

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 3, 2020

GI-2020-11-CVS-39-08

Stephen Wassell

Via Email: [swassell@southernco.com](mailto:swassell@southernco.com)

VP, Storage Peaking & Ops  
Central Valley Gas Storage  
10 Peachtree Place NE, Suite 1000  
Atlanta, GA 20209

SUBJECT: General Order 112<sup>1</sup> Transmission Integrity Management Plan (TIMP) Inspection of  
Central Valley Gas Storage (CVGS)

Dear Mr. Wassell:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Paul Penney and Kai Cheung conducted a General Order 112-F<sup>1</sup> inspection of CVGS's TIMP on November 30, 2020. The inspection included a remote review of procedures and records related to High Consequence Area (HCA) identification.

As identified during the review, CVGS does an HCA analysis on a yearly basis using Method 1 as defined in Title 49 Part 192, Section 192.903. As of the date of the audit, CVGS has not identified any areas along its transmission line that meet the definition of an HCA, although there is one area identified that meets the definition of a Medium Consequence Area (MCA) –as defined in 192.3—that will be integrity assessed in 2021.

SED did not note any violations or concerns. No response to the audit letter is necessary. This letter serves as the official closure of the inspection. Thank you for your cooperation with this safety inspection.

If you have any questions, please contact Paul Penney at (415) 703-1817 or by email at [Paul.Penney@cpuc.ca.gov](mailto:Paul.Penney@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Terence Eng".

Terence Eng, P.E.  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

cc: Dennis Lee, SED  
Paul Penney, SED  
Keith Vanderlee, CVGS ([KVander@southernco.com](mailto:KVander@southernco.com))  
John Boehme, CVGS ([jboehme@southernco.com](mailto:jboehme@southernco.com))

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