

# West Coast Gas Company, Inc.

9203 Beatty Drive, Sacramento, CA 95826

916-364-4100 / Fax 916-364-4200

Email: westgas@aol.com / www.westcoastgas.com

08 March 2016

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

RE: Response to December 7-9, 2015 Audit Findings Letter dated February 8th, 2016

Dear Mr. Bruno,

Following are West Coast Gas Company Inc.'s response to the SED Areas of Concern /Observations / Recommendations.

If you have any questions, please feel free to contact me at 916-364-4100, Monday through Friday, 7 am to 3:30 pm.

Sincerely,

*Mark Williams*

Mark Williams  
President

cc: Banu Acmis  
Jason McMillian

## SUMMARY OF INSPECTION FINDINGS

### I. Probable Violations

1. General Order No. 112-F, Public Utilities Commission of the State Of California, Rules Governing Design, Construction, Testing, Maintenance, And Operation of Utility Gas Gathering, Transmission, And Distribution Piping Systems which was issued on June 25, 2015 with Decision 15-06-044.

General Order (GO) 112-F, Subpart B – Reports, 122 Gas Incident Reports, 122.2 Requirements for reporting to the CPUC describes the CPUC’s reportable incident criteria, reporting instructions along with the reporting timeline during and outside normal business hours.

SED reviewed WCG’s EP and noted that WCG’s EP does not have the Reportable Incident Criteria of CPUC GO 112-F since the reporting and notification section of WCG’s EP procedures only list DOT as the agency to notify for gas incidents.

In addition to the DOT reportable incident criteria, WCG must also include the CPUC Reportable Incident Criteria and incident reporting instructions in its EP for gas incidents that are caused by release of gas along with the allowed time to report such incidents to the CPUC during and outside normal business hours. WCG must also list CPUC’s reportable incident phone numbers to its Emergency Notification List.

WCG must notify SED of CPUC of any reportable gas incidents as required by CPUC’s GO 112-F and use Report of Gas Leak or Interruption Form, CPUC File No. 420 which is given in Appendix B of GO 112-F.

**WCG RESPONSE: SED states that WCG must list CPUC's reportable incident phone numbers to its Emergency Notification List.**

**WCG has added the CPUC Reportable Incident Number to our Emergency Plan (OME Page 87, attached) and has created Form 615-3A - Regulatory Notification Record - CPUC. (Attached)**

2. Title 49, Code of Federal Regulations (CFR), §192.615 Emergency plans.

§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.”*

SED identified that WCG did not keep training records of its personnel to document that they are knowledgeable of the emergency procedures.

WCG conducted a tabletop exercise shortly after SED brought up this deficiency to WCG’s attention for its employees located in Sacramento. WCG must also conduct the same training for its emergency response employees responsible for Castle and Herlong pipeline systems.

WCG must conduct Emergency Response training of all personnel who are responsible for responding to emergencies for all WCG's gas pipeline systems as it is a requirement of §192.615 (b) as well as WCG's EP and keep annual training exercises. SED also noted that WCG can use hypothetical scenarios or previous emergency events that occurred in WCG's system by discussing and critiquing actions taken. WCG must also identify lessons learned in order to improve the effectiveness of its emergency response.

Please provide SED with the most current emergency training records of all employees responsible for responding to emergencies in Mather, Castle, and Herlong systems.

**WCG RESPONSE:** SED wanted the most current emergency training records of all employees responsible for responding to emergencies in Mather, Castle and Herlong.

WCG conducted a review and training of a previous incident.

Emergency Response Training: WCG met with Castle Fire Department, the one critique that Captain Steve gave was the first responding WCG personnel to stop and tie-in with the fire department and give action plan. (See attached Form 615-6: Employee Emergency Training - First Responder).

## II. Areas of Concern/ Observations/ Recommendations

1. SED reviewed WCG maps and noted that some of WCG's maps are either not up-to-date or do not show sufficient details of the buried pipeline; therefore, they are required to be revised to show details of the type & dimension, exact location of the underground gas pipeline systems, and other details. SED also noted that this is particularly important to have accurate maps to show WCG's underground pipeline and other assets on the maps to be used for locate and mark activities, excavations, leak survey, and other operation and maintenance activities.

During the inspection, WCG informed SED that it is in the process of updating and/or recreating some of its maps for all its service territory.

Please inform SED when WCG will finalize revising its pipeline maps for all of WCG's systems and notify SED when they are completed.

**WCG RESPONSE:** Please inform the SED when WCG will finalize revising its pipeline maps.

WCG has map drafts from our architect and should have final maps for Castle, Mather and Herlong completed by the SED's April 11th inspection.

2. SED reviewed WCG's O&M Plan and noted that WCG has been calibrating all its equipment according to manufacturers' instructions and recommendations. However, SED found that WCG calibrates its pressure gauges only in-house by using the existing pressure gauges located in the yard. SED recommended that the reference pressure gauge which is used to calibrate other pressure gauges, needs to be calibrated and certified by the manufacturer annually.

After this discussion, WCG made necessary changes in its O&M Plan and ordered a certified pressure gauge from the manufacturer to calibrate all pressure gauges that WCG uses in the field. WCG also decided to order a brand new pressure gauge every year that is calibrated and

certified by the manufacturer to be used as the reference pressure gauge to calibrate the other pressure gauges.

Please provide SED with the name, model, and certification information of the reference pressure gauge when WCG receives it and please provide most recent calibration records of all the pressure gauges when they are completed.

**WCG RESPONSE:** Please provide SED with the name, model and certification information of the reference pressure gauge.

Reference Pressure Gauge is a Crystal IS33, Serial Number 2262119825, Asset ID Number H-216-2070. Calibration Test Certificate is attached as is WCG Form Gen B1: Equipment Calibration Record.

3. SED reviewed WCG's EP and noted the following deficiencies:

WCG's EP does not have a list of emergency equipment that it currently possesses or what equipment WCG will be contracted to be used during emergencies.

WCG must identify the list of currently available emergency equipment and other equipment that will be contracted for in its EP.

**WCG RESPONSE:** WCG must identify the list of currently available emergency equipment and other equipment that will be contracted for, in its EP.

WCG lists all of its available equipment in its Emergency Plan (OME Page 71, attached) in additional WCG has the phone numbers of the Rental Companies to be used in case other equipment needs to be contracted for. (See Forms 615-2C, 2H & 2M, attached)

4. Public Awareness Program (PAP)

SED reviewed WCG's PAP and noted the following:

- WCG developed and implemented a written continuing public information program as per §192.616 requirements.
- WCG also follows the American Petroleum Institute's (API), Recommended Practice (RP) 1162 Program Recommendations.
- WCG provides information to its customers, contractors, excavators, schools, churches, Underground Safety Alert, Emergency Officials, and Public Officials.
- WCG provides public awareness information to its customers by bill stuffers.
- WCG's Public Awareness Message (PAM) topics are given below:

*Call Before You Dig  
Carbon Monoxide  
Natural Gas Emergencies in Your Home- Dos and Don'ts*

*Gas Appliance Safety*  
*Gas Leak Indicators*  
*Gas Odor & Appliance Leaks*  
*Customer Owned Service Lines*

- SED reviewed the public awareness information and noted that since subjects are divided into groups and provided to the customers separately as bill stuffers throughout the year, customers will benefit more if the essential information is consolidated and sent to customers as a separate letter twice a year.
- WCG also provided “Sniff Cards” to all its customers which can be scratched to release an odor similar natural gas odor to educate them on how to recognize the gas leak.
- SED found these cards very effective to make public aware of potential danger of possible gas leak by recognizing the gas odor and contacting WCG and other emergency officials to prevent any incidents.
- During the inspection, SED recommended that WCG provide the important pipeline safety, damage prevention, emergency response, emergency contact, and general pipeline awareness messages to all Stakeholder audience listed above by mailing letters and/or meeting with them personally if applicable.
- In 2014, WCG sent out program evaluation feedback cards to its customers to obtain information on how effective its Public Awareness Messages that were sent to the customers as part of their bills throughout the year.
- The results showed that only 15% of the customers comprehended the messages out of the 22% who responded to the survey.
- SED and WCG reviewed the questions on the survey and determined that another evaluation is necessary since WCG will start mailing separate letters to its customers and all other stakeholders and conduct another evaluation within a year.
- The new survey card will have a comments section to give an opportunity to the customers and other stakeholders to provide their feedback on the evaluation cards.
- WCG also needs to evaluate the effectiveness of its Public Awareness Program once a year not to exceed 15 months and make changes if necessary.

SED determined that WCG must do the following:

4.1 WCG must provide essential public awareness information to its customers including schools, churches, and hospitals twice a year by mailing letters which provide information about the following subjects:

- Pipeline purpose and reliability
- Awareness of hazards and prevention measures
- Damage Prevention Awareness

- Leak Recognition and Response
- How to get additional information

Please provide SED with a copy of the PAM that is mailed to all WCG customers twice a year along with distribution records for each of WCG's gas distribution pipeline system.

**WCG RESPONSE:** Please provide SED with a copy of the PAM that is mailed to all WCG customers twice a year.

WCG currently relays these messages to our customers on their billing statement twice a year, see attached log, Form 616. The SED suggested that it would benefit our customers to only receive the information twice a year in a tri fold pamphlet. WCG is in the process of creating a tri fold. WCG hopes to have the tri fold available and mailed out in September 2016.

4.2 WCG must provide the essential public awareness information to Emergency Officials, once a year and Local Public Officials once in three years on the following subjects:

- Pipeline purpose and reliability
- Awareness of hazards and prevention measures
- Damage Prevention Awareness
- Leak Recognition and Response
- How to get additional information
- Emergency Preparedness Communications

WCG can mail the message or have group meetings with Local Public and Emergency Officials and keep relevant records such as addresses sent and/or meeting attendance list along with topics discussed during the meeting.

**WCG RESPONSE:** WCG meets with Local Emergency Officials once a year and a meeting and attendance log is kept on WCG Form 615-5A & Form 615-5B. Attached are meetings with Herlong, 03.03.2016; Mather, 02.10.2016 and Castle, 01.21.2016.

4.3 WCG must provide the essential public awareness information to Excavators and One-Call Centers once a year on the following subjects:

- Pipeline location information
- Pipeline purpose and reliability
- Awareness of hazards and prevention measures
- Damage Prevention Awareness
- Leak Recognition and Response
- One-call requirements
- How to get additional information

WCG can conduct group meetings or one-call center outreach once a year and should keep related records.

**WCG RESPONSE:** WCG belongs to the Underground Service Alert Notification (USAN) group which is a One-Call Center. Each One-Call Ticket is responded to and information pertaining to that ticket are on that ticket.

4.4 WCG must document the message type and content, and delivery method and frequency for each stakeholder audience.

**WCG RESPONSE:** WCG documents this information on its Form 616, see attached.

4.5 WCG must identify, document, and make necessary changes to its PAP based on the results and findings of its annual internal audit of program assessment.

**WCG RESPONSE:** WCG will keep track of its changes to the PAP using Form 605-A1. (Sample attached)

4.6 WCG must conduct another effectiveness evaluation of its PAP and document the method used to perform the evaluation after WCG sends the new PAM based on SED's recommendations.

**WCG RESPONSE:** WCG will conduct another effective evaluation of its new PAM one month after the PAM is distributed to its customers.

4.7 WCG must document actual PAP outreach for each stakeholder and systems covered by its program.

**WCG RESPONSE:** WCG uses Form 616 to document actual PAP outreach to each stakeholder.

4.8 WCG must make necessary changes to improve its PAP after it obtains the feedback from the stakeholders and it must also document its PAP evaluation results to improve the effectiveness.

**WCG RESPONSE:** Once feedback is received, WCG will re-evaluate its PAP and document any changes.