

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 12, 2020

Mark Williams ([mw7300@aol.com](mailto: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: General Order (GO) 112-F Gas Inspection of WCG's Operator Qualification and Distribution Integrity Management programs.

Dear Mr. Williams:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Victor Muller and Dmitry Lysak conducted a General Order 112-F inspection of West Coast Gas's (WCG's) Operator Qualification and Distribution Integrity Management programs from May 4 to May 8, 2020.

SED's staff identified one violation of Title 49 Code of Federal Regulations (CFR), Part 192. This finding is noted in the Post-Inspection Written Preliminary Findings which is enclosed with this letter.

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

If you have any questions, please contact Victor Muller at (415) 940-4352 or by email at [Victor.Muller@cpuc.ca.gov](mailto: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](mailto:rczahar@aol.com))  
Cynthia Morris, WCG ([westgas@aol.com](mailto: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.