



California Public Utilities Commission



Workshop Agenda
Gas Citation Program Established by ALJ-274



August 1 – August 2, 2013

455 Golden Gate Avenue
San Francisco, CA 94102
Benicia Room



DAY 1: FOCUS ON DEFINING A REPORTABLE VIOLATION

**AUGUST 1, 2013
10:00 AM – 4:00 PM
BENICIA ROOM**

455 GOLDEN GATE AVENUE, SAN FRANCISCO, CA 94102

10:00am – 10:30am

Welcome and Introduction by CPUC staff.

The purpose of this workshop is to elicit feedback on the gas citation program from the regulated gas utilities and other stakeholders so that SED staff can further develop the process and apply a risk based treatment to self-reported violations.

10:30am – 11:45am

Discussion of what types of violations should be self-reported by utilities.

Each utility to present a summary of how they have interpreted the requirements in ALJ-274 and any proposals they have for further clarifying the requirements. Questions to be discussed include:

- *What types of violations should be reported?*
- *How should the method by which a violation was discovered be factored into a citation (i.e., self-reports, compliance audits, incident investigations, customer complaints, informants, etc.)? Should utilities be required to report violations found as part of the QA/QC programs?*

LUNCH 11:45am – 1:15pm

1:15pm – 2:30pm

Discussion of whether all violations should be reported within 10 days of discovery as required by ALJ-274 or should some violations be reported on an interval basis, e.g. monthly?

- *What types of violations should be reported as currently required by ALJ-274 (within 10 days)?*
- *What types of violations can be reported on an interval basis?*
- *How should utilities categorize, track and report metrics on self-reported violations?*

BREAK 2:30pm – 2:45pm

2:45pm – 4:00pm

A deep dive into the application of a risk-based treatment to violations. SED's Risk Assessment Staff will discuss what violations have been reported thus far, providing summary statistical data and lead a discussion of the following questions:

- *How to treat low risk, high frequency events vs. high-risk/low frequency events?*
- *What is the role of Root Cause Analysis?*
- *How will trends, analysis, and failure to correct systemic issues be factored in?*



DAY 2: FOCUS ON ESTABLISHING A FINE SCHEDULE

AUGUST 2, 2013

9:00 AM – 12:00 PM

BENICIA ROOM

455 GOLDEN GATE AVENUE, SAN FRANCISCO, CA 94102

9:00am – 10:45am

Discussion of the enforcement process and determining a penalty based on a severity of a violation. CPUC staff will lead the discussion of questions including:

- *What are the appropriate levels of severity?*
- *Applying a penalty value based on level of severity from a range of (\$0 to Max).*
- *What are some aggravating /mitigating factors and how should they be factored into the citation being issued?*
- *Treatment for fraud, deception, misleading Commission Staff?*
- *Treatment for compounding day, month, year?*

BREAK 10:45am – 11:00am

11:00am – 12:00pm

Discuss the next steps for establishing further guidelines to the citation program.

Discussion topics may include:

- *What corrections/modifications are needed to ALJ-274*
- *Comments on Citation Program Staff Guide*
- *Issues needing follow-up discussions*

Closing comments and discussion of logistical next steps