



May 23, 2011

Banu Acimis  
CPUC, Utilities Safety and Reliability Branch  
180 Promenade Circle, Suite 115  
Sacramento, CA 95834

Thank you for the address heads up. No I have not responded to your April 14 letter. It turns out you have my only hard copy of Alpine's most current OEM binder. I am kind of at a loss without it, I have made the many changes we talked about in the exit interview, I had planned on modifying that book prior to responding to the many issues cited in your letter. For that reason I never intended to release that book to you and would ask that you return it so I can be sure there is only a current version floating out there.

As far as my response to the cited issues:

- 1) The equipment calibration issue was corrected by the creation of a Reference manual for all misc. equipment use and care including a maintenance log for each to assure updated calibration records, including; Pipe Horn, Odorometer, Compressed gas indicator and Voltmeter devices.
- 2) The leak survey by Alpine employees is now included as a covered task and the training on a new Heath DP-Infra Red device for methane detection is included.
- 3) During the inspection interview you were not sure of the requirement to quantify any observation of external corrosion. Now that you have confirmed that this is necessary if we ever observe corrosive pitting we have purchased a "PosiTector UTG" ultrasonic wall thickness gauge for use thru painted material. This will be used to establish a baseline and used if external signs of internal corrosion are observed on our distribution systems steel segment of pipe.
- 4) Valve 36 identification tag was reattached.
- 5) Line Markers are monitored during system patrolling and damaged and or vandalized marker issues are corrected as they arise.
- 6) Regulator Station documentation and procedures issues cited were addressed and changes were implemented at time of inspection.
- 7) Gas leak report was revised in December to address the issues cited.

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- 8) The evaluator of the PE welds to review Alpine OQ personnel is the manufacturer representative of the PE pipe we use and the manufacturer specifications for installation and joining we accept as our procedures. This information was provided to you in detail and the observation of the sample joining are witnessed by both this manufacturer rep and another Alpine employee are recorded in Alpine's Forms 283-285 fusion qualification record.

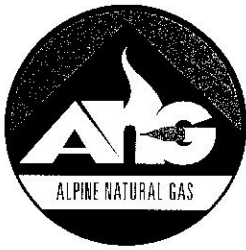
Mechanical fittings were historically included in field training, only recently (2010) did we separate documentation of this training. I cannot provide you records for 2007 when none were created at time of training.

- 9) No steel welds performed on system since the system was installed in 1999. If, steel welds are ever performed then the Qualified Operator will have documented training and current qualifications in the ability to perform this task.
- 10) Emergency Plan Assessment Form 615 was presented to the inspector. Alpine's October 2010 Table top exercise was summarized. This Plan assessment reviewed our emergency procedures for such things as Fires, Explosions, Natural Disasters and major gas leaks of any kind:
- a) Responding to Call
  - b) Communicating with Emergency and or Public Officials
  - c) Controlling Gas, Fire or Explosion.
  - d) Calling System Administrator to initiate Emergency plan
  - e) Assessment of Resources needed on scene for appropriate response
  - f) Mutual Assistance required?
  - g) Notifications needed.

This annual review is used to understand employee's level of plan knowledge and identify any areas of weakness in either the employee's knowledge base or the plan itself.

Sincerely,

Michael Lamond, Administrator  
Alpine Natural Gas



December 15, 2011

Banu Acimis, Utilities Engineer  
Utilities Safety & Reliability Branch

Ms. Acimis

Please see my responses below, to your questions displayed as CPUC Response, included in your latest letter dated 12/12/11.

CPUC Response: 12/12/11: You must provide a frequency of maintenance of all equipments that ANG personnel use and they need to be included in ANG's OEM. Attached maintenance sheet shows the last time they were inspected, it does not indicate the frequency. Please provide a list showing maintenance frequency of all equipments. Please provide a copy of the latest plan if it's been updated since November 11, 2011.

Response: See the maintenance log

CPUC Response: 12/12/11: You must provide a specific page number which shows the covered tasks performed by its contractors. Part ten or Attachment E do not indicate the covered tasks that ANG's **contractors** perform and the AOC's associated with the covered tasks they perform. If the covered tasks performed by the contractors are not in the plan, please include them in your plan and let me know the page number of the OQ plan where I can see the addition. Please provide a copy of the latest plan if it's been updated since November 11, 2011.

Response: I have moved Heath Consultants OQ Plan from my OEM manual where it is an appendix, to Alpine's OQ Plan as Attachment F, however, currently all covered tasks are performed by ANG personnel, including leak surveys. If, Heath for example, would perform this task in the future the AOC for this covered task 36, described on page 22 of the OQ plan are the same for the contractor as they are for the ANG operator.

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CPUC Response: 12/12/11: You must provide a specific page number where this change can be located in ANG's OQ plan since the OQ plan is over 60 pages and edits were not marked to track changes easily. Please provide a copy of the latest plan if it's been updated since November 11, 2011.

Response: See page 5, section 4.2 of OQ plan

CPUC Response: 12/12/11: You must provide a specific page number where this change can be located in ANG's OQ plan since the OQ plan is over 60 pages and edits were not marked to track changes easily. Please provide a copy of the latest plan if it's been updated since November 11, 2011.

Response: All evaluators will be identified and will meet criteria in section 4.2 of the Plan.

CPUC Response: 12/12/11: ANG must provide the name and qualification records of the person who evaluates ANG personnel for PE joining by December 15, 2012.

Please note that § 192.285 Plastic pipe: Qualifying persons to make joints, (c)(1) and (2) require the following:

(c) A person must be requalified under an applicable procedure, if during any 12-month period that person:

(1) Does not make any joints under that procedure; or

(2) Has 3 joints or 3 percent of the joints made, whichever is greater, under that procedure that are found unacceptable by testing under §192.513.

Therefore, if any of ANG employees does not perform any joints during any 12-month period, or joints made by any employee are found unacceptable, ANG employee has to be requalified before he makes any other joints even though ANG's reevaluation interval for this covered task is 48-months.

Response: Currently the two ANG Qualified Operators perform joints during every calendar year. No unacceptable joints have been discovered. The 48 month interval evaluation will meet criteria in section 4.2 on page 5 of Plan and will be completed by December 15, 2012. Just so I'm clear evaluators do not have to be qualified to perform a particular covered task to evaluate performance.

Mike Lamond, Administrator  
Alpine Natural Gas Operating Company