

BEFORE

PUBLIC UTILITIES COMMISSION OF THE STATE OF

Order Instituting on the Commission's to Adopt New Safety and Reliability for Natural Gas Transmission and Related Ratemaking

Notice of Utility Workers Union of America (U

Carl Regulatory Utility Workers 2021 Oceanside Phone: E-mail: w

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 discusses 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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November 4, 2013

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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 These are the federal pipeline safety regulations but are superseded, except that specific provisions in these rules are more stringent than a federal standard applicable to facilities or transportation are declared to be con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)

Define 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

(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 discussed 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

(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 143.1

Section 143.1 Distribution Leakage Surveys

Section 143.1

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 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 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 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, location, type, size, number, and criticality.

(b) Each valve, the use of which may transmission or distribution system, must be lubricated (where required) and left fully operational inspection. "Fully operational" means that it can be opened and closed valve.

(c) The report of inspection must include: a list of the valves 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.

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Section 143.4 Leaks in Risers

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143.4. Leaks in proximity to residential structures and streets

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(a) Any leak in, or in close proximity 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 123.2.

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Section 143.5 Locate and Mark

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143.5. Locate and Mark

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(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 trip that marks are both from any given area on the right

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Section 302 Employee Communications

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302.2 Participation by Utility Employees

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The commission and each utility shall provide opportunity for substantial and ongoing participation by corporation employees including their representatives of the employees' choice of contractors, in the development and implementation and maintenance procedures including matters covered by utility safety programs and plans, with the object of industrywide culture of safety that will minimize risk and dangerous conditions for the corporation's work.

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Section 303 Standards of Service

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303.2. Meter and Service

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

(c) The commission shall specify customer service safety metrics after review of proposals and input from the

(d) The commission shall convene a meeting of utility employees quarterly to review progress in achieving

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