

**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)

**AMENDMENT TO SAFETY PLAN  
OF LODI GAS STORAGE, L.L.C**

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August 24, 2010

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**AMENDMENT TO SAFETY PLAN  
OF LODI GAS STORAGE, L.L.C**

Lodi Gas Storage, L.L.C. ("LGS") hereby responds to the Ruling of the Assigned Commissioner Setting Schedule for Comments on Safety Plans, Granting Unopposed Motion to Move Exhibit into Record, and Adopting Procedures for Commission Consideration of Request to Lift Operating Pressure Limitations on Line 131-30, dated July 20, 2012 ("Ruling"), which directed natural gas utilities that employ in-line inspection tools towards assessing for metal loss to amend their Safety Plans to address concerns regarding coordination and supervision of in-line inspection contractors no later than August 24, 2012.

LGS responds to this direction in new Attachment G to LGS' Safety Plan filed with the Commission on June 29, 2012. Attachment G addresses LGS' in-line inspection safety process.

Dated: August 24, 2012

Respectfully submitted,  
DOWNEY BRAND LLP

By:           /s/ Dan Carroll            
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