

BEFORE 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 Rulemaking 웹□η 웹□η 웹□η 웹□η 웹□η) 웹□η
on 웹□η the 웹□η Commission's 웹□η Rulemaking 웹□η 웹□η 웹□η) 웹□η
to 웹□η Adopt 웹□η New 웹□η Safety 웹□η and 웹□η Reliability 웹□η Regulation 웹□η 웹□η 11
for 웹□η Natural 웹□η Gas 웹□η Transmission 웹□η 웹□η 웹□η 웹□η 웹□η Pip
and 웹□η Related 웹□η Ratemaking 웹□η 웹□η 웹□η 웹□η 웹□η) 웹□η
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웹□η Notice 웹□η Notice of 웹□η Utility 웹□η Workers 웹□η Union 웹□η America 웹□η (U
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November 웹□η 4, 웹□η 2013

Notice of Utility Workers Union of America (UWUA)

On

Pursuant to Rules and Procedure, the Utility Workers Union of America (UWU) Notice.

On October 30, 2013 at 1 p.m., UWUA representative Niki Bawa, advisor to Commissioner Carla Peterman Francisco, Julian discussed the UWUA's Comments on the Recommendations to revise and update the Order proceeding September 26, 2013, addressing gas pipeline safety and operations. UWUA initiated a meeting.

UWUA provided an excerpt from the Notice pages included all of UWUA's specific recommendations. This Notice focused on the inadvisability of recommendation regarding leak classification and management; developing a comprehensive leak reduction strategy and preventing them from enforcement, acknowledging CPUC's responsibility to enforce state law and statute; achieving workforce adequacy the industry.

Respectfully submitted,

/s/

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November 4, 2013

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ATTACHMENT웹□n
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C. 웹□η 웹□η Summary 웹□η of the Following Recommendations

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웹□η UWUA 웹□η made 웹□η a 웹□η number 웹□η of 웹□η recommendations 웹□η for 웹□η revisions 웹□η of 웹□η existing 웹□η sections 웹□η of the GO 웹□η 112. 웹□η 웹□η They 웹□η

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Section 웹□η 10.2.1 Relation 웹□η to the Federal Law

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101.2. 웹□η 웹□η 웹□η These 웹□η rules 웹□η are 웹□η adopted 웹□η in 웹□η addition regulations, 웹□η specifically 웹□η Title 49 웹□η of the 웹□η Code 웹□η of 191, 웹□η 192, 웹□η 193 웹□η and 웹□η 199, 웹□η which 웹□η also 웹□η govern 웹□η its Operation, 웹□η and 웹□η the Gas Piping System Standard and the gas pipeline regulation in the State of California. 웹□η These are the federal pipeline safety regulations but are 웹□η su regulations, 웹□η except that they are specific to the state standard. These rule more stringent than a federal standard is applicable to facilities or transportation are declared to be standard and will control, pursuant to Pub. Util. 970, and 49 USC 60104(c).

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Section 웹□η 10.2.2 Purpose of the Rules to Implement the State

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102.1. 웹□η The purpose of these rules is to implement the California Gas Pipeline Safety Act of 2011, Pub. Util. C and specifically plan and enforce the principle that public and safety is the top priority in the operation delivery system in California.

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Section 웹□η 10.2.3 Renumbered by the Commission section 102.1

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102.3. 웹□η These rules are established to the federal regulations, applicable requirements for the design, materials, locations, testing, operations, and maintenance of regulated pipelines facilities in the gathering, transmission, distribution of gas and liquefied natural gas facilities for health, comfort and convenience of the public and an public welfare and to provide that safe and maintained by gas utilities operating under the jurisdiction of the commission.

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Section 웹□η 10.2.3 Timely Update on the Commission Website

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104.3 웹□η 웹□η 웹□η Timely Update on the Commission Website

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

Section 105

Workforce definition

(h) Adequate Workforce for purposes of implementing Pub. section 961(d)(10) and for ensuring that employees are qualified, trained, and workers necessary to carry out these rules and standards for the maintenance procedures according to their qualifications and order to promote the safety, health, comfort, and employees and the public.

Section 124.2

Annual Report

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

124.2 Unspecified conditions

(a) An element of the report required by shall include a compilation of late reports made to pursuant to 49 CFR 191.23 and 19 repair or other response to the observed conditions. In addition to the matters described as follows:

(b) The utility shall report any external or coating non-pipe observations and early responsive repair or other response to the observed conditions.

Section 127

Reporting Excavated incidents

127. Reporting related incidents

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

any; 웹□η whether 웹□η utility 웹□η personnel 웹□η was 웹□η on 웹□η site; 웹□η describes techniques 웹□η and 웹□η equipment; 웹□η description 웹□η of 웹□η utility 웹□η facilitate of 웹□η repairs 웹□η to 웹□η utility 웹□η facilities 웹□η and 웹□η their 웹□η cost.
(b) 웹□η 웹□η Each 웹□η utility 웹□η shall 웹□η provide 웹□η a 웹□η compilation 웹□η required 웹□η by 웹□η section 14.5.5.

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Section 웹□η 14.5.1 웹□η Distribution 웹□η Leakage 웹□η Survey 웹□η and 웹□η Procedure

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

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Section 웹□η 14.5.2 웹□η Transmission 웹□η Leakage 웹□η Survey 웹□η and 웹□η Procedure

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(a) 웹□η A 웹□η gas 웹□η integrity leak survey 웹□η detection 웹□η pipe 웹□η conducted on 웹□η foot 웹□η for 웹□η all 웹□η transmission 웹□η pipe 웹□η annually.
(b) 웹□η A 웹□η gas 웹□η integrity leak survey 웹□η detection 웹□η pipe 웹□η conducted on 웹□η foot 웹□η for 웹□η all 웹□η transmission 웹□η pipe 웹□η east-west 웹□η in 웹□η annually. 웹□η
(c) 웹□η The 웹□η intervals 웹□η for 웹□η inspections 웹□η in 웹□η subdivisions 웹□η (to 웹□η reflect 웹□η the 웹□η actual 웹□η leak 웹□η experience) 웹□η in 웹□η the 웹□η
(d) 웹□η 웹□η The 웹□η utility 웹□η shall 웹□η provide 웹□η an 웹□η adequate 웹□η w sufficient 웹□η for 웹□η surveys 웹□η as 웹□η provided 웹□η herein.

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Section 웹□η 14.5.3 웹□η Valve 웹□η Maintenance

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143.3 웹□η 웹□η Valve 웹□η Maintenance

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- (a) 웬□η 웬□η Each 웬□η operator 웬□η will 웬□η make 웬□η an 웬□η inventory 웬□η a 웬□η description 웬□η location, 웬□η type, 웬□η size, 웬□η number, 웬□η turn and 웬□η criticality.
- (b) 웬□η 웬□η Each 웬□η valve, 웬□η the 웬□η use 웬□η of 웬□η which 웬□η may 웬□η transmission 웬□η or 웬□η system, 웬□η must 웬□η be 웬□η serviced, 웬□η lubricated 웬□η (where 웬□η required) 웬□η and 웬□η left 웬□η fully 웬□η operational 웬□η inspection. 웬□η 웬□η "Fully 웬□η operational" 웬□η is 웬□η when the valve can 웬□η open and 웬□η close 웬□η the 웬□η valve. 웬□η
- (c) 웬□η 웬□η The 웬□η report 웬□η includes the 웬□η maintenancist 웬□η include: 웬□η a 웬□η the 웬□η valve 웬□η as 웬□η found 웬□η at 웬□η the 웬□η beginning 웬□η of 웬□η the 웬□η maintenance 웬□η procedures 웬□η or 웬□η other 웬□η activities 웬□η at 웬□η the 웬□η condition 웬□η at 웬□η the 웬□η conclusion 웬□η of 웬□η the 웬□η inspection.
- (d) 웬□η 웬□η The 웬□η operator 웬□η will 웬□η ensure 웬□η that 웬□η each 웬□η inspects equipment 웬□η to 웬□η lubricate 웬□η and 웬□η operate 웬□η the 웬□η valve 웬□η at 웬□η
- (e) 웬□η 웬□η The 웬□η operator 웬□η will 웬□η ensure 웬□η that 웬□η each 웬□η is 웬□η fully 웬□η trained 웬□η to 웬□η inspect 웬□η and 웬□η operate 웬□η the 웬□η si he/she 웬□η is 웬□η assigned.

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Section 웬□η 14.4.1 Leaks 웬□η and Risers

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143.4. 웬□η 웬□η Leaks 웬□η in 웬□η proximity 웬□η to 웬□η leaking 웬□η and 웬□η repair

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- (a) 웬□η 웬□η Any 웬□η leak 웬□η in, 웬□η or 웬□η in 웬□η close 웬□η proximity 웬□η completely 웬□η and 웬□η permanently 웬□η repaired 웬□η on 웬□η the 웬□η same 웬□η including 웬□η specifically 웬□η a 웬□η leak 웬□η at 웬□η the 웬□η location 웬□η repair 웬□η be 웬□η performed 웬□η by 웬□η qualified 웬□η employee 웬□η of 웬□η the 웬□η operator
- (b) 웬□η the 웬□η operator 웬□η shall 웬□η include 웬□η these 웬□η reports 웬□η and 웬□η of 웬□η the 웬□η annual 웬□η leak 웬□η report 웬□η required 웬□η by 웬□η section 웬□η

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Section 웬□η 14.4.2 Locate 웬□η and 웬□η Mark

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143.5. 웬□η Locate and Mark

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- (a) 웬□η 웬□η locators 웬□η shall 웬□η be 웬□η employees 웬□η of 웬□η utility
- (b) 웬□η 웬□η excavations 웬□η shall 웬□η be 웬□η observed 웬□η by 웬□η utility 웬□η empowered 웬□η to 웬□η enforce 웬□η utility 웬□η procedures 웬□η for 웬□η excavatio facilities, 웬□η using 웬□η excavation 웬□η by 웬□η hand.

- (c) 웬□η 웬□η each 웬□η utility 웬□η shall 웬□η sign off on markers 웬□η in its 웬□η transmission 웬□η and 웬□η distribution 웬□η that 웬□η marks 웬□η are 웬□η both 웬□η directions 웬□η from 웬□η many 웬□η give few 웬□η point 웬□η on 웬□η the 웬□η

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គេហទំនាក់ទំនង

Section 302.2. គេហទំនាក់ទំនង គេហទំនាក់ទំនង Communications

គេហទំនាក់ទំនង

302.2 គេហទំនាក់ទំនង គេហទំនាក់ទំនង Participation របស់ក្រុមហ៊ុន Utility គេហទំនាក់ទំនង Employees

គេហទំនាក់ទំនង

The គេហទំនាក់ទំនង commission គេហទំនាក់ទំនង and គេហទំនាក់ទំនង each គេហទំនាក់ទំនង utility គេហទំនាក់ទំនង shall គេហទំនាក់ទំនង provide គេហទំនាក់ទំនង substantial, គេហទំនាក់ទំនង and គេហទំនាក់ទំនង ongoing គេហទំនាក់ទំនង participation គេហទំនាក់ទំនង by គេហទំនាក់ទំនង the គេហទំនាក់ទំនង gas គេហទំនាក់ទំនង including គេហទំនាក់ទំនង គេហទំនាក់ទំនង representative គេហទំនាក់ទំនង employees' គេហទំនាក់ទំនង choosing, គេហទំនាក់ទំនង and គេហទំនាក់ទំនង of គេហទំនាក់ទំនង contractors, គេហទំនាក់ទំនង in គេហទំនាក់ទំនង the គេហទំនាក់ទំនង development គេហទំនាក់ទំនង and គេហទំនាក់ទំនង implementation គេហទំនាក់ទំនង and គេហទំនាក់ទំនង maintenance គេហទំនាក់ទំនង procedures គេហទំនាក់ទំនង including គេហទំនាក់ទំនង matters គេហទំនាក់ទំនង covered គេហទំនាក់ទំនង utility គេហទំនាក់ទំនង safety គេហទំនាក់ទំនង programs គេហទំនាក់ទំនង and គេហទំនាក់ទំនង plans, គេហទំនាក់ទំនង គេហទំនាក់ទំនង will គេហទំនាក់ទំនង object គេហទំនាក់ទំនង industrywide គេហទំនាក់ទំនង culture គេហទំនាក់ទំនង of គេហទំនាក់ទំនង safety គេហទំនាក់ទំនង that គេហទំនាក់ទំនង will គេហទំនាក់ទំនង minimize គេហទំនាក់ទំនង or គេហទំនាក់ទំនង and គេហទំនាក់ទំនង dangerous គេហទំនាក់ទំនង conditions គេហទំនាក់ទំនង for គេហទំនាក់ទំនង the គេហទំនាក់ទំនង corporation គេហទំនាក់ទំនង works គេហទំនាក់ទំនង

គេហទំនាក់ទំនង

គេហទំនាក់ទំនង

Section 303.2. គេហទំនាក់ទំនង Meter Standards គេហទំនាក់ទំនង Meter Standards

គេហទំនាក់ទំនង

303.2. គេហទំនាក់ទំនង Meter Standards

គេហទំនាក់ទំនង

303.2. គេហទំនាក់ទំនង Meter Standards គេហទំនាក់ទំនង purpose គេហទំនាក់ទំនង of គេហទំនាក់ទំនង this គេហទំនាក់ទំនង Public Utilities គេហទំនាក់ទំនង Law គេហទំនាក់ទំនង 970 គេហទំនាក់ទំនង for គេហទំនាក់ទំនង after គេហទំនាក់ទំនង meter គេហទំនាក់ទំនង services គេហទំនាក់ទំនង has គេហទំនាក់ទំនង defined គេហទំនាក់ទំនង by គេហទំនាក់ទំនង គេហទំនាក់ទំនង After គេហទំនាក់ទំនង allowing គេហទំនាក់ទំនង for គេហទំនាក់ទំនង meaningful, គេហទំនាក់ទំនង substantial គេហទំនាក់ទំនង and គេហទំនាក់ទំនង long គេហទំនាក់ទំនង utility គេហទំនាក់ទំនង employees គេហទំនាក់ទំនង their គេហទំនាក់ទំនង designated គេហទំនាក់ទំនង representatives, គេហទំនាក់ទំនង and គេហទំនាក់ទំនង employees គេហទំនាក់ទំនង of គេហទំនាក់ទំនង contractors, គេហទំនាក់ទំនង the គេហទំនាក់ទំនង utility គេហទំនាក់ទំនង shall គេហទំនាក់ទំនង propose គេហទំនាក់ទំនង customer គេហទំនាក់ទំនង service គេហទំនាក់ទំនង functions គេហទំនាក់ទំនង including គេហទំនាក់ទំនង but គេហទំនាក់ទំនង not គេហទំនាក់ទំនង limited គេហទំនាក់ទំនង leak គេហទំនាក់ទំនង reports គេហទំនាក់ទំនង from គេហទំនាក់ទំនង customers គេហទំនាក់ទំនង and គេហទំនាក់ទំនង meter គេហទំនាក់ទំនង services គេហទំនាក់ទំនង including គេហទំនាក់ទំនង but គេហទំនាក់ទំនង not គេហទំនាក់ទំនង limited គេហទំនាក់ទំនង to គេហទំនាក់ទំនង pilot គេហទំនាក់ទំនង examination គេហទំនាក់ទំនង of គេហទំនាក់ទំនង connectors គេហទំនាក់ទំនង and គេហទំនាក់ទំនង other គេហទំនាក់ទំនង គេហទំនាក់ទំនង appurtenances គេហទំនាក់ទំនង of residential គេហទំនាក់ទំនង dwellings; គេហទំនាក់ទំនង timely គេហទំនាក់ទំនង order គេហទំនាក់ទំនង completion គេហទំនាក់ទំនង for គេហទំនាក់ទំនង residential គេហទំនាក់ទំនង involving គេហទំនាក់ទំនង flowing គេហទំនាក់ទំនង គេហទំនាក់ទំនង inc គេហទំនាក់ទំនង on, គេហទំនាក់ទំនង turn គេហទំនាក់ទំនង off, គេហទំនាក់ទំនង high គេហទំនាក់ទំនង usage គេហទំនាក់ទំនង គេហទំនាក់ទំនង in គេហទំនាក់ទំនង tightings.

(c) គេហទំនាក់ទំនង commission គេហទំនាក់ទំនង shall គេហទំនាក់ទំនង specify គេហទំនាក់ទំនង standards គេហទំនាក់ទំនង គេហទំនាក់ទំនង service គេហទំនាក់ទំនង safety គេហទំនាក់ទំនង metrics គេហទំនាក់ទំនង after គេហទំនាក់ទំនង review គេហទំនាក់ទំនង of គេហទំនាក់ទំនង the គេហទំនាក់ទំនង utility គេហទំនាក់ទំនង proposals គេហទំនាក់ទំនង and (d) គេហទំនាក់ទំនង commission គេហទំនាក់ទំនង shall គេហទំនាក់ទំនង monitor គេហទំនាក់ទំនង meeting គេហទំនាក់ទំនង of គេហទំនាក់ទំនង its គេហទំនាក់ទំនង staff, គេហទំនាក់ទំនង employees គេហទំនាក់ទំនង quarterly គេហទំនាក់ទំនង to គេហទំនាក់ទំនង review គេហទំនាក់ទំនង progress គេហទំនាក់ទំនង and គេហទំនាក់ទំនង achieving គេហទំនាក់ទំនង

គេហទំនាក់ទំនង

គេហទំនាក់ទំនង

គេហទំនាក់ទំនង