

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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June 3, 2020

Mark Williams (mw7300@aol.com)

President

West Coast Gas Company Inc.

9203 Beatty Drive

Sacramento, CA 95826

GI-2020-05-WCG-34-07/GI-2020-05-WCG-34-09

SUBJECT: Closure Letter for General Order (GO) 112-F Gas Inspection of WCG's Operator Qualification and Distribution Integrity Management programs.

Dear Mr. Williams:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) reviewed West Coast Gas' (WCG) response letter dated May 18, 2020, that addressed a potential violation identified during the GO 112-F operator qualification and distribution integrity management programs inspection for West Coast Gas (WCG) that was conducted from May 4 to May 8, 2020.

Attached is a summary of SED's inspection finding, WCG's response to SED's finding, and SED's evaluation of WCG's response to the finding.

This letter serves as the official closure of the 2020 GO 112-F OQ and DIMP program inspection for WCG.

Thank you for your cooperation in this inspection. If you have any questions, please contact Victor Muller at (415) 940-4352 or by email at Victor.Muller@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

Enclosure: Post-Inspection Written Preliminary Findings

cc: Dennis Lee, SED
Claudia Almengor, SED
Ray Czahar, WCG (rczahar@aol.com)
Cynthia Morris, WCG (westgas@aol.com)

Post-Inspection Written Preliminary Findings

Date of Transmittal: 05/12/2020

Dates of Inspection: 5/4/2020-5/8/2020

Operator: WEST COAST GAS CO INC

Operator ID: 31267 (primary)

Inspection Systems: WCG OQ and DIMP Programs

Assets (Unit IDs): West Coast Gas (88675)

System Type: GD

Inspection Name: WCG DIMP & OQ

Lead Inspector: Victor Muller

Operator Representative: Mark Williams

Unsatisfactory Results

Topical Content (OQ, PA, CRM): Operator Qualification (MISCTOPICS.OPTRQUAL)

Question Text Are records maintained for changes that affect covered tasks and significant OQ plan changes?

References 192.805(i) (192.805(f))

Assets Covered West Coast Gas (88675 (34))

Issue Summary The WCG's OQ plan defines Significant Changes on page 4 as follows:

Significant Changes Means the following as it related to the Plan:

- 1) Wholesale changes to the program
- 2) Change in evaluation methods, i.e. performance and written to written only
- 3) Increases in evaluation intervals, i.e. from 1 to 5 years
- 4) Increasing span of control ratios
- 3) Removal of covered tasks, not including combining covered tasks

WCG's OQ plan states on page 23:

Significant Plan written program changes should be identified and have the appropriate regulatory agency notified once the changes of the program have been reviewed and approved by the Operations Manager. When directed by the Operations Manager, the Office Manager will transmit the revised Plan to the CPUC San Francisco headquarters office as follows...

Title 49 CFR §192.805(i) states:

(i) After December 16, 2004, notify the Administrator or a state agency participating under 49 U.S.C. Chapter 601 if the operator significantly modifies the program after the administrator or state agency has verified that it complies with this section. Notifications to PHMSA may be submitted by electronic mail to InformationResourcesManager@dot.gov, or by mail to ATTN: Information Resources Manager DOT/PHMSA/OPS, East Building, 2nd Floor, E22-321, New Jersey Avenue SE., Washington, DC 20590

The install tracer wire, Squeeze off pipe (PE plastic) and, Repair/tie in polyethylene pipe tasks changed from 1 year to 5 year reevaluation intervals in the 7/11/2017 update to WCG's OQ plan. These changes constitute significant changes as defined by WCG's OQ plan and should have been reported to SED as required by both Title 49 CFR §192.805(i) and WCG's OQ plan. SED finds WCG in violation of Title 49 CFR §192.805(i) for failure to report significant modification to WCG's operator qualification program.

WCG'S RESPONSE:

West Coast Gas Company Inc. would like to thank the SED for conducting the audit by email and conference calls. We found this to be an effective way of communicating during this current situation.

WCG has updated is binder cover to reflect the need for communicating changes to the CPUC, see attachment A.

WCG has also updated its OQ 01 Page 4 to reflect the need for communicating changes to the CPUC, see attachment B.

WCG is committed to improving its OQ Plan and any further significant changes will be communicated to the CPUC at

Program Manager, Gas Safety & Reliability Branch, Safety & Enforcement Division, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, CA 94102.

SED's Conclusion:

SED has reviewed the response from WCG and determined that WCG's OQ Plan changes in response to this violation and WCG's commitment to communicating any significant changes to the OQ Plan sufficiently address this violation. While WCG should have reported the changes they made to their OQ plan in 2017 to SED, the changes made were reasonable and would have been approved. Therefore, this violation did not result in a threat to public safety and SED has opted not to impose a fine or penalty at this time.