

BEFORE PUBLIC HEARING

PUBLIC UTILITY COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting the Commission's Model Order to Adopt New Safety and Reliability Regulations for Natural Gas Transmission and Distribution Pipelines and Related Rate-making Mechanisms

Order  
on  
to

Commission  
Staff

Order

Comments of Utility Workers Union of America on Changes to General Order 112

Proposed by Safety Enforcement Division Staff

Order  
Order

Commission  
Staff  
Division  
Staff

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September 26, 2013

Comments of Utility Workers Union of America  
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Comments of the Utility Workers Union of America  
Changes to the General Order 112  
Proposed by the Safety Enforcement Division Staff

Introduction  
of the  
Proposed

1. The proposed changes to the General Order 112 are intended to address the safety concerns of the Utility Workers Union of America (UWU) and the California Public Employees' Labor Relations Authority (CPERA). The proposed changes are intended to improve the safety of the workers and the public, and to ensure that the workers are properly trained and supervised. The proposed changes are intended to be implemented as soon as possible, and to be subject to ongoing review and evaluation.

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and workplace culture that places safety as their' (emphasis added)

□

This has and is the Legislature's command:

Pub. Util. Code Section 963(b)(3):

□

It is the policy of the state that the workplace safety of the public and gas top

The commission shall take all necessary

to carry out the policy in a consistent

principle of and asset

□

□

Public Util. Code Section

The plan developed, approved, and provisions shall

shall set forth how the gas pipeline shall be established

in paragraph (3) Section 963 and achieve

following: □

... □

The current effort to basic gas operation Gen

112 presents the Commission opportunity to broaden

operational safety culture changes by California make to

consolidate their ongoing gas Bruno important that

Commissioners explicitly acknowledge that they mention the

Legislature's comprehensive gas safety legislative Natural Gas

Safety Act of 2011, Pub. Util. Code Section 963(b)(3)

□

The proposed changes, while and reflecting

significant progress in some areas of regulation and

incorporating some of UWUA's specific recommendations:

comprehensively as the Commission and Legislature have

prominent, some proposals take significant steps backward

areas of the gas pipeline precisely the opposite of

and the proposed changes the Commission to develop

comprehensive leak reduction strategy for California as

this document

□

□

□

□

□

□

□

□

□

□

Related to the the SED and the Refinement to address crucial issue of workforce adequacy in the industry, or not the public will be safer than it has culminated in the the The Commissioners must de leadership and to actual operational impacts and the public expect

The UWUA made a comprehensive set of proposals in this proceeding. The submission is on the basis and is attached.

Recommended language for each of the UWUA at the appropriate place. The has been that Please note that the recommended language differs in the UWUA recommendations offered from the workshops counter-proposals.

**I. Regulatory Framework Pursuant to Subpart 12A (Preamble and Definit**

**A. and legal**

**1. Acknowledging State Legislative Activity**

In the session, the Legislature (2012) added to the Public Utilities Code 4.5 on Gas Safety including the Gas Safety Act of 2011, Pub. 955 through 970, inclusive. The Code includes including the 2011 (H) 4, Stats. 2011 B 52 216, Stats. 2011 S 5 (M), (P), and the 2011 Ch (H) 2 declares the public and employees is the top priority gas utility Code section 9 added by the gas utilities and the develop and implement safety plans.

(Pub. [Code section 961](#), [added by \[Assembly Bill 705\]\(#\)](#)); [the state's policy for implementing and enforcing pipeline safety](#) ([Part 192 of the Code section 95\(b\)](#)); [Any written order of the GO 112](#) by [the Commissioners](#) should acknowledge [the Legislature's](#) [objective](#) since [it](#) [confers authority on the Commission](#) of [its](#) [scope](#). [Cal. Const.](#) [Article 12](#), [Section 1](#) should acknowledge and [promote](#) [705](#) as [and](#) [promote](#) [language](#) that replicates [language 705](#) in [PU 961](#) ([Article 12](#)) [Section 3](#). As [UWUA](#) suggested in [its](#) [written](#) [recommendation](#) should contain the [following](#) [language](#) in [Article 1](#) in [Section 1](#) note [the](#) [language](#) is [tweaked](#) [slightly](#) from [the](#) [June](#)

**Section 102.1. [The current content of \[Article 10\]\(#\) of \[the\]\(#\) \[Natural Gas Pipeline Safety\]\(#\)](#)**

102.1. The purpose of this article is to adopt the Gas Pipeline Safety Act of 2011, Pub. Util. Code and specifically to implement and enforce the provisions and is the top priority in the operation delivery systems in California.

**Section 2. Relationship Between [Article 10](#) and [Federal](#) [Law](#)**  
Up to now the Commission [has](#) [relied](#) [heavily](#) [on](#) [rules](#) [adopted](#) [by](#) [the](#) [Pipeline and Hazardous Materials Safety](#) [49 CFR](#) [to](#) [implement](#) [and](#) [enforce](#) [the](#) [standards](#) [for](#) [gas](#) [systems](#) [and](#) [maintenance](#), [including](#) [documentation](#), [testing](#), [repairs](#) [and](#) [general](#) [this](#) [may](#) [be](#) [appropriate](#), [since](#) [PHMSA](#) [has](#) [industry](#) [expertise](#) [than](#) [has](#) [the](#) [Commission](#). However, [it](#) [has](#) [been](#) [mean](#) [in](#) [practice](#) [that](#) [the](#) [Commission](#) [matters](#) [previously](#) [or](#) [systematically](#) [it](#) [might](#) [have](#) [consequence](#) the [case](#) [of](#) [PG&E](#) [and](#) [the](#) [San Joaquin Hills](#) [Station](#) [denominator](#) for [O&M](#) [in](#) [California](#)

our heightened emphasis on safety in the wake of response.

This is of particular concern because the MSA excluded direct employee input in the formulation of and DIMP rules that are now driving much pipeline level.<sup>3</sup> In California the basis for the pipeline code of employees participate directly and continuously at all planning. Pub. Util. Code 191, section 191.20, adopting whistleblower provisions.

Any rule should retain the 60-day rule by regulations contained in 49 CFR 191.201. The national low-cost operation and maintenance appropriate in cases of California is not in this area any state or to a Subpart A should following language in an amended Section 101.2:

101.2. These rules apply to the federal regulations, specifically Title 49 of the Code of 191, 192, 193 and 199, which also govern Operation, and Maintenance of Gas Pipelines gas pipeline in California. These are the federal pipeline safety regulations but are sub-regulations, except that specific standards or requirements more stringent than a federal state pipeline facilities or transportation are declared to be con standard and will control, pursuant to Pub. Util 970, and 49 USC 60104(c).

<sup>3</sup> California State Utility Workers Union v. California Pipeline Forum, April 18, 2011. <sup>4</sup> 49 USC section 60104(c) provides in pertinent submitted a current certification under section 60105(a) of or more stringent safety standards for pipeline facilities or intra- transportation only if those standards are compatible with prescribed under this chapter. A state authority may standards

(Please note that this language does not require a party to specify specific approaches to reporting and documentation; testing; construction, including materials and maintenance, which in some cases exceed a standard as appropriate to California's circumstances. The UWUA Workshop Recommendations, there should be a general concern concerning California's intention and priority in this area

102.3. These rules establish the design, construction, operation, maintenance, applicable requirements for the design, materials, locations, testing, operations and maintenance of regulated gas pipelines, facilities, gathering, transmission, distribution of gas and liquefied natural gas facilities health, comfort and convenience of the public and public welfare and to protect the public from being maintained by gas utilities operating under the jurisdiction.

□

This general language shall be read in conjunction with specific in important areas of the documentation and maintenance that are more stringent than the staff proposals of significant improvement in some areas involving reporting (especially RIF), which UWUA supports as noted below. UWUA, the parties should specify California specific standards for transmission, storage and/or operation and maintenance functions may be and supersede 49 CFR 191 and 192, and adequacy requirements.

**□**

**B. Non-Adequacy Definition 105**

The Legislature has directed gas utilities to implement gas safety plans and the gas corporation the policy established in paragraph (a) of section 105.3 ... an adequately sized, qualified and properly trained

□



carry out the duties of the Public Utilities Code sections 961(d)(10) that are undersized, untrained, unskilled, or unsafe procedures that are unfulfilled, or inadequately executed. The Commission employ workforces sized and skilled to meet their safety-related policies and procedures that provide the public and make us expect. The UWUA members have failure to carry out necessary procedures due to an erosion of safety procedures to accommodate an inadequate performance procedures that take at the Rider pp. The Commission has committed to addressing this R.11-02-019. The Commission found the Southern California Gas General decision, the Commission found the

236 G.C.S. § 961 23q 236 - 6, 1 33, - ,-. 72 3 6-73 -. 23, 3 32- 7 6 6 32- 6. 6 6 6 - ,-. . 3 3 36-23 72 - - " - 3q 3,1 6z3 q , 73 . 2 32,1 2- 3 6 2 2- 2 7 2 3 221 3 ,-. "

237 3 9 11-02-019 6 - 2366 3 2 7 2 3 66 36 3. 73 3 G.C.S. § 961 3 237- 72 3 6 2 33 6 - 3q 3 6z3 7 G& 6 6 2 7 2 3 6, 3

Commission

D.13-05-010, Findings of Fact 2 and 237, page: Commission proposes to define the term of public utility to meet the Commission's standards and according to their own interpretation timely basis

Commission

**Section 961**

Commission

(h) Adequate Workforce for purposes of implementing Pub. Code section 961(d)(10) and for their employees and trained and workers necessary to carry out these rules require of the utility's adopted open maintenance procedures according to their terms and order to promote the safety, health, comfort, and employees and the public.

Commission

This regulation is a regulation standard that is not utilities from under their own efforts to meet the Commission's and the adequate service delivered on the by the basis is employing enough regulations actually the work A separate is the related questions of regulations, which currently are the CO standards, "qualification program," that is qualified to perform covered tasks if directed and observed by an in 805(c)<sup>5</sup> The UWUA proposal would require that is performed by a qualified employee, not an unqualified someone is

II. Leaks

A. Comprehensive Leak Reduction Strategy  
Leaks and the operator's approach to preventing among defining characteristics of a gas pipeline transmission and the operator's approach to assuring system. Every category of threat to system performance is documented in System Integrity Management Plan for American Society of Mechanical Engineers (ASME), and the ASME B1PS, measured part by leak accuracy and frequency

<sup>5</sup> The PHMSA person is qualified if the person has perform assigned covered tasks. The 49 CFR 803. The regulation does not require any experience or demonstration of competence in the scenario in which an inexperienced supervisor with observe an unqualified utility employee, or contractor employee, and comply with the PHMSA standard.

<sup>6</sup> This document is the ASME System Integrity Management Plan in its regulations. See generally 49 CFR 192.7 and incorporating the four general requirements in the ASME Plan of threat in Table 9 and Appendix A.

- External Corrosion
- Internal Corrosion
- Stress corrosion cracking
- Manufacturing
- Construction
- Equipment
- Third Party Damage
- Incorrect Operation
- Weather-related and gas

Currently GO 112 contains provisions specifically addressed to including limited leak surveys (see 143.1) and a requirement expressly stated in the regulations that the operator in the aggregate repaired and leaks pending repair during calendar year, as a component of its annual report and 49 CFR sections 191.11 through 191.110 and PHMSA. The lack of agency rule the Commission's addressing leaks have encouraged gas utilities to regress in their role as will apply the regulations in section below. The Commission utilities must develop and implement a comprehensive leak repair program urged by the WUA demonstrate their determination to place addressing the public's safety both the WUA and the State GO 112 Section 3 and 4 of the District's signature that will address operation and maintenance is comprehensive.

WUA proposed GO 112 should contain a comprehensive reduction strategy, including leak identification; leak reporting response and repair for each of the facilities including lines. WUA propose and more regulations for each element it including specifically a robust leak repair procedures and timelines for high leaks in proximity to residential buildings constitute a "comprehensive" strategy because it focuses

7. The ASME B31.8 page 30.

areas; 쉘 □ ηit 쉘 □ ηdoes 쉘 □ ηnot 쉘 □ ηdirectly 쉘 □ ηaddress 쉘 □ ηthe 쉘 □ ηenvironmental 쉘  
 associated 쉘 □ ηleaky 쉘 □ ηtransmission 쉘 □ ηbrake 쉘 □ ηit 쉘 □ ηshould.  
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 classifying 쉘 □ ηleaks 쉘 □ ηproposed 쉘 □ ηby 쉘 □ ηUWUA, 쉘 □ ηand 쉘 □ ηthe 쉘 □ ηreporting  
 SED 쉘 □ ηas 쉘 □ ηmodified 쉘 □ ηby 쉘 □ ηUWUA's 쉘 □ ηsuggestions  
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 threat 쉘 □ ηidentified 쉘 □ ηby 쉘 □ ηASME 쉘 □ ηfor 쉘 □ ηsafety 쉘 □ ηdisturbances  
 pipelines 쉘 □ ηand 쉘 □ ηstorage 쉘 □ ηand 쉘 □ η(b) 쉘 □ ηstandard 쉘 □ η  
 permanently 쉘 □ ηreduce 쉘 □ ηand 쉘 □ ηeliminate 쉘 □ ηleaks 쉘 □ ηthough 쉘 □ ηprompt 쉘 □ η  
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**B. Improved Transparency and Accountability on Operational Issues 123.2**

Improved transparency and accountability on operational issues that has been promoted by the Commission from San Bernardino in no area of the system is what we know is, breaking barriers effort to reduce leak. Understanding reporting scope of the problem is the proposed new 112 section on reporting leak report as an element of the new reporting regulations by the Code section 958.5 (added by AB 56 (Hill)).

**123.2. Annual Report**

(a) Each operator shall submit to the Commission required by Pub. Util. Code 958.5 a report of escape of gas reported to the operator by the workforce and the response to the report including condition allowing uncontrolled release was addressed. The report shall include the identification of the operator's system the leak occurred on at the surface including the process severity or degree of hazard of the leak; the reported; the timeliness of the response employed to eliminate the leak.

(b) The report shall include a description of the frequency and severity of the identified leaks

SED in 5 PRS responded by proposing a new that contains a much more comprehensive and detailed annually along with the annual report to PHMSA. The proposed report is a requirement over the UWUA's generalized topics and should be the process of the changes/improvements noted. There are several that

<sup>8</sup> Report of the Independent Review (2011), Recommendations 5.4.4.5, page 75. manages the WVOA April 11, 201 through 13 responding to the QA March 24,

(1) detailed report of response times for reports SED staff actions 1232(d)

(2) granularity of report requiring disclosure of leaks terms of the ASME staff proposed actions 1232(g)

(3) reporting the time between report and in the SED Staff proposal position 1232(h) that reveals only of leaks repaired and pending repair does not effectiveness of leak repair proposal will improve the Commission's transparency in repair and thus reduce threats both the pub

(4) reporting certain "near misses" level in proposed Section 123.2(d), including items that are incident reporting of Sections 122, 122.1 and damage occurred

(5) the requirement of a granular for analysis of LAUF in SED Staff proposed section 123.2(i). the extent to which waters for LAUF may be not to repair leaks or otherwise tighten the sy:

(6) the requirement in SED Staff proposed section therefore provide a basis for limited information for use in planning and in the field There are several areas where

reporting employees engaged in O&M activities (leak prevention) by job classification (utility or contractor). The proposed section 123.2(d) proposes to report disqualifications but without providing the context of engaged in the work with the responsibility qualification

(2) reporting leak proposal actions 1232(a) should add the additional information about leak location by ge

within  □  the  □  system,  □  so  □  that  □  threat  □  identificat  □  and  □  targeted.  □  

(3)  □  pointing  □  incidents  □  Proposed  □  section  □  123.2(h)  □  seem:  □  idiosyncratic  □  concerns  □  (homeowners,  □  )  □  effectiveness  □  rather  □  the  □  early  □  requ basic  □  information  □  about  □  associated  □  with  □  failure  □  to  □  call),  □  how  □  frequently  □  are  □  associated  □  with  □  failure  □  to  □  call,  □  during  □  the  □  execution  □  of  □  has  □  proposed  □  a  □  new  □  this  □  information  □  and  □  reports  □  more  □  frequently.

 □  the  □  modifications  □  of  □  support  □  of  □  proposed  □  that  □  notes  □  that  □  is  □  an  □  annual  □  report  □  that  □  public  □  and  □  the  □  Commission  □  for  □  purposes  □  of  □  policy  □  or  □  other  □  reporting  □  requirements  □  that  □  of  □  and  □  state  □  and  □  below  □  in  □  part  □  of  □  IV.

**C.  □  leak detection  □  leak  □  surveys**

 □  The  □  foundation  □  for  □  a  □  leak  □  reduction  □  strategy  □  is  □  prompt  □  permanent  □  repair.  □  □  □  □  leak  □  notes  □  involve  □  way  □  patrol  □  and  □  a  □  mo  □  digging  □  leak  □  in  □  repair involves  □  larily  □  inspection  □  of  □  evidence  □  of  □  leaks  □  such ground  □  or  □  soil  □  analysis  □  and  □  groundwater  □  as  □  not conditions  □  indicating  □  that  □  the  □  facilities  □  have  □  recently  □  incurred  □  in  □  the  □  way  □  of  □  eventually  □  not  □  only  □  n  □  GO  □  112  □  specifically  □  addresses  □  leak  □  detection  □  of  □  leak  □  California  □  regulations  □  on  □  leak  □  detection  □  for  □  transmission  □  inadequate  □  PHMSA  □  regulations  □  because  □  of  □  excessively  □  long  □  requirement  □  of  □  visual  □  inspection  □  of  □  both  □  transmission  □  and  □  of  □  both  □  of  □  transmission  □  and  □  □  of  □  applicability  □  of  □  and  □  distribution  □  systems

Patrol functions distribution residents were often performed by meter readers observe conditions warranting a detailed survey to identify the leak on pipe. of meter readers following installation of leak reports, and the independent reports by followed by timely response by utility subterfuge inspect intervals and more frequent leak surveys is needed identification and repair.

With respect to the proposed that the Enhancement Plan (PSEP) for Southern California Gas is a more robust (frequent) meter inspection process of person observation and leak as suring that access to valves) is unobstructed and that all gas distribution are investigated. (UWUA 102, which is a copy of Robin 5, page 5, line 20. ED has page 5. The intervals as in current GO 112, and has made surveys. SED has made a helpful suggestion that with leak detecting equipment.

UWUA's recommendations for the Leak component of the section 143 are as follows:

**143.1 Distribution Leakage Surveys and Procedures**

143.1. Distribution Leakage Surveys and Procedures

(a) A gas leak detector must be conducted in business districts and in the vicinity of schools including tests of the atmosphere in gas, electric, system manholes, at cracks in pavement, and sidewalk locations providing an opportunity for finding gas leaks, at intervals exceeding 12 months

(b) A gas detector survey must be conducted in consequence areas for leaks at residential meters



c) The intervals for inspections and the division of the utility to reflect the actual leak experience in the area.  
(d) The utility shall provide an adequate and sufficient to perform surveys as provided herein.

□

**(3) Amend Section 143.2.2.1 to read:**

143.2.2.1 Transmission Leak Surveys and Procedures

(a) A gas detector leak survey detection system shall be conducted on foot for all transmission pipe annually.

(b) A gas detector leak survey detection system shall be conducted on foot for all transmission pipe located in the area annually.

c) The intervals for inspections in subdivisions (a) to reflect the actual leak experience in the area.

(d) The utility shall provide an adequate and sufficient to perform surveys as provided herein.

□

Given the reduced patrol activity in distribution, should be shortened for a public utility that is identifying leaky relating them to the pipe location so they can transmission, the same rationale applies except that the higher pressures involves a shorter interval in population consequence) areas. The requirements are particularly important here.

#### **D. Critical of PRC**

UWUA has called for creating a comprehensive response, SED Staff has proposed a scheme for classification on leaks. The information generated without hearings or input from the field from experienced in the field who on leaks and leak. However, the Commission its current practice a series of hearings with the goal for the purpose of safety and the environment. rule can emerge from that process.

□

All gas utilities shall adopt procedures for classifying the classification characterizes the seriousness of the peak repair activities by utility PRC-10 systems. The new system for leaks that is not completely consistent with the Section 143.2 classification and the Action Definition Criteria Priority of leak cases of Southern California Gas (SCG) PRC-10 "Grade 1, Grade 2, Grade 3" with grade 1 completely different from what is currently used with grade being the most serious.

PRC-10 defines a Grade 1 leak as an probable hazard to persons or property and requiring repair, or continuous action until the conditions are 143.2(1). The defining characteristics of a Grade 1 leak are from the defining characteristics of a leak, such as factors as smell, pressure ("hissing gas") and location exclude frequently occurring leak scenarios and conditions considered.

The current concept of a Grade 1 leak, which in judgment of gas pipeline company personnel is the immediate hazard in 143.2(B) reporting element of the proposed classification for the projects an element of subjectivity that may result in fewer actual repairs, uncontrolled release of gas. SCG has opined that an obvious source of gas can be made, though gas migrate underground as it is contained in a pipeline. It might disagree with the decision?

Most important, PRC-10 does not require the manner that eliminates the uncontrolled release of gas provides a list of actions that does not include

- (i) Implementation of the gas pipeline company's 49 CFR 192.615;
- (ii) Evacuating the premises;
- (iii) Blocking off an area;
- (iv) Rerouting traffic;
- (v) Eliminating sources of ignition;
- (vi) Venting the area;
- (vii) Stopping the flow of gas by closing valves or
- (viii) Notifying police and fire departments.

□

Of particular concern is the leaking gas from the atmosphere is a permissible method of leak response. incentive to convert a Grade 1 leak to a Grade a prolonged period.

A leak detection pose an immediate hazard time of but unless scheduled repair based on future potential for a Grade B repair, Section 143.2(b) on a leak classification postponed for up to 15 months, peak demand on a segment of pipeline that is under construction Section 123(a). It is because of uneasiness with how could become, the SED Staff proposal contains consider (“should”) suggesting periodic evaluations, offering scenarios calling for timely action,” and offering potentially more frequent inspections election of the after proposal Section 143.2(2), subsections through (e).

The action by the is proposed repair or clear.” Section 143.2(2)(a). What action is involved in “clearing? Again, if venting is an appropriate function for the 3 (not hazardous and “reasonably hazardous”) which main requires further action, proposed presents a significant step. Uncontrolled releases of methane are never benign.

adopt Proposed Rule 143.2 at the proposed time to be above to as essential

**E. Leaks at Risers**

One type of leak needs to be addressed in preserves existing practices that are in the risers are the piping in the service from below grade (underground) and above district level (up to 60 psi in the case of anodeless (AL) case of steel risers) to the regulator which enters a dwelling unit or other structure from the through the meter.

Risers are frequent sources of leaks. For have considered leaks at risers to require immediate reasons: because of the pressures involved; because line (upstream of the regulator) that makes it impossible release of gas; proximity of the leak to human people to the leaking gas; and the possibility that enclosed space or because of the impression of leisurely approach to this highly visible system proposes to codify its practice.

**Add new Section 143.4 Leaks at Risers**

143.4. Leaks in approximately structures residing at risers

- (a) Any leak in or in close proximity completely and permanently repaired on the same including specifically a leak at the
- (b) the operator shall include these reports and of the annual leak report required by section

requested and received funding for repair of a leaky pipe.

For the past year, following the 5-010 decision, the General Rate Case, SCG has delayed the replacement of new approach that would permit delaying of policy of employing an insufficient number of distribution work according to procedure. UWUA has resisted them to the Commission and its staff. environmentally irresponsible. In February SCG ignored around for leaks at risers, a window from a satisfactory from an environmental standpoint. UWUA procedure.

Recently SCG has informed UWUA that it intends invoking the USA (Underground Safety Alert) procedure causing a delay of days for gas but ignores the riser leaks are on private property in the media gas riser repair require excavation, which procedure permits without the USA gas additives in the trench with other underground utility facilities. The have priority repair to UWUA transparent attempt prompt leak repair and the amount employ sufficient make these important repairs. The seems a urgency about maintaining appearance and air

The new approach involved a new procedure for "non-hazardous." "Hazardous" leaks would continue to be hazardous leaks would be repaired as scheduled up to "hazardous/nonhazardous" would be made as a matter of leak site using a "soap bubble" test that did not field.

codifying the procedure in effect and applying WUA's  
regulation.

III. More Robust Standards for Certain Operation and Maintenance functions

As indicated above, California will adopt more stringent operation

maintenance standards than the federal minimums better concerns and physical conditions. The Commission will propose in regulating of valve maintenance, to date, a mark services (not covered by federal law.

**A. Valves are a critical component of the gas transmission system. Valves can serve a number of functions including reducing or increasing pressure; redirecting gas flow; or flow, etc. The Commission has expressed a particular concern functions. The Commission SB 216 (2011, Yee) and AB 56 (2011, section 95 currently address matters in that a valve is operable in the manner 112 section 143 provides:**

**143.2 Valve Maintenance. The use of wh for the safe operation of a distribution system, lubricated (where required) and partially operated at 15 months, but not less than one year.**

The limitations in this (1) transmission (2) of “necessary for the safe operation of therefore guidance was covered by the dimensions of the valve covered by the specification (3) about the outcome of the maintenance practices be

10 Note that the California regulation omits CR 192.745(b): Each operator must take action to correct found inoperable, unless the operator does not document the operable condition of the valve at the

the

the

(4) excessively long intervals between the maintenance procedures renumbering the section as proposed by UWUA SED

UWUA recommended a significantly revised procedure for preventive scheduled maintenance

### 143.3 Valve Maintenance

(a) Each operator shall make a valve inventory and a description of the location, type, size, number, and criticality

(b) Each valve, the use of which may be transmission or electric system, shall be serviced, lubricated (where required) and left fully operational inspection. "Fully operational" means that it can be opened and closed the valve.

(c) The report on the valve inspection must include: a list of the valve as found at the beginning of the maintenance procedures or other activities at the condition at the conclusion of the inspection

(d) The operator will ensure that each inspection equipment to lubricate and operate the valve at

(e) The operator will ensure that each is fully trained and operate the size and type he/she is assigned.

UWUA's recommendation proposes several improvements, beginning comprehensive valve inventory. This enables and prioritizing valves of the system may be necessary for a system. The problem that this addresses is prioritization may leave many valves uninspected for years, and operation necessary an emergency such as occurred at San Bruno. The inventory including the SED staff and employees to participate in identifying the valves "necessary for safe operation" will assure that valve maintenance contributes to the



decreasing the risk that an inoperable valve extends  
occurred at Bruno

Second, UWUA included both distribution valves in  
inventory. It is not clear that the valves in  
by existing section 143.3 (distribution only.) In  
inspection and maintenance standards must cover all v.  
Third, UWUA recommends a standard for assessing  
of the inspection and maintenance standards must be “fi  
meaning that it can be “easily operated” and clos  
requirement for a valve be “partially operated” dur  
does not assure that a valve is capable of be  
effectively operated during an incident. In connec  
standard, UWUA proposes that at the beginning  
conclusion of maintenance procedure, sometimes with  
actual condition of valve after maintenance, sometimes with  
Fourth, UWUA states that valve maintenance be fully  
and qualified to perform the main maintenance with  
adopts a version of this proposed training equipment  
in its proposed new inspection section 143.4, which  
personnel as defined by PHMSA regulation 49 CFR  
equipment at the actual work appears to be a

**143.4 Operator Qualification** equipment and facilities  
pipeline company for training and qualification of  
to the equipment and facilities on which the  
covered skill

Fifth, UWUA recommends that the interval for  
“valves necessary for the safe operation of  
lengthy inspection interval permits first and to  
a systemic safety risk that should be  
primarily a function of workforce

of valves that result from the valve  
UWUA by recommending that the inspections be conducted  
than annually.

Valve maintenance is going on for the fact that is dependent  
adequate workforce. The workforce adequacy definition can  
be approved if the Commission is to have an effective

**B. Locate and Mark** Section 143.5 Locate a  
Locate and mark activities are created to be done  
to underground pipes. They are invoked when the  
UWUA has proposed a project to be performed by qualified  
employees, including specifically utility employees who observe  
can enforce utility procedures.

143.5. Locate and Mark

- (a) locators shall be employed by utility
- (b) excavations shall be observed by utility  
empowered to enforce utility procedures for excavation  
facilities, including excavation by hand.
- (c) each utility shall employ a person or persons to  
transmission and distribution of low voltage that marks are  
both directions from any given point on the

**Locate**  
UWUA has also on site throughout distribution  
transmission of way. This will make it much  
to ascertain proximity to utility facilities. PHMSA requires  
necessary to identify the location of the transmission  
possibility of damage. The 49 CFR 192.707(b) rule  
eliminates the active the PHMSA rule by providing  
sight of the adjacent marker  
Locate

c. **After-Meter Services**

The Utilities Code specifically requires the Commission to include rates for "after-meter services" and requires the Commission to include rates for (a) **After-Meter Services** and (b) **After-Meter Services**.

(4) The Commission shall take into account the after-meter services and shall employ staffing to provide for the consistent with the approved by the Commission.

After

"After services" are defined by Pub. Util. Code section 328.1):

(1) "After services" includes, but is not limited to inspecting customer tapping and investigation, pilot relighting, and high-voltage

Some

Some utilities are attempting to provide by directing customers seeking these services to a third party contractor. charge a separate Commission should faithfully execute the UWUA proposed article 30 that declares Commission's intention to implement the law, using non-Legislature in the safety plan: development and safety metrics pursuant to the Public Util. Code section

Section 970 provides:

(a) The Commission shall adopt safety performance metrics for pipeline safety.

(b) The Commission shall adopt safety performance metrics

(1) Each safety performance metric shall be a performance.

(2) Each safety performance metric shall be a useful frame.

(3) Each safety metric shall be designed to measure the safety

(4) The Commission shall adopt safety metrics as a useful indicator of pipeline safety.

(c) The Commission shall adopt safety metrics



foundation for a vigorous comprehensive leak reduction program come. UWUA also notes and supports the "near misses" for the proposed and revised in the incident procedures in Staff proposed Section 122.2(a) (applicable to 122.2(d) (quarterly reports). Near misses are events that into system conditions before they occur, consistent with the basic command of the SB 705 Util. Code 9(1) to

“identify and minimize hazards and systemic risks accidents, explosions, fires, and damage to the and the gas corporation workforce;...

**2. UWUA Proposals**

UWUA has made additional proposals Commissioners should adopt.

**a. Improved Safety Related Conditions**

Utilities file reports of safety related conditions a CPUC covering transmission and storage (high pressure) 112 Section 192 CFR 191.23 and 191.25. In the Legislature proposed for the Commission, to act with more timeliness and urgency on identified by the utilities. PHMSA reports included in the Section 9 report to the Commission specifically corrective actions taken. A specific issue not currently included in report investigations of external conditions as observed and leak surveys. The following new section 124 follows:

124.2 Reporting Safety

(a) Each element of the report required by R shall include a compilation of related reports made to pursuant to 49 CFR 191.23 and 19 repair or other response to the observed condition. (b) In addition to the matters specified in 191.25, the utility shall report any external or coating on pipe observed during leak surveys, repair or other response to the observed condition.

□

**b. Reporting on Incidents**

□

Damage related to excavations of any kind by right concern of both the Commission and the Legislature. receive information so that it can work with the SED Staff to include findings in its proposed annual modifications in proposed Section 123.2(h). However, that proposal seems somewhat idiosyncratic and may of the issues.

□ UWUA proposes a new Section 127 that provides within 30 days and a compilation of for transmission report. The Legislature has also indicated issue and may provide. The UWUA suggests that the adopt its proposal for a new section with expedite an amendment to reflect the Legislature's conclusions communicated.

□ The UWUA proposed language is:

**□**

**127. Reporting Related Incidents**

□

(a) Each utility shall report to the Commission every incident where utility facilities are damaged by excavation in the proximity of any of the following elements, and any other Commission may prescribe: location of incident; whether it was called; identity and qualifications of any utility personnel who was on site; description of

techniques and equipment; description of utility facilities of repairs to utility facilities and their cost.  
(b) Each utility shall provide a report on required by section 958.5

□  
□

**V.2 Process Recommendations**

□ UWUA has made several recommendations that fall process. These include a substantive matter on house-keeping matter that conveys text of its has a timely her □

□

**□ A. Part Modifications**

□

□ The Commission and the Legislature have both stressed improving communication among employees and the C as an essential component of the Commission's journey improvement pathway. The Legislature has a part of the Pipeline Safety Act. 705 (201

(e) The Commission and gas corporation shall provide meaningful, substantial, and ongoing participation by workforce in the development and implementation of objective of developing that will minimize accidents, explosions, fires, and for the protection public and the gas corporation

The Commission added Subpart G to GO 12-009, and granted WWO's Protection Order for this and the SCG General Order. Commission should clarify the related to employee communications in the gas industry whistleblowers renaming Subpart G and adding a section breadth of employee participation provided for by the

12 signed Commissioner and Administrative Law Judge's Ruling Re the Utility Workers Union of America for a Dismissed Pr  
January 25, 2020, paragraph 10, Ordering Paragraph

□

UWUA proposes that the Commission

(1) ~~enable the Subpart E FACILITATING EMPLOYEE PARTICIPATION IN~~

(2) ~~add a new section 302.2 Participation by Utility~~

302.2 Participation by Utility Employees

The commission and each utility shall provide of substantial, and ongoing participation including representing the employees' choice of contractors, in the development and implementation and maintenance procedures including matters covered utility safety plans, with the objective of industrywide culture of safety that will minimize and dangerous conditions for the corporation work.

**B. Publishing the Take Notice on the Website**

GO 112 has been modified since the time period including the addition of a new Subpart G address and extending reporting requirements with the exception of

Order being updated UWUA recommends that the Commission

104.3 to provide the Commission website, so that

the public is informed of the new and

104.3 The Commission shall update the text of GO after the issuance of a decision adding, deleting, General Order, or 15 days after any Order comes into effect.

The Commission shall update the text of GO after the issuance of a decision adding, deleting, General Order, or 15 days after any Order comes into effect.



**c. Summary of Recommendations**

UWUA has made a number of recommendations for revisions of existing sections of GO 112. They

**Section 101.2 Relation to Federal Law**

101.2. These rules are adopted in addition to regulations, specifically Title 49 of the Code of 191, 192, 193 and 199, which also govern Operation, and the Gas Piping Systems and gas pipeline in the State of California. These are the federal pipeline safety regulations but are supplementary regulations, except that specific standards rule more stringent than a federal standard applicable facilities or transportation are declared to be con standard and will control, pursuant to Pub. Utilit 970, and 49 USC 60104(c).

**Section 102.1 Purpose of Rules to Implement State**

102.1. The purpose of California Gas Pipeline Safety Act of 2011, Pub. Util. C and specifically to and enforce the that public and is the top priority in the operati delivery system in California.

**Section 102.3 Renumbered to Section 102.1**

102.3. These rules establish to the federal regulations, applicable requirements for the design, materials, locations, testing, operations and maintenance regulated gas pipelines facilities, and gas distribution of gas and liquefied natural gas facilities health, comfort and convenience of the public and public welfare and to provide that safe maintained by gas utilities operating under the commission.

**Section 104.3 Timely Update on Commission Website**

104.3 Timely Update Commission Website

The Commission shall update the text of GO after issuance of a decision adding, deleting, or General Order, or 15 days after any order comes into effect.

Section

**105. Adequate Workforce definition**

(h) Adequate Workforce for purposes of implementing Pub. section 961(d)(10) and for employing workers trained and necessary to carry out these rules and the rules of the utility's open maintenance procedures according to their terms and order to promote the safety, health, comfort, and employees and the public.

Section

**106. Annual LER Report**

Section

UWUA has made comments suggesting improving the content of proposed by SED. It is not proposed for specific

**127. Related Conditions**

Section

**124.2 Reporting Safety Incidents**

Section

(a) An element of the report shall include a compilation of related reports made to pursuant to 49 CFR 191.23 and 19 repair or other response to the observed condition. (b) In addition, the shall be reported in 49 CFR 191.25, the utility shall report any external or coating on pipe observed during leak surveys, repair or other response to the observed condition.

Section

Section

**Reporting Excavated Incidents**

Section

**127. Reporting-related Incidents**

(a) The utility shall report to the Commission every incident where utility facilities are damaged excavation in the proximity of any shall be the following: location of incident; whether it was called; identity and qualifications of

Section

any; whether utility personnel was on site; descriptive techniques and equipment; description of utility facilities; repairs to utility facilities and their cost.  
(b) Each utility shall provide a compilation of records required by section 958.5

Section  
Section

**Section 143.1 Distribution Leakage Surveys**

Section

**143.1. Distribution Leakage Surveys and Procedure**

(a) A gas detector survey shall be conducted in business districts and in the vicinity of streets including tests of gas electric, telephone, system manholes, cracks in pavement, and sidewalk locations providing an opportunity for finding gas exceeding 12 months, but at least once each year.  
(b) A gas detector survey must be conducted on consequence areas for leaks at residential meters.  
(c) The intervals for inspections in subdivisions shall be set to reflect the actual leak experience in the area.  
(d) The utility shall provide an adequate number of personnel sufficient to perform surveys as provided herein.

Section  
Section

**Section 143.2 Transmission Leakage Surveys**

Section

**Section 143.2. Transmission Leakage Surveys and Procedure**

Section

(a) A gas detector leak survey shall be conducted on foot for all transmission pipe annually.  
(b) A gas detector leak survey shall be conducted on foot for all transmission pipe east of the city limits annually.  
(c) The intervals for inspections in subdivisions shall be set to reflect the actual leak experience in the area.  
(d) The utility shall provide an adequate number of personnel sufficient to perform surveys as provided herein.

Section  
Section

**Section 143.3 Valve Maintenance**

Section

**143.3 Valve Maintenance**

Section

Section

(a) Each operator will make an inventory of a description of the location, type, size, number, and criticality.

(b) Each valve, the use of which may transmission or distribution system, must be lubricated (where required) and left fully operational inspection. "Fully operational" means that the valve can be opened and closed.

(c) The report of the inspection must include: a record of the valve as found at the beginning of the maintenance procedures or other activities at the condition at the conclusion of the inspection.

(d) The operator will ensure that each inspection equipment to lubricate and operate the valve at the time of inspection.

(e) The operator will ensure that each inspector is fully trained to inspect and operate the valve; he/she is assigned.

Section 143.4

**Leaks and Risers**

Section 143.4

**143.4. Leaks in proximity of risers and risers**

Section 143.4

(a) Any leak in, or in close proximity completely and permanently repaired on the same including specifically a leak at the meter can be performed by qualified employees of the operator.

(b) The operator shall include these reports and of the annual leak report required by section 143.4.

Section 143.5

**Locate and Mark**

Section 143.5

**143.5. Mark and**

Section 143.5

(a) locators shall be employees of the utility.

(b) excavations shall be observed by utility empowered to enforce utility procedures for excavation facilities, including excavation by hand.

(c) Each utility shall provide markers in its transmission and distribution systems that marks are both directions from any given point on the

Section 143.5

Section 143.5

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Section 302.2 Participation by Utility Employees

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The commission and each utility shall provide of substantial and ongoing participation by the gas including including representatives employees the including, and emp of contractors, in the development and implementation and maintenance procedures including matters covered utility safety programs and plans, with the object industrywide culture of safety that will minimize and dangerous conditions for the corporation work.

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Section 303.2 Standards of Service

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303.2. Meter Service

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303.2. (a) The commission shall provide 970 for after meter services as defined by (b) allowing for meaningful, substantial and ongoing utility employees through designated representatives, and new employees of contractors, the utility shall propose customer service functions including but not limited to leak reports from customers and the after time meter services including but not limited to pilot examination of connectors and other appurtenances of residential dwellings; timely order completion for residential involving flowing gas in accordance, turn off, high usage and investigations.

(c) The commission shall specify customer service safety metrics after review of the utility proposals and

(d) The commission shall bring to the attention of staff, utility, employees quarterly to review progress on achieving

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