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Thomas J. Long, Legal Director

July 11, 2013

Sunil Shori, Safety and Enforcement Division
Maribeth Bushey, Administrative Law Judge
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

Re: R.11-02-019, Post-Workshop Comments of TURN on Gas Safety Metrics

Dear Mr. Shori and ALJ Bushey:

The Utility Reform Network (“TURN”) submits these comments regarding the workshop concerning gas safety metrics you chaired on June 27, 2013. TURN found the workshop a useful exploration of the issues relating to improving the metrics used by the Commission and utilities to ensure gas pipeline safety.

TURN found particularly fruitful the initial workshop discussion, led by Judge Bushey, regarding the key information one would want to know about a completely unfamiliar gas pipeline system before deciding whether to purchase it. With respect to whether the unknown system was safe, the workshop participants agreed that no single metric would answer the question, but rather a variety of considerations would be important, such as the makeup of the system (e.g., materials and performance), the quality and training of the employees operating and maintaining the system, the funding for the system, and its maintenance history. As the discussion continued, however, participants reached a consensus that, absent other information, system records would be the most useful way to assess the safety of the system, because the records would provide key insights into each of the considerations listed in the previous sentence. As various participants noted, the records would not only provide information about the system’s materials and maintenance history; the records also would or could reveal the quality and training of the system’s caretakers and whether it was being adequately funded. After all, the reasoning at the workshop went, a well-funded system would be able to retain well-trained and dedicated employees, and such employees would express their care for the system in high-quality records.

Thus, a key takeaway from the workshop is that careful and comprehensive records are probably the best single indicator that a gas system is likely to be safe. This conclusion comports with common sense: because most of the system assets are underground, records are the best way to understand the nature and quality of those assets and how well they have been cared for.

TURN believes that this insight should inform the consideration of changed or additional metrics

for pipeline safety. The changes and additions that were proposed in the second half of the workshop are generally promising as far as they go. However, the proposal overlooks the opportunity to establish additional metrics regarding the quality, completeness and ready availability of records that would provide extremely useful information regarding the safety of a gas system.

For example, operators could be required to report the percentage of transmission segments that are required to have a pressure test record for which such records are lacking, or the percentage of segments for which other key records -- such as updated as-built documentation, complete leak histories, and required inspection reports -- are missing or not readily available. Such metrics would reinforce for the operators the importance of careful record-keeping and help the CPUC Safety and Enforcement Division (“SED”) spot situations that need more attention in audits. Of course, TURN is not suggesting that SED take operator reports of such record-keeping metrics at face value; the accuracy of the reports themselves would need to be periodically assessed in audits. Still, operators should know they face stiff penalties if they misrepresent the quality of their records in their reports to the Commission.

For these reasons, TURN urges the Commission to add metrics related to the quality, availability and completeness of required records to any new or modified metrics that emerge from this process.

Sincerely,

/s/

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cc: R.11-02-019 Service List