

BEFORE

PUBLIC UTILITIES COMMISSION OF THE STATE OF

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

Notice of Utility Workers Union of America (U

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November 4, 2013

Notice of Utility Workers Union of America (UWUA)

On

Pursuant to Rules 8.03 and 8.04 of the Utility Workers Union of America (UWUA) Notice.

On October 30, 2013 at 1 p.m., UWUA representative with Niki Bawa, advisor to Commissioner Carla Petermann in San Francisco. Julian discussed the UWUA's Comments on the Recommendations to revise and update the Commission's gas pipeline safety and operations. UWUA initiated the meeting.

UWUA provided an excerpt of six pages that included all of UWUA's specific recommendations attached to this Notice. The Commission focused on the inadvisability of recommendation regarding leak classification and management; developing a comprehensive leak reduction strategy that and not venting them in the open air. Knowing CPUC's responsibility to enforce state law and statute; achieving workforce adequacy in the industry.

Respectfully submitted,

/s/

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c. Summary of Recommendations

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

Section 102.2 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 of 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 Rules is to 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 Former 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 102.3 Timely Update on Commission Website

104.3 Timely Update Commission Website

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

Section

Section 105. (b) Late Workforce definition

(h) **Definition of Workforce** for purposes of implementing Pub. section 961(d)(10) and for employing workers trained and necessary to carry out these rules and the procedures 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.

Section

Section 12. Annual LER Report

Section

UWUA has made conceptual suggestions for improving proposed by SED. It is not proposing specific

Section 12. Safety-related Conditions

Section

124.2 Reproductive conditions

Section

(a) An element of the report required by 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 described as report 191.25, the utility shall report any external or coating on pipe observed and during the repair or other response to the observed condition.

Section

Section

Section 12. Reproductive Excavated incidents

Section

127. Reproductive-related Incidents

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

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

Section 143.1

Section 143.1 Distribution Leakage Surveys

Section 143.1

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, at cracks in pavement, and sidewalk locations providing an opportunity for finding gas exceeding 12 months, but at least once each
- (b) A gas detector survey must be conducted on consequence areas for leaks at residential meters
- (c) The intervals for inspections in subdivisions (to reflect the actual leak experience in the
- (d) The utility shall provide an adequate work sufficient to perform surveys as provided herein.

Section 143.2

Section 143.2 Transmission Leakage Surveys

Section 143.2

143.2. Transmission Leakage Surveys and Procedure

- (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
- (c) The intervals for inspections in subdivisions (to reflect the actual leak experience in the
- (d) The utility shall provide an adequate work sufficient for the surveys as provided herein.

Section 143.3

Section 143.3 Valve Maintenance

Section 143.3

143.3 Valve Maintenance

Section 143.3

(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 transmit or distribute system, must be annually inspected, lubricated (where required) and left fully operational inspection. "Fully operational" means the valve can be opened and closed.

(c) The report of 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

Section 143.4 Leaks in Risers

Section 143.4

143.4. Leaks in proximity to buildings and property

Section 143.4

(a) Any leak in, or in close proximity to, completely and permanently repaired on the same including specifically a leak at the time of repair, shall 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

Section 143.5 Locate and Mark

Section 143.5

143.5. Locate and Mark

Section 143.5

(a) locators shall be employees of the utility.

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

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

Section 143.5

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Section 302. Utility Participation

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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 of employees' choosing, and of contractors, in the development and implementation and maintenance procedures including matters covered utility safety programs and plans, which will be the object industrywide culture of safety that will minimize and dangerous conditions for the production gas corporation work

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Section 303. Standards for Meter Service

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303.2. Meter Service

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303.2. (a) The purpose of this rule is to ensure that the 970 for after meter services as defined by (b) allowing for meaningful, substantial and ongoing utility employees in their designated representatives, and employees of contractors, the utility shall propose customer service functions including but not limited leak reports from customers and the leaks, in 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 on, 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 meet with the staff, employees quarterly to review progress in achieving

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