



SOUTHERN CALIFORNIA EDISON

1 PEBBLY BEACH ROAD

AVALON, CALIFORNIA 90704

2017 REVISION

**Safety Plan for the Catalina
Petroleum Gas Pipeline
Distribution System**

**SAFETY PLAN
FOR THE SCE CATALINA
PETROLEUM GAS PIPELINE DISTRIBUTION SYSTEM
REVISION SHEET**

<u>DATE</u>	<u>DESCRIPTION</u>	<u>COMPLETED BY</u>
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Table of Contents

Revision Sheet	i
Table of Contents	ii
List of Figures	iv
List of Appendices	iv
Abbreviations and Acronyms	v
Petroleum Gas Pipeline System Safety Plan Profile and Review	vi
Safety Policy Statement	vii
Introduction	1
1.0 Safety Systems	3
1.1 Identify and Minimize Hazards and Systemic Risks. 961(d)(1)	3
1.2 Identify the Safety-Related Systems That Will Be Deployed to Minimize Hazards. 961(d)(2)	4
2.0 Emergency Response	6
2.1 Equipment and Personnel Procedures to Limit the Damage from Accidents. 961(d)(5)	8
2.2 Timely Response to Reports of Leaks, Hazardous Conditions, and Emergency Events. 961(d)(6)	10
2.3 Prepare for and Respond to Earthquakes and Other Major Events. 961(d)(8)	14
3.0 State and Federal Regulations	16
3.1 Protocols for Determining Maximum Allowable Operating Pressures. 961(d)(7)	16
3.2 Meet or Exceed the Minimum Standards for Safe Design, Construction, Installation, Operation and Maintenance of Gas Transmission and Distribution Facilities Prescribed by Regulations. 961(d)(9)	17
3.3 Best Practices in the Gas Industry and with Federal Pipeline Safety Statutes. 961(c)	18
3.4 Methane Emissions Compliance Plan	19
4.0 Continuing Operations	20

4.1	Safety of the Public and Gas Corporation Employees as the Top Priority, Take All Reasonable and Appropriate Actions Consistent with the Principle of Just and Reasonable Cost-Based Rates. 963(b)(3)	20
4.2	Provide Adequate Storage and Transportation Capacity to Reliably and Safely Deliver Gas to All Customers. 961(d)(3).	22
4.3	Provide for Effective Patrol and Inspection to Detect Leaks. 961(d)(4).....	22
4.4	Ensure an Adequately Sized, Qualified and Properly Trained Gas Corporation Workforce. 961(d)(10)	23
5.0	Emerging Issues - Any Additional Matter that the Commission Determines Should be Included in the Plan. 961(d)(11)	25

List of Figures

Figure 1 SCE Petroleum Gas Pipeline System Location Map

List of Appendices

Appendix A Distribution Integrity Management Plan

Appendix B Community Gas Emergency Plan

Appendix C SCE Catalina Workforce Meeting to Review Safety Plan

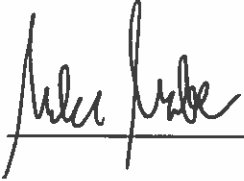
Abbreviations and Acronyms

AGA	American Gas Association
APGA SIF	American Public Gas Association Security and Integrity Foundation
BTU	British Thermal Units
CFR	Code of Federal Regulations
CPUC	California Public Utilities Commission
CUC	Catalina Utilities Center
DIMP	Distribution Integrity Management Plan
DOT	U.S. Department of Transportation
EH&S	Environmental Health and Safety
GECS	Gas Engineering and Compliance Section
GTDP	Gas Transmission and Distribution Piping
IDLH	Immediately Dangerous to Life and Health
LEL	Lower Explosive Limit
LPG	Liquefied Petroleum Gas
MAOP	Maximum Allowable Operating Pressure
NTSB	National Transportation Safety Board
O&M	Operations and Maintenance
O.S.H.A.	Occupational Safety and Health Administration
PG&E	Pacific Gas and Electric Company
PU	Public Utility
SB	Senate Bill
SCE	Southern California Edison Company
SES	Safety and Environmental Specialist
SHRIMP	Simple, Handy, Risk-based Integrity Management Plan
TBDU	Transmission and Distribution Business Unit
W&G	Water and Gas

Safety Plan for the Petroleum Gas Pipeline System Profile and Review

This Safety Plan for the Petroleum Gas Pipeline System has been developed and approved by the following individuals:

Developed by:



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Safety Policy Statement

Southern California Edison (SCE) is committed to safety. We are committed to strengthening our safety culture to achieve an injury-free workplace. SCE always seeks to have no serious injuries to the public resulting from system failures. To get there, we're creating and sustaining a working environment where what matters most are:

- Having every employee leave the workplace unhurt;
- Using work behaviors and practices that uncompromisingly protect the safety of everyone;
- Caring for the safety of everyone; and
- Stopping work anytime unsafe conditions or behaviors are observed until the job can be completed safely.

A continuous commitment and dedication to following these values by employees will assure that the safest workplace is established and that the safest work behaviors are always used to prevent injuries.

Prerequisites for safety are a qualified and appropriately sized work force. To verify the adequacy of our work force, a staffing plan was developed. This plan is based on a bottom up approach where operations and maintenance activities are identified and quantified and personnel qualifications are established. SCE developed a staffing plan that was used to validate the number of qualified personnel utilized to operate and maintain the petroleum gas system based on safety being the highest priority and consistent with the principle of just and reasonable cost-based rates.

We welcome the opportunity to demonstrate our commitment to safety through this Safety Plan.



Greg Ferrée
Vice President, Distribution Business Line
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Introduction

The SCE Catalina petroleum gas pipeline distribution system (Catalina Gas System) serves the City of Avalon on Santa Catalina Island, California. Liquefied petroleum gas (LPG) is stored and vaporized at its Catalina Utilities Center (CUC) Facility. A petroleum gas and air mixture (a surrogate for natural gas) is distributed through approximately 6.5 miles of pipeline segments. The petroleum gas/air mixture is distributed at a pressure of 7 pounds per square inch gauge (psig) with a typical heating value of approximately 1,350 British thermal units per cubic foot (BTU/ft³). The maximum allowable operating pressure (MAOP) is 10 psig. According to Title 49, Code of Federal Regulations, Part 192.3 (49 CFR 192.3), the pipeline system is a “high pressure distribution system.” Other components of the distribution system include 96 gas valves, a corrosion protection system comprised of four rectifier’s, a pressure-monitoring unit, and approximately 1,300 gas meters. The most commonly installed gas meter is the American Meter AC-250 (250 cubic feet/hour [ft³/hr] capacity). Pipe sizes range from 0.5 to 8 inch diameter pipe. The pipeline was originally installed in 1965 and currently consists of both steel and polyethylene (plastic) pipe. The pipeline begins at CUC Valve #1, which is located within the perimeter boundary of the CUC Facility.

On September 9, 2010, a 30-inch diameter natural gas transmission pipeline owned and operated by Pacific Gas and Electric Company (PG&E) ruptured in the city of San Bruno, California, causing significant property damage, killing eight people, and injuring others. The information gathered in connection with the National Transportation Safety Board’s (NTSB) investigation of the rupture suggests that it initiated at the long seam of one of the pipeline segments.

After the San Bruno gas explosion, Senate Bill (SB) 705 was promulgated to increase the safety of natural and petroleum gas transmission and distribution systems. SB 705, codified as Pub. Util. Code §§ 961 and 963, requires each gas corporation to develop a Safety Plan. The Safety Plan is to be filed no later than June 29, 2012, and is to show how the operator addresses each element of Public Utility Code §§ 961 and 963 for its gas transmission and distribution facilities.

Specifically, the Safety Plan is to address the directives codified in Public Utility Code § 961(c) and (d)(1-10) and § 963(b)(3). To organize the detailed legislative directives, the Public Utilities Commission has grouped the directives into five overall topics: (1) safety systems, (2) emergency response, (3) state and federal regulations, (4) continuing

operations, and (5) emerging issues. The Catalina Gas System Safety Plan is organized according to these same topics, directives assigned to each topic, and topic numbering as presented by the Public Utilities Commission.

The Catalina Gas System Safety Plan will be reviewed annually and submitted with the DOT Annual Gas Report and CPUC templates as required by GO 112-F, Section 123 – Annual Reports, by March 15 of each year.

Safety Systems

This section discusses the policies, procedures and standards that are currently in place to protect public and worker safety for elements of Public Utility Code §§ 961 and 963 as grouped by the CPUC as Safety Systems. The specific section of the Public Utility Code is referenced after each subsection title.

1.1 Identify and Minimize Hazards and Systemic Risks. 961 (d)(1)

To identify and minimize hazards and systemic risks, Catalina Gas System performs numerous work activities, which include the following:

- Distribution Integrity Management Plan (DIMP)
- Leak Surveys
- Pipeline Patrols
- Damage Prevention Programs
- Corrosion Control Measures
- Valve Maintenance Program
- Operator Qualification Program
- Operation & Maintenance Manual
- Surveillance of the Petroleum Distribution System

One goal of the Safety Plan is to ensure the regulatory and management systems in place effectively prevent or detect and correct safety lapses. The listed programs, plans, and work activities function to identify threats to overall gas system operations. The remedial and preventative work activities performed to minimize hazards and systemic risks, are scheduled, performed, and tracked through the Catalina Operations, Maintenance and Compliance System, which is described in Section 1.2.

On August 2, 2011 and in compliance with regulations, SCE implemented the first Distribution Integrity Management Plan (DIMP) for the Catalina Gas System. The DIMP (refer to Appendix A) was developed based on the design, construction, operations and maintenance records of SCE, including: incident and leak history, corrosion control records, continuing surveillance records, patrolling records, maintenance history, and excavation damage experience, as well as the judgment and knowledge of the Catalina Gas System workforce.

Within the DIMP, the processes used for Threat Evaluation and Risk Prioritization are the processes found in the Simple, Handy, Risk-based Integrity Management Plan™

(SHRIMP™) software package developed by the APGA Security and Integrity Foundation (SIF).

Using the assessment conducted by the SHRIMP program as the foundation, Catalina Gas System has evaluated and prioritized the system threats and deployed performance measures, accelerated and additional actions to minimize hazards. The following performance measures are being tracked:

- Hazardous leaks either eliminated or repaired, categorized by cause
- Excavation damages
- Excavation tickets received
- Leaks either eliminated or repaired, categorized by cause
- Hazardous leaks either eliminated or repaired, categorized by material
- Backfill operations monitored
- Excavation activities monitored or audited
- Cathodic protection deficiencies by location and how they were resolved including:
 - Eliminated shorts (including shorted casings) in this portion of the distribution system
 - Repaired, replaced, or added a rectifier or ground bed to the existing cathodic protection system in this portion of the distribution system
 - Replaced anode beds or added anodes section-wide in this portion of the distribution system
- Material failures and
- Repaired or replaced problem materials

Hazards and systemic risks identified in DIMP, as well as all other policies, procedures, or standards, will be scheduled, performed, and tracked through the Catalina Operations, Maintenance and Compliance System, which is described in Section 1.2.

1.2 Identify the Safety Related Systems That Will Be Deployed to Minimize Hazards. 961(d)(2)

Catalina Gas System has implemented the safety-related system referred to as SCE Catalina Operations, Maintenance and Compliance System. Work activities to identify and minimize hazards and systemic risks as required by regulations, policies, procedures, or standards are scheduled, performed, and processed through the Catalina Operations,

Maintenance and Compliance System to ensure performance, provide tracking, and generate documentation.

Systems, Application, and Products (SAP) software is utilized to create automatic generating preventative maintenance work orders to perform all required activities to safely operate and maintain the distribution system. These work orders are distributed by the Supervisor to the Foreman for scheduling, staffing, and execution. When the work activity is completed, the work order is closed and documentation is filed.

For confirmation, the Catalina compliance analyst will generate a monthly report of our Gas Inspection and Maintenance Program (GIMP) from SAP to ensure all compliance related work orders and notifications are completed on time. The Catalina compliance analyst will review work orders and notifications to ensure completion of all documentation, ensure review of documentation by the Supervisor (as required by Standard Procedure 412 – Surveillance of the Petroleum Gas Distribution System), and the closing of work orders. The Compliance Analyst will report tracking information directly to the Catalina Compliance Manager. In addition, as part of the bi-annual Environmental Health and Safety (EH&S) compliance facility assessment, the Transmission and Distribution Business Unit (TDBU) Safety and Environmental Specialist (SES) will verify completion of the compliance analyst's reporting and tracking activities. This will provide a layer of independent review to ensure compliance. If supervisory review creates secondary work activities, work orders or notifications will be generated to track and complete secondary activities via the same procedure used to complete and track primary work orders and notifications.

The listed programs, plans, and work activities listed in Section 1.1 function to identify threats to the overall gas system operations. The remedial and preventative work activities performed to minimize hazards and systemic risks, are scheduled, executed and tracked through the Catalina Computerized Maintenance Management System. This management system effectively prevents or detects and corrects safety lapses. The Computerized Maintenance Management System is an enhancement of existing methods using the elements promulgated by SB 705 and the lessons learned from the San Bruno incident. As such, Catalina Gas System has a prudent management system in place to protect public and worker safety, which is the goal of the Safety Plan.

Emergency Response

This section discusses policies, procedures, and standards that are currently in place to protect public and worker safety for elements of Public Utility Code §§ 961 and 963 as grouped by the CPUC as Emergency Response. The specific section of the Public Utility Code is referenced after each subsection title.

The Catalina Gas System utility utilizes its gas distribution system to supply a propane-air mixture as a surrogate for natural gas. The emergency response procedures discussed below are developed in accordance with 49 Code of Federal Regulations, Parts 191-195 (Emergency Plans-Transportation of Natural and Other Gas), Article 82 of the California Fire Code- Liquefied Petroleum Gases, and General Order (94-B) of the CPUC.

Gas incidents may include leaks, odors, outages, fires, or other incident types. Incidents reported to SCE Catalina Utilities Center will be classified using the Catalina Gas Telephone Report of Customer Leak form. A copy of the telephonic leak report form is provided in Appendix B. SCE receives notifications of potential gas leaks or unsafe conditions through two different avenues as described below. Information is recorded on the Telephone Report of Customer Leak form and logged in the Pebble Beach Station Logs. Control Room personnel is periodically trained by their Supervisor on receiving, classifying, and responding to reports of propane gas leaks or other unsafe conditions.

1. Private individuals may call in report of occurrences to our customer service center 24 hours a day. The customer service representatives at our call center will record the location and basic nature of the problem, along with contact information (name and number) for the reporting party. The customer service center then notifies the Control Room by issuing a trouble ticket.
2. Private individuals may also contact emergency services directly by calling 911 and providing information to the local dispatcher. The emergency services agency will then notify the Control Room of the leak or potentially unsafe conditions. The following agencies have been notified to call directly to the Control Room: Los Angeles County Fire Department, Los Angeles County Sheriff's Department, Avalon Fire Department, and the City of Avalon Public Works and City Hall.

Each of the emergency response agencies listed in this section have been provided a copy of SCE's Emergency Response Plan, including our Telephone Report of Customer Leak

form for reference in receiving notifications. Additional guidelines for determining an appropriate action level can be found using the SCE Incident Complexity Analysis tool. The descriptions and recommended activation status for each SCE incident level is summarized in the table below. A copy of the Incident Complexity Analysis tool is provided in Appendix C.:

Edison Incident Levels		IMT/IST/EOC Activation Status
Level 1	Events with no potential for severe harm, but which requires management visibility.	Management Discretion
Level 2	Events with little potential for severe harm, but which can escalate rapidly if not managed properly.	Management Discretion
Level 3	Events with the potential to result in severe harm to the company, but for which there is a higher level of familiarity or anticipation.	Activate IMT/IST/EOC
Level 4	A rare and unanticipated or novel emergency with the potential to do, or that is in the process of doing, irreparable or severe harm to the company. The most severe type of incident.	Activate IMT/IST/EOC

Level 1 Incidents: These are non-emergency service calls which will be scheduled for routine response or maintenance by SCE gas service representatives. Events with no potential for harm to life, the environment, or property, but which require visibility.

Level 2 Incidents: These are urgent response issues with potential for escalation if not managed properly, potentially posing a threat to life, the environment, and property. Included among these incidents is a smell of gas inside or immediately adjacent to occupied structures. It includes incidents of interruption of service to critical clients. While SCE staff may be assisted by public safety responders for some incidents, these situations will generally be handled by SCE gas service staff. The response by SCE staff shall be immediate to any Level 2 incident.

Level 3 Incidents: This level of emergency response includes incidents posing catastrophic potential. These would include rupture of gas mains, fires and explosions involving gas accumulations or structures, high volume gas leaks, and similar incidents. Level 3 incidents will require public safety and may also involve specialized contractor response. Portions of the Catalina gas system may be subjected to extended outages while repairs are accomplished. The response by SCE staff shall be immediate to any Level 3 incident.

Level 4 Incidents: The most severe level of emergency. A rare and unanticipated or novel emergency with the potential to, or is in the process of doing, irreparable or severe

harm. Incidents may include natural disasters (earthquakes, floods, tsunamis, fires, etc.) or catastrophic system failures.

The Emergency Response Plan, including system maps (as referenced in Appendix B), has been made available to fire departments serving Catalina Island. This emergency plan must be made available to the public upon request per state and federal law. The position of buried gas distribution lines in open areas shall be marked when practical by signage, and shall be made available to pipeline excavation warning services

2.1 *Equipment and Personnel Procedures to Limit the Damage from Accidents. 961(d)(5)*

Incident Responsibilities

- SCE staff shall manage all routine incidents (Level 1) within SCE procedures.
- SCE staff shall operate within the Incident Command System (ICS) structure of the public safety responders near the scene, when necessary or as required, to coordinate response to significant incidents (Level 2, 3, or 4).
- On-scene emergency personnel from Avalon Fire Department, with mutual assistance from Los Angeles County Fire and Paramedics, shall coordinate emergency medical care when necessary.
- Los Angeles County Sheriff and the Avalon Fire Department shall conduct evacuations in gas incidents when necessary, as coordinated through the Incident Commander.
- The Los Angeles County Sheriff's Department, in conjunction with other supporting agencies, shall establish and maintain incident perimeters as necessary to protect public safety and worker access, as coordinated through Incident Command.
- SCE gas utility staff shall isolate the incident area by shutting off the flow of gas from feed lines into the impacted area.
- The Avalon Fire Department shall manage any fire suppression, combustible, or oxygen deficient atmospheres and related risks, as coordinated through Incident Command.
- SCE staff shall monitor the atmospheric conditions in and around the site and determine gas concentrations. SCE staff shall not enter hazardous work environments limited in "prohibitive work environments" below. SCE staff shall monitor any atmosphere where gas concentrations may be present.
- Once the incident is made safe, the ICS structure established by emergency response officials may be deactivated. The restoration process will be managed by internal or external SCE resources. Use of the Incident Command System for restoration planning and execution will be made at the discretion of SCE.

Prohibitive Work Environments

SCE gas utility workforce shall not enter explosive atmospheres. If such conditions are suspected or determined, SCE staff should request fire department assistance in dealing with this condition. An example of this condition may include a residential structure with a high interior gas concentration due to a gas leak. Explosives atmospheres are any environment which meets or exceeds 10% of the Lower Explosive Limit (LEL). No entry should be made into suspect spaces until this risk has been mitigated. SCE staff may close exterior valves and shut off the gas flow, or shutoff electrical power to such spaces from safe positions. As a precaution, use of electronic devices, smoking, or any hot work involving welding or cutting should be immediately suspended and restricted when a potential gas leak is reported.

SCE staff shall not enter confined spaces which may be either Immediately Dangerous to Life and Health (IDLH) or oxygen deficient. These environments require a self-contained breathing apparatus for respiratory protection and life safety and are beyond the training and scope of SCE gas staff duties. If such conditions are encountered, immediate assistance may be sought from fire department or contract responders. SCE staff may not enter such spaces until they are ventilated and returned to normal atmospheric values that do not require respiratory protection. IDLH atmospheres include concentrations of 2100 ppm or more (or exceeds 10% LEL) of propane or less than 19.5% oxygen (O₂). SCE staff may cause such spaces to be ventilated from safe positions.

Welding, cutting, or other “hot work” on gas mains which are actively transporting propane mixtures is strictly prohibited. Unlike lines transporting natural gas, propane will accumulate in low spaces quickly and pose significant flash fire and explosion hazards. These lines must be blocked and drained completely of product and the workplace ventilated until free of propane (less than 10% of the lower explosive limit). This should be confirmed with gas detection equipment specifically calibrated to propane. Only then is it safe to weld or cut SCE gas mains. Welding is performed by a qualified contractor.

SCE Catalina Utilities Center Response Equipment Inventory

Gas is distributed at 7 psig and is monitored 24-7. The MAOP is 10 psig which is maintained by the vaporizer plant. Pressure control has been built into the vaporizer plant and relief valves are installed on piping to safeguard the MAOP. SCE maintains the following equipment for response to gas emergencies on Catalina Island:

- Response vehicles and equipment (W&G crew vehicles, combustible gas indicators, valve wrenches, fire extinguishers, 900 mhz radio, cellular telephone, gas system maps, traffic control signage and road cones, emergency lighting, hand tools, and personal protection equipment).
- Trained response staff (W&G crew members – Foremen, Operator/Mechanic-trained in propane physical and chemical properties, system operations, Incident Command System (ICS), response priorities, contacting emergency response resources, gas leak isolation from the gas meter and gas main isolation valves, gas leak locating using electronic gas detection/monitoring equipment, response procedures, evacuation and public protection, and prevention of auto ignition. Utilitymen are trained to assist with these activities as directed by trained staff).
- Supervisory staff/Emergency Incident Commanders (W&G Supervisor and CUC Supervisor)
- Gas concentration monitoring equipment
- Other equipment (materials and supplies to perform repairs)

2.2 Timely Response to Reports of Leaks, Hazardous Conditions, and Emergency Events. 961(d)(6)

Response Priorities

The priority of action for all incidents involving propane will be life safety first, property second, and environment third. Immediate care shall be given to any injured person(s). The fourth priority is corporate image and the intention that customers shall receive quality, timely, and professional service.

Hazard Zone - The area in which personnel are potentially in immediate danger from the hazardous situation. This zone shall be established by the incident commander. Access to this area will be rigidly controlled and only authorized personnel shall be allowed to enter the Hazard Zone. Members of the general public are excluded from this zone. Further zoning may be incorporated into the hazard zone for purposes of emergency response and O.S.H.A. compliance.

Emergency Notifications

Public safety emergency response may be required to support SCE gas staff in managing potentially flammable concentrations of leaking gas. Catalina Utilities Center staff shall dial 911 and access emergency response services to any report of a significant gas odor within or immediately adjacent to a structure, any major leak, fire, report of rupture of a gas main, or emergency shutdown of gas system facilities.

If emergency response personnel are not yet on scene, the first gas operator to arrive will serve as Incident Commander. The gas operator will assess the situation and take or direct any necessary actions to protect life, property, and to secure the flow of gas.

If emergency response personnel are on scene prior to arrival of gas operator staff, that person will introduce themselves to the Incident Commander (IC) as the gas pipeline operator representative. SCE will operate within the ICS structure established by the local emergency response agencies. That person will continue serving as the point of contact until the situation is made safe or they are relieved of that duty by another gas pipeline operator representative.

Internal (SCE) emergency response communications will be coordinated through the Control Room at the Catalina Utilities Center.

The public may notify SCE of a gas emergency by calling the SCE Customer Call Center at: (800) 367-8851 or by calling 911.

Before digging to avoid pipeline intrusion call Dig Alert at 811 at least 48 hours in advance.

Response Procedures to Incidents Affecting Mains and Services

CONDITION	IMMEDIATE ACTIONS	RISK MANAGEMENT
Under-pressure in the gas system.	Contact customers and evacuate affected area with assistance from the Sheriff’s Department, isolate gas by closing gas meter valves, plan and implement repair and restoration	Investigate potentially affected customers for extinguished pilot lights prior to restoring gas to prevent fire and explosion risk. Conduct system repair. Restore pilot lights as needed.
Over-pressure in the gas system	Contact customers and evacuate affected area with assistance from the Sheriff’s Department, isolate gas by closing meter valves, plan and implement repair and restoration.	Investigate affected customers for gas- flare caused fires. Investigate atmospheres for combustible concentrations. Eliminate sources of ignition. Conduct system repair.
Pipeline rupture or uncontrolled escaping gas	Contact customers and evacuate affected area with assistance from the Sheriff’s Department. Identify affected area and close gas meter valves. Repair and restore system.	Interact with customers and safety responders as needed. Monitor atmosphere for combustible concentrations. Eliminate sources of ignition. Ventilate and protect against ignition as necessary. Conduct system repair.
Gas detected or suspected outside of buildings	Attempt to identify cause of leak (ex. Excavation, new construction, fencing, vegetation, etc.). Pinpoint leak using barhole device, available openings, and CGI. Assess location, extent of migration, and magnitude of leak and assign a leak classification.	Identify the affected area, eliminate sources of ignition, and ventilate the area. Continue to monitor atmosphere for combustible concentrations. Perform repairs as necessary.

CONDITION	IMMEDIATE ACTIONS	RISK MANAGEMENT
Gas detected or suspected inside or near a building.	If the SCE representative has any concerns for employee or customer safety, call 911 and request fire department assistance if not already on scene. Identify affected area and close valves. Evacuate buildings as necessary.	Coordinate with emergency services and customers as necessary. Monitor for gas accumulations and ventilate as necessary. Eliminate sources of ignition. Check all piping and appliances for leaks.
Transient or occasional light odor of gas in or near a building-unconfirmed leak source.	Identify affected area and close valves. Evacuate buildings as necessary.	Coordinate with emergency services and customers as necessary. Monitor for gas accumulations and ventilate as necessary. Eliminate sources of ignition. Check all piping and appliances for leaks.
Odor of gas emanating from single appliance.	Identify affected appliance and close appliance valves. Evacuate buildings as necessary.	Coordinate with customer as necessary. Monitor for gas accumulations. Ventilate as necessary. Repair leaks.
Suspected leaking gas meter.	Isolate meter by closing gas valves.	Coordinate with emergency services and customers as necessary. Monitor for gas accumulations and ventilate as necessary. Eliminate sources of ignition.
Inadequate supply (loss of delivery, plant failure, loss of power, etc.)	Notify customers of supply shortage and make preparations for service interruption. Isolate impacted areas. Develop and implement alternative means of source supply. Systematically restore system using purge points at system ends. Relight pilots.	Notify high priority customers (i.e. hospitals, customers on life-support, police, and fire departments). Identify systematic isolation and purge points. Coordinate with fire and emergency services as needed.

Performance Monitoring

All service requests, service complaints, odor and emergency calls and responses are logged. As part of continuing surveillance, the performance and quality of responses are

evaluated quarterly by supervision. A summary of calls and responses is reported to the CPUC on a quarterly basis. Work orders are created in a SAP work management system to manage and track completion of corrective actions. When interacting with customers, awareness of leak reporting, recognizing leaks, damage prevention, and maintenance of customer piping is also assessed and used in determining the effectiveness of public awareness messages. Catalina Gas System maintains a Public Awareness Program.

2.3 Prepare for and Respond to Earthquakes and Other Major Events. 961(d)(8)

Evacuation, Site Worker, and Public Protection

Lawful responsibility for ordering public evacuation rests with public safety officials. However in case of major events, Catalina Gas System staff also have responsibility to immediately notify public safety officials of gas risks, and in the absence of public safety officials, take immediate actions to notify and protect the public from gas risks. This will include the recommendations as follows:

Perimeter zone(s) around the affected area should be established as directed by the incident commander. These include:

Public Protection/Evacuation Zone - The Evacuation Zone is the larger area surrounding the Hazard Zone, in which a lesser degree of risk to emergency personnel exists, but from which all civilians will be removed. The limits of this zone will be enforced by the Sheriff’s Department when necessary. The area to be evacuated depends upon the nature and extent of the fire, explosion, or leak.

Response Procedures to Major Events like Fire, Earthquake, and Landslide.

CONDITION	IMMEDIATE ACTIONS	RISK MANAGEMENT
Fire located near or directly involving our pipeline facility.	Identify affected area and close gas meter valves. Evacuate 1000’ from source. Repair and restore system post-emergency once cleared by fire department and inspected by regulatory authority.	Assist fire and emergency services as requested. Monitor atmosphere for combustible concentrations. Eliminate sources of ignition.

<p>Explosion occurring near or directly involving our pipeline facility.</p>	<p>Identify affected area and close gas meter valves. Evacuate 1000' from source. Repair and restore system post-emergency once cleared by fire department and inspected by regulatory authority.</p>	<p>Assist fire and emergency services as requested. Monitor atmosphere for combustible concentrations. Eliminate sources of ignition.</p>
<p>Natural Disaster / Natural Forces (i.e. Earthquake, Flood, Tsunami/Tidal Wave, Wildfires, Landslides, etc.)</p>	<p>Patrol the system to identify any impacted facilities. Assess the extent of the damage and potential for escalation. Evacuate 1000' from source. Mitigate hazardous conditions (emergency shutdown / isolation). Provide necessary repairs and restore system.</p>	<p>Assist fire and emergency services as requested. Monitor atmosphere for combustible concentrations. Eliminate sources of ignition. Perform additional patrols to evaluate the effects on any pipeline facilities.</p>

State and Federal Regulations

This section discusses policies, procedures, or standards that are currently in place to protect public and worker safety for elements of Public Utility Code §§ 961 and 963 as grouped by the CPUC as State and Federal Regulations. The specific section of the Public Utility Code is referenced after each subsection title.

3.1 Protocols for Determining Maximum Allowable Operating Pressure. 961(d)(7)

Federal regulations currently specify maximum allowable operating criteria. Since September 13, 2010, where warranted, the CPUC has ordered reductions of transmission line MAOP on a line-by-line basis, and has set standards for any authorized resumptions. No such reduction has been specified for the Catalina Gas System Petroleum Gas Pipeline Distribution System. The Catalina Gas System Petroleum Gas Pipeline Distribution System operates at 7 psig and at an MAOP of 10 psig. Both the operating pressure and MAOP are uniform throughout the distribution system. Service regulators located at meters or meter manifolds reduce the pressure from 6 psig to 2 inches gas column. The pressure of the gas entering the distribution system is monitored and low and high alarms are set at 5 and 7 psig, respectively. A pressure relief valve is set at 10 psig.

SCE Catalina performs numerous maintenance activities to validate the integrity of the distribution system, including leak surveys, pipeline patrols, damage prevention programs, corrosion control measures, pressure monitoring, valve maintenance program, operator qualification program, and utilization of 47 standard procedures. The gas leak history is consistent with the expectations of a safely operated distribution system. A majority of gas leaks consist of gas odor calls that typically require customer attention because the leak source is on the customer side (downstream) of the gas meter. The remedial and preventative work activities performed to operate, maintain, ensure integrity and security of facilities are scheduled, performed and, tracked through the Catalina Computerized Maintenance Management System (as described in Section 1.2).

3.2 Meet or Exceed the Minimum Standards for Safe Design, Construction, Installation, Operation and Maintenance of Gas Transmission and Distribution Facilities Prescribed by Regulations. 961(d)(9)

Operation and Maintenance Manual

State and federal regulations prescribe minimum requirements for construction, maintenance, and repair of gas mains and service lines. These regulations require the operator to prepare and follow a manual of written procedures for conducting operations and maintenance activities and for emergency response. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted, and updated as necessary once every calendar year.

SCE has developed the operation and maintenance (O&M) manual according to the regulations prescribed above. The O&M manual consists of standard practices for construction, maintenance, and repair of gas mains and service lines.

To ensure meeting or exceeding the minimum standards for safe design, construction, installation, operation, and maintenance of gas distribution facilities, the manual includes policies and procedures for all applicable required activities from all subparts of 49 CFR 192 (including C, D, E, F, G, H, J, P). DIMP risk scores for corrosion, earthquake, landslides and vegetation fire are the largest hazards. Consequently, subparts I (Corrosion), L (Operations), and M (Maintenance) of the manual include the following:

- Operating, maintaining and repairing the pipeline in accordance with each of the requirements of 49 CFR 192 Subparts L and M.
- Controlling corrosion in accordance with the operations and maintenance requirements of 49 FR 192 Subpart I.

- Making construction records, maps, and operating history available to appropriate operating personnel.
- Gathering of data needed for reporting incidents under 49 CFR Part 191 in a timely and effective manner.
- Starting up and shutting down any part of the pipeline in a manner designed to assure operation within the Maximum Allowable Operating Pressure (MAOP) limits prescribed by 49 CFR 192.619 – 192.623, plus the build-up allowed for operations of pressure-limiting and control devices.
- Periodically reviewing the work performed by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying these procedures when deficiencies are found.
- Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, making available as needed at the excavation, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line.
- Responding promptly to a report of a gas odor inside or near a building.
- Implement control room management procedure required by 49 CFR 192.631.
- Instructions enabling personnel who perform operations and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subjected to the reporting requirements of 49 CFR 191.23.
- The procedures required by 49 CFR 192.613(a), 192.615, and 192.617.

Manual Review and Update

The manual is revised annually by qualified personnel. Annually, or more frequently as appropriate, each supervisor reviews the work performed by the operations personnel reporting to him to ensure that the procedures in use are adequate. The supervisor ensures that any necessary revisions are made to the operating procedures, and forwards the changes to the person responsible for maintaining the O&M manual.

Recordkeeping

All documents generated for petroleum gas mains and service lines are filed in the Catalina District compliance documentation system. SCE good management practices require that documentation be retained for a minimum of five years.

3.3 Best Practices in the Gas Industry and with Federal Pipeline Safety Statutes. 961(c)

As part of this Safety Plan and as operation, maintenance, and program manuals are reviewed and revised according to regulatory specified frequencies and/or operating conditions, Catalina Gas System ensures both regulatory compliance and evaluation of best practices in the gas industry and federal and state pipeline safety statutes for a small lower-pressure distribution system. Best practices will be collected and identified

through ongoing consultancy with organizations like the American Gas Association (AGA) and Western Propane Gas Association as well as regulatory agencies such as the CPUC and PHMSA. Catalina Gas System consults guidance documents such as the Guide for Gas Transmission and Distribution Piping systems by the Gas Piping Technology Committee (GPTC) to change, optimize, or enhance existing methods and work practices. Plans, programs, and work activities subject to best practice review include the following:

- Distribution Integrity Management Plan (DIMP)
- Leak Surveys
- Pipeline Patrols
- Damage Prevention Programs
- Corrosion Control Measures
- Valve Maintenance Program
- Operator Qualification Program
- Operation & Maintenance Manual
- Surveillance of the Petroleum Distribution System

One goal of the Safety Plan is to ensure the regulatory and management systems in place effectively prevent or detect and correct safety lapses. Operational field data are reviewed quarterly as part of continuing facility surveillance to determine and take appropriate action concerning failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions. Review findings are documented. Work orders are created in a SAP work management system to manage and track completion of identified corrective actions. The listed programs, plans, work activities function to identify and address threats to overall gas system operations. At the same time, Catalina Gas System cannot consider these Safety Plans in a cost vacuum. The incorporation of best practices must provide value to our rate base of approximately 1,300 customers of a distribution system that operates at 7 psig and a MAOP of 10 psig. Catalina Gas System will carry out the safety priority policy of this Safety Plan consistent with the principle of just and reasonable cost-based rates.

3.4 Methane Emissions Abatement Compliance Plan (R.15-01-008)

The Catalina Gas System is a Petroleum Gas/Air mixture and does not contain methane; therefore this section does not apply.

Continuing Operations

This section discusses the policies, procedures, or standards that are currently in place to protect public and worker safety for elements of Public Utility Code §§ 961 and 963 as grouped by the CPUC as Continuing Operations. Catalina Gas System has and continues to assess risk and implement required mitigation measures. The specific section of the Public Utility Code is referenced after each subsection title.

4.1 Safety of the Public and Gas Corporation Employees as the Top Priority, Take All Reasonable and Appropriate Actions Consistent with the Principle of Just and Reasonable Cost-Based Rates. 963(b)(3)

SCE's policy is to conduct business responsibly with a full appreciation and concern for employee safety, public safety, and the environment. Compliance with all applicable federal, state, and local safety and environmental laws is an integral part of all the organization's business activities. SCE is committed to strengthening its safety culture to achieve an injury-free workplace by creating and sustaining a work environment that values:

- Having every employee leave the workplace unhurt
- Using work behaviors and practices that uncompromisingly protect the safety of everyone
- Caring for the safety of each other
- Stopping work anytime unsafe conditions or behaviors are observed until the job can be completed safely

In any emergency situation involving the Catalina Petroleum Gas Distribution System or any other company asset, SCE's top priorities are to initiate response activities to protect life, mitigate damages, and preserve the environment.

SCE also provides resources for employees to manage stress during and after major events or incidents. The Employee Assistance Program (EAP) provides free, confidential 24/7 counseling, referrals and information to all employees and their immediate family when seeking guidance about personal or professional concerns. The EAP Resources for living can be accessed online at www.mylifevalues.com or by calling (800) 443-4474.

The gas crew is small, with a single crew servicing the entire Catalina Gas System. Communication and participation is facilitated by this small number of employees.

Generally, crew members perform nearly all work activities so there are no barriers to communication based on work specialties that perform a limited range of work activities. All employees know of system conditions from working on it directly and performing nearly all work tasks. All employees report to the same supervisor. Some employees are upgraded to the foreman position when needed and are exposed to supervisory responsibilities. The Catalina Gas utility does not experience communication or participation barriers posed by a large number of employees, multiple office locations, work specialties, or reporting to multiple supervisors. Employees can meet with their supervisor or meet with supervisors or managers outside the gas utility responsible for other utility operations within the CUC. Employees can call the SCE corporate ethics and compliance hot line anonymously and issues will be investigated by corporate resources other than his or her direct supervisor. The ethics and compliance hotline is available by calling 1-800-877-7089 or visiting EthicsHelplineOnline.com. This contact information is posted on the employee bulletin board along with employee work rights information. The same contact information is displayed on the opening page of the SCE International Portal, which is available to all employees. All employees are required to complete his or her timesheet electronically and have ready access to a computer. Employees participate in the CUC safety team.

As part of safety enhancement goals, SCE has developed various platforms and opportunities for meaningful, substantial and ongoing participation by gas operators to promote a strong safety culture which minimizes the potential for accidents, explosions, fires and dangerous conditions. SCE conducts weekly operator crew meetings, close call and monthly safety meetings. In the operator and close call meetings, operators share any incidents they came across while performing their daily tasks. The goal of the meetings is to conduct an After-Action Review (AAR) of incidents and responses with an emphasis on response methods, strategies, management and related information with the intent on strengthening team capability and performance.

In addition, SCE ensures the safety of the employees and the public by continuing surveillance of its facilities and gas pipelines to determine and take appropriate action concerning failures, leakage history, corrosion, substantial changes in cathodic protection requirements and other unusual operating and maintain conditions.

To comply with CPUC § 961(e), Catalina Gas System presented this Safety Plan to the workforce. Comments and suggestions made from the meeting are presented in Appendix C. The character of the comment or suggestion and rationale for the disposition are also presented. During the meeting, Catalina Gas System informed the

employees that any employee who perceives a breach of safety requirements may inform the CPUC of the breach, and that the CPUC will keep the identity of the employee confidential. The address of the Director of the CPUC's Safety and Enforcement Division was shared. Also, for confidentiality, employees were informed to request designation as "Safety Breach Notification from Gas System Operator Employee – Confidentiality Requested" when the CPUC is contacted.

4.2 Provide Adequate Storage and Transportation Capacity to Reliably and Safely Deliver Gas to All Customers. 961(d)(3)

The Catalina Liquefied Petroleum Gas (LPG) System receives propane from tanker trucks, stores the propane and mixes the propane with air to meet distribution system demands. The system is divided into subsystems: propane delivery, propane storage, propane vaporization, propane direct sales and propane/air distribution.

There are no issues of storage or transportation capacity that affect the safe and reliable distribution of gas to all customers. Tanker trucks are barged to Catalina Island and deliveries may be delayed due to bad weather. However, SCE has never depleted stored propane due to an adequate storage capacity that allows for delays caused by bad weather. Distribution pressure is uniform throughout the system and customers do not experience shortages due to low pressure during peak demand periods. Current pressure monitoring data, system surveillance, and field observations indicate that service pressure to all customers is adequate. A pressure monitoring station installed in the distribution system confirms adequate pressures at system extremities under peak consumption conditions. Any noted deficiencies are documented in our SAP work management system to manage and track completion of identified corrective actions.

As previously mentioned, the distribution system operates at 7 psig. The distribution system does not utilize compressors or pressure reducing stations. The ability to provide reliable and safe distribution of gas has been achieved and maintained in part due to the relative lower complexity of the distribution system as compared to pipeline systems of larger gas utilities.

4.3 Provide for Effective Patrol and Inspection to Detect Leaks. 961(d)(4)

When a pipeline route is travelled by employees qualified as Line Riders, the qualified Line Rider shall also perform a formal patrol and complete a Pipeline Patrol Report form. A Line Rider shall carry sufficient copies of both forms while conducting each patrol to allow multiple forms to be completed if necessary.

Federal regulations require that all mains within the pipeline system be patrolled as follows:

- In business districts, at intervals not exceeding 4½ months, but at least four times each calendar year (quarterly)
- Outside business districts, at intervals not exceeding 7½ months, but at least twice each calendar year (every six months)

The petroleum gas pipeline distribution system is entirely within the City of Avalon, which is geographically small (1.3 square miles) and there is little distinction between the business and non-business districts; therefore, to avoid having two different patrol frequencies, all mains will be patrolled at the more restrictive business district time-frame (quarterly). This frequency may be increased on any segment, at any time, due to increased activity or other special conditions.

Annually, Catalina Gas System personnel will use a qualified contractor to conduct a leakage survey of the distribution system. The purpose of the leakage survey is to detect and locate propane leaks. If a propane leak is found, the procedure for initiating a response is presented in SP-405, *Notifying, Reporting, and Responding to Propane Releases or Threatened Releases*. The procedure for repairing a propane leak is presented in SP-414, *Petroleum Gas Mains and Services Lines*. Additionally, hazards and systemic risks identified during the leak survey will be processed through the Catalina Operations, Maintenance and Compliance System, as described in Section 1.2 of this Safety Plan.

4.4 Ensure an Adequately Sized, Qualified and Properly Trained Gas Corporation Workforce. 961(d)(10)

Adequately Sized Workforce

The workforce consists of approximately 12 field and administrative staff. The workforce supports both the gas and water utilities on Catalina. Based on past operational experience, the workforce charges approximately 70 percent of its labor costs to the water utility and 30 percent to the gas utility. SCE Catalina also generates and distributes electrical power on the Island. An Instrument, Control and Electrical (ICE) crew assigned to the generation utility also supports water and gas operations as required.

Due to increasing standards of operations, maintenance activities and compliance verification, the addition of operational staff to ensure regulatory compliance is being evaluated. SCE recently implemented a new staffing plan which established the

Compliance, Projects, and Planning Department, which houses technical staff supporting water, gas, and electric generation on Catalina Island.

SCE Catalina has difficulty hiring and retaining qualified operators/mechanics from both on and off Catalina Island. On Catalina Island, there are no means of developing operator/mechanics and foremen outside of employment with SCE. Based on the cost of living on Catalina Island, success in finding a qualified operator/mechanic and/or foreman that currently live off of the island and are willing to move to Catalina Island in the near future has been, from our experience, difficult.

The Water & Gas System Mechanic position is the fundamental position for the successful operation of the gas utility. The Water & Gas System Mechanic position is responsible for executing nearly all inspections, maintenance, repair and response activities on the water and gas system. Much operator experience is gained simply through time spent operating and maintaining the system. There are three general pathways for filling these positions. The traditional method is to utilize the Utilityman position to train new employees on the functions and requirements of the gas system. There is no established timeline on this process, but familiarity is established through normal operations. The second method is through an apprentice program, which is a defined protocol to prepare employees for transitioning to system mechanic. The intermittent use of this program is driven by infrequent turnover of system mechanics. Testing and training protocols must be reestablished every three years and lack of hiring can cause program development and improvement periods to lapse. The final method is hiring external (non-SCE) qualified candidates. This process requires that the employee hold journeyman level experience and understanding prior to employment.

Qualified and Properly Trained Workforce

Catalina Gas System ensures our workforce is trained and qualified through the Operator Qualification Plan (OQ Plan) as presented in the Operator Qualification Plan Program Manual and as required by 40 CFR Subpart N (801-809) Qualification of Pipeline Personnel. A qualified individual will possess the appropriate combination of information (knowledge), craftsmanship (skills), and proficiency (abilities or capabilities) which allows the individual to perform covered tasks in a competent manner. All qualified individuals have been evaluated and show that they can perform assigned covered tasks with proficiency; and appropriately recognize and react to abnormal operating conditions. The OQ Plan Program Manual requires each operator shall have and follow a written qualification program. The program shall include provisions to:

- Identify covered tasks
- Ensure through evaluation that individuals performing covered tasks are qualified;
- Allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;
- Evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an incident as defined in Part 191;
- Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task;
- Communicate changes that affect covered tasks to individuals performing those covered tasks;
- Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed;
- After December 16, 2004, provide training, as appropriate, to ensure that individuals performing covered tasks have the necessary knowledge, skill and abilities to perform the tasks in a manner that ensures the safe operation of pipeline facilities; and
- After December 16, 2004, notify the Administrator or participating 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.

The written qualification program must be available for review by the CPUC under 49 U.S.C. Chapter 601. Most recently the Operator Qualification (OQ) Plan was reviewed during an audit performed by the CPUC in 2015 with no deficiencies found.

Emerging Issues – Any Additional Matter that the Commission Determines Should be Included in the Plan. 961(d)(11)

As required to be incorporated, Catalina Gas System follows all applicable CPUC rulemaking activities and enforcement proceedings to identify and incorporate emerging issues affecting the activities and purpose of this Safety Plan. Any additional matter that the CPUC determines shall be included in this Safety Plan will be incorporated as directed and performed as required. As of the date of this Safety Plan, Catalina Gas System has addressed each element of Pub. Util. Code §§ 961 and 963 for the petroleum gas distribution system operated on Catalina Island.

5.1 Customer Responsibilities

As required by the Catalina Gas System Public Awareness Program, a Gas Safety brochure is provided to gas customers twice yearly. On page 9 of the brochure, customers are reminded that they are responsible for gas piping and components after the

gas meter. Customer piping may be buried, be above-ground, or both. Customer piping may corrode or leak and should be inspected periodically and replaced if unsafe conditions are discovered. Most plumbing and heating contractors can assist in locating, inspecting, and repairing piping.

Figure 1

SCE Petroleum Gas Pipeline System Location Map

Appendix A

Distribution Integrity Management Plan SCE

Appendix B

Community Gas Emergency Plan

Appendix C

SCE Catalina Workforce Meeting to Review the Safety Plan

SCE Catalina Workforce Meeting to Review the Safety Plan

§ 961(e) states that each gas corporation is to provide opportunities for meaningful, substantial, and ongoing participation by the workforce in the development and implementation of the plan, with the objective of developing an industry-wide culture of safety that will minimize accidents, explosions, fires, and dangerous conditions for the protection of the public and the gas corporation workforce.

On June 27, 2012, to comply with § 961(e), SCE Catalina made the Safety Plan available to our workforce, discussed it thoroughly and solicited comments and recommendations. A log of the comments and suggestions, including the disposition of the comment or recommendations, and a summary of the rationale for the disposition is presented below.

Employees were informed that if any of them perceive a breach of safety requirements, they may inform the Commission of the breach, and that the Commission will keep the identity of the employee confidential. This information was summarized in a handout and a copy of the handout was given to each employee during the meeting. In addition, the handout presents the address of the Director of the Commission’s Consumer Safety and Protection Division and instructions to request designation as “Safety Breach Notification from Gas System Operator Employee – Confidentiality Requested” to seek confidential treatment. A copy of the handout is presented in this Appendix.

Log of Employee Comments/Suggestions from the Safety Plan Review Meeting – June 27, 2012.

Employee Comments & Recommendations	Disposition and Rationale
1) I want to better understand how work orders are supposed to be processed and that I am completing the correct forms and documentation.	Work orders are given to supervisors and foremen at the daily work planning meeting. When the work task is assigned, forms and documents to be completed are to be provided. If you have questions, ask your foreman for clarification. Completed forms are to be turned into your foreman for further processing.
2) What tasks are associated with the distribution integrity management plan (DIMP) and simple, handy, risk-based integrity management plan (SHRIMP)?	The DIMP (and SHRIMP as a part of DIMP) became effective in August 2011. Work tasks associated with the plans are issued via work orders and instructions from you foreman. Copies of the plans are available and you are encouraged to read and review them. Your comments are welcome.

<p>3) I want to learn more about our standard procedures.</p>	<p>All standard procedures are available in electronic form on the common directory and in hardcopy. The location of these resources will be shown to you after this meeting. In addition, one standard practice will be reviewed during each Monday morning crew meeting to help keep current on requirements.</p>
<p>4) We need more employees and more field training (as opposed to classroom training). Also, the apprentice program needs to be improved. What is being done about these issues?</p>	<p>Training is performed under the umbrella of the operator qualification program and requirements presented in the O&M manual standard practices. The purpose of the Safety Plan is to change, optimize, or to enhance existing methods and this applies to training, too. Please note that some employees feel training needs to improve but others feel training is meeting requirements. In regards to staffing level, we have an employee enrolled in the apprentice program who is scheduled to complete training this fall. Once this training is complete, they will be providing additional day to day support of the utility. I will ask management for clarification of staffing levels for the near future and about the apprentice program curriculum. I will report back to you on July 2, 2012 at the Monday morning crew meeting</p>
<p>End of comments/suggestions.</p>	

SCE Catalina Workforce Meeting to Review the Safety Plan

Employee Handout

June 27, 2012

As an employee, if you perceive a breach of safety requirements for the propane distribution system, you may inform the California Public Utilities Commission (CPUC) of the breach and the CPUC will keep your identity confidential.

If you wish to report a breach of safety requirements, contact the Director of the CPUC's Consumer Safety and Protection Division.

Jack Hagan
Director of the Consumer Protection & Safety Division
California Public Utilities Commission

San Francisco Office (Headquarters)
505 Van Ness Ave.
San Francisco, CA 94102
Phone: (415) 703-2782
800.848.5580 (Toll Free)
Fax: (415) 703-1758

When you contact the CPUC, request designation as a "Safety Breach Notification from Gas System Operator Employee – Confidentiality Requested" to receive confidential treatment.

Appendix D

Water & Gas Tool and Equipment Inventory

Water & Gas Vehicle Tool and Equipment Inventory - Gas Emergency Reponse										
Description	F-350 (38284)	F-350 (38285)	F-350 (38286)	F-350 (30726)	Ranger (38894)	Jeep (37550)	F-550 Dump (37249)	F-250 (30727)	Warehouse	Offsite Storage
Portable Electric Generator									X	
Aspirator									X	
Bar Hole Plungers	X	X	X	X	X				X	
Electric Hammer									X	
Line Locators									X	
Box Locators									X	
Portable light standards (2)									X	
Rotary Hammer									X	
Air Spade									X	
Air Compressor									X	X
Traffic Control Equipment									X	X
Signs									X	
Caution Tape		X	X	X					X	
Cones	X		X	X	X	X			X	
Plastic Barriers									X	X
Repair clamps									X	
assorted plastic pipe and fittings									X	
assorted steel pipe and fittings									X	
assorted meters and regulators									X	
Reusable wattles										X
Valve Keys (S, M, L)	X	X	X	X	X					
Pipe Wrenches	X	X	X	X	X				X	
Pressure Gauges	X	X	X	X	X				X	
Pipe Squeezers	X	X	X	X	X					
Repair Clamps									X	
Sensits	X	X	X	X	X					
Duct Seal			X	X					X	
Pipe Tape Wrap	X	X	X	X	X				X	
First Aid Kit	X	X	X	X	X		X			
Fire Extinguisher	X	X	X	X	X		X		X	
FR Clothing	X	X	X	X						
Safety Vest	X	X	X	X	X	X				
Hard Hat	X	X	X	X		X				
Gloves	X	X	X	X		X				
Emergency Response Plan	X	X	X	X	X					
O&M Manual (Standard Procedures)	X	X	X	X	X					
GMI Combustible Gas Indicator									X	
DP-4 Flame Ionization Unit									X	
Digging Bars	X	X	X	X	X				X	
Shovels	X	X	X	X	X				X	
Odorator									X	
Pipe Threader									X	
EasyFusion Machine									X	
Bike Pump									X	
Grease Gun									X	
Gas Pipe Warning Labels									X	
Tracer Wire									X	
Snoop - Leak Detection Solution				X					X	
Polyken 1027 Primer									X	
Polyguard 1139 Mastic Coating									X	
Trash Pump									X	X
900 mHz Radio	X	X	X	X	X	X	X	X		
Satellite Phone	X									