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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

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Order 웹□η Instituting 웹□η 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) 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 Dis 웹□η tion 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 Workers 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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캘리포니아

WORKSHOP CALIFORNIA STATEMENT OF DEFENSE UUA

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GENERAL CALIFORNIA PRINCIPLES

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(1) 캘리포니아 112 should explicitly require the implementation of SB 705, as well as the inclusion of language that has the same language as the 961(e), and 63(b)(3).

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SPECIFIC CALIFORNIA LANGUAGE IS INCLUDED IN THE (SUBPART B, SECTION 6)IONS?

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

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

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SPECIFIC CALIFORNIA LANGUAGE IS INCLUDED IN THE (SUBPART B, SECTION 3)IONS?

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GO 112 should specify that standards for the distribution operation and functions, and 49 CFR 191 and specifically the

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SPECIFIC CALIFORNIA LANGUAGE IS INCLUDED IN THE (SUBPART B, SECTION 4)IONS?

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

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SPECIFIC CALIFORNIA LANGUAGE IS INCLUDED IN THE (SUBPART B, SECTION 2)IONS?

캘리포니아

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

캘리포니아

SPECIFIC CALIFORNIA LANGUAGE IS INCLUDED IN THE (NEW PART START)IONS?

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

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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 distribution of gas and facilities to safeguard the safety, health, comfort and utility 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) 켈 definitions from 켈 PUC 켈 provisions 켈 950

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105 켈 definitions

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

(b) 켈 *Commission-regulated 켈 gas 켈 pipeline 켈 facility* 켈 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 the 켈 pipeline 켈 켈 in 켈 the 켈 distribution 켈 line, 켈 within 켈 the 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 Code 켈 for 켈 the 켈 local distribution 켈 of 켈

켄 *transmission 켈 line*, 켈 켈 at 켈 the 켈 commission, 켈 pursuant 켈 to 켈 Section 켈 of 켈 Code 켈 certified 켈 to 켈 the 켈 Regulatory 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 켈 (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 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 of 켤 357 켈 of 켤 Division 켈 2.

켄 켈 distribution 켈 system 켈 켈 by 켤 to 켤 inspection 켈 and 켤 enforcement 켤 program 켤 with 켤 Section 켤 4451) 켤 of 켤 Division 켤 2.

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켄 *Compatible 켤 emergency 켤 response 켤 standards* 켤 are 켤 standards 켤 that 켤 are 켤 applicable 켤 to 켤 the 켤 standards 켤 that are 켤 in 켤 addition 켤 to, 켤 the 켤 standards 켤 adopted 켤 by 켤 the 켤 United 켤 States 켤 pursuant 켤 to 켤 Chapter 켤 of 켤 Code 켤 of 켤 the 켤 commission 켤 is 켤 authorized 켤 to 켤

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(c) 켤 of 켤 chapter.
켄 *Consistent 켤 sequence 켤 standards* 켤 the 켤 same 켤 the 켤 standards 켤 adopted 켤 by 켤 the 켤 United 켤 States 켤 pursuant 켤 to 켤 Chapter 켤 of 켤 Code 켤 of 켤 the 켤 United 켤 States 켤 Code 켤 of 켤 regulation) 켤

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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 the General Order.

(f) **inert gas** is a gas that does not burn or support nitrogen, carbon dioxide or inert gases of such gases.

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

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(6) **adequate workforce** means the ability to carry out the duties according to terms.

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(h) **Adequate Workforce** means the ability to carry out the duties of the key to timely basis to promote the safety, health, and the public.

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SUBPART B Reports

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(1) **Section 123.2. Annual Leak Reports**

123.2. **Annual Report**

(a) **operator** shall submit as part of the report to the utility 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. location of the leak on the operator's leak log including the proximity to the hazard the leak 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) **to Section 124** **reporting safety** a requirement external corrosion observed during leak is a **hazard** and compromised coatings be reported as an element

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124. **Report of Suspected**

(a) As an element of the report required by include a compilation of the following conditions made pursuant to 49 CFR 191.23 and 191.25 and the response to the observed condition.
(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) **and Section Reporting of Incidents**

127. **Reporting of**

(a) Each utility shall report to the Commission incident where utility facilities are damaged or compromised or its facilities were damaged or compromised in the following elements, and any other matter that the location of the facility, the utility's name, utility number, and utility qualifications, the utility's personnel was on description of the facility, techniques and location of the damage; description of the damage or the cost.
(b) Each utility shall provide a compilation of by section 958.5

SUBPART CONSTRUCTION AND SAFETY STANDARDS

(1) **Title of Commission 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, 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 for areas with 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 and 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 The 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 The 꺆꺆꺆 utility 꺆꺆꺆 shall 꺆꺆꺆 provide 꺆꺆꺆 an 꺆꺆꺆 approved 꺆꺆꺆 list 꺆꺆꺆 of 꺆꺆꺆 sites 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 list 꺆꺆꺆 of 꺆꺆꺆 valves 꺆꺆꺆 in 꺆꺆꺆 its 꺆꺆꺆 description 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 The 꺆꺆꺆 "Fully 꺆꺆꺆 operational" 꺆꺆꺆 term 꺆꺆꺆 shall 꺆꺆꺆 be 꺆꺆꺆 defined 꺆꺆꺆 as 꺆꺆꺆 the 꺆꺆꺆 valve 꺆꺆꺆 can 꺆꺆꺆 be 꺆꺆꺆 closed 꺆꺆꺆 the 꺆꺆꺆 valve. 꺆꺆꺆
- (c) 꺆꺆꺆 The 꺆꺆꺆 inspection 꺆꺆꺆 report 꺆꺆꺆 shall 꺆꺆꺆 include: 꺆꺆꺆 a 꺆꺆꺆 description 꺆꺆꺆 of 꺆꺆꺆 as 꺆꺆꺆 found 꺆꺆꺆 at 꺆꺆꺆 the 꺆꺆꺆 beginning 꺆꺆꺆 of 꺆꺆꺆 the 꺆꺆꺆 inspection; 꺆꺆꺆 a 꺆꺆꺆 list 꺆꺆꺆 of 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 ability 꺆꺆꺆 to 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 of 꺆꺆꺆 the 꺆꺆꺆 inspection 꺆꺆꺆 crew 꺆꺆꺆 has 꺆꺆꺆 the 꺆꺆꺆 ability 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 꺆꺆꺆 annual 꺆꺆꺆 leak 꺆꺆꺆 report 꺆꺆꺆 required 꺆꺆꺆 by 꺆꺆꺆 section 꺆꺆꺆 123.2.

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(6) Add Section 143.5 and Mark

143.5. and Mark

- (a) locators shall be and
- (b) excavations shall be by a fully qualified and empowered to take the necessary procedures for excavation in proximity facilities, including excavation by hand
- (c) shall provide of sign markers along its track and distribution of such that marks are visible in any given point May the right

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SUBPART MARK

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(1) RENAME “FACILITATING EMPLOYEE SAFETY

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(2) Add section Part 302.2 by Utility Employees

302.2 Part 302.2 by Utility Employees

The commission and each utility shall provide an opportunity for a substantial, and ongoing participation by employees in the development and implementation of safety procedures including matters covered by these rules and the objective of developing an industry-wide program to reduce accidents, explosions, fires, and other hazards to the protection of public and the risk of injury.

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NEW SUBPART MARK DEVELOPMENT OF SAFETY PERFORMANCE

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Add Section 303.2 After Meter and Mark

303.2. The Commission (a) shall, after meter services as defined by Pub. Util. Code, allowing for meaningful, substantial and ongoing employees through their designated representatives with employees, contractors, the utility shall propose safety metrics covering functions including, but not limited to, gas leaks to customers and the public; after the proposed metrics are established, not limited to appliances and examination of appurtenances for residential dwellings; timely order residential orders involving flowing gas including turn of investigations, high usage investigations. (c) The commission shall advise employees after review of the utility proposal and input from (d) The commission shall convene a meeting with staff, employees quarterly to review progress in achieving the

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