

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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

R. 11-02-019
(Filed February 24, 2011)

LODI GAS STORAGE, L.L.C.'S SAFETY PLAN

DOWNEY BRAND LLP
Dan L. Carroll
Jane E. Luckhardt
621 Capitol Mall 18th Floor
Sacramento, CA 95814
Telephone: (916) 444-1000
Facsimile: (916) 444-2100
Email: dcarroll@downeybrand.com
Email: jluckhardt@downeybrand.com

Dated: June 29, 2012

Attorneys for Lodi Gas Storage, L.L.C.

Pursuant to Order Paragraph 5 of D.12-04-010 Lodi Gas Storage, L.L.C. (LGS) hereby files its Safety Plan for Natural Gas Pipeline Safety Act of 2011 (“Safety Plan”). The Safety Plan includes an overall description of LGS’ public and worker safety policies, procedures, standards and guidelines. The Safety Plan also describes and incorporates by attachment the following six documents:

- Attachment A: Buckeye Partners, L.P. Board of Directors Health, Safety, Security and Environmental Committee Charter
- Attachment B: Commitment to Health, Safety & Environmental Values
- Attachment C: Operator Qualification Manual
- Attachment D: Operations and Maintenance Manual
- Attachment E: Gas Integrity Management Plan
- Attachment F: Emergency Response Plan

As permitted by D.12-04-010 the Safety Plan includes tables showing where each element required by Public Utilities Code Sections 961 and 963 is addressed within the Safety Plan and/or its attachments.

As described in Section 6 of the Safety Plan, LGS employees undergo Department of Transportation update training each year. LGS uses an online survey to obtain employee feedback and where appropriate revises its compliance programs. Furthermore and consistent with the direction provided D.12-04-010, LGS is making the Safety Plan available to its employees.

With the exception of confidential personnel information and global positioning system coordinates for valves, the Safety Plan and its Attachments are included in their entirety. The identification of LGS personnel, their qualifications and their contact information has been redacted from both the Operator Qualification Manual and the Emergency Response Plan to protect LGS employees’ privacy. The global positioning system coordinates of the valves have been redacted from the Emergency Response Plan to maintain the safety and security of the valves. LGS is committed to the safe operation of its facilities and does not believe that either employee personal information or the global positioning system coordinates of the valves impact

the ability of the California Public Utilities Commission, its Staff, parties to this proceeding or the public to review and evaluate LGS' Safety Plan.

Dated: June 29, 2012

Respectfully submitted,
DOWNEY BRAND LLP

By: /s/ Jane E. Luckhardt
Dan L. Carroll
Jane E. Luckhardt
Attorneys for Lodi Gas Storage, L.L.C.