno, Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division (SED)
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Subject: CVGS Response -- 2018 General Order 112-F Gas Inspection of Central Valley Gas Storage [GI-2018-11-CVS-39]

Dear Mr. Bruno,

Central Valley Gas Storage, LLC (CVGS) continues to place the safety of the public and its workforce as its top priority and endeavors to operate and maintain its gas pipeline facilities at standards that meet or exceed the requirements of California Public Utilities Commission General Order (GO) 112-F. Our management team at CVGS values the SED inspection process as an opportunity to improve our practices and records with the benefit of your findings and recommendations, and we appreciated being able to interact with your SED auditors in November 2018 during your review of CVGS's records for the period of 2015 through 2017.

We have carefully reviewed the Inspection Report you provided us on December 18, 2018, including the Post-Inspection Written Preliminary Findings (Summary). As you requested, we are providing a written response indicating the measures taken by CVGS to address the following result identified in the Summary:

Title 49 Code of Federal Regulations (CFR) §192.736(c)

Title 49 CFR §192.605(a) states in part: "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 follows its Operation and Maintenance Manual which includes written procedures in Procedure 10.03 -- Compressor Station Gas Detection and Alarm Systems -- to comply with Title 49 CFR § Section 192.736. Procedure 10.03 provides that each gas detection and alarm system is tested to ensure the gas detection system is properly calibrated and that the alarm system enunciators are operating properly. The Procedure calls for recording the results of all such tests on Form 10.03A. SED's auditors correctly noted that while CVGS was able to provide documentation showing that the tests were done in each year, the documentation was not 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.

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.

CVGS appreciates the thorough review of its facilities and documentation by the SED audit team and looks forward to continuing our constructive relationship with SED in accomplishing the top priority of maintaining safe and reliable operations. I trust that the documentation provided in this response is suitable to address the Summary result.

Please contact me at 404-584-3725 if you have any questions about this response or require additional information. You also should receive a hard copy of this response and referenced documentation shortly via U.S. Mail.

Sincerely,



Stephen L. Wassell, PE
Vice President
Storage and Peaking Operations

cc: John Boehme
Robert Cornell
Dennis Chappell
James Hotinger
Wai Yin (Franky) Chan, Kelly Dolcini, Dennis Lee – CPUC (via e-mail)

Attachments