

**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

**COMMENTS OF THE
COALITION OF CALIFORNIA UTILITY EMPLOYEES ON THE
GAS METRICS WORKSHOP PRESENTATION**

Pursuant to the June 27, 2013 Developmental Workshop on Gas Safety Metrics and the Amended Scoping Memo and Ruling of the Assigned Commissioner issued May 2, 2013, the Coalition of California Utility Employees submits these comments on the Gas Metrics Workshop Presentation.

The Coalition of California Utility Employees (CUE) is a coalition of unions whose members work at electric and natural gas utilities in California. These unions include the International Brotherhood of Electrical Workers, Local 1245, which has 12,000 members who work on both natural gas and electricity systems at PG&E. CUE offers these comments from the perspective of employees who have worked on PG&E's gas systems for many decades. These comments do not offer concrete reporting metrics examples, but rather guiding principles and goals for the Commission to consider while drafting the revisions to General Order 112-E.

I. REPORTING MATRICES SHOULD ATTEMPT TO REMAIN AS UNIFORM ACROSS AGENCIES AS POSSIBLE

Gas operators and field technicians have several agencies to which to report. Maintaining uniform and consistent reporting requirements between the agencies will increase efficiency in reporting and provide a clearer picture of overall gas safety. CUE recognizes that there are discrepancies in

standards between the state and federal levels, but minimizing any differences in reporting will prove useful in increasing efficiency and decreasing confusion.

II. SUPERVISING CPUC STAFF SHOULD UNDERSTAND METRICS

Commission staff charged with overseeing or auditing the operators and/or performing field audits should be qualified to understand reporting metrics and have the ability to issue spot for problems within the utilities' safety culture. As discussed at length at the workshop, reporting metrics can be gamed and may ultimately lead to a worse operator safety culture. Therefore, it is essential that any auditing CPUC staff have the training to recognize potential misreporting, failures to report gas leaks, and general gaming of the reporting metrics. Operators can successfully avoid reporting leaks if no one is paying attention.

III. THE CPUC SHOULD REQUIRE UTILITIES TO ESTABLISH A SEPARATE COMPLIANCE/DAMAGE PREVENTION DEPARTMENT WITHIN THE UTILITY

Currently, the employee job classifications that perform this work can also perform construction. This has caused a conflict for employee resources depending on workload and budgets, as gas compliance employees may be moved to a different department altogether to do construction. The CPUC should mandate that the operators create a separate department for safety compliance and damage prevention within their utilities. This would require establishing new job classifications which would feed directly into this separate department. The sole purpose of this department would be to monitor leak surveys and oversee reporting. Currently, there is a lack of follow-up between leak surveyors and compliance departments. This division would communicate directly with the leak surveyors and maintain a line of communication between the CPUC and the employees.

IV. THE CPUC SHOULD REQUIRE UTILITIES TO MAINTAIN UP-TO-DATE DATABASES FOR THEIR FIELD TECHNICIANS

The utilities must provide access to an up-to-date electronic database in each of the service technician's trucks. This database would include all maps of the service area, and include work history and leak history. Access to this information will give the technician the knowledge of previous work done in the area. For example, a technician may respond to a call and the data found in the database may indicate there are repeated leak problem in the area. This knowledge is essential for protecting the safety of the employee and the residents of the area. In 2013, there is no good reason why complete information is not available electronically, and in one place, for the employee in the field.

V. OPERATORS MUST PREPARE MEANINGFUL EARTHQUAKE PLANS AND CONDUCT EMERGENCY PREPAREDNESS DRILLS

While "preparation to minimize damage and respond to earthquakes and other major events" is required pursuant to SB 705 and must be included in Operator's gas safety plans, the operators should require actual *drills* to train their employees in emergency response. A yearly handout with the protocol is not sufficient. Moreover, the electric utilities already perform routine earthquake and major event drills. There is no reason why gas operators should not be doing the same.

VI. CONCLUSION

We thank ALJ Bushey and the SED for giving us the opportunity to comment on the proposed reporting metrics. We look forward to exploring the issues in more detail after the SED proposal is issued.

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Respectfully submitted,

/s/

Marc D. Joseph
Jamie Mauldin
Adams Broadwell Joseph & Cardozo
601 Gateway Blvd., Suite 1000
South San Francisco, CA 94080
(650) 589-1660 Telephone
(650) 589-5062 Fax
mdjoseph@adamsbroadwell.com
jmauldin@adamsbroadwell.com

Attorneys for the Coalition of
California Utility Employees