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BEFORE □đ THE

PUBLIC □đ UTILITIES □đ COMMISSION □đ OF □đ THE □đ STATE □đ OF □đ CA

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Order □đ Instituting □đ Rulemaking □đ □đ □đ □đ) □đ
on □đ the □đ Commission's □đ Own □đ Motion □đ □đ) □đ
to □đ Adopt □đ New □đ Safety □đ and □đ Reliability □đ Regulations, □đ □đ □đ 11
for □đ Natural □đ Gas □đ Transmission □đ Distribution □đ Pipelines) □đ
and □đ Related □đ Ratemaking □đ Mechanisms. □đ □đ) □đ

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**COMMENTS □đ OF □đ THE □đ UTILITY □đ WORKERS □đ UNION □đ OF □đ AMER
LOCALS □đ 132, □đ 483□đ 522**

**Representing □đ Employees □đ at □đ Southern □đ California □đ Gas □đ Com
on □đ R021 019, □đ Gas □đ Safety □đ Rulemaking □đ**

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April 11, 2011

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**COMMENTS □đ OF □đ THE □đ UTILITY □đ WORKERS □đ UNION □đ OF □đ AMER
LOCALS □đ 132, □đ 483□đ 522**

**Representing □đ Employees □đ at □đ Southern □đ California□đ Gas □đ Com
on □đ R021 019, □đ Gas □đ Safety □đ Rulemaking □đ**

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□đ On □đ February 2014, the □đ Commission □đ issued □đ this □đ order □đ initiati
rulemaking □đ (February □đ 24 □đ Order) began □đ a □đ process □đ that □đ promises □đ
the □đ approach □đ by □đ California’s □đ gas □đ utilities □đ and □đ their □đ employees
with □đ safe □đ and □đ effective □đ natural □đ gas □đ se

□đ There □đ are □đ nearly □đ 4400 □đ UWUA □đ members □đ working □đ at □đ Sou:
Local □đ Unions □đ 132, □đ 483 □đ and □đ 522. □đ □đ UWUA □đ Members □đ (hereaft
intend □đ to □đ participate □đ vigorously □đ in □đ this □đ proceeding, □đ focusing □đ on
safety □đ and □đ quality service □đ to □đ the □đ public □đ doing □đ they □đ both □đ represent
interests □đ as □đ residential □đ consumers □đ and □đ carry □đ out □đ the □đ principle:
Constitution □đ and □đ their □đ local □đ union □đ by

We □đ are □đ an □đ organization □đ of □đ men □đ and □đ women □đ of □đ every □đ
ethnicity, □đ who □đ are □đ committed □đ to □đ a □đ society □đ where □đ all □đ wo
families □đ live □đ and □đ work □đ with □đ dignity; □đ where □đ there □đ is □đ an
political □đ mandate □đ for □đ a □đ more □đ equitable □đ distribution □đ of □đ the
for □đ all □đ those □đ performing □đ useful □đ society □đ service □đ where □đ workers □đ have □đ a
collective □đ voice □đ and □đ power □đ at □đ the □đ workplace; □đ where □đ econor
achieved □đ for □đ our □đ members □đ and □đ all □đ workers; □đ where □đ work □đ
fairly □đ rewarded.

To □đ accomplish □đ these □đ goals □đ we □đ commit □đ to:

... □đ

*Participate □đ in □đ regulatory □đ legislative, □đ legal □đ and □đ electoral □đ proceedings □đ
protect □đ the □đ interests □đ of □đ consumers □đ and □đ the □đ public □đ (including
reliable, □đ safe □đ and □đ environmentally □đ sound □đ utilities □đ at □đ affordable, □đ
reasonable □đ cost.* UWUA □đ Constitution, □đ Preamble

□đ

□đ In □đ this □đ regard □đ UWUA □đ fully □đ Commission’s □đ decision □đ to □đ include
transmission □đ and □đ distribution □đ system □đ safety □đ this □đ this □đ proceeding □đ
system □đ is □đ a □đ seamless □đ network □đ of □đ pipes, □đ devices □đ and □đ people
deemed □đ essential □đ by □đ California’s □đ Constitution □đ the □đ laws □đ of □đ gas □đ to

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customers at their meter and that the provisions shall enable customers to use gas safely in their homes, schools, hospitals, and other essential elements of the service that consumers and the public expect.

I. Overview

UWUA supports and advocates the Commission's creation of a system-wide safety culture that provides an opportunity for the workers who operate and maintain the system to participate fully in the development and implementation of safe practices and protection of the public interest. UWUA makes California's statutory three-pronged public interest calculations by and the public meaningful stakeholders.¹ UWUA will make proposals to improve system safety and service throughout the state, including both underlying strengths and weaknesses. UWUA makes proposals to improve the flow of information both in the ongoing gas system procedures within the company and Commission Transparency in system operations and improvement and self-correction that proactively identifies risks and prevents harm should be the common goal of workers, managers and the public.

In the February 24, 2011 Commission proceeding described its objectives in the following proceeding:

- A. Provide the Public with an opportunity to make their views known to the Commission. (Section 4.)

¹ Pub. Util. Code section 451 provides in pertinent part:

... Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities, ..., as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.

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C. □đ Develop □đ and □đ additional □đ safety changes □đ to □đ the □đ Commission's □đ regulate natural □đ gas □đ transmission □đ and □đ distribution □đ pipelines, □đ including □đ r construction, □đ especially □đ values, □đ maintenance, □đ inspections, □đ operation record □đ retention, □đ ratemaking, □đ and □đ the □đ application □đ of □đ penalties.

D. □đ Consider □đ ways □đ that □đ this □đ Commission □đ can □đ undertake □đ a □đ assessment □đ for □đ all □đ natural □đ gas □đ pipelines □đ regulations □đ and □đ possibly □đ for □đ other □đ industries □đ that □đ the □đ Commission □đ regulates. □đ

E. □đ Consider □đ available □đ options □đ for □đ the □đ Commission □đ to □đ better policies, □đ practices, □đ and □đ incentives □đ to □đ elevate □đ safety □đ consideration utility □đ management □đ focus □đ on □đ the □đ "nuts □đ and □đ bolts" □đ details □đ operations. □đ (Section □đ 8.)

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G. □đ Consider □đ if □đ we □đ need □đ further □đ rules □đ or □đ other □đ protection inform □đ the □đ Commission □đ of □đ safety □đ hazards. □đ (Section □đ 10.)

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□đ In Part *Creating and Institutionalizing Safety Culture* UUA will describe its focus on *Other Section* (đ 6, changes to the safety regulations culture); *Order Section* (đ 7, systemic risk assessment); *Other Section* 10, protect for communications to the *Commission* comprehensive to map system hazards proactively and develop a plan to those that cannot be *Partial Final Process* UUA will outline a plan workshops as the best way to bring to the national Commission safety programs and knowledge and insights of on the *Work* G. property, *Item 4* (đ 4, public process). □đ UUA will also to managing the relationship between this proceeding and the A.10-12 *Consolidated GRN* life San Diego Gas & Electric, *Item 8* (đ 8, aligning ratemaking penalties safety consideration). The *Item* identified for additional comment by the Assigned Com

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Commissioner □ Ruling □ dated □ March □ 24, □ 2011 ACR (Marcell □ address □ Safety □ Items □ 2.1 □ and □ and □ and □ and □ and □ 2.2 □ and □ 2.3).

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II. Creating □ and □ Institutional Safety □ Culture

□ A. □ Safety. □ The Commission □ has □ stated □ in □ the □ February goal □ to □ establish □ rules □ and □ policies □ that □ accord □ safety □ of □ level □ priority. □

“We □ must □ ensure □ that □ our □ gas □ utilities □ recognize □ that □ mere is □ not □ enough. □ Safe □ pipeline □ operations □ must □ begin □ with management □ and □ the □ culture □ it □ creates □ in □ the □ workroom crews □ of □ the □ pipeline □ operators □ must □ have □ a □ corporate and □ workplace □ culture □ that □ places □ safety □ as” □ their □ first □ (emphasis □ added)

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□ For □ UWA □ establishing □ the □ elements □ safety □ culture □ effective □ recognition □ that □ pipelines □ are □ essential □ facilities □ providing □ a □ critical essential □ good □ to □ the □ California □ public. □ The □ gas □ business □ transportation □ and □ delivery □ of □ a □ dangerous, □ combustible □ substance □ public □ and □ the □ workers □ is □ of □ paramount □ importance. □ From safety □ culture □ in □ gas □ business □ entails □ a □ philosophy □ about □ work safety □ where □

□

- Gas □ pipelines □ are □ essential □ facilities □ providing □ a □ critical □ the □ California □ public. □ The □ gas □ business □ requires □ the □ delivery □ dangerous, □ combustible □ substance. □ Safety □ for □ the □ workers □ is □ of □ paramount □ importance.

□

- Unsafe □ conditions □ and □ practices □ are □ identified □ proactively □ and minimized □ through □ implementation □ systems □ approach □ that □ safety □ engages □ all □ employees □ of □ the □ utility □ including □ both □ management □ Protecting □ workers □ and □ the □ public □ involves □ every □ aspect □ operations, □ not □ just □ pipelines.

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- Systems of safety is □ not □ an □ abstract □ concept; □ identifying □ failed □ safety □ is □ a □ first □ step □ in □ making □ real □ safety □ fixes. □

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empowerment □ leadership □ in □ problem □ solving, □ identifying □ and □ safety □ issues □ and □ proposing □ solutions. □ Integrating □ continuo for □ training, □ skill □ development □ and □ a □ collaborative □ problem solving □ is □ an □ essential □ feature □ of □ a □ systems □ approach □

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- Clearly □ written □ procedures, □ with □ periodic □ review □ and □ revisi worker □ experience □ and □ feedback, □ and □ an □ expectation □ of □ compliance □ are □ essential □ elements □ of □ a □ systems □ approach □ to □ safety.

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- Safety □ events □ are □ addressed □ through □ root □ cause □ and □ inc disciplinary □ action; □ the □ emphasis □ is □ on □ strengthening □ the □ blaming □ the □ individual.

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- The □ safety □ culture □ recognizes □ the □ values □ of □ mutual □ respect, □ responsibility □ and □ power, □ and □ collective □ collaborative □ work □ employees □ of □ the □ gas □ business, □ both □ management □ and □ la

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- In □ our □ industry □ safety □ and □ service □ levels □ are □ intimately is □ consistently □ utilizing □ our □ experience □ and □ knowledge, □ tool: create □ a □ safe □ and □ free □ environment □ for □ workers □ and □ public. □ This □ emphasizes □ performance □ levels □ and □ metrics □ t historically □ prevailed □ in □ the □ industry.

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□ This □ approach □ to □ developing □ a □ safety □ culture □ is □ consiste in □ the □ nuclear □ industry □ with □ best □ practices □ at □ other □ gas □ utilities provided □ leadership □ in □ safety □ culture □ development □ and □ offers □ national □ level □ for □ worker/management □ cooperation □ and □ worker □ en the □ safety □ area. □ successful □ systems □ approach □ to □ safety □ degree □ commitment □ and □ involvement □ by □ utility □ senior □ management □ and □ engagement □ of □ both □ and □ management □ at □ all □ levels □ in □ an □ respect □ in □ order □ to □ empower □ employees □ to □ create □ and □ mai for □ the □ public □ Articulating □ the □ expectation □ and □ describing □ the □ accompanied □ by □ concrete □ measures □ implementation.

² □ See □ below □ at Section □ 311A on Workplaces □ list □ of □ utilities □ th: the □ UWUA □ Systems □ of □ Safety □ program.

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documentation □ affecting □ calculation □ of □ maximum □ allowable □ oper pressures; □

- preparing □ for, □ inge □ or □ minimizing □ damage □ from, □ and □ resp earthquakes, □ fir □ and □ other □ major □ events; □
- ensuring □ adequate □ numbers □ of □ properly □ trained □ gas □ corpora carry □ out □ these □ activities; □
- exceeding □ the □ minimum □ standards □ for □ construction, □ de □ operation □ and □ maintenance □ of □ gas □ transmission □ and □ distribu prescribed □ by □ regulations □ issued □ by □ the □ US □ Department □ 49 □ CFR □ Part □ 192. □

□ The □ safety □ plan □ would □ begin □ with □ the □ he □ and □ proactive □ approach □ to □ answering □ the □ Commission’s □ existential □ que the □ “systemic □ risk □ assessment □ what □ else □ can □ we □ do □ to □ prevent □ another □ tragedy □ from □ unexpected □ sources?” (February □ 24 □ Order, □ Paragraph □ 7)

The February 24 Order □ to □ focus □ on □ infrastructure □ and □ to □ prioritize □ large □ catastrophic □ magnitude □ other □ words, □ are □ there □ other □ San □ Brunos. □ Rancho □ Cordovas □ and □ answer □ this □ question □ involves □ steps □ such □ as □ the □ Commission □ PG&E □ in □ response □ to □ (□) □ documentation □ characteristics □ and □ capacities □ of □ existing □ infrastructure □ to □ establish □ as □ a □ foundation □ for □ operating □ □ a □ degree □ of □ confidence; □ (□ articulating □ improved □ patrol, □ inspection, □ testing □ and □ documentation □ field □ more □ frequent, □ more □ thorough □ and □ more □ completely □ do implementing □ them □ effectively □ and □ ensuring □ continuity □ (□) □ physical □ deficiencies □ are □ mapped □ program □ for □ eliminating □ the □ identified □ hazards □ and □ managing □ the □ risks □ associated □ with □ haz immediately □ eliminated □ must □ be □ developed.

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□đ These procedural steps affecting physical □đ characteristics □đ of □đ the □đ pipeline system should □đ be □đ undertaken □đ for □đ all □đ pipeline □đ operations. Assigned as □đ the □đ Commissioner □đ suggest the □đ in March □đ 24 □đ Item 6 (Operational □đ limitation □đ on □đ certain pre-1974 □đ pipes where □đ surveillance □đ may) and have 240 (larger) □đ inspection □đ procedures □đ for □đ pipes □đ with □đ certain □đ physical □đ characteristics. Pressures □đ may □đ be □đ frequently □đ increased □đ (Items □đ MACIP) □đ and □đ 2.4 □đ are generic □đ hazards □đ that □đ the □đ Commission □đ must □đ identify □đ which □đ may □đ differ □đ in frequency □đ and □đ severity □đ among □đ different □đ utility □đ specific □đ plans, □đ including □đ procedures □đ to □đ identify □đ the □đ specific □đ hazards of old □đ pipe □đ (Item □đ 2.1) □đ and □đ strategic □đ cycling □đ of □đ potentially □đ compromised □đ pipe □đ (Item □đ 2.4) □đ to □đ the □đ Commission □đ to □đ oversee □đ a □đ approach □đ to □đ eliminating □đ these □đ hazards □đ among □đ others, □đ while □đ preserving □đ the □đ ability □đ to □đ identify □đ and □đ manage □đ risks □đ associated □đ with □đ □đ. Equally □đ important □đ to □đ the □đ development □đ of □đ a □đ safety □đ culture □đ factors □đ that □đ impact □đ safety. □đ especially □đ true □đ for □đ California, □đ where □đ aging □đ infrastructure □đ is □đ universally □đ acknowledged □đ performance □đ of □đ potentially □đ fatigued □đ physical □đ equipment □đ and □đ material □đ often □đ depends □đ on □đ judgment □đ and □đ performance □đ of □đ the □đ employees □đ who □đ operate □đ and □đ public □đ benefits □đ from □đ a □đ trained, □đ skilled, □đ motivated □đ force □đ and □đ of □đ well □đ workers, □đ who □đ are □đ fully □đ engaged □đ in □đ issues □đ involved □đ in □đ operating □đ and □đ maintaining □đ the □đ plant □đ and □đ equipment □đ with □đ which □đ they □đ are □đ interacting □đ among □đ labor, □đ management □đ and □đ about □đ regulators □đ behavior □đ that □đ □đ system □đ and □đ the □đ most □đ efficient □đ and □đ effective □đ ways □đ to □đ test □đ it □đ to □đ ensure □đ that □đ consumers □đ will □đ get □đ the □đ service □đ they □đ need □đ at □đ an □đ affordable □đ rate. □đ

□đ In □đ this □đ safety □đ practice □đ build □đ on □đ programs □đ that □đ already □đ are □đ addressing □đ workplace □đ safety □đ particularly □đ the □đ development □đ procedures □đ for □đ performing □đ work □đ safely □đ and □đ efficiently □đ and □đ the □đ development □đ of □đ

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procedure □đ compliance □đ mapping □đ hazard □đ elimination □đ focus □đ on □đ factors □đ that □đ undermine □đ procedure □đ compliance □đ including □đ work □đ orders employee □đ assignment □đ completion □đ and □đ compliance □đ with □đ the □đ field including □đ documentation □đ the □đ use □đ of □đ independent □đ contractors □đ when observation □đ of □đ compliance □đ and □đ irregular □đ work □đ may □đ be □đ necessary

□đ From □đ the □đ public □đ safety □đ standards □đ mapping □đ should □đ be □đ at □đ the □đ customer □đ level, □đ with □đ identifying □đ and □đ eliminating □đ conditions □đ that □đ cause □đ explosions, □đ illness □đ or □đ other □đ forms □đ of □đ damage □đ or □đ damage equipment, facilities, □đ procedures □đ or □đ other □đ conditions □đ including □đ customer error. □đ □đ □đ This □đ might □đ include □đ improved □đ leak □đ detection □đ and □đ other □đ assistance □đ with □đ appliances, □đ more □đ timely □đ connection □đ and □đ (especially □đ during □đ the □đ season) □đ more □đ effective □đ and □đ responsive □đ customer service □đ call □đ handling □đ Focusing □đ exclusively □đ on □đ the □đ high □đ pressure □đ one □đ that □đ exploded □đ in □đ San □đ Bruno □đ may □đ miss □đ a □đ ongoing □đ pipeline and □đ customer □đ service □đ events □đ causing □đ injury □đ and □đ damage near □đ misses, □đ which □đ may □đ be □đ most □đ instructive □đ in □đ identifying □đ and □đ avoiding □đ damage. □đ

□đ The □đ important □đ point □đ is □đ that □đ a □đ hazard □đ mitigation □đ approach □đ is □đ a □đ continuous □đ and □đ interactive □đ approach □đ of □đ proactively □đ identifying □đ hazards □đ as □đ a □đ one-time □đ event, □đ but □đ an □đ integral □đ part □đ of □đ the □đ safety □đ culture □đ “how □đ can □đ this □đ hazard □đ be □đ eliminated □đ before,” □đ it □đ with □đ full □đ employee participation □đ and □đ input □đ from □đ the □đ employee

□đ The □đ plan □đ would □đ be □đ submitted □đ to □đ the □đ Commission □đ for □đ review □đ would □đ be □đ regularly □đ reviewed □đ and □đ subject □đ to □đ compliance □đ audit. □đ inconsistent □đ with □đ federal □đ pipeline □đ integrity □đ requirements, □đ but □đ would □đ be □đ transmitted □đ and □đ distributed □đ including □đ to □đ services □đ beyond □đ the □đ reach □đ of □đ federal □đ authority. □đ □đ This □đ requirement □đ would □đ apply □đ to □đ all □đ pipeline

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safety □ plan □ would □ be □ submitted □ to □ and □ approved □ by □ the □ continuous □ oversight □ and □ review □ ~~would □ be □ a □ of □ significant □~~

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□ **C. □ Transparency □ of □ the □ Safety □ Commitment □ for □ Gov** □

□ A □ systems □ approach □ to □ safety □ requires □ removing □ obstacles □ safety □ issues, □ both □ compliance □ and □ ~~non~~ □ regulators □ and □ enforcement agencies. ~~The □ goal □ is □ a □ cooperative □ proactive □ approach □ to □ safe before □ it □ happens □ replacing □ a □ reactive □ blame □ approach □ to □ damage □ that have □ been □ prevented. □~~ □ proposes □ a □ regular □ and □ consistent □ flow □ communication □ among □ utility □ managers, □ employees □ and □ government □ accordance □ with □ the □ following □ principles:

- Gas □ pipelines □ are □ essential □ facilities □ providing □ a □ critical □ □ the □ California □ public. □ Safe □ operation □ is □ of □ paramount □ employees □ of □ the □ utility □ and □ for □ the □ consuming □ public □ gas □ transport □ and □ facilities. □
- There □ should □ be □ regular □ institutionalized □ channels □ of □ comm the □ three □ sets □ of □ safety □ stakeholders □ with □ direct □ respon: (1) □ utility □ managers □ with □ operational □ responsibilities □ including monitoring and □ remediation □ including □ repair □ and □ replacement; □ employees □ performing □ transmission, □ distribution □ and □ field □ servi (3) □ government □ agency □ investigative □ and □ enforcement □ ~~enables □ them □ to □ carry □ out □ their □ respecting □ that □ gas □ pipeline □ are □ operated □ and □ maintained □ in □ a □ safe □ and □ effective □ the □ public □ and □ consumers □ □ of □ gas □ service..~~
- Utility □ employees □ through □ their □ bargaining □ representatives □ should □ fully □ and □ equally □ develop, □ implementation, □ interpretation □ and □ modification □ of □ programs □ for □ protecting □ the □ safety □ of □ the employees, recognizing □ that □ in □ the □ gas □ operation □ and □ all □

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maintenance □ programs □ implications □ for □ safety. □ They □ s
in □ presentations □ to □ agencies □ having □ approval □ authority □ and
when □ enforcement □ authorities □ come □ on □ the □ property □ to □
utility □ operation, □ maintenance, □ construction □ or □ other □ activities.

- Utility □ employees □ through □ their □ representatives □ should □ have □
established □ channels □ of □ communication □ at □ regular □ intervals □
management □ with □ public □ agencies □ having □ regulatory □ and □ en
responsibility. □ □ □ □

□ Applying □ these □ transparency □ principles, □ the □ suggestion □ of □ the
March □ 24 □ AAR □ related □ safety □ conditions □ be □ reported □, □ including □
corrected □ by □ repair □ or □ replacement, □ would □ be □ appropriate □ in □
122.2(d) □ in □ RCFC. □ This □ would □ accomplish □ three □ things. □ (1)
understanding □ that □ safe □ operation □ of □ the □ gas □ system □ is □ a □
constant □ vigilance □ and □ proactive □ intervention □ and □ thus □ increase □
its □ safety; □ (2) □ it □ would □ improve □ regulators' □ knowledge □ and □
condition □ particular □ pipe □ segments; □ would □ enhance □ the □ ability □ of □
to □ account □ for □ safety □ utility □ expenditures.

□ Item □ 2.2 □ of □ the □ March □ 24 □ AAR □ regarding □ immediate □ and □
quarterly □ notification □ where □ pressures □ MAOP □ exceeded □ transparency □
would □ suggest □ that □ these □ incidents □ where □ risk □ increased □
did □ not □ end □ be □ reported, □ be □ subjected □ to □ root □ cause □ analysis
to □ eliminate □ or □ mitigate □ the □ hazards □ (or □ identify □ more □ Quarterly
frequent) □ reporting □ of □ near □ miss □ excessive □ pressures □ essential □ in □
hazard □ mapping □ and □ mitigation □ process.

□ Immediate □ notification □ poses □ different □ issues, □ closely □ tied □ to
response. □ □ □ □ need □ near □ reported □ immediately. □ □ However, □ prompt □
notification □ to □ authorities □ including □ emergency □ responders □ of □ incr
particularly □ if □ uncontrolled □ by □ pressure □ regulating □ or □ limiting □

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appropriate □đ as □đ an □đ anticipatory □đ in Assurance □đ modification □đ rule □đ should □đ focused □đ on □đ coordinating □đ communications □đ and □đ alerts □đ among □đ potent responder agencies. □đ

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III. □đ □đ Procedural □đ Issues

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A. □đ □đ Workshops

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□đ In □đ process □đ to □đ UWUA proposal □đ to □đ utilize □đ the □đ workshop □đ technical consolidated GRC □đ proceeding □đ in □đ its □đ Prehearing □đ Conference □đ Statement, Commission's □đ Scoping □đ Memo □đ in □đ that □đ case □đ invited □đ UWUA □đ to □đ proposal □đ in □đ this □đ proceeding. □đ

The □đ Utility □đ Workers □đ Union □đ of □đ America □đ (UWUA) □đ proposed □đ be □đ held □đ in □đ this □đ proceedings related to safety programs □đ and □đ costs associated □đ with: □đ the □đ aging □đ natural □đ gas □đ transmission □đ and □đ restoration □đ of □đ electric □đ services; □đ enhancing □đ customer □đ communication and □đ response □đ systems. □đ We □đ decline □đ to □đ schedule □đ these □đ kin this □đ point □đ in □đ this □đ proceeding □đ given □đ the □đ resource □đ constraint Commission □đ staff □đ and □đ the □đ parties. □đ The □đ Commission □đ just □đ Order □đ Instituting □đ Rulemaking □đ on □đ February □đ 24, □đ 2011 □đ into □đ safety □đ and □đ reliability □đ regulations □đ for □đ pipelines. □đ The □đ input □đ UWUA □đ on □đ safety □đ concerns □đ may □đ be □đ more □đ appropriate □đ for A.10-12-06/06, □đ Scoping □đ Memo □đ at □đ p. □đ 12 □đ

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□đ Workshops □đ offer □đ an □đ important □đ opportunity □đ for □đ developing □đ i value □đ to □đ the □đ Commission's decision process □đ for □đ policy □đ issues, □đ by □đ recorded/reported □đ interaction □đ among □đ informed □đ party □đ representatives □đ by □đ the □đ stiff □đ conventional □đ testimony □đ and □đ the □đ direct □đ give-and-take □đ of □đ experts □đ with □đ shared □đ possibly differing □đ perspectives priorities □đ and □đ values □đ can □đ be □đ very □đ instructive □đ in □đ a □đ case □đ commission, □đ utility □đ operators □đ and □đ workers, □đ utility □đ management, □đ ar users □đ are □đ facing □đ new □đ challenges □đ that □đ are □đ directly □đ ways □đ of □đ doi business. □đ

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The workshop approach can also be viewed as promoting and openness that is essential to creating a true culture from the ground up. The conventions of strategic information withholding and disclosure can provide both a model and experiential introduction to constructive interactions that would characterize a safety culture.

UWUA proposed five workshops, covering what appear to be important areas in developing a safety culture in which all are equally engaged and committed. Workshops would focus on human factors involved in reading and maintaining delivery of natural gas to the public.

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WORKSHOP APPROACH TO SAFETY

The UWUA has a national safety program that facilitates labor management cooperation in the creation of an effective culture in work settings involving special employees and the public, particularly the nuclear and natural gas systems of Safety fundamental and completely integrated elements:

- A systems approach to identification and elimination of hazards
- A training program based on the small group activity that promotes active engagement by employees and managers in the sense of ownership and responsibility for safe practices

UWUA along with its union colleagues in the utility industry Teamsters, works with the following companies among others in its approach to safety and the SGAM approach to worker/management Entergy (New York, Massachusetts, Michigan, Ohio) Edison (New York); DTE (Michigan), Peoples Gas (Illinois); Bay State Gas (Massachusetts (Massachusetts, Ohio, Pennsylvania); Allegheny Power (Pennsylvania). Southern California Edison has recently instituted a comprehensive safety training program Systems of Safety in cooperation with UWUA and its Local 246.

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and the field.

UWUA proposed a workshop led by its National Safety Director Systems of Safety to cover the following topics:
 - Planning
 - Commitment to safety
 - Hazard mapping;
 - root cause analysis of incidents when they occur
 - system of safety for eliminating hazards a hazards that cannot be eliminated is an excerpt from a potential workshop material describing elements of safety
 - safety

WORKSHOP 2 - TRANSMISSION SAFETY ISSUES

UWUA suggests a workshop to address transmission human factor issues that could include the following topics:

- The status of inspection and maintenance programs for system;
- Appropriate crew sizes to accomplish maintenance work and effectively
- The importance of clearly written procedures and procedures when working with high pressure pipelines
- The importance of employee training and ways of improving and transmitting experienced workers to less experienced workers
- Procedures for documentation of pipeline segments, and replacement as well as new construction.

WORKSHOP 3 - DISTRIBUTION SAFETY ISSUES

UWUA suggests a workshop to address distribution (low pressure) issues that could include the following topics, without:

- standards for timely response for accomplishing fielding work leak surveys and repairs of old mains or reported
- standards for timely response to customer service calls, including connections and burn

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- the □đ importance □đ of □đ clearly □đ written □đ procedures □đ and □đ procedure
- appropriate □đ crew □đ sizes □đ to □đ accomplish □đ operation □đ safely □đ and □đ effectively □đ and □đ in □đ a □đ timely □đ and □đ responsive □đ manner;
- the □đ importance □đ of □đ employee □đ training □đ and □đ ways □đ of □đ impro and □đ transmittal □đ from □đ experienced □đ workers □đ to □đ less□đ□đ experienc
- procedures □đ for □đ documentation □đ segments, including □đ repair □đ and □đ replacement □đ as □đ well □đ as □đ new□đ□đ construction

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WORKSHOP □đ CUSTOMER □đ SERVICE □đ AND □đ RESPONSE

□đ UWUA □đ suggest□đ a □đ workshop□đ customer □đ service □đ and □đ response □đ focus □đ on □đ call □đ center □đ procedures □đ and □đ staffing, including with call the □đ obje answer □đ times □đ and □đ expediting □đ service □đ orders.

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WORKSHOP □đ 5□đ AGING □đ PLANT

□đ UWUA □đ suggest□đ a □đ workshop □đ on □đ the □đ importance □đ of □đ preventiv a □đ mitigation □đ measure □đ for □đ unreplaced □đ aging □đ plant, □đ in □đ both □đ t distribution □đ segments□đ the □đ industry.

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□đ UWUA □đ will □đ work □đ with □đ SCG □đ representatives □đ and □đ witnesses; □đ staff □đ including□đ in □đ addition- □đ CPS□đ DR□đ and □đ Energy □đ Division; □đ and □đ w such □đ as □đ TURN □đ and □đ Disability □đ Rights □đ Advocates □đ to □đ structure □đ workshops and □đ prepare □đ workshop □đ reports □đ for □đ the □đ commissioners. □đ scheduling □đ the □đ workshops □đ in □đ August □đ in □đ Southern □đ California, □đ at Los □đ Angeles.□đ □đ □đ

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B. □đ □đ Ratemaking □đ and □đ Cost □đ Recovery

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□đ The □đ Sempra □đ Companies □đ (SCC) □đ and □đ SBC□đ □đ rate □đ case □đ pro moving □đ concurrently □đ with □đ this □đ safety □đ proceeding. □đ □đ □đ GRCs □đ a

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considering □ ratemaking □ policy. □ □ UWUA □ considers □ this □ rulemaking
focused □ ~~ongoing~~ □ development □ and □ ~~on safety risks~~ □ the □ costs □ and □
implications □ of □ ~~which~~ □ ~~be~~ □ developed □ ~~in~~ □ ~~the~~ □ ~~GRC~~. □ regard □ this □
R.11-02-~~03~~ □ G should □ be □ managed □ generally □ in □ a □ manner □ compa
proceeding □ implementing □ the □ powerplant □ operation □ and □ maintenance
directed □ by □ Pub. □ Util. Stas. Code 2007613, Second □ Ex. □ ~~section~~ □ ch. □ 1
eventuated □ in □ GO □ 167. □ □ That □ proceeding □ brought □ owners, □ ~~an~~ □
experts together □ to □ develop □ substantive □ procedures □ and □ programs □
powerplant □ availability □ ~~to~~ □ the □ supervision □ ~~to~~ □ especially □ constituted □ Comm
and □ ultimately □ Commission, □ ~~with~~ □ ~~the~~ □ ~~addressing~~ □ rates □ and □ costs □ i
jurisdictional □ utilities □

□ This general □ ~~suggests~~ □ that rulemaking proceeding be □ phased, □
with □ the □ ~~first~~ □ (Phase □ 1) □ being □ focused □ on □ the □ development □
culture □ and □ the □ direct □ programmatic □ implications □ of □ the □ safety
could □ proceed □ concurrently □ with □ the □ GRC □ timetable □ for □ develo
intervenor □ testimony □ in □ ~~while~~ □ ~~over~~ □ ~~could~~ □ ~~be~~ □ informed □ by □ the □ dev
Phase 1.5 □ □ The □ second □ phase ~~phase would~~ □ ~~be~~ □ ~~the~~ □ forum □ fo
development □ of □ safety □ plans, □ including □ the □ process □ for □ systemi
mapping) □ and □ ~~to~~ □ ~~hazard~~ □ elimination □ and □ ~~to~~ □ ~~maintain~~ □ ~~the~~ □ ~~proceed~~ □ in □ 20.

□ Nevertheless, □ given □ the □ announced □ ~~02-30-03~~ □ ~~GO~~ □ and □ ~~the~~ □ ~~intense~~ □
interest □ in □ the □ rate □ implications □ of □ ~~this~~ □ ~~Sam~~ □ ~~Ed~~ □ ~~Brno~~ □ ~~car~~ □ ~~explōsin~~ □
probably □ should, □ provide □ ~~level~~ □ ~~high~~ □ policy □ guidance □ on □ ~~and~~ □ ~~rate~~ □ ~~making~~ □
implications □ for □ ~~related~~ □ programs □ at □ an □ early □ enough □ time □ t
the □ consolidated □ Sempra □ rate □ case and proceeding offset □ proceedings □ fo

4 □ □ ~~05-01-02~~ □ ~~Code~~ □ ~~410-102~~ □ G □ Section □ E.3.d., □ page □ 29 □ ff.

5 □ □ □ Programs □ developed □ in □ the □ first □ and □ second □ phases □ wo
treatment □ in □ offset □ proceedings. □ □ Given □ ~~they~~ □ ~~do~~ □ ~~claim~~ □ ~~no~~ □ ~~interest~~ □ ~~in~~ □
(c.f., □ SB □ 780 □ (Padilla) □ and □ other □ specific □ rates □ ~~or~~ □ ~~treatment~~ □ ~~track~~ □ ~~offset~~ □
developing □ safety □ program □ and □ plans □ might □ be □ particularly □ appropriat

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transmission □đ and □đ distribution □đ cost □đ recovery . □đ Ad □đ suggests □đ utilities □đ the □đ Commission □đ adopt □đ the □đ following □đ principles □đ on □đ an □đ expedite proceeding. □đ

- The □đ commission should ensure □đ that □đ each □đ gas □đ corporation □đ has □đ sufficient revenues □đ to □đ implement □đ safety □đ plans □đ and □đ programs □đ effectively received □đ by □đ the □đ gas □đ that □đ are □đ authorized □đ by □đ the □đ commission safety □đ plans □đ programs □đ should be □đ expended □đ by □đ the □đ gas □đ corporation for □đ the □đ purposes □đ authorized □đ by □đ the □đ commission.
- The □đ commission should prevent □đ ratepayers □đ from □đ directly □đ or □đ indirectly subsidizing □đ unreasonable □đ or □đ imprudent □đ actions □đ by □đ gas □đ corporations specifically: □đ

(1) □đ □đ The □đ Commission □đ require □đ ratepayers □đ to □đ pay □đ for □đ not □đ include □đ in □đ rates □đ any □đ revenues □đ that □đ recover, □đ directly incurred □đ in □đ connection □đ with

(A) □đ data □đ gathering □đ and □đ evaluation □đ work □đ necessitated □đ by □đ historical □đ compliance □đ with □đ any □đ applicable □đ state □đ or □đ federal record-keeping □đ or □đ by □đ the □đ utility's □đ failure □đ to □đ to □đ serve □đ keeping □đ and □đ data □đ maintenance □đ practices;

(B) □đ inspection □đ work □đ (including □đ retrofitting □đ and □đ smart □đ metering □đ necessitated □đ by □đ unreasonable □đ reliance □đ on □đ faulty □đ records □đ inadequate □đ data □đ concerning □đ pipeline □đ characteristics;

(C) □đ maintenance □đ work □đ necessitated □đ by □đ deferral □đ of □đ maintenance □đ other □đ activities □đ and □đ authorized □đ in □đ prior □đ rate □đ cases;

(2) □đ □đ In □đ any □đ proceeding □đ addressing □đ utility □đ recovery □đ of □đ capital) □đ for □đ investments □đ in □đ pipeline □đ reliability, □đ including □đ installation □đ of □đ new □đ transmission □đ pipeline □đ reliability □đ control □đ other □đ systems □đ and □đ the □đ replacement □đ of □đ transmission □đ pipeline, □đ the □đ ensure □đ that □đ

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APPENDIX A: □đ □đ

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SYSTEMS □đ OF □đ SAFETY

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CERTIFICATE OF SERVICE

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

**COMMENTS □đ OF □đ THE □đ UTILITY □đ WORKERS □đ UNION □đ OF □đ AMER
LOCALS □đ 132, □đ 483đ □đ 522
Representing □đ Employees □đ at □đ Southern □đ California □đ Gas □đ Com
on □đ R021019, □đ Gas □đ Safety □đ Rulemaking □đ**

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 (names attached)

on the 14th day of **April, 2011.**

/s/ WILLIAM JULIAN II
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