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ATTACHMENT A

June 27 Workshop Statement

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BEFORE 웹□η 웹□η

PUBLIC 웹□η UTILITIES 웹□η COMMISSION 웹□η OF 웹□η THE 웹□η STATE 웹□η C

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Order 웹□η Instituting 웹□η 웹□η 웹□η 웹□η 웹□η 웹□η) 웹□η
on 웹□η the 웹□η Commission's 웹□η 웹□η 웹□η 웹□η 웹□η) 웹□η
to 웹□η Adopt 웹□η New 웹□η Safety 웹□η and 웹□η Rel 웹□η City 웹□η Reg 웹□η 웹□η 웹□η 11
for 웹□η Natural 웹□η Gas 웹□η Transmission 웹□η and 웹□η 웹□η 웹□η 웹□η 웹□η Pipelines
and 웹□η Related 웹□η Ratemaking 웹□η 웹□η 웹□η 웹□η) 웹□η

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웹□η Workshop 웹□η Statement 웹□η of 웹□η Utility 웹□η 웹□η 웹□η 웹□η 웹□η Union 웹□η
On 웹□η

Developmental 웹□η Workshop, 웹□η Jun 웹□η 27, 웹□η 2013

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JUNE 웹□η 25, 웹□η 2013

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WORKSHOP STATEMENT OF DEFENSE UUA

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GENERAL PRINCIPLES

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(1) 112 should explicitly implement SB 705, as well as and include language that 705 language that 961(e), and 63(b)(3).

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SPECIFIC LANGUAGE IS INCLUDED IN THE (Subpart B, Section 6)ions

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(2) 112 should retain incorporation by reference of contained in 49 CFR 191 and 192, but should I common denominator for the is not appropriate cases for California.

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GO 112 should specify California to reporting and documentation, within some categories and 49 CFR 191 and

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SPECIFIC LANGUAGE IS INCLUDED IN THE (Subpart B, Section 3)ions

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GO 112 should specify standards for storage and distribution operation and functions, and 49 CFR 191 and specifically Navy reference

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SPECIFIC LANGUAGE IS INCLUDED IN THE (Subpart B, Section 4)ions

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(3) 112 should require operators to facilitate direct regulators and employees, using the agency AND RESUBPART

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SPECIFIC LANGUAGE IS INCLUDED IN THE (Subpart B, Section 2)ions

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(4) 112 should implement Public Utilities Code section standards, publishing and forcing them) NEW SUBPART H

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SPECIFIC LANGUAGE IS INCLUDED IN THE (NEW PART STARTMENT)

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(5) 112 should contain a comprehensive leak reduction survey and identification; leak reporting; leak response pipeline facilities time (NEW SUBPART I)

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SPECIFIC RECOMMENDATIONS

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SUBPART General

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(1) **California PHMSA and TAMP standards**
California PHMSA standards specify superseding California standards

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101.2. The rules are incorporated in addition to the federal regulations, specifically Title 49 of the Code of Federal Regulations, 192, 193 and 199, in the Design, Construction, Testing, and Maintenance of Gas Transmission-regulated gas pipeline facilities of the State of California. These rules do not supersede safety regulations but are supplements to the federal specific standards or these rules do not conflict with a rule will be adopted

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(2) **California 101.2 current content to be changed**
California implementing the California Safety Act of 2011.

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102.1. The purpose of these rules is to implement Act of 2011, Pub. Util. Code 950 through 970 and enforce the principle that safety is the top natural gas delivery system in California.

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(3) **California 102.1 content of 102.1 with clarification**
California PHMSA standards

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102.3. These rules establish, in addition to the applicable requirements for the design, construction, quality testing, operations and maintenance of gas pipeline facilities used in the gas transmission distribution of gas and facilities to safeguard the safety, health, comfort and utility of employees, property and public welfare and to adequate service will be maintained by gas utilities of the Commission

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(4) **California 104.3 to provide timely updates**
California Commission adds

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104.3 The Commission shall update the text of GO 112 the issuance of a decision adding, deleting, or name Order, or 15 days after any order on a hearing

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(5) **켄 definitions from 켈 PUC 켈 950**

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105 켈 definitions

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(a) **켄** means 켈 the 켈 Public 켈 Utilities 켈 Commission of 켈

(b) **켄 regulated 켈 gas 켈 pipeline 켈 facility** an 켈 intrastate 켈 gas facility 켈 as 켈 defined 켈 in 켈 Section 켈 60101 켈 of 켈 Title 켈 49 켈 subject 켈 to 켈 regulatory 켈 authority 켈 of 켈 the 켈 commission 켈 to 켈 in 켈 the 켈 certification 켈 submitted 켈 by 켈 the 켈 commission 켈 and 켈 a 켈 United 켈 States 켈 Secretary 켈 of 켈 Transportation 켈 켈 in 켈 the 켈 United 켈 States 켈 Code 켈 of 켈 Regulations 켈 for 켈 the 켈 pipeline 켈

켄 distribution 켈 line, 켈 within 켈 켈 jurisdiction 켈 of 켈 the 켈 Federal 켈 Regulatory 켈 Commission 켈 pursuant 켈 to 켈 Section 켈 717(b) 켈 of 켈 Title 켈 of 켈 켈 for 켈 the 켈 local distribution 켈 of 켈 켈

켄 transmission 켈 line, 켈 켈 켈 commission, 켈 pursuant 켈 to 켈 Section 켈 of 켈 켈 certified 켈 to 켈 the 켈 Commission 켈 as 켈 being 켈 subject 켈 regulatory 켈 jurisdiction 켈 of 켈 the 켈 commission 켈 over 켈 rates 켈 and 켈 service 켈 purposes, 켈 켈 means 켈 a 켈 pipeline 켈 that

(A) 켈 transports 켈 gas 켈 from 켈 a 켈 gas 켈 storage 켈 facility, 켈 or 켈 large 켈 downstream 켈 from 켈 distribution 켈 center, 켈 (B) 켈 rates 켈 20 켈 percent 켈 or 켈 minimum 켈 length, 켈 or 켈 (C) 켈 transports 켈 gas 켈 within 켈 a 켈 gathering 켈 line, 켈 켈 켈 current 켈 production 켈 facility 켈 켈

(c) 켈 natural 켈 gas 켈 that 켈 is 켈 subject 켈 to 켈 the 켈 safety 켈 inspection 켈 program 켈 pursuant 켈 to Chapter 켈 4 켈 (commencing 켈 with 켈 켈 2.

(5) 켈 distribution 켈 system 켈 켈 켈 to 켈 inspection 켈 and 켈 enforcement 켈 program 켈 with 켈 Section 켈 4451) 켈 of 켈 Division 켈 2.

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켄 response 켈 standards 켈 standards 켈 that 켈 are 켈 applicable 켈 to 켈 켈 standards 켈 are 켈 in 켈 addition 켈 to, 켈 켈 adopted 켈 the 켈 United 켈 States 켈 pursuant 켈 to 켈 Chapter 켈 (commencing 켈 with 켈 켈 of 켈 Subtitle 켈 VIII 켈 of 켈 Title 켈 49 켈 Code 켈 켈 the 켈 commission 켈 is 켈 authorized 켈 to 켈 켈

(c) 켈 of 켈 the 켈 chapter.

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(d) **켄** 켈 the 켈 same 켈 켈 adopted 켈 by 켈 the 켈 United 켈 켈 켈 to 켈 Chapter 켈 601 켈 (commencing 켈 with 켈 켈 of 켈 Subtitle 켈 VIII 켈 of 켈 Title 켈 49 켈 States 켈 Code 켈 (49) 192.903, 켈 as 켈 adopted 켈 January 켈 1, 켈 2011, 켈 regulation). 켈

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(e) Handed means any structure used to store gas, of 500 or more cubic feet, or will be in contact at its maximum design pressure, except that a pipe transmission or distribution of gas, but which also holder for purposes of this General Order.

(f) Inert is a gas that does not burn or support nitrogen, carbon dioxide or other such gases.

(g) Person means any person, firm or corporation engaged in transporting natural gas, hydrocarbon gas for any domestic, commercial, industrial or other purposes.

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(6) adequate workforce means the number of employees necessary to carry out the duties according to terms.

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(h) Adequate Workforce means the number of employees necessary for the purposes of implementing Pub. Util. Code 961(d)(10) for these purposes of qualification necessary to carry out the duties of these rules and in the requirements adopted for operation and maintenance of their terms timely basis shall be used to promote the safety, health, and comfort of its patrons, employees and the public.

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SUBPART B Reports

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(1) Add Section 123.2. Annual Leak Reports

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123.2. Annual Reports

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(a) Each operator shall submit as part of its response report to Pub. Util. Code 96.5 of every uncontrolled release reported to the operator by the public or member response to the report including whether and how the uncontrolled release was addressed by the operator. The location of the leak on each of the operator's facilities including the proximity to the hazardous materials, the manner in which the leak was reported response and the procedures employed to eliminate the

(b) The index shall be a function of the utility's strategic frequency and severity of the identified leaks.

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(2) Add to Section 124 reporting safety a requirement external corrosion observed during leak shall be reported and compromised coatings be reported as an element

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124. **Report of Safety Condition**

(a) Each utility shall report to the Commission by include a compilation of its report required by? include a compilation of its report required by?

(b) In addition to the matters described as the utility report any external corrosion or compromise pipe observed during leak surveys, and the corrective response to the observed condition.

(a) Each utility shall report to the Commission by include a compilation of its report required by? include a compilation of its report required by? include a compilation of its report required by?

(b) In addition to the matters described as the utility report any external corrosion or compromise pipe observed during leak surveys, and the corrective response to the observed condition.

(3) Add Section Reporting Incidents

127. Report of Incidents

(a) Each utility shall report to the Commission incident where utility facilities are damaged or compromised proximity of its facilities and the report shall include following elements, and any other matter that the location of the incident, the utility's name, and the utility's qualifications to perform the work.

(a) Each utility shall report to the Commission incident where utility facilities are damaged or compromised proximity of its facilities and the report shall include following elements, and any other matter that the location of the incident, the utility's name, and the utility's qualifications to perform the work.

(b) Each utility shall provide a compilation of by section 958.5

SUBPART C CONSTRUCTION AND SAFE STANDARDS

(1) Title Distribution System

(2) 3.1 Distribution Surveys and Procedures

3.1. Distribution Leakage Surveys and Procedures

(a) A gas detector survey must be conducted of schools, hospitals, and churches, including tests of telephone, sewer and water system manholes, and at cracks and at other locations providing an opportunity for exceeding 12 months, but at least once each calendar year.

(b) A gas detector survey must be conducted in consequence areas for residential meters and services.

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

(d) The utility shall provide an appropriate work order to perform surveys as provided

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(3) 꺆꺆꺆 Amend 꺆꺆꺆 Section 꺆꺆꺆 143.2 꺆꺆꺆 Gas 꺆꺆꺆 Leak 꺆꺆꺆 Surveys 꺆꺆꺆 and 꺆꺆꺆 Procedures
꺆꺆꺆 꺆꺆꺆
꺆꺆꺆 143.2. 꺆꺆꺆 꺆꺆꺆 Transmission 꺆꺆꺆 Leak 꺆꺆꺆 Surveys 꺆꺆꺆 and 꺆꺆꺆 Procedures
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- (a) 꺆꺆꺆 Gas 꺆꺆꺆 detector 꺆꺆꺆 survey 꺆꺆꺆 must 꺆꺆꺆 be 꺆꺆꺆 conducted 꺆꺆꺆 on 꺆꺆꺆 a 꺆꺆꺆 annually. 꺆꺆꺆
- (b) 꺆꺆꺆 Gas 꺆꺆꺆 detector 꺆꺆꺆 survey 꺆꺆꺆 must 꺆꺆꺆 be 꺆꺆꺆 conducted 꺆꺆꺆 on 꺆꺆꺆 a 꺆꺆꺆 located 꺆꺆꺆 in 꺆꺆꺆 a 꺆꺆꺆 high 꺆꺆꺆 consequence 꺆꺆꺆 area 꺆꺆꺆 as 꺆꺆꺆 a 꺆꺆꺆 semi
- (c) 꺆꺆꺆 꺆꺆꺆 intervals 꺆꺆꺆 for 꺆꺆꺆 inspections 꺆꺆꺆 in 꺆꺆꺆 subdivisions 꺆꺆꺆 (a) 꺆꺆꺆 and 꺆꺆꺆 reflect 꺆꺆꺆 the 꺆꺆꺆 actual 꺆꺆꺆 leak 꺆꺆꺆 existing 꺆꺆꺆 in 꺆꺆꺆 the 꺆꺆꺆 area 꺆꺆꺆 (b)
- (d) 꺆꺆꺆 utility 꺆꺆꺆 shall 꺆꺆꺆 provide 꺆꺆꺆 an 꺆꺆꺆 provided 꺆꺆꺆 at 꺆꺆꺆 a 꺆꺆꺆 to 꺆꺆꺆 perform 꺆꺆꺆 surveys 꺆꺆꺆 as 꺆꺆꺆 provided

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(4) 꺆꺆꺆 Add 꺆꺆꺆 Section 꺆꺆꺆 143.3 꺆꺆꺆 on 꺆꺆꺆 Valve 꺆꺆꺆 Maintenance

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꺆꺆꺆 143.3 꺆꺆꺆 Valve 꺆꺆꺆 Maintenance
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- (a) 꺆꺆꺆 Each 꺆꺆꺆 operator 꺆꺆꺆 shall 꺆꺆꺆 provide 꺆꺆꺆 a 꺆꺆꺆 description 꺆꺆꺆 of 꺆꺆꺆 the 꺆꺆꺆 location, 꺆꺆꺆 type, 꺆꺆꺆 size, 꺆꺆꺆 number 꺆꺆꺆 and 꺆꺆꺆 turns 꺆꺆꺆
- (b) 꺆꺆꺆 Each 꺆꺆꺆 valve, 꺆꺆꺆 the 꺆꺆꺆 use 꺆꺆꺆 of 꺆꺆꺆 which 꺆꺆꺆 may 꺆꺆꺆 be 꺆꺆꺆 transmission 꺆꺆꺆 or 꺆꺆꺆 distribution 꺆꺆꺆 system, 꺆꺆꺆 shall 꺆꺆꺆 be 꺆꺆꺆 lubricated 꺆꺆꺆 (where 꺆꺆꺆 required) 꺆꺆꺆 and 꺆꺆꺆 left 꺆꺆꺆 fully 꺆꺆꺆 operational 꺆꺆꺆 at 꺆꺆꺆 inspection. 꺆꺆꺆 꺆꺆꺆 "Fully 꺆꺆꺆 operational" 꺆꺆꺆 means 꺆꺆꺆 a 꺆꺆꺆 that 꺆꺆꺆 can 꺆꺆꺆 close 꺆꺆꺆 the 꺆꺆꺆 valve. 꺆꺆꺆
- (c) 꺆꺆꺆 The 꺆꺆꺆 inspection 꺆꺆꺆 shall 꺆꺆꺆 include: 꺆꺆꺆 a 꺆꺆꺆 description 꺆꺆꺆 as 꺆꺆꺆 found 꺆꺆꺆 at 꺆꺆꺆 the 꺆꺆꺆 beginning 꺆꺆꺆 of 꺆꺆꺆 the 꺆꺆꺆 inspection; 꺆꺆꺆 a 꺆꺆꺆 procedures 꺆꺆꺆 or 꺆꺆꺆 other 꺆꺆꺆 activities 꺆꺆꺆 at 꺆꺆꺆 the 꺆꺆꺆 site; 꺆꺆꺆 and 꺆꺆꺆 the 꺆꺆꺆 conclusion 꺆꺆꺆 of 꺆꺆꺆 the 꺆꺆꺆 inspection.
- (d) 꺆꺆꺆 The 꺆꺆꺆 operator 꺆꺆꺆 shall 꺆꺆꺆 ensure 꺆꺆꺆 that 꺆꺆꺆 each 꺆꺆꺆 member 꺆꺆꺆 of 꺆꺆꺆 the 꺆꺆꺆 inspection 꺆꺆꺆 crew 꺆꺆꺆 has 꺆꺆꺆 the 꺆꺆꺆 lubricate 꺆꺆꺆 and 꺆꺆꺆 operate 꺆꺆꺆 the 꺆꺆꺆 valve 꺆꺆꺆 at 꺆꺆꺆 the 꺆꺆꺆 time 꺆꺆꺆 of 꺆꺆꺆 inspection.
- (e) 꺆꺆꺆 The 꺆꺆꺆 operator 꺆꺆꺆 shall 꺆꺆꺆 ensure 꺆꺆꺆 that 꺆꺆꺆 each 꺆꺆꺆 member 꺆꺆꺆 is 꺆꺆꺆 trained 꺆꺆꺆 to 꺆꺆꺆 inspect 꺆꺆꺆 and 꺆꺆꺆 operate 꺆꺆꺆 the 꺆꺆꺆 valve 꺆꺆꺆 at 꺆꺆꺆 the 꺆꺆꺆 time 꺆꺆꺆 of 꺆꺆꺆 inspection.

(5) 꺆꺆꺆 Add 꺆꺆꺆 Section 꺆꺆꺆 143.4 꺆꺆꺆 on 꺆꺆꺆 Leaks 꺆꺆꺆

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143.4. 꺆꺆꺆 꺆꺆꺆 Leaks 꺆꺆꺆 in 꺆꺆꺆 proximity 꺆꺆꺆 to 꺆꺆꺆 residential 꺆꺆꺆 structures, 꺆꺆꺆
꺆꺆꺆
(a) 꺆꺆꺆 A 꺆꺆꺆 leak 꺆꺆꺆 in, 꺆꺆꺆 or 꺆꺆꺆 in 꺆꺆꺆 close 꺆꺆꺆 proximity 꺆꺆꺆 to, 꺆꺆꺆 a 꺆꺆꺆 residential 꺆꺆꺆 structure, 꺆꺆꺆 shall 꺆꺆꺆 be 꺆꺆꺆 permanently 꺆꺆꺆 repaired 꺆꺆꺆 on 꺆꺆꺆 the 꺆꺆꺆 same 꺆꺆꺆 day 꺆꺆꺆 as 꺆꺆꺆 the 꺆꺆꺆 leak 꺆꺆꺆 is 꺆꺆꺆 discovered 꺆꺆꺆 by 꺆꺆꺆 a 꺆꺆꺆 qualified 꺆꺆꺆 employee 꺆꺆꺆 of 꺆꺆꺆 the 꺆꺆꺆 utility 꺆꺆꺆 operator.
(b) 꺆꺆꺆 The 꺆꺆꺆 operator 꺆꺆꺆 shall 꺆꺆꺆 include 꺆꺆꺆 a 꺆꺆꺆 separate 꺆꺆꺆 section 꺆꺆꺆 of 꺆꺆꺆 an annual 꺆꺆꺆 leak 꺆꺆꺆 report 꺆꺆꺆 required 꺆꺆꺆 by 꺆꺆꺆 section 꺆꺆꺆 123.2.

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