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**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 30, 2017

GI-2016-03-GRS38-04

Mr. David A. Weber, President and CEO ([Dave.Weber@nwnatural.com](mailto:Dave.Weber@nwnatural.com))  
Gill Ranch Storage  
220 NW 2nd Avenue  
Portland, OR 97209

**SUBJECT: General Order 112 Gas Inspection of Gill Ranch Storage Emergency Management Program**

Dear Mr. Weber:

The Safety and Enforcement District (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 Gill Ranch Storage (GRS) from October 4-5, 2016. The inspection included a review of emergency management procedures and records for 2014 and 2015.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter.

Please provide a written response indicating the measures taken by GRS to address probable violations and the areas of concern and recommendations within 30 days from the date of this letter.

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 District

Enclosure: Summary of Inspection Findings

cc: Karl Leger, RegSafe ([Karl.Leger@regsafe.com](mailto:Karl.Leger@regsafe.com))  
Todd Thomas, GRS ([Tthomas.nwngs@nwnatural.com](mailto:Tthomas.nwngs@nwnatural.com))  
Dennis Lee, SED ([Dennis.Lee@cpuc.ca.gov](mailto:Dennis.Lee@cpuc.ca.gov))  
Terence Eng, SED ([Terence.Eng@cpuc.ca.gov](mailto:Terence.Eng@cpuc.ca.gov))

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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. Probable Violations

1. Title 49 CFR §192.605 Procedural manual for operations, maintenance, and emergencies 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. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.”*

SED reviewed emergency response procedures including the Emergency Action Plan (Revision 1.1 October 10, 2010) available to controllers during emergencies. Emergency response procedures were updated and reviewed by the operator at intervals not exceeding 15 months; however, the Emergency Action Plan was last updated and reviewed in 2011.

GRS is therefore in violation of Title 49 CFR §192.605 for failing to review its Emergency Action Plan at intervals not exceeding 15 months.

2. Title 49 CFR §192.615 Emergency Plans states in part:

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

GRS explained it trains personnel on emergency response topics annually and uses written questions to verify knowledge. GRS currently does not have minimum passing criteria for these trainings and could not demonstrate how it verifies that training is effective.

GRS is therefore in violation of Title 49 CFR §192.615 for failing to demonstrate that its training is effective.

3. Title 49 CFR §192.615 Emergency Plans 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.”*

SED reviewed GRS’s liaison records with public officials. The records reviewed by SED do not indicate content information about the meetings. GRS is in violation of §192.615 for failing to demonstrate it met the requirements of Title 49 CFR §192.615 (c) (1) through (4).

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

1. SED reviewed documentation for liaison activities. Some of the attendance rosters for liaison meetings did not list an organization and contact information for participants. SED recommends GRS document the organization and contact information on the attendance rosters to help identify who represented the organizations and have contact information for future support readily available.
2. SED recommend GRS have multiple hard copies of the emergency response manuals available to personnel to provide support to multiple employees concurrently.
3. GRS public awareness materials reference Digalert as the 811 regional notification center. Digalert is Southern California’s regional notification center for Imperial, Inyo, Los Angeles, Orange, San Bernardino, San Diego, Santa Barbara and Ventura counties. SED recommends GRS reference USA North as the 811 regional notification center for Madera and Fresno counties.
4. Since there are multiple 911 dispatch centers in GRS’s right of way who may not be aware of GRS and its facilities, SED recommends GRS contact 911 dispatch centers in their service territory and verify dispatch centers have emergency contact information for GRS and are aware of the pipeline right of way.
5. SED reviewed GRS emergency response procedures and the Emergency Action Plan submitted to the CPUC as part of the initial application Nos. A.08-07-032/A.08-07-033. Since the Emergency Action Plan contains excellent general emergency response guidance and procedures to help meet code requirements, SED recommends that GRS makes the information contained in the plan available to GRS personnel in the future whether as a standalone document or incorporated into GRS emergency response procedures.