

**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.

Rulemaking 11-02-019
(Filed February 24, 2011)

OPERATOR SAFETY PLAN OF GILL RANCH STORAGE, LLC

Ann L. Trowbridge
DAY CARTER & MURPHY LLP
3620 American River Drive, Suite 205
Sacramento, California 95864
Telephone: (916) 570-2500, ext. 103
FAX: (916) 570-2525
E-mail: atrowbridge@daycartermurphy.com
Attorneys for Gill Ranch Storage, LLC

June 29, 2012

**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.

Rulemaking 11-02-019
(Filed February 24, 2011)

OPERATOR SAFETY PLAN OF GILL RANCH STORAGE, LLC

In accordance with Ordering Paragraph 5 of California Public Utilities Commission (Commission or CPUC) Decision (D.) 12-04-010, Gill Ranch Storage, LLC (GRS) files the attached Operator Safety Plan (Safety Plan).

GRS operates the Gill Ranch Storage Project (Gill Ranch), located in Madera and Fresno Counties. Gill Ranch is comprised of an underground natural gas storage field, a compressor station for injecting and withdrawing gas from the storage field and associated dehydration and control facilities, an approximately 27-mile, 30-inch natural gas pipeline connecting Gill Ranch to Pacific Gas and Electric Company's (PG&E) Line 401, 10- to 16-inch gathering and distribution lines that transport gas between injection and withdrawal wells and the central compressor site, and an electric substation at the compressor site. The California Public Utilities Commission issued a Certificate of Convenience and Necessity for Gill Ranch in 2009 (D.09-10-035).

GRS owns a 75% undivided interest in Gill Ranch and PG&E owns a 25% interest.¹ GRS is the operator of Gill Ranch pursuant to an Operator Agreement between GRS and PG&E.

The attached Safety Plan is prefaced by a letter from David A. Weber, President and CEO of GRS, and is comprised of the following documents:

- Pipeline Safety Management System (Appendix A thereto provides a cross-reference between Public Utilities Code sections 961 and 963 and relevant operator documentation)
- GRS Operations and Maintenance (O&M) Manual
- GRS Emergency Response Plan (Section 3 of O&M Manual)
- GRS Transmission Integrity Management Program Plan

¹ PG&E owns and operates the 115 kV power line that serves the compressor station and other facilities.

- Maximum Allowable Operating Pressure Covered Task 8010 Procedure
- GRS Earthquake Response Plan
- Pipeline Compliance Data Book

This filing includes the documents that demonstrate GRS' compliance with the requirements of Public Utilities Code sections 961 and 963 and D.12-04-010. In order to protect the privacy and safety of personnel, GRS has redacted confidential personnel information from the attached documents.² GRS has also omitted from the Emergency Response Plan two maps showing the location of specific pipeline facilities, to avoid risk of harm to utility facilities, Gill Ranch personnel, and/or the public.³

GRS is serving the Pipeline Safety Management System on all parties on the service list for this proceeding. Due to the size of the additional documents listed above (*i.e.*, the GRS O&M Manual, the GRS Emergency Response Plan, the GRS Transmission Integrity Management Program Plan, the Maximum Allowable Operating Pressure Covered Task 8010 Procedure, the GRS Earthquake Response Plan, and the Pipeline Compliance Data Book), GRS is simultaneously serving a Notice of Availability of those documents, including instructions for requesting a copy of them from GRS.

In accordance with Public Utilities Code section 961(b)(2), the Commission must review and accept, modify or reject a safety plan for each gas corporation. GRS looks forward to participating in the safety plan review process as directed by the Commission.

DATED: June 29, 2012

DAY CARTER & MURPHY LLP

By: /s/ Ann L. Trowbridge

Ann L. Trowbridge
 3620 American River Drive, Suite 205
 Sacramento, California 95864
 Telephone: (916) 570-2500, ext. 103
 FAX: (916) 570-2525
 E-mail: atrowbridge@daycartermurphy.com
Attorneys for Gill Ranch Storage, LLC

² See, e.g., General Order 66-C, § 2.5; Cal. Govt. Code § 6254(c).

³ See, e.g., Cal. Govt. Code § 6254(k).