

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 5, 2019

Mr. Mark Williams, President
West Coast Gas Company, Inc.
9203 Beatty Drive
Sacramento, CA 95826

GI-2019-05-WCG-34-02-03-04-05-06

SUBJECT: General Order (GO) 112-F Gas Inspection of West Coast Gas Company

Dear Mr. Williams:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted an inspection of West Coast Gas Company (WCG) on May 20 through May 24, 2019. During the inspection, SED performed a comprehensive review of the maintenance and operations records for the period of January 1, 2016 through December 31, 2018. SED also reviewed the Operations and Maintenance Plan (O&M), the Emergency Response Plan (ERP), the Drug and Alcohol Misuse Policy (D&A), and the Public Awareness Program Effectiveness Review (PAP-ER). SED performed a field inspection of a representative sample of WCG facilities in the Mather Field area and Castle Air Field area. SED staff also reviewed WCG's Operator Qualification records, which included field observation of WCG personnel performing covered tasks.

SED's findings are noted in the Post-Inspection Written Preliminary Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records and pipeline facilities that SED inspected during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by WCG to address the violations and concerns noted in the Summary.

If you have any questions, please contact Jason McMillan at (916) 928-2271 or by email at Jason.McMillan@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

cc: Ray Czahar, WCG (rczahar@aol.com)
Cynthia Morris, WCG (westgas@aol.com)
Aimee Cauguiran, SED (Aimee.Cauguiran@cpuc.ca.gov)
Claudia Almengor, SED (Claudia.Almengor@cpuc.ca.gov)

Post-Inspection Written Preliminary Findings

Dates of Inspection: 05/20/2019 – 05/24/2019

Operator: WEST COAST GAS CO INC

Operator ID: 31267

Inspection Systems: All

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

System Type: GD

Inspection Name: WCG

Lead Inspector: Jason R. McMillan

Operator Representative: Mark Williams

Unsatisfactory Results

No Preliminary Findings.

Concerns

Procedures : Customer and EFV Installation Notification (PRO.SUBACUSTEFV)

Question Text Is there an adequate excess flow valve (EFV) installation and performance program in place?

References 192.383(b) (192.381(a), 192.381(b), 192.381(c), 192.381(d), 192.381(e), 192.383(a), 192.383(c))

Assets Covered West Coast Gas (88675 (34))

Issue Summary Currently, there is no procedure to collect data for annual reporting of the EFV installations. However, WCG has not installed any new EFVs since the new reporting requirement has been in effect. WCG should develop and implement a procedure for collecting EFV data for annual reporting going forward.

Additionally, WCG currently does not have a customer notification in place that satisfies the EFV requirements. Although they have a draft notification ready to post on their website and to include in the billing statements which are mailed to customers, WCG should post the notification as soon as possible. Please provide a copy of the notification to SED when it is in place.

Procedures : Distribution System Patrolling & Leakage Survey (PRO.SUBMPATROLDIST)

Question Text Does the process require distribution system patrolling to be conducted?

References 192.721(a) (192.721(b))

Assets Covered West Coast Gas (88675 (34))

Issue Summary WCG's procedure "Maintenance 721; Facility Patrolling" states that patrolling is performed within "residential and commercial districts at least 4 times per year, at intervals not to exceed 4-¹/₂ months." The procedure also defines what a commercial district is. It can be argued that WCG's Herlong subsystem is neither within a residential district nor within a commercial district, as is defined by the procedure. Therefore, the Herlong subsystem is not subject to this procedure, and is not included within the stated maintenance schedule for patrolling. SED suggests that WCG amend the current procedure to ensure all parts of their gas pipelines are included in the patrolling requirement.

SED notes that WCG performs patrol of the Herlong subsystem regularly, and SED is not concerned with the actual work performed on the pipeline. SED is merely concerned that the procedure in question does not adequately capture the entirety of WCG's pipeline assets.

Records : Reporting (PRR.REPORT)

Question Text Have complete and accurate Annual Reports been submitted?

References 191.11(a)

Assets Covered West Coast Gas (88675 (34))

Issue Summary SED reviewed the PHMSA Annual Report for calendar year 2016, 2017 and 2018 which were submitted by WCG. The reports were submitted before March 15th of each following year, but there were some factual discrepancies on the annual reports due to clerical error. SED requests that WCG verify the accuracy of all information on the annual report before submission.

Records : Operations And Maintenance (PRR.OM)

Question Text Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?

References 192.605(a) (192.605(b)(8))

Assets Covered West Coast Gas (88675 (34))

Issue Summary WCG Procedure "General 605-B8; Work Review" outlines the requirements that are in line with this regulation. The frequency of this task currently states that "All pipeline operations and maintenance work must be reviewed for effectiveness and adequacy at an interval not to exceed 15 months, but at least once each calendar year." WCG performs this review annually during the review of O&M procedures but has not made any record of reviewing specific work performed on the pipeline system. SED discussed this requirement in depth during the inspection and suggests that WCG develop a process to document the review of a representative sample of maintenance and operational work performed on their pipeline system.

Drug and Alcohol Misuse Program

Question Text Verify that the Alcohol Misuse Prevention Program assures for providing educational materials that explain alcohol misuse requirements and the operator's policies and procedures with respect to meeting those requirements.

References 199.239(a)

Assets Covered West Coast Gas (88675 (34))

Issue Summary WCG provides the material required by 199.239(a) in their Drug & Alcohol training and OME but it is not included in the employee handbook. Since the drug and alcohol training might not occur until after the pre-employment drug and alcohol tests, SED suggests that the educational material required by 199.239(a) be included in the new employee handbook and made available to prospective employees prior to the pre-employment drug and alcohol testing.