

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 Ratemaking

Notice of Utility Workers Union of America (U

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November 4, 2013

Notice of Utility Workers Union of America (UWUA)

UWUA

Pursuant to Rules 83 and 84 of the Federal Rules of Civil Procedure, the Utility Workers Union of America (UWUA) Notice.

On October 30, 2013, at 10:30 AM, representative of the Union met with the Khosravi Commission. The Commission in San Francisco discussed the UWUA's Comments and Staff Recommendations to revise and update the proceeding on October 26, 2013. The GO 112 is the meeting addressing gas pipeline safety. The meeting included all of UWUA's specific comments. This Notice addresses all of UWUA's recommendations, the inadvisability of adopting the SED recommendation and management; the importance of the five peak production strategy that emphasizes repair of leaks and not improved maintenance routines including valve maintenance, leaks in close proximity to the pipeline, CPUC's responsibility to enforce state law and statute; achieving workforce adequacy in the industry.

UWUA

Respectfully submitted,

/s/ UWUA

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UWUA

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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 Maintenance of Gas Piping Systems and gas pipeline in the State of California. These are the federal pipeline safety regulations but are superseded, except that specific provisions in these rules are more stringent than a federal standard applicable to facilities or transportation are declared to be con standard and will control, pursuant to Pub. Util 970, 49 USC 60104(c).

Section 102.1 Purpose of Rules to Implement State

102.1. The purpose of California's 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 102.1

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

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. Late Workforce definition

(h) **Definition of Workforce** for purposes of Pub. Util. Code section 961(d)(10) and for the purpose of being trained and necessary to carry out these rules and the requirements of the utility's adopted operating procedures according to their terms in order to promote the safety, health, comfort, and employees and the public.

Section

12. Annual Leak Report

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

12. Safety-related Conditions

Section

124.2 Reporting Safety Incidents

Section

(a) Each 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 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.

Section

17. Excavated Incidents

Section

127. Reporting-related Incidents

Section

(a) Each utility shall report to the Commission every incident where utility facilities are damaged excavation in the utility facilities and the report shall include the following elements, and any other Commission may prescribe: location of incident; whether it was called; identity and qualification 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 tests and incidents required by section 958.5

Section
Section

Section 143.1 Distribution Leakage Surveys

Section

143.1. Distribution Leakage Surveys and Procedure

(a) A gas sensing detector survey shall be conducted in business district 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 gas exceeding 12 months, but at least once each
(b) A gas detector survey must be conducted in consequence areas for leaks at residential meters
(c) The intervals for inspections in (a) and (b) shall to reflect the actual leak experience in the area
(d) The utility shall provide an adequate workforce sufficient to perform surveys as provided herein.

Section
Section

Section 143.2 Transmission Leakage Surveys

Section

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

Section
Section

Section 143.3 Valve Maintenance

Section

143.3 Valve Maintenance

Section

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

(b) Each valve, the use of which may transmit or distribute system, must be fully lubricated (where required) and left fully operational for inspection. "Fully operational" means that 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

Leak Risers

Section 143.4 Leaks in Proximity to Residential Structures

Section 143.4

143.4. Leaks in Proximity to Residential Structures

Section 143.4

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

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

Section 143.5

Locate and Mark

Section 143.5 Locate and Mark

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143.5. Locate and Mark

Section 143.5

(a) Locators shall be employees of the utility.

(b) Excavations shall be observed by utility empowered to utility center procedures for excavation in public facilities, including excavation by hand.

(c) Each utility shall provide hand personnel its transmission and distribution of touch marks are both from any given area on the right

Section 143.5

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Section 꺆꺆꺆 302.2 꺆꺆꺆 Employee 꺆꺆꺆 Comm 꺆꺆꺆
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302.2 꺆꺆꺆 꺆꺆꺆 꺆꺆꺆 Participation 꺆꺆꺆 꺆꺆꺆 꺆꺆꺆 Utility 꺆꺆꺆 Employees

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The 꺆꺆꺆 commission 꺆꺆꺆 and 꺆꺆꺆 each 꺆꺆꺆 utility 꺆꺆꺆 shall 꺆꺆꺆 provide 꺆꺆꺆 of
substantial, 꺆꺆꺆 and 꺆꺆꺆 ongoing 꺆꺆꺆 participation 꺆꺆꺆 as 꺆꺆꺆 by 꺆꺆꺆 corporation 꺆꺆꺆 emp
including 꺆꺆꺆 꺆꺆꺆 꺆꺆꺆 representatives 꺆꺆꺆 of 꺆꺆꺆 the 꺆꺆꺆 employees' 꺆꺆꺆 choosir
of 꺆꺆꺆 contractors, 꺆꺆꺆 in 꺆꺆꺆 the 꺆꺆꺆 development 꺆꺆꺆 and 꺆꺆꺆 implementation
and 꺆꺆꺆 maintenance 꺆꺆꺆 procedures 꺆꺆꺆 including 꺆꺆꺆 matters 꺆꺆꺆 꺆꺆꺆 red 꺆꺆꺆
utility 꺆꺆꺆 safety 꺆꺆꺆 programs 꺆꺆꺆 and 꺆꺆꺆 plans, 꺆꺆꺆 with 꺆꺆꺆 the 꺆꺆꺆 object
industrywide 꺆꺆꺆 culture 꺆꺆꺆 of 꺆꺆꺆 safety 꺆꺆꺆 that 꺆꺆꺆 will 꺆꺆꺆 minimize 꺆꺆꺆
and 꺆꺆꺆 dangerous 꺆꺆꺆 conditions 꺆꺆꺆 for 꺆꺆꺆 the 꺆꺆꺆 꺆꺆꺆 꺆꺆꺆 gas 꺆꺆꺆 the
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Section 꺆꺆꺆 303.2 꺆꺆꺆 Standards 꺆꺆꺆 M 꺆꺆꺆 Standards 꺆꺆꺆
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303.2. 꺆꺆꺆 꺆꺆꺆 Standards 꺆꺆꺆

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970 꺆꺆꺆 for 꺆꺆꺆 after 꺆꺆꺆 meter 꺆꺆꺆 services 꺆꺆꺆 as 꺆꺆꺆 defined 꺆꺆꺆 by 꺆꺆꺆
꺆꺆꺆 (b) 꺆꺆꺆 allowing 꺆꺆꺆 for 꺆꺆꺆 substantial 꺆꺆꺆 and 꺆꺆꺆 ongoing 꺆꺆꺆 participi
utility 꺆꺆꺆 employees 꺆꺆꺆 through 꺆꺆꺆 their 꺆꺆꺆 designated 꺆꺆꺆 representatives,
employees 꺆꺆꺆 of 꺆꺆꺆 contractors, 꺆꺆꺆 the 꺆꺆꺆 utility 꺆꺆꺆 shall 꺆꺆꺆 propose 꺆꺆꺆
customer 꺆꺆꺆 service 꺆꺆꺆 functions 꺆꺆꺆 including 꺆꺆꺆 but 꺆꺆꺆 꺆꺆꺆 꺆꺆꺆 꺆꺆꺆
leak 꺆꺆꺆 reports 꺆꺆꺆 from 꺆꺆꺆 customers 꺆꺆꺆 and 꺆꺆꺆 the 꺆꺆꺆 public; 꺆꺆꺆 time
meter 꺆꺆꺆 services 꺆꺆꺆 including 꺆꺆꺆 but 꺆꺆꺆 not 꺆꺆꺆 limited 꺆꺆꺆 to 꺆꺆꺆 pilot
examination 꺆꺆꺆 of 꺆꺆꺆 connectors 꺆꺆꺆 and 꺆꺆꺆 other 꺆꺆꺆 appurtenances 꺆꺆꺆 of
residential 꺆꺆꺆 dwellings 꺆꺆꺆 in 꺆꺆꺆 order 꺆꺆꺆 completion 꺆꺆꺆 for 꺆꺆꺆 residential 꺆꺆꺆
involving 꺆꺆꺆 flowing 꺆꺆꺆 gas 꺆꺆꺆 including 꺆꺆꺆 turn 꺆꺆꺆 on, 꺆꺆꺆 turn 꺆꺆꺆 off,
usage 꺆꺆꺆 꺆꺆꺆 investigations.

(c) 꺆꺆꺆 꺆꺆꺆 commission 꺆꺆꺆 shall 꺆꺆꺆 specific 꺆꺆꺆 customer 꺆꺆꺆 service 꺆꺆꺆 safety 꺆꺆꺆
metrics 꺆꺆꺆 after 꺆꺆꺆 review 꺆꺆꺆 꺆꺆꺆 꺆꺆꺆 and 꺆꺆꺆 input 꺆꺆꺆 from 꺆꺆꺆
(d) 꺆꺆꺆 꺆꺆꺆 commission 꺆꺆꺆 shall 꺆꺆꺆 convene 꺆꺆꺆 a 꺆꺆꺆 meeting 꺆꺆꺆 of 꺆꺆꺆 it
employees 꺆꺆꺆 quarterly 꺆꺆꺆 to 꺆꺆꺆 review 꺆꺆꺆 progress 꺆꺆꺆 꺆꺆꺆 achieving 꺆꺆꺆

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