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April 11, 2011

COMMENTS □ð OF □ð THE □ð UTILITY □ð WORKERS □ð UNION □ð OF □ð AMER LOCALS □ð 132, □ð 483ð □ð 522
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□ð There □ð are □ð nearly □ð 4400 □ð UWUA □ð members □ð working □ð at □ð Sou
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Constitution □ð and □ð their □ð lo ¢ālv\$.∂ □lónion □ð by
We ð are ð an ð organization ð of ð men ð and ð women d ð of ð every ethnicity, ð who ð are ð committed ð to ð a ð society ð where ð all ð wo families ð live ð and ð work ð with ð dignity; ð where ð there ð is ð an political ð mandate ð for ð a ð more ð equitable ð distribution ð of ð the for ð all ð those ð performing ð us ð fsocieð yser vð cwhe ð et ð workers ð have ð e collective ð voice ð and ð power ð at ð the ð workplace; ð where ð econor achieved ð for ð our ð members ð and ð all ð workers; ð where ð work
fairly □ð rewarded⊡ð. To □ð accomplish □ð these □ð goals □ð⊡ðve □ð commit □ð to: □ð
Participate □ð in latorygu□ð legislative, □ð legal □ð and □ð electoral □ð proceedings □ð protect □ð the □ð interests □ð of □ð consumers □ð and □ð the □ð public □ð (including reliable, □ð safe □ð and □ð environmentally □ð sound □ð utilities □ð at □ð affordable, □ reasonable □ð costsvuð □ððConstitution, □ð Prēðnble □ð
□ð In □ð this □ð regard □ð UWUA s æðiæ ullbyð Coðn smpişssio tn's □ð decision □ð to □ð include
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customers \square ð to \square ð use \square ð gas \square ð safely \square ð in \square ð their \square ð homes, \square ð sackeoolð, \square ð hospit
essential \Box ð elemenfts \Box ð ð hð ser thæt \Box ð consumers \Box ð and \Box ð the \Box ð public \Box ð expect. \Box c
<u>I. □ð □ð O</u> vēnðview
□ð UWUA □ð supportð and □ð advoð (£hæ nmiðssion's □ð callcre ð tíon □ð ð of □ð a □ ð \$ sten
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happens sh ð uld \square ð be \square ð the \square ð common \square ð goal \square ð of \square ð workers, \square ððmanagers \square ð an
\square ð In \square ð the \square ð February hð 24ð \square ð n \square mdes ionð \square ð described \square ð its \square ð objectives \square ð in
proceeding: □ð
A. □ð Provide □ð the □ð P ubðimeāðis wi tlð toðað make □ð their □ð við ws □ð known □ð
Commission. □ð (Section □ðð 4.)
□ð □
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□ð
C. \Box ð Develop \Box ð and \Box ð and \Box ð and \Box ð sachtynges \Box ð to \Box ð the \Box ð Commission's \Box ð regular natural \Box ð gas \Box ð transmission \Box ð and \Box ð distribution \Box ð pipelines, \Box ð including \Box ð ronstruction, \Box ð especiallyt \Box 0 values, \Box 0 maintenance, \Box 0 inspections, \Box 0 operation record \Box 0 retention, \Box 0 ratemaking, \Box 0 and \Box 0 the \Box 0 application \Box 0 of \Box 0 penalties.
D. D Consider D ways D that D this D Commission D can D undertake D a cassessment D for D all D natural D gas D pipelithis D regulates D and D possibly D for D other D industries D that D the D Commission C regulates.
E. \square ð Consider \square ð available \square ð options \square ð for \square ð the \square ð Commission \square ð to \square ð better policies, \square ð practices, \square ð and \square ð incentives \square ð to \square ð elevate \square ð safety \square ð consideratio utility \square ð management \square ð focus \square ð on \square ð the \square ð "nuts \square ð and \square ð bolts" \square ð details \square operations. \square ð (Section \square ðð 8.)
□ð
G. \Box ð Consider \Box ð if \Box ð we \Box ð need \Box ð further \Box ð rules \Box ð or \Box ð other \Box ð protection inform \Box ð the \Box ð Commission \Box ð of \Box ð safety \Box ð ha \overline{z} ðrds. \Box ð (Section \Box ð 10.)
□ð In <i>Paðt □ð Heatīrðy □ð and □ð Institutiond Higfety, □ð Gulf Hið Ne</i> ð UA □ð dæklerilðe □ð its □ð
focus \Box ð on \Box ð Ottæher Sæðtion ð \Box ð 6, \Box ð changes \Box ð to \Box ð the \Box ð safety \Box ð regulations \Box ð
culture); \Box ð ItenOrdðiOseððiOn \Box ð 7, \Box ð systemic \Box ð risk \Box ð assessmeOt); er Sæðrion \Box ððtem
10, □ð protæct □ð for □ð communications □ð to □ð theð ð vði thom ð is síðð comprehensive □ð
to $\square\eth$ map $\square\eth$ system $\square\eth$ hazards $\square\eth$ proactively $\square\eth$ and $\square\eth$ develop $\square\eth$ a $\square\eth$ plan $\square\eth$ to
those \Box ð that \Box ð cannot \Box ð be \Box ððarliðnlinðalliðid \Box ð, Proðalliða UA \Box ð will \Box ð outline \Box ð a \Box ð pr
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safety \Box \eth programs the analknowledge \Box \eth and \Box \eth insights \Box \eth \Box \eth on the the \eth \Box \eth \Box δ \Box δ
property, \Box ð Item \Box ðð OASkeið i $(D$ 1ð \Box ð 4, \Box ð public \Box ð process). \Box ð \Box ð UWUA \Box ð will \Box ð als
to \square ð managin ğ the \square ð relationship \square ð between \square ð this \square ð proceeding \square ð and \square ð the \square ð
to \Box ð managinð the \Box ð relationship \Box ð between \Box ð this \Box ð proceeding \Box ð and \Box ð the \Box ð A.10 $_{7}$ 12 \Box 0 \Box 0 \Box 0 Cas \Box 10 \Box 2 \Box 0 \Box 0 Cas \Box 10 \Box 10 \Box 10 Cas \Box 11 Cas \Box 11 Cas \Box 11 Cas \Box 12 Cas \Box 12 Cas \Box 11 Cas \Box 11 Cas \Box 12 Cas \Box 11 Cas \Box 12 Cas \Box 11 Cas \Box 12 Cas \Box 12 Cas \Box 13 Cas \Box 14 Cas \Box 15 Cas \Box 16 Cas \Box 16 Cas \Box 17 Cas \Box 18 Ca

Comm	issioner □ð Ruling □ð dated □ð March □ð 2½,ð 24 20ð 1ACR) (Mðaveill □ð addðellsæd□ð
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□ð	
II. Crěc	<u>ating 🛮 ð and 👊 ð InstitutionaSiafnty 🖽 ð óCultður ð</u>
□ð	A. □ð □ð Safety. Thờ Culture mmission □ð has □ð stated □ð in □ð the □ð February
goal [dois destablish desta
level	□ĎróbritĎ. □ð
□ð	"We ð must ð eð sthæt ð our ð gas ð utilities ð recognize ð that ð mere is ð not ð enough. ð Safe ð pipeline ð operations ð must ð begin ð with management ð and ð the ð culture ð it ð creates ð in ð the ð workroon crews ð of ð the heð uð iþitpeline ð operators ð must ð have the vorkplace ð culture ð that ð places ð safety ð as" the vorkplace ð first (emphasis ð addeð)
	For Dð UWUA establishing Dð the Dð elements Sánfæfty Dð arult a æffesti veð taið Dð
recogn	nition □ð thatpī pægas s□ðð are □ð essential □ð facilities □ð providing □ð a □ð critica
essent	tial \Box ð good \Box ð to \Box ð the \Box ð California \Box ð public. \Box ð \Box ð The \Box ð gas \Box ð business \Box
transp	ortation 🗆 ð and 🗀 ð delivery 🗀 ð of 🗀 ð a 🗀 ð dangerous, 🗀 ð combustible 🗀 ð substance
public	$\Box\eth$ and $\Box\eth$ the $\Box\eth$ workers $\Box\eth$ is $\Box\eth$ of $\Box\eth$ paramount $\Box\eth$ importance. $\Box\eth$ $\Box\eth$ Fron
safety	□ð culturehe ð ð ið ng āsð t ð business □ð entails □ð a □ð philosophy □ð about □ð work
safety	□ð whereð
□ð •	Gas 🗆 ð pipelines 🗆 ð are 🗆 ð essential 🗆 ð facilities 🗀 ð providing 🗀 ð a 🗀 ð critical 🗀 ð the 🗀 ð California 🗀 ð public. 🗀 ð 🗀 ð The 🗀 ð gas 🗀 ð business 🗀 ð requires 🗀 ð the 🗀 ð delivery 🗀 ð dangðræus ð 🗀 ð combustible 🗀 ð substance. 🗀 ð 🗀 ð Safety 🗀 ð for 🗀 ð the workers 🗀 ð is 🗀 ð of 🗀 ð paramount 🗀 ð importance.
•	Unsafe ð conditions ð and ð practices ð are ð identified ð proactively ð al minimized ð through ð implementation systems ð approach thato ð ð safety ð engages allð ð employees ð of ð the ð utility ð including ð both ð managen Protecting ð workers ð and ð the ð public ð involves ð every ð aspect ð operations, ð not ð just ð pipelines.
□ð •	Systems of $\eth a f e t y$ is $\eth a d d d d d d d d d d d d d d d d d d $

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□ð	empowerment de lædderschip din de problem de solving, de identifying de and safety de issues de and de proposing de solutions. de de integrating de continuo for de training, de skill de develop ment issi o mand o de develop ment issi o mand o de solving de solving de sesential de feature de of de despreach de solving de sesential de feature de of de solving de sesential de sesential de feature de of de solving de sesential de sesential de feature de of de solving de sesential de se
• •	Clearly □ð written □ð procedures, □ð with □ð periodic □ð review □ð and □ð revision worker □ð experience □ð and □ð feedback, □ð and □ð an □ð expectation □ð of □ð compliance □ð aræntalessð elements□ð a □ð systems □ð approadhð□ð to □ð safety.
-ŏ □ŏ	Safety \square ð events \square ð are \square ð addressed \square ð through \square ð root \square ð cause \square ð and \square ð includisciplinary \square ð action; \square ð the \square ð emphasis \square ð is \square ð on \square ð strengtheming \square ð the \square ð individual.
ŏ	The \Box ð safety \Box ð culturæ \Box Øgshizæld ð tiðue \Box ð values \Box ð of \Box ð mutual \Box ð respect, \Box responsibility \Box ð and \Box ð power, \Box ð and \Box ð collective \Box ð collaborative \Box ð work \Box ð employees \Box ð of \Box ð the \Box ð gas \Box ð business, \Box ð both \Box ð management \Box ð and \Box ð la
ŏ	In ð our ð industry ð safety ð and ð service ð levels ð are oað intimately is ð consistently ð utilizing ð our ð experience ð and ð knowledge, ð tools create ð a ð safetræð Göjaryd fræð to environment ð for ð workers ð and public. ð ð This etatalisisingð rð performance ð levels ð and ð metrics ð t historically ð prevalileð in ð the ð dindustry.
□ð	This \Box ð approach \Box ð to \Box ð developing \Box ð a \Box ð safety \Box ð culture \Box ð is \Box ð consiste
in □ð	the \Box ð nuclear \Box ðði and str ý with \Box ð best \Box ð practices \Box ð at ð \Box ð \Box ðt lithe \Box \Box ð gálv \Box v uti
provi	led □ð leadership □ð in □ð safety □ð culture □ð development at ð að the ð ð ffers □ð
nation	hal \Box ð level \Box ð for \Box ð worker/management \Box ð cooperation \Box ð and \Box ð worker \Box ð en
the 🗆	ð safety 2 ð Taðorða. □ð successful □ð systems □ð apperopainles □ð ð toa □ðo shaigelty □ð ð degree □
comm	itment □ð and □ð involvement □ð by □ð utility □ð sen idn e ⊞ððrfu ði ha gð ment □ð and □
engag	ement □ð of □ n ibnth□ð namad □ð management □ð at □ð all □ð levels □ð in □ð an □ð
respe	ct □ð in □ð order □ð to □ð empower □ð employees □ð to □ð create □ð and □ð mai
for \square	ð the \Box ð $$ pð $$ blíðð Articulating \Box ð the \Box ð expectation \Box ð and \Box ð describing \Box ð the \Box ð
accon	panied □ð by □ð concrete s□ði me fas u ræimplementation.
2 \square \eth	
□ð	6

documentation \square ð affecting \square ð calculation \square ð of \square ð maximum \square ð allowable \square ð oper
pressures; III 📆
• preparing □ð for, □ðtipgevæði or □ð minimizing □ð damage □ð from, □ð and □ð resp
earthquakes, 🗆 ð fir ts rmsð 🛭 ð and 🗀 ð other 🗀 ð majoðr 🗀 ð events; 🗀 ð
• ensuring □ð adequate □ð numbers □ð of □ð properly □ð trained □ð gas □ð corpora
carry □ð out □ð these □ð að tivities; □ð
• exceeding \Box \eth the \Box \eth minimum \Box \eth standards \Box \eth bons t \Box \eth dies t g t d
operation □ð and □ð maintenance □ð of □ð gas □ð transmission □ð and □ð distribı
prescribed $\ \Box$ ð by $\ \Box$ ð regulations $\ \Box$ ð issued $\ \Box$ ð by $\ \Box$ ð the $\ \Box$ ð US $\ \Box$ ð Department $\ \Box$ ð
49 □ð CFR □ð Partð□ð 192. □ð
\Box ð The \Box ð safety \Box ð plan \Box ð would \Box ð begin \Box ð with \Box ð the \Box h ð hsizæ rd \Box ð \Box ð moda pið ing,
proactive $\ \ \Box$ ð approach $\ \ \Box$ ð to $\ \ \Box$ ð answering $\ \ \Box$ ð the $\ \ \Box$ ð Commission's $\ \ \Box$ ð existential $\ \ \Box$ ð que
the □ð "systemic □ð risk □ð assessmen//haflðilsepiscouflöheræð" "and 'what can we do
to prevent another tragedy from unexpected sources?" (February $\Box\eth24\Box\ethOrder,\Box\eth$
Paragraph □ð□7ð
Paragraph □ð□7ð) The February □ð 24 □ð populærs □ð to □ð focð saginð gom ð ssion in fð astructure □ð
The February □ð 24 மற்றிக்கை □ð to □ð focðsaginðgosníðssion infðastructure □ð
The February 0 24 0 apprecient 0 to 0 for a significant denote a significant denote 0 and 0 to 0 prioritize 0 the significant denote 0 to 0 catastrophic 0 masgnitude 0 other 0 to
The February ð 24 ð prioritize ð to ð focð sag tirð græðin ssion in f astructure ð and ð to ð prioritize ð a hag ard sand en f ally ð catastrophic ð masgnit d den ð other č words, ð are ð there ð other ð San ð Brunos. ð Rancho ð Cordovas o ð ð ð d ð o ð
The February ð 24 ð prioritize ð to ð focð sag tirð gronn ð ssion in f astructure ð and ð to ð prioritize ð a hag zarð s proð en f a llý ð catastrophic ð masgnit d de ð other č words, ð are ð there ð other ð San ð Brunos. ð Rancho ð Cordovas o ð ð ð and ð answer ð this ð question ð involves ð steps ð such ð as ð the ð Commission
The February ð 24 Ďprochers ð to ð focðsaginðgronnðssion infæastructure ð and ð to ð prioritize Ďahgeardís prodenfiðallý ð catastrophic ð mægnitíðóden ð other č words, ð are ð there ð other ð San ð Brunos. ð Rancho ð Cordovas o ð ð ð d answer ð this ð question ð involves ð steps ð such ð as ð the ð Commission PG&E ð in ð response ð te (ð) þræðie wð Brunos d ocumentation arð oberististse ð ð
The February ð 24 ðppeders ð to ð focðsagtirðgostrðssion infoastructure ð and ð to ð prioritize ðahgæarðs prodenfiðallöy ð catastrophic ð mægnitöðden ð other ð words, ð are ð there ð other ð San ð Brunos. ð Rancho ð Cordovas oð ðlæðnd ð answer ð this ð question ð involves ð steps ð such ð as ð the ð Commission PG&E ð in ð response ð te (ð þ) sæðaew ð Bóronfo ð documentatiocharð coeristicts ð ð and ð capacities ð of ð existing infrastysictaure ð to soð læstald is has elling as ð a
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The February ð 24 Ďppeders ð to ð focðsaginigosiniðssion infóðastructure ð and ð to ð prioritize Ďahgzarðs prodenfiðallój ð catastrophic ð mægnitiðiðen ð other ð words, ð are ð there ð other ð San ð Brunos. ð Rancho ð Cordovas o Ďaðiðind ð answer ð this ð question ð involves ð steps ð such ð as ð the ð Commission PG&E ð in ð response ð te Ď præðie vð Boronfo ð documentatiocharðico éristi che ðð and ð capacities ð of ð existingð infrastysicture ð to Soðlæstaldi shæfiði ta ðð as ð a foundation ð for ð operating ð thið queðinn its ð a ð degree ð of ð confidence; ð (articulating ð improved ð patrol, ð inspection, ð testing ð and ð documentation
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agencies. The □ð goal	□ð is □ð a □ð cooperative □ð proactive □ð approach □ð to □ð safe
before □ðit □ð þap ðe	neplacing □ða □ð rea ctivnig ⊡ð balapmoach □ð to □ð damage □ð that ⊨
have □ð been □ð pre l	WanteAd. ⊞õõpropõoses □ða □ð regular □ð and □ð consistent □ð flow [
communication □ð am	ong \square ð utility \square ð managers, \square ð employees \square ð and \square ð government \square
accordance \Box ð with \Box	ð the □ð following□ðð principles:
• Gas □ð pipelines	s □ð are □ð essential □ð facilities □ð providing □ð a □ð critical □ð
the □ð California	a □ð public. □ð □ð Safe □ð operation □ð is □ð of □ð paramount □
employees □ð o	f \square ð the \square ð utility \square ð and \square ð for \square ð the \square ð consuming \square ð public \square
gas □ð transpor	t □ð and fa cildtei-lis :erīyð □ð
• There □ð should	l □ð be □ð regular □ð institutionalized □ð channels □ð of □ð comm
the □ð three □ð	ð sets □ð of □ð safety □ð stakeholders □ð with □ð direct- Ⅲððrespon:
(1) □ð utility □	ð managers □ð with □ð operational □ð responsibilities □ð including
monitoring and	□ð remediation □ð including □ð repair □ð and □ð replacement; □ð □
employees □ð p	erforming □ð transmission, □ð distribution □ð and □ð field □ð servi
(3) □ð governm	ent □ð agency □ð investigative □ð and □ð enforceðntent ðið enpeldsonið
them □ð to □ð	carry □ðout □ð their □ð Diðe apscuting □ð thkets □ð ð gans □ð pipeline □ð
are □ð operated	□ð and □ð maintained □ð in □ð a □ð safe □ð and □ð effective □ð
the □ð public □	ð and □ð consumers □ð oð oð oð gas □ð service
• Utility □ð emplo	yees □ð through □ð their □ð bargaining □ð representatives □ð shou
fully □ð and □ð	equaðlylevæðopment, □ð implementation, □ð interpretation □ð and □
modification □ð	of □ð programs □ð for □ð protecting □ð the □ð safety □ð of □ð th
	nizing □ð that □ð in □ð the □ð gaðsopleðrantiðunstryð amðdallíð

maintenance □ð programs □ððh aup lications □ð for □ð safety. □ð tidfpatæð ¶ b ey □ð s
in $\ \Box$ ð presentations $\ \Box$ ð to $\ \Box$ ð agencies $\ \Box$ ð having $\ \Box$ ð approval $\ \Box$ ð authority $\ \Box$ ð and
when $\ \square\eth$ enforcement $\ \square\eth$ authorities $\ \square\eth$ come $\ \square\eth$ on $\ \square\eth$ the $\ \square\eth$ property $\ \square\eth$ to $\ \square\eth$
utility \square ð operation, \square ð maintenance, \square ð construction \square ð or \square ð other \square ð activities.
 Utility □ð employees □ð throughrgaðntimgir□ððrepresentatives □ð should □ð have □ð
established $\ \square$ \eth channels $\ \square$ \eth of $\ \square$ \eth communication $\ \square$ \eth at $\ \square$ \eth regular $\ \square$ \eth intervals $\ \square$ \eth
management $\ \Box$ ð with $\ \Box$ ð public $\ \Box$ ð agencies $\ \Box$ ð having $\ \Box$ ð regulatory $\ \Box$ ð and $\ \Box$ ð en
responsibility. □ðð □ð □ð
□ð Applying □ð these □ð transparency □ð principles, □ð theð Itæruggðs£iðn□ððfn□ð the
March □ð 24 Ⅲðð Athæt □ð aldelætós lafetðy conditions □ð be □ð reportetok, o sæð in tócluding □ð
corrected $\ \Box$ ð by $\ \Box$ ð repair $\ \Box$ ð or $\ \Box$ ð replacement, $\ \Box$ ð would $\ \Box$ ð be $\ \Box$ ð appropriate $\ \Box$ ð in $\ \Box$
122.2(d) \Box ð in \Box ð \Box đ \Box đ \Box ð This \Box ð would \Box ð accomplish \Box ð three \Box ð things. \Box ð \Box ð (1)
understanding \square ð that \square ð safe \square ð operation \square ð of \square ð the \square ð gas \square ð system \square ð is \square ð a \square
constant $\ \Box$ ð vigilance $\ \Box$ ð and $\ \Box$ ð proactive $\ \Box$ ð intervention $\ \Box$ ð and $\ \Box$ ð thus $\ \Box$ ð increase $\ \Box$
its \Box ð safety; \Box ð (2) \Box ð it \Box ð would \Box ð improve \Box ð regulators' \Box ð knowledge \Box ð and \Box č
condition \Box particular \Box of pipe \Box of se gra) einter one distributed on the \Box of the \Box of ability \Box of \Box
to 🛮 ð account 🗘 ð f or el æðs afeðyutility 🗘 ð expendiðures.
□ð Item □ð 2.2 □ð of □ð the □ð March □ð 24 □ð A@Rpamödinguinnánsædiæteæmahemð □ð on
quarterly notification \square of where \square of pressures MAD exceed that Therenoty \square of principles \square of
would \square ð suggest \square ð that \square ð these \square ððnirmride nótsnissðes \square ð where \square ð risk \square ð increased \square ð
did □ð not □ð en de □ð de □ð subjected □ð to □ð root □ð cause □ð analys
to 🗆 ð eliminate 🗆 ð or 🗆 ð mitigate 🗆 ð the 🗀 ð hazards (tóðrið leði þrifirlda ps ð 🗖 ð liði or leð Qði arterly
frequent) repjorting □ð of □ð near □ððinnvisksing □ð excessive □ðipjnisssūðæssential □ð in □ð
hazard □ð mapping □ð and □ð mitigatiŌnð □ð process.
\Box ð Immediate \Box ð notification \Box ð poses \Box ð different \Box ð issues, \Box ð closely \Box ð tied \Box ð tc
response. □ð □ð □ð nÆedð něaro teðp ðirðæd □ðð immediately. □ð □ð However, □ð prompt [
notification $\ \Box$ ð to $\ \Box$ ð authorities $\ \Box$ ð including $\ \Box$ ð emergency $\ \Box$ ð responders $\ \Box$ ð of $\ \Box$ ð incr
particularly \square ð if \square ð uncontrolled \square ð by \square ð pressure \square ð regulating \square ð or \square ð limiting \square ð

appropriate □ð as □ð an □ð anticipatonyð□ðimAnsurðinðimædifatætion □ð rule □ð should □ĉ
focused □ð on □ð coordinating □ð communications □ð and □ð alerts □ð among □ð potent
responder ag ĕ ncies. Шãõ
□ð <u>III. □ð □ð Procedur</u> al□ðð Issues □ð
A. □ð □ð Worksðhops
□ð In □ðpænsse □ð to □ðs UWð UpAroposal □ð to □ð utilize □ð the □ð invorkð hthp □ð technic
consolidated GRŒ □ð proceeding □ð in □ð its □ð Prehearing □ð Conference □ð Statement,
Commission's □ð Scoping □ð Memo □ð in □ð that □ð case □ð invited □ð UWUA □ð to □ċ
proposal □ð in □ð this □ð þr ð č ee ð ing.ð
The ð Utility ð Workers ð Union ð of ð America ð (UWUA) ððproposed be ð held ð in ð this ðötproæcklisngsselæðafeðyprograms ð and ð ð costs associated ð with: ð the ð aging ð natural ð gas ð transmission ð ð and ð restoration ð of næðer ð services; ð enhancing ð customer ð communication and ð response ð systems. ð We ð decline ð to ð schædnolps ðóthese ð ð kin this ð point ð in ð this ð proceeding ð given ð the ð resource ð constra Commission ð staff ð and ð the ð parties. ð The ð Commission ð just ð Order ð Instituting ð Rulemaking ð on ð February ð 24, ð 2011 ð into í safety ð and ð reliability ð regulations ððgásr ððpinaetines. ð The ð input ð UWUA ð on ð safety ð concerns ð may ð be ð more ð appropriate ð for A.10-112-2005 Óco6, ð Scoping ð Memo ð at ð p. ð 12 ð ð
value □ð to □ð the □ð Commissi onis⊞iða d eðision cess □ð for □ð policy □ð issues, □ð by □
recorded/reported □ð interaction □ð among □ð informed □ð party □ð representatives □ð
by □ð the □ð stiff □ð conven tilend sÖ lð ð tes tinnðo pye □ð a næka ð hÖcartiss n. □ð □ð The □ð direct [
give¬andtoktet Ġð of □ð experts □ð with □ð shanted□ð ðphansiblhedgð difðfebring □ð perspectives
priorities □ð and □ð values □ð can □ð be □ð very □ð instructive □ð in □ð a □ð case □ð
commission, □ð utility □ð operators □ð and □ð workers, □ð utility □ð management, □ð ar
users □ð are □ð facing □ð new □ð challenges □ð thætte Ⅲðð preœkeiu end ly□ð lvð alynsplicð of □ð doi
business. □ð

□ð The □ð workshop □ð approach □ð can □ð also □ð be □ð viewed □ð as □ð promotin
and $\square \eth$ openness $\square \eth$ that $\square \eth$ is $\square \eth$ essential $\square \eth$ to $\square \eth$ creating $\square \eth$ a $\square \eth$ true $\square \eth$ culture \square
from □ð the □ð li tigaliði □ð conventions □ð of □ð strategi n fo rðngatin ing□ðið of □ð
withholding \Box ð and \Box ð disclosuræulæðnækingð thðscanð \Box ð provide \Box ð both \Box ð a \Box ð model \Box
experiential \square ð introduction \square ð to \square ðothsetr \square čtisært \square töððaæfti \square rðs \square ð that \square ð would \square ð
characterize □ð a □ð safety □ ð culture.
□ð UWUA □ð pro p sosæð five □ð workshops, □ð covering □ð what □ð appear □ð to □ð b
important ar \check{e} as \square ð in \square ð developing \square ð a \square ð safety \square ð culture \square ð in \square ð which \square ð all \square ð
are □ð equally □ð engaged □ð and Ⅲðð cōðnThietæd.□ð workshops □ð would □ð focus □ð on
human \Box ð factors \Box ð i inv olk æ dr æ a ð ing \Box ð and \Box ğ mæ ð instæfenin ð delivery \Box ð of \Box ð natural \Box
to □ð the □ð påblic.
$\Box\eth$
WORKSHOP □-ð 11 ð S ðYMIS E □ ð APPROACH □ ð TO □ ð SAFETY
□ð The □ð UWUA □ð has □ð a □ð national □ð safety □ ð þaðg lyam,ð thá slys te ms □ð of
facilitates □ð la hont kg ement □ð cooperation □ð in □ð the □ð creation □ð of □ð an □ð effe
culture din din divork districtings involve dispetoial
particularly □ð the □ð nuclear □ð and □ð naturål □ðð gað □ððiSnyktætniæs□ð of □ð Safety □ð
fundamental $\ \Box$ ð and $\ \Box$ ð completely $\ \Box$ ð integrated $\ \eth$ $\ \eth$ elements:
• A □ð systems □ð app rpuacartivð töleðntö fication □ð and □ð elimin hatzard sð oð □ð
• A □ð training □ð program □ð based □ð on □ð the □ð small □ð group □ð activity □
promotes $\ \square$ ð active $\ \square$ ð engagement $\ \square$ ð by $\ \square$ ð employees $\ \square$ ð and $\ \square$ ð managers $\ \square$ ð ir
sense ð of ð ownership ð and ð responsibility ð for ð safe ð practices ð ð ð ð ð ð ð ð ð
□ð 14

and □ð the □ððield.
UWUA □ð propsosæð a □ð workshop □ð led □ð by □ð its □ð Natiðbæðlinð Sånfæty □ðð Directo
Systems \Box \eth of \Box
commitment \Box ð to \Box ðpsæfættyjve \Box fæðard \Box ð mapping; \Box ð root \Box ð cause \Box ð analysis \Box ð of \Box
incidents \Box \eth when \Box \eth they \Box \eth eliminating \Box \eth hazards \Box \eth and \Box
hazards \square ð that \square ð cannot \square ð be \square ðð eliðn Appatén klix ð is \square ð an \square ð excerpt \square ð from \square ð pote
workshop □ð mat e rialð describ in g □ð elementa □ð syfsteðns □ð approach .□ð ðto □ð safety
\square ð \square ð
WORKSHOP □-ð 2 ð□ðRANSMISSION □ ð SAFETY □ ðð ISSUES
□ð UWUA □ðgæssgs □ða □ð workshop □ð to □ð addressd □ððtsatnsængiss síðði hūðinan □ð
factor □ð issthest □ð could □ð include □ð the □ð, folkowithgoutð Œð plics i Eð tion:
• The \square ð status \square ð of \square ð inspection \square ð and \square ð maintenance \square ð programs \square ð for \square ð
system; □ð
• Appropriate □ð crew □ð sizes □ð to □ð a ticom plisind ð ó opera intenance □ð work □ð
and □ð effectivellyð
• The \square ð importance \square ð of \square ð clearly \square ð written \square ð procedures \square ð and \square ð procedur
when \square ð working \square ð with \square ð high \square ð pressäre \square ð pipelines
• The \square ð importance \square ð of \square ð employee \square ð training \square ð and \square ð ways \square ð of \square ð impro
and \Box ð transmittalm \Box ðð experienced \Box ð workers \Box ð to \Box ð less \Box ð ex \overline{p} erienced \Box ð v
• Procedures □ð for □ð documentation □ð of □ð pipælihædingð sæðgumæpætist, □ð and □ð
replacement \square ð as \square ð well \square ð as \square ð ne \overline{w} ð \square ð construction.
WORKSHOP ☐ B B B B B B STRIBUTION ☐ B SAFETY ☐ B ISSUES
□ð UWUA □ð sug g estð a □ð workshop □ð to □ð address □ð distribution □ð (low □ð pr
factor \square ð issues \square ð that \square ð could \square ð include \square ð the \square ð following \square ð dopics, \square ð without \square
• standards 🗆 ð for 🗀 ð timely 🗀 ð response 🗀 ð for 🗀 ð accomplishing ð ið diælding ð 🕉 ork
leak □ð surveys □ð and □ð repairs □ð of □ðildetæd‡adtsð□ð or □ð reporte
• standards □ð for □ð timely □ð respo nsað tið toð ð dús tofety r □ð service □ð calls, □ð
including □ð connections □ð ạ ơn를 Ġð urn

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• the □ð importance □ð of □ð clearly □ð written □ð procedures □ð and □ð ð procedure
• appropriate □ð crew □ð sizes □ð to □ð accomplish □ð operation □ðafælly □ð mainte:
and \Box ð effectively \Box ð and \Box ð in \Box ð a \Box ð timely \Box ð anðd \Box ð responsive \Box ð manner;
• the □ð importance □ð of □ð employee □ð training □ð and □ð ways □ð of □ð impro
and □ð transmittal □ð from □ð experienced □ð workers □ð to □ð lessð□ð experienc
• procedures □ð for □ð documentation □ð ægmēð tpsjpælðinædingð □ð repair □ð and □ð
replacement □ð as □ð well □ð as □ð ne₩ð□ð construction
\Box ð
<u>WORKSHOP □-ŏC4U5ST3OMER □ŏSERVICE □ŏAND □</u> ŏIR&ESPONSE
□ð UWUA □ð suggestð a □ð workðshop □ð customer □ð service Elðbætndið Tvð cueksþonðse □ð
focus □ð on □ð call □ð center □ð procedures □ð and □ð staffin g ,uc ið gw itð da ð th ð □ð obje
answer □ð times □ð and □ð expediting □ðßðrvice □ð orders.
<u>WORKSHOP □-ð 5 ð ÆĞING □</u> ð ÞÍÐANT
$\begin{tabular}{lllllllllllllllllllllllllllllllllll$
a □ð mitigation □ð measure □ð for □ð unreplaced □ð aging □ð plant, □ð in □ð both □ð t
distribution □ð segmænfts□ðiðhe □ð indiðistry.
\Box ð
\square ð UWUA \square ð will \square ð work \square ð with \square ð SCG \square ð representatives \square ð and \square ð witnesses; [
staff □ð includingð ið □ð addition- □ðð t6PS ÞÖ DR ÞAan dð □ð Energy □ð Division; □ð and □ð w
such □ð as □ð TURN □ð and □ð Disability □ð Rights □ð Advocates □ð to □ð structure □ċ
workshops and □ð prepare □ð workshop □ð reports □ð for □ð the □ð commissioners. □ð
scheduling \Box ð the \Box ð workshops \Box ð in \Box ð August \Box ð in \Box ð Southern \Box ð California, \Box ð at
Los □ð Angeles.ð □ð □ð
□ð
B. □ð □ð Ratemaking □ð and □ðŒøst □ð Recovery □ð
☐ The ☐ Sempra ☐ Companies ☐ Ö (SOC) ☐ Ö anacte☐ Ö S Deceral ☐ Ö rate ☐ Ö case ☐ Ö pro
moving \Box ð concurrently \Box ð with \Box ð this \Box ð safety \Box ð proceeding. \Box ð \Box ð \Box ð GRCs \Box ð a
□ð 16

considering $\ \Box$ ð ratemaking $\ \Box$ ð policy. $\ \Box$ ð $\ \Box$ ð UWUA $\ \Box$ ð considers $\ \Box$ ð this $\ \Box$ ð rulemaking
focused \Box δ ongoin δ \Box δ development \Box δ and \Box δ δ examples δ δ the \Box δ costs \Box δ and \Box δ
implications □ð of □ð whitch□ð ð ev □ð developed □ð līrð □ð ð lirð □ð thæ. □ð regard □ð this □
R.11¬02 遺兌 总Šð should □ð be □ð managed □ð generally □ð in □ð a □ð manner □ð compa
proceeding $\ \Box$ ð implementing $\ \Box$ ð the $\ \Box$ ð powerplant $\ \Box$ ð operation $\ \Box$ ð and $\ \Box$ ð maintenance
directed □ð by □ð Pub. □ð Util.StaðisCodði 2000 27,611ði,Seccond □ð Ex. □ðivSteisstion,ð □ð ch. □ð 1
eventuated □ð in □ð GO □ð 167. □ð □ð That □ð proceeding □ð brought □ð owners, □ð ı
experts together \square ð to \square ð develop \square ð substantive \square ð procedures \square ð and \square ð programs \square ð
powerplant □ð availabilingle⊡ð Lið the □ð supervisið na □ðð os þec fally □ð constituted □ð Comm
and □ð ultima thle y □ðð Commission, □ð withætlyt □ ð akike ressing □ð rates □ð and □ð costs □ċ
jurisdictional □ð utiliŧiesð
□ð This genneral □ð approauggesðs □ð that ru hethakingð proceeding beð □ð phased, □ð
with \Box on \Box on \Box of the \Box of development \Box on
culture \square ð and \square ð the \square ð direct \square ð programmatic \square ð implications \square ð of \square ð the \square ð safety
could $\ \Box$ ð proceed $\ \Box$ ð concurrently $\ \Box$ ð with $\ \Box$ ð the $\ \Box$ ð GRC $\ \Box$ ð timetable $\ \Box$ ð for $\ \Box$ ð develo
intervenor □ð testimony □ð in ₩hithe □ððwakld □ðð be □ð informed □ð by □ð the □ð dev
Phase 1万ð □ð The □ð second □ð phaseprote(Pdinse wið Le) □ð bo€ □ð the □ð forum □ð fo
development $\square \eth$ of $\square \eth$ safety $\square \eth$ plans, $\square \eth$ including $\square \eth$ the $\square \eth$ process $\square \eth$ for $\square \eth$ systemi
mapping) □ð and ☑ð Þaðzalimination □ð andonð mitigalti□ð would □ð proceedð □ð in □ð 20:
□ð Nevertheless, □ð given □ð the □ð announced Đ ờ Đức Ġðða nf l □ð Rhe l □ð intense □ċ
interest □ð in □ð the □ð rate □ð implications □ð of □ð t h es □ððSparodeðedBrrgnoð Cðare,xplðsain
probably 🗆 ð should, 🗆 ð prov ider 🗗 🕭 l ði gh licy 🗆 ð guidance 🗆 ð onafiði fað e rnuking e 🖽 ð
implications □ð for □ðelately □ð programs □ð at □ð an □ð early □ð enough □ð time □ð t
the 🗆 ð consolidated 🗆 ð Sempra 🗆 ð rate 🗆 ð ca s eandð þróð ine edliðing ffset 🗀 ð proceedings 🗀 ð fo

transmission 🗆 ð and 🗀 ð distribution 🗀 ð cost 🗀 ð recovery . 🗆 🗗 🗗 🖰 💆 ð 🍎 🖒 ð ð 🍎 🖒 ð ð sluggestð utið tilest 🗀 ð
the $\square\eth$ Commission $\square\eth$ adopt $\square\eth$ the $\square\eth$ following $\square\eth$ principles $\square\eth$ on $\square\eth$ an $\square\eth$ expedite
proceeding. $\square \check{\sigma}$
• The □ð commissibnuldðenðure □ð that □ð each □ð gas □ð corporation □ð has □ð su
revenues $\ \ \Box$ ð to $\ \ \Box$ ð implement $\ \ \Box$ ð safety $\ \ \Box$ ð plans $\ \ \Box$ ð and $\ \ \Box$ ð programs $\ \ \Box$ ð effectivel
received □ð by □ð theponaðtigans □ð thoart □ð are □ð authorized □ð by □ð the □ð comm
safety □ð pl and □ð progræ ms uldðbēð□ð expended □ð by □ð the □ð gas □ð corporation
for $\ \Box$ ð the $\ \Box$ ð purposes $\ \Box$ ð authorized $\ \Box$ ð by $\ \Box$ ð the $\ \Box$ ð commission.
• The □ð commissibnuldðpriðvent □ð ratepayers □ð from □ð directly □ð or □ð indirect
subsidizing \square ð unstænable \square ð or \square ð imprudent \square ð actions \square ð by \square ð gas \square ð corporati
specifically: □ð
(1) □ð □ð The □ð 6bmrldssöð n□ðððrequire □ð ratepayers □ð toshōðuþday□ðlð for □
not □ð include □ð in □ð rates □ð any □ð revenues □ð that □ð recover, □ð direc
incurred $\square \eth$ in $\square \eth$ connection $\eth \square \eth$ with
(A) □ð data □ð gathering □ð and □ð evaluation □ð work □ð necessitated □ð
historical $\ \Box$ ð compliance $\ \Box$ ð with $\ \Box$ ð any $\ \Box$ ð applicable $\ \Box$ ð state $\ \Box$ ð or $\ \Box$ ð fed
record₁keæ pti g □ð or □ð by □ð the □ð utility's □ð failure □ð to □ð oæse rve [
keeping □ð and □ð data □ð maintenanceððð practices;
(B) in spection \Box ð work \Box ð (including \Box ð retrofitting \Box ð and \Box ð smart \Box ð pigs
necessitated □ð by □ð unreasonable □ð reliance □ð on □ð faulty □ð records □
inadequate $\ \square\eth$ data $\ \square\eth$ concerning $\ \square\eth$ pipeline $\ \square\eth$ characteristics;
(C) \Box ð maintenance \Box ð work \Box ð necessitated \Box ð by \Box ð deferral \Box ð of \Box ð ma
other □ð activif örs ecasðt □ð and □ð authorized □ð in □ð pīrðor □ð rate □ð case:
(2) \square ð \square ð In \square ð any \square ð proceeding \square ð addressing \square ð utility \square ð recovery \square ð of
capital) \Box ð for \Box ð investments \Box ð in \Box ð pipeline \Box ð reliability, \Box ð including \Box ð
installation 🗆 ð of 🗀 ð new 🗀 ð transmission 🗀 ð pipeline ræ ssuæl væsð 🗷 ð n tr ollð 🗷 ð ther
systems \square ð and \square ð the \square ð replacement \square ð of \square ð transmission Slóopilple , \square ðð the [
ensure □ð tha ð

□ð

(A) □ð □ð Any □ð such □ð investments □ð are □ð supported □ð by □ð a □
considers \square ð alternatives \square ð to \square ð promote \square ð safety \square ð of \square ð the \square ð pipeli:
(B) \Box ð The \Box ð ad teptæk in g ð rað fairly \Box ð accounts \Box ð for \Box ð any \Box ð prior \Box ð
gas □ð corporation □ð to □ð carry □ð out □ð its □ð obligation □ð to □ð safe
and □ð maintain □ð its □ð ǧas □ð plant.
\Box ð
• The ⊡ ðn ©nission sh ð uld d ēð icate □ð sufficient □ð resources □ð to □ð effectively □ð c
the $\ \Box$ ð implementation $\ \Box$ ðyoflaðn $oldsymbol{\tilde{p}}$ sað and $\ \Box$ ð programs $\ \Box$ ð ap proxeis lsi $\ \Box$ ð,theð $\ \Box$ ð C
including $\ \Box$ ð review $\ \Box$ ð of $\ \Box$ ð documentation, $\ \Box$ ð timely $\ \Box$ ð inspections, $\ \Box$ ð repairs,
to 🗆 ð abate 🗆 ð ess 🗀 ð haddardous 🗀 ð conditionsmiðissiðði The ð hðuðstætuldð 🗆 ð
reflect □ð t he nm í sssion's be š t judðgment □ð about □ð s urffscien tes.Ið□ð
$\square \check{\mathfrak{d}}$ $\square \check{\mathfrak{d}}$
CONCLUSION □ð
For □ð the □ð foregoing □ð rea seqs ,estsð UMV that □ðð the □ð Commission □ð adopt □ð UW
substantive □ð and □ð procedural □ð proposals □ð to □ð begin □ð the □ð creation □ð of
thorough¬go⊞G □ð culture □ð of □ð safety □ð in □ð the □ð gasð□ð industry □ð in □ð Cal
\Box \eth
Respectfully □ð submitteð)
□ð /s/ □ð□ð □ð □ð □ð □ð /s/ □ð □ð
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document

COMMENTS ð OF ð THE ð UTILITY ð WORKERS ð UNION ð OF ð AMEI LOCALS ð 132, ð 483ð ð 522 Representing ð Employees ð at ð Southern ð Californja ð ð Gas ð Con on ð RO121019, ð Gas ð Safety ð Rulðmaking ð	
A copy was served as follows:	
[X] BY E-MAIL: I sent a true copy via e-mail to all known parties of record in R. 11-02-019 who have provided e-mail addresses, as shown on the website of the California Public Utilities Commission, updated last on April 8, 2011, accessed April 11, 2011. http://docs.cpuc.ca.gov/published/service_lists/R1102019_79735.htm (mames attached) on the 14th day of April, 2011.	

/s/ WILLIAM JULIAN II □ð

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