

BEFORE 웹□η PUBLIC UTILITIES COMMISSION 웹□η OF THE STATE 웹□η

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Order 웹□η Instituting 웹□η Rules Making 웹□η 웹□η 웹□η 웹□η) 웹□η
on 웹□η the 웹□η Commission's 웹□η Rules Making 웹□η 웹□η) 웹□η
to 웹□η Adopt 웹□η New 웹□η Safety 웹□η and 웹□η Reliability Rules Making 웹□η 웹□η 11
for 웹□η Natural 웹□η Gas 웹□η Transmission 웹□η Rules Making 웹□η Pip
and 웹□η Related 웹□η Ratemaking 웹□η Rules Making 웹□η 웹□η) 웹□η

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웹□η Comments 웹□η of 웹□η Utility 웹□η 웹□η 웹□η 웹□η 웹□η 웹□η

On 웹□η

Proposed 웹□η Order 웹□η of 웹□η A, 웹□η 웹□η B, 웹□η C, 웹□η D, 웹□η E, 웹□η F, 웹□η G, 웹□η H, 웹□η I, 웹□η J, 웹□η K, 웹□η L, 웹□η M, 웹□η N, 웹□η O, 웹□η P, 웹□η Q, 웹□η R, 웹□η S, 웹□η T, 웹□η U, 웹□η V, 웹□η W, 웹□η X, 웹□η Y, 웹□η Z, 웹□η 웹□η 2014

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Carl 웹□η Julian 웹□η 웹□η 웹□η 웹□η 웹□η William 웹□η Julian 웹□η II
Regulatory 웹□η Affairs 웹□η Director 웹□η 웹□η 웹□η 43556 웹□η Aliso Viejo 웹□η
Utility 웹□η Workers 웹□η Union 웹□η Local 111 웹□η Davis 웹□η CA 웹□η 웹□η 95618
2021 웹□η S. 웹□η Neptune Street 웹□η 웹□η 웹□η Phone: 웹□η 웹□η 638-2121
Oceanside 웹□η 05 웹□η 웹□η 웹□η 웹□η 웹□η E-mail: 웹□η 웹□η billjulian@sbcglobal.net
Phone: 웹□η (951) 499-2561
E-mail: 웹□η webd@auwua.net 웹□η

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July 웹□η 18, 웹□η 2014

Comments of Utility Regulators (e.g., FERC) on Proposed Decision of ALJ Bush issued July

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Introduction

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웬□η It 웬□η is early now 웬□η years 웬□η since 웬□η a 웬□η defective 웬□η G&E 웬□η pipe neighborhood 웬□η in 웬□η same 웬□η then 웬□η the legislature 웬□η and 웬□η the 웬□η undertaken 웬□η a 웬□η perfect 웬□η to 웬□η transform 웬□η the 웬□η safety 웬□η negative 웬□η transport 웬□η and 웬□η definitely 웬□η shift 웬□η from 웬□η a 웬□η reactive 웬□η "culture" 웬□η proactive 웬□η "culture" 웬□η of 웬□η performance 웬□η has 웬□η stated 웬□η the 웬□η short-term 웬□η its initial 웬□η order 웬□η in 웬□η the 웬□η proceeding:

"We must ensure that our gas utilities recognize is not enough. Safe pipeline operations must begin management and the ~~pipeline~~ operators must workrooms and crews of ~~the~~ ~~pipeline~~ operators must have a ~~and~~ workplace culture that places safety as their (emphasis ~~had~~)

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The current president of the General Planning basic gas operations at the California State opportunity update their forward-looking goals Bruno added he national and safety culture changes sought make California's policy

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根据The proposed challenge to the proposed rule in August 2013, the proposed decision (hereafter referred to as the "Proposed Decision") by the United States Commission on Safety and Security of Nuclear Power Plants ("the Commission") and many of its stakeholders, including the Union of Concerned Scientists ("UCS"), considered a response to all of the challenges to the proposed rule in the direction and many of which has adopted in the concept several of the proposed rule's components. The proposed rule includes the following components: 1) Operation and Maintenance; 2) Transmissions and Distribution; 3) Reporting; 4) Miscellaneous issues. The Commission will adopt General Order and assist the Commission in its safety analysis. Part III summarizes the Union of Concerned Scientists' suggestion.

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I. 業務 Operation and 保全 Maintenance 業績 Performance and 報告 Reporting

A. 웹□η 웹□η Leak 웹□η Basic 웹□η Repair 웹□η IP addressing 웹□η S 웹□η 웹□η 143 웹□η

Leaks and the operator's approach to preventing them among defining characteristics of a gas pipeline train and issue for gas pipelines to assure system integrity. Every category of threat to system performance listed in document *Maintaining System Integrity during Natural Gas Pipeline Incidents* by American Society of Mechanical Engineers (ASME) ASME B31.12-2014 is part by leak severity and frequency.

⁴ 웹□η 웹□η This 웹□η document 웹□η is 웹□η incorporated 웹□η by 웹□η reference 웹□η as 웹□η de
in 웹□η regulations. 웹□η 웹□η See 웹□η generally 웹□η 49 웹□η CFR 웹□η 192.7 웹□η and 웹□η is

- External Corrosion
- Internal Corrosion
- Stress corrosion cracking
- Manufacturing
- Construction
- Equipment
- Third Party Damage
- Incorrect Operation
- Weather-related and Outside Forces

With

Currently GO and operators specifically addressed to to the including limited leak survey requirement expressly stated in the operator in the aggregate period during the calendar year, has a component of its annual repair and 49 CFR sections 1910.106 PHMSA regulations. The PD addresses these deficiencies with a change to the title that makes clear its distribution. It represents starting from pasted forward that UWUA generally supports, with several recommendations for constructive improvement that will work to prevent future incidents. With

1. Leak Detection Section 143.1 [amended]

The foundation for a leak reduction strategy is prompt permanent leak detection. Starting from the first inspection, it involves primarily visual inspection and report of odor, ground or surface disturbance, dead vegetation, other conditions indicating that the facilities have been unreported incursions in relatively few years (post).

Incorporating the four general sections in Appendix A.

⁵ 30 page 30

웹□η The 웹□η PD 웹□η proposes 웹□η to 웹□η extend 웹□η ~~the wind industry's~~ 웹□η inspection of leak 웹□η detection 웹□η ~~the power system~~ 웹□η transmission 웹□η and ~~last~~ 웹□η ~~more~~ 웹□η aggressive, 웹□η shortened 웹□η interval 웹□η for 웹□η leak 웹□η detection 웹□η ~~ways~~ 웹□η (Section 웹□η 143.1(b) 웹□η establishing 웹□η a 웹□η twice 웹□η ~~in~~ 웹□η ~~the peak~~ 웹□η ~~peak~~ 웹□η ~~not exceed~~ 웹□η ~~the~~ 웹□η ~~peak~~ 웹□η ~~transmission~~ 웹□η supports 웹□η this 웹□η proposal 웹□η as 웹□η to the needs of the current wind power facilities 웹□η on 웹□η Southern California 웹□η are 웹□η gas 웹□η distribution, 웹□η and 웹□η operated 웹□η and maintained 웹□η by the wind distribution, 웹□η carry gas 웹□η at very high pressures 웹□η (in excess of UWUA) 웹□η suggests that the transmission leak detection 웹□η is appropriate to the existing distribution facilities 웹□η.

2. Leak Classification and Action Criteria 웹□η (Section 143.1) 웹□η Reducing 웹□η leaks 웹□η and 웹□η emissions 웹□η from 웹□η leaks 웹□η is 웹□η at 웹□η and 웹□η delivery 웹□η industry's 웹□η safety 웹□η ~~longer~~ 웹□η ~~more~~ 웹□η ~~time~~ 웹□η for 웹□η comprehensive 웹□η leak reduction 웹□η strategy 웹□η developed 웹□η though 웹□η a 웹□η process 웹□η in 웹□η which 웹□η all 웹□η knowledgeable 웹□η parties 웹□η participate, 웹□η That 웹□η process 웹□η transparent, 웹□η participatory, 웹□η effective, 웹□η not 웹□η happened. 웹□η However, 웹□η the CPUC 웹□η staff 웹□η ~~had~~ 웹□η ~~not~~ 웹□η made 웹□η proposals 웹□η that 웹□η ~~make~~ 웹□η ~~the~~ 웹□η ~~process~~ 웹□η to 웹□η focus 웹□η on 웹□η make 웹□η progress 웹□η in 웹□η avoiding, 웹□η reducing 웹□η ~~and repairing~~ 웹□η the 웹□η August 2013 웹□η ~~final proposal~~ (Final Proposal), 웹□η finding 웹□η utility 웹□η but 웹□η a 웹□η regression 웹□η current 웹□η utility 웹□η practices.

The 웹□η ~~and~~ 웹□η ~~the~~ 웹□η significant 웹□η improvement, 웹□η which support 웹□η with 웹□η clarifications 웹□η that 웹□η would 웹□η make 웹□η it 웹□η avoiding, 웹□η reducing, 웹□η repairing 웹□η ~~and repairing~~ As 웹□η a 웹□η practical 웹□η matter should 웹□η result 웹□η in 웹□η repair 웹□η of 웹□η most 웹□η ~~leaked~~ 웹□η ~~and repaired~~ 웹□η upgrading 웹□η of 웹□η the 웹□η going ~~and reviewing~~ 웹□η the 웹□η status 웹□η of 웹□η not 웹□η completely 웹□η repaired 웹□η at 웹□η ~~the~~ 웹□η time 웹□η of 웹□η discovery.

- The virtues of the HPRC
 - Improved patrol and leak survey procedures and permanent evaluation for the twelve months for underlined distribution transmission
 - Repair has a priority response for Grade 1 and transmission
 - Limitation non regrades of distribution and transmission

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the weaknesses of 10 different companies. It should be noted that the core

- More 꿈□ thorough 꿈□ [consideration] 꿈□ of 꿈□ valves;
 - Clarification 꿈□ of 꿈□ the 꿈□ [relative leak] 꿈□ repeat 꿈□ leak 꿈□ "prompt" 꿈□ including 꿈□ addressing 꿈□ [leak] 꿈□ at 꿈□ risers;
 - Language 꿈□ hand 꿈□ concept 꿈□ clarifications 꿈□ that 꿈□ will 꿈□ help 꿈□ more 꿈□ nonsmoothed

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UWUA 멤□ηdoes 멤□ηnot 멤□ηunderstand 멤□ηthe 멤□ηPD 멤□ηto 멤□ηmake 멤□ηfor 멤□ηimmediate 멤□ηre 멤□ηain

_____ 웹□η In 웹□η this 웹□η beg~~the~~ing~~the~~ _____
examples 웹□η of 웹□η Grade 웹□η 1 웹□η leak 웹□η scenarios 웹□η “requiring” 웹□η prompt~~the~~
clarified 웹□η by 웹□η adding 웹□η “repair” 웹□η to 웹□η the 웹□η actions 웹□η required, 웹□η
that 웹□η repair 웹□η is 웹□η a _____
143.2(a)(2) 웹□η should 웹□η _____
and/or _____
_____ 웹□η action 웹□η include. _____
_____ 웹□η not _____

Provides flexibility in the field of operators. Examples of Grade 1 keepers include London, Birmingham, and Manchester. Two numbers (i) rapid classification of personnel. The judgment sets priority on personnel. Five indices objective conditions. The

- (i) 웹□ηAny 웹□ηleak, 웹□ηwhich 웹□ηin 웹□ηthe 웹□ηjudgmer~~점~~웹□ηof 웹□ηthe³
scene, 웹□ηis 웹□ηregarded 웹□ηas 웹□η~~점~~웹□ηimmediate 웹□ηhazard;
(ii) 웹□ηEscaping 웹□ηgas 웹□ηthat 웹□ηhas 웹□ηignited 웹□ηunintentionally;
(iii) 웹□ηAny 웹□ηindication 웹□ηof 웹□ηgas 웹□ηthat 웹□η~~점~~웹□ηmigrated 웹□η
or 웹□ηtu~~점~~웹□η⁴
(iv) 웹□ηAny 웹□ηreading 웹□ηat 웹□ηthe 웹□ηoutside 웹□η~~점~~웹□ηof 웹□ηa 웹□η⁵
could 웹□ηpotentially 웹□ηmigrate 웹□ηto 웹□ηthe 웹□η~~점~~웹□ηinside 웹□ηwall 웹□ηof 웹□η⁶
(v) 웹□ηAny 웹□ηreading 웹□ηof 웹□ηeighty 웹□ηpercent 웹□η~~점~~웹□ηthe 웹□ηgas
(LEL) 웹□ηor 웹□ηgreater 웹□ηin 웹□η~~점~~웹□ηenclosed 웹□ηspace;
(vi) 웹□ηAny 웹□ηreading 웹□ηof 웹□ηeighty 웹□ηpercent 웹□η~~점~~웹□ηof 웹□ηLEL 웹□ηof
substructures 웹□ηnot 웹□ηassociated 웹□ηwith 웹□ηgas 웹□η~~점~~웹□ηlines 웹□ηwhere⁷
potentially 웹□ηmigrate 웹□ηto 웹□ηthe 웹□ηoutside 웹□ηwall 웹□ηof 웹□ηa 웹□η⁸
(vii) 웹□ηAny 웹□ηleak 웹□ηthat 웹□ηcan 웹□ηbe 웹□η~~점~~웹□ηheard, 웹□ηor 웹□η
location 웹□ηthat 웹□ηmay 웹□ηendanger 웹□ηthe 웹□η~~점~~웹□ηpublic 웹□ηor
웹□η

6) The subjective judgments called for items (i) and qualified personnel within the meaning of the term **MSA** (Measurement Scales) are called **30-point MCR scales** or **part:**

Qualified 웹□▷means 웹□▷that 웹□▷an 웹□▷individual 웹□▷has 웹□▷been 웹□▷evaluated 웹□▷

- (a) The *Ma* assigned covered tasks; and the
 (b) Recognize and react to *nabornal* operating conditions

143.2(a)(2)(i) 꿈□ηand 꿈□η(vii) 꿈□ηsh~~ipping~~ 꿈□ηpeak 꿈□ηin 꿈□ηthe 꿈□η
the ~~qualified~~ 꿈□ηoperator 꿈□ηpersonnel 꿈□ηregarded 꿈□ηas 꿈□ηan 꿈□ηim
hazard;..."and 꿈□η 꿈□ηA(ny) 꿈□ηleak 꿈□ηthat 꿈□ηcan 꿈□η~~influence~~ 꿈□ηthe ~~judgment~~, 꿈□η
qualified 꿈□η***Operator*** 꿈□η***personnel*** 꿈□ηmay 꿈□ηendanger 꿈□η
public 꿈□ηor 꿈□η***operator*** 꿈□ηSpecifying 꿈□ηthe 꿈□ηrequirements 꿈□ηof 꿈□ηpublic
controversy 꿈□ηand 꿈□ηconflict 꿈□ηbetween 꿈□ηopinions 꿈□ηand 꿈□η***operator*** 꿈□η
suggestion 꿈□ηapplies 꿈□ηto 꿈□ηGrade 꿈□η2 꿈□ηleak 꿈□η***operator*** 꿈□η
143.2(b)(5)(vi) 꿈□η***Examples*** 꿈□ηof 꿈□ηGrade 꿈□η2 꿈□ηleaks 꿈□ηrequiring 꿈□ηaction
include...
(vi) Any 꿈□ηleak 꿈□ηthat 꿈□η~~is~~ 꿈□η***qualifying*** 꿈□ηagreement 꿈□ηpersonnel 꿈□ηat 꿈□η
the 꿈□ηis 꿈□ηof 꿈□ηsufficient 꿈□ηmagnitude 꿈□ηto 꿈□ηjustify 꿈□ηscheduled

vii. 웹□η 웹□ηAny 웹□ηleak 웹□ηin 웹□ηan 웹□ηenclosed 웹□ηspace 웹□ηwhere
viii. 웹□η 웹□ηAny 웹□ηleak 웹□ηin 웹□ηplastic 웹□ηpipe 웹□ηhole 웹□ηstatic

itemId Items itemId(v) itemId description itemId(g) itemId concentration itemId(a) itemId metric itemId lower itemId explosive itemId limit itemId maximum itemId minimum itemId current itemId used in itemId field itemId by itemId field itemId measure itemId regard itemId concentration itemId directly itemId percentage itemId of itemId gas itemId sample itemId collection itemId application itemId of itemId conversion itemId formula itemId itemId calculate itemId itemId providing itemId an itemId alternative itemId concentration itemId metric itemId of itemId 2.7 itemId % itemId has itemId significant itemId impact itemId on itemId personnel. itemId itemId This itemId suggestion itemId applies itemId to itemId implementation itemId of itemId involving itemId treatment itemId of itemId Grade itemId itemId make itemId pass itemId well itemId service itemId itemId 1. itemId itemId

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웹□η 웹□η ii. 웹□η 웹□η Grade 2 웹□η Leaks

웹□η Grade 2 웹□η leaks 웹□η recognized 웹□η as the 웹□η of detection 웹□η but 웹□η justifies 웹□η the proposed concept. 웹□η proposed a 웹□η future Grade 2 웹□η leaks concept must be cleared within 15 웹□η PD 웹□η proposed section 143.2(b) division 웹□η (b) introduces 웹□η the concept of "clearing" 웹□η a leak. 웹□η It 웹□η proposed concept differs from 웹□η that 웹□η in 웹□η that 웹□η paragraph 웹□η the theft 웹□η of the repair. 웹□η repair. 웹□η is 웹□η a danger 웹□η in the 웹□η PD's 웹□η leak 웹□η 2 웹□η leaks 웹□η through the 웹□η process 웹□η of clearing mit 웹□η a 웹□η continuous 웹□η of leaks 웹□η for years 웹□η through 웹□η a 웹□η significant period of time. 웹□η be 웹□η clarified 웹□η on 웹□η striking 웹□η the 웹□η by 웹□η to 웹□η "or" 웹□η clear." 웹□η preferred 웹□η approach. 웹□η If 웹□η the 웹□η comes 웹□η to the 웹□η clearing 웹□η a simple 웹□η language 웹□η language 웹□η be 웹□η needed 웹□η to 웹□η 웹□η confusion. 웹□η

1. 웹□η 웹□η Apply 웹□η the 웹□η same 웹□η concept 웹□η to 웹□η Grade 1 웹□η to 웹□η Grade 2 웹□η or higher. 웹□η This is the 웹□η proposed concept. 웹□η and 웹□η then 웹□η the 웹□η repaired 웹□η a 웹□η year. 웹□η 웹□η Section 143.2 regraded 웹□η the 웹□η by adding 웹□η subsection 웹□η to 웹□η Section 143.2(b)(5)
2. 웹□η Apply 웹□η the 웹□η repair. 웹□η process 웹□η (Section 143.2(b)(2)) 웹□η 2 웹□η to the repaired 웹□η
3. 웹□η no more than 24 months 웹□η after the repair

웹□η

웹□η 3. 웹□η 웹□η Leaks at 웹□η Risers

웹□η A 웹□η Riser 웹□η is the 웹□η piping 웹□η in the 웹□η service 웹□η that passes off 웹□η transitions 웹□η from the 웹□η below 웹□η grade 웹□η to the 웹□η above and 웹□η across 웹□η level 웹□η pressure 웹□η (up 웹□η to 웹□η 60 웹□η psi 웹□η in the 웹□η case 웹□η of 웹□η pressures 웹□η in the 웹□η case 웹□η of 웹□η steel 웹□η risers) 웹□η to the 웹□η r

웹□η

pressure 훨□ηbefore 훨□ηit 훨□ηenters 훨□ηa 훨□ηgas 훨□ηline 훨□ηupstream 훨□ηgas 훨□ηmeter.
before 훨□ηit 훨□ηgoes 훨□ηthe 훨□ηgas 훨□ηline 훨□ηthe 훨□ηmeter.

斟□η Risers 훨□ηare 훨□ηfrequent 훨□ηsources 훨□ηof 훨□ηleaks. 훨□η斟□ηFor 훨□ηth
have 훨□ηconsidered 훨□ηleaks 훨□ηat 훨□ηrisers 훨□ηtreatment 훨□ηmethod 훨□ηother 훨□η

reasons: 훨□η

- the 훨□ηpressures 훨□ηhigh 훨□ηv
- the 훨□ηlocation 훨□ηon 훨□ηthe 훨□ηservice 훨□ηline 훨□ηupstream 훨□ηof 훨□ηimpossible 훨□ηto 훨□ηcontrol 훨□ηleak 훨□ηof 훨□ηgas;
- proximity 훨□ηto the 훨□ηleak 훨□ηpeople 훨□ηhuman 훨□ηhabitation;
- the 훨□ηpossibility 훨□ηthat 훨□ηleaky 훨□ηrisers. 훨□η

斟□η UWUA 훨□ηproposes 훨□ηto 훨□ηimmediate 훨□ηaction 훨□ηGeneral 훨□ηRate
Southern 훨□ηCalifornia 훨□ηGas 훨□η(SCG) 훨□ηrequested 훨□ηand 훨□ηreceived 훨□ηif
replacing 훨□ηleaky 훨□ηrisers. 훨□η斟□η

斟□η A 훨□ηleak 훨□ηways 훨□ηbe 훨□ηconsidered 훨□ηa 훨□ηGrad^e
classification 훨□ηscheme 훨□ηpropose 훨□ηprompt 훨□ηaction" 훨□ηalternative 훨□ηto 훨□ηimme^t
above 훨□ηreasons 훨□ηthe 훨□η"prompt 훨□ηaction" 훨□ηalternative 훨□ηto 훨□ηimme^t
The 훨□ηregulation 훨□ηshe 훨□ηoperator 훨□η斟□η

斟□η Add 훨□ηnew 훨□ηsealing 훨□ηleak 훨□ηRisers
斟□η

斟□η 143.3.斟□ηLeak 훨□ηLeaks 훨□ηat 훨□ηmeters 훨□ηand 훨□ηrisers

(a)斟□ηAll leak 훨□ηat 훨□ηthe 훨□ηgas 훨□ηline 훨□ηis 훨□ηrepaired 훨□ηwithin 훨□ηthe 훨□ηday 훨□ηthe 훨□ηgas 훨□ηline 훨□ηis 훨□ηrepaired 훨□ηwithin 훨□ηthe 훨□ηoperator 훨□η

斟□η repaired 훨□ηgas 훨□ηline 훨□ηis 훨□ηrepaired 훨□ηwithin 훨□ηthe 훨□ηoperator 훨□η

斟□η performed 훨□ηby 훨□ηqualified 훨□ηemployee 훨□ηof 훨□ηthe 훨□ηoperator 훨□η

(b)斟□ηoperator 훨□ηshall 훨□ηinclude 훨□ηthese 훨□ηgas 훨□ηline 훨□ηleak 훨□ηrepair 훨□η

斟□η required 훨□ηby 훨□ηsection 123.2.

斟□η

斟□η 14.斟□ηValves 훨□ηnew 훨□ηand 훨□ηinten^mance

斟□η Valves 훨□ηare 훨□ηa 훨□ηcritical 훨□ηgas 훨□ηfunction 훨□ηgas 훨□ηgas 훨□ηgas
Valves 훨□ηcan 훨□ηserve 훨□ηa 훨□ηnumber 훨□ηof 훨□ηfunctions 훨□ηincluding 훨□ηreducing 훨□ηor 훨□ηincreasing 훨□ηdownstream 훨□ηpressure; 훨□ηredirecting 훨□ηgas

斟□η

flow, etc. The Legislature has法定职能, including regulating utilities functions. Section 216(2011, Yee) and AB 56 (2011, section 143.2) currently addresses valves in a manner that a valve is operable in needed circumstances. 143.2 provides:

143.2 Valve Maintenance, the use of which for the safe operation of a distribution system, lubricated (where required) and partially operating at least once each calendar month, but at least 15 months, but at least once each calendar month. The limitations in this provision include: (1) not for "necessary" for the safe operation of the universe of valves covered by the maintenance dimensions of the universe of valves covered by the outcome of the maintenance procedures. (2) no guidance what parts of valves are covered by the maintenance dimensions of the universe of valves covered by the outcome of the maintenance procedures. (3) not excessively long intervals between maintenance procedures. Other forms of renumbering the valves for purposes of change.

UWUA recommended a significantly revised approach to preventive maintenance:

143.4 Valve Maintenance

(a) Each operator shall make available its a description of location, type, size, number, turn and critical.

(b) Each valve, the use of which may transmission or control system, the inspection, lubricated (where required) after the conclusion of the "operable" means that the valve can easily operate than (c) The report of the inspection of valves found at the beginning of the inspection; the operator must take corrective action if found inoperative, unless the operator designs to do so, not document the valve condition prior to the inspection.

Note that the California regulation requires CER 192.745(b): Each operator must take corrective action if found inoperative, unless the operator designs to do so, not document the valve condition prior to the inspection.

procedures 웹□ηor 웹□ηother 웹□ηactivities 웹□ηat 웹□ηthe 웹□ηsite; 웹□ηand 웹□η conclusion 웹□ηof 웹□ηthe 웹□ηinspection.

(d) 웹□η 웹□ηThe 웹□ηoperator 웹□ηwill 웹□ηensure 웹□ηthat 웹□ηeach 웹□ηinspected equipment 웹□ηto 웹□ηlubricate 웹□ηand 웹□ηoperate 웹□ηthe 웹□ηvalve 웹□ηat 웹□ηthe 웹□η

웹□η UWUA's 웹□ηrecommendations 웹□ηseveral 웹□ηimprovements, 웹□ηbeginning 웹□η comprehensive 웹□ηvalve 웹□ηinventory. 웹□η 웹□η 웹□ηThis 웹□ηenables 웹□ηan 웹□η and 웹□ηprioritizing 웹□ηthe 웹□ηuse 웹□ηof 웹□ηwhich 웹□ηmay 웹□ηbe 웹□ηnecess a 웹□ηsystem. 웹□η 웹□ηThe 웹□ηproblem 웹□ηthat 웹□ηthis 웹□ηaddresses 웹□ηis 웹□η prioritization 웹□ηmay 웹□ηleave 웹□ηmany 웹□ηvalves 웹□ηneeded 웹□ηto 웹□ηaddress uninspected 웹□ηfor 웹□ηyearly 웹□ηannually 웹□ηinoperable 웹□ηwhen 웹□ηnecess 웹□ηsuch 웹□ηas 웹□ηoccurred 웹□ηat 웹□ηSan 웹□ηBruno. 웹□η 웹□ηThe 웹□ηinventory 웹□η including 웹□ηthe 웹□ηSED 웹□ηstaff 웹□ηand 웹□ηexperienced 웹□ηutility 웹□ηemploye identifying 웹□ηthe 웹□ηvalves 웹□η“necessity” 웹□ηsafe 웹□ηsafe 웹□ηthe 웹□ηCon assure 웹□ηthat 웹□ηvalve 웹□ηmaintenance 웹□ηcontributes 웹□ηto 웹□ηimproving 웹□η decreasing 웹□ηthe 웹□ηrisk 웹□ηthat 웹□ηan 웹□ηinoperable 웹□ηvalve 웹□ηextends 웹□η 웹□η Second, 웹□ηUWUA 웹□ηproposes 웹□ηtransmission 웹□ηand 웹□ηdistribution 웹□ηthe inventory. 웹□η Third, 웹□ηUHMSA 웹□ηregulations 웹□ηcover 웹□ηboth 웹□ηtransmission 웹□ηand distribution 웹□η(49 CFR 웹□η192.747) 웹□ηvalves 웹□ηbut 웹□ηapply 웹□ηa 웹□η (partially 웹□ηoperate 웹□ηfor 웹□ηtransmission 웹□ηversus 웹□η“check” 웹□ηfor 웹□ηd standard 웹□ηwould 웹□ηresult 웹□ηin 웹□ηan 웹□ηoutcome 웹□ηof 웹□η“operable” 웹□η distribution 웹□ηvalves.

웹□η Third, 웹□ηUWUA 웹□ηrecommends 웹□ηa 웹□ηstandard 웹□ηfor 웹□ηassessing 웹□η of 웹□ηthe 웹□ηinspection 웹□ηand 웹□ηmaintenance 웹□ηinoperable; 웹□ηthe 웹□ηvalve meaning 웹□ηthat 웹□ηit 웹□ηcan 웹□ηbe 웹□η“easily” 웹□ηopen 웹□ηand 웹□ηclose 웹□ηclosed with 웹□ηthis 웹□ηmaintenance 웹□ηstandard, 웹□ηUWUA 웹□ηproposes 웹□ηthat 웹□η beginning 웹□ηand 웹□ηconclusion 웹□ηof 웹□ηmaintenance 웹□η Third, 웹□ηbe 웹□η importance 웹□ηof 웹□ηdocumenting 웹□ηthe 웹□ηfound 웹□ηat 웹□ηthe 웹□ηbeginning is 웹□ηthat 웹□ηit 웹□ηmay 웹□ηsuggest 웹□ηan 웹□ηundetermined 웹□ηproblem 웹□ηand 웹□η addressed, 웹□ηif 웹□ηdeterioration 웹□ηfrom 웹□ηthe 웹□ηcondition 웹□ηin 웹□ηwhich conclusion 웹□ηof 웹□ηthe 웹□ηprevious 웹□ηand 웹□ηcurrent 웹□ηimproved

“Fourth, the UWUA recommends shortening the maximum valves necessary for the safe operation” from 15 lengthy inspection interval permits impaired function to a systemic safety risk that should be addressed by an maintenance is ongoing that is dependent on workforce. The workforce adequacy should be proposed approved that have an effective valve plan (See below, Pages ff.)

UWUA notes that in its September Comments it adds a general training company equipment qualification in its Improvement. good suggestions UWUA fully supports an improvement over UWUA's suggestion for section should include valves.

5. Encroachments

The important new section on encroachments is Mark 14 or Utility rights and reduce unsuspected dangers to the be given by repositioning marks that give many persons might encroach actual notice of the residence of facilities and trigger requires markers “wherever necessary to identify the location of the transmission possibility of damage to the adjacent marker in the line of sight the subjectivity in the PHMSA marker in the line of the adjacent marker

⁸ the Commission accepts UWUA's proposed new sections 143.4 (Valves) that the should be numbered section

B. 웹□η 웹□η An 웹□η privacy complaint matter addressing 웹□η Section 123.2

웹□η

웹□η 1. 웹□η privacy complaint matter

웹□η Improved 웹□η transparency 웹□η accountability on 웹□η operational 웹□η issues 웹□η that 웹□η has 웹□η been 웹□η promoted 웹□η by 웹□η the 웹□η Commission 웹□η from 웹□η to 웹□η San 웹□η area 웹□η In 웹□η no 웹□η area 웹□η 향후 웹□η 웹□η system 웹□η is 웹□η we 웹□η know 웹□η this, 웹□η we 웹□η need to 웹□η make changes to 웹□η system to reduce 웹□η leaks. 웹□η Understanding 웹□η reporting scope 웹□η of 웹□η the 웹□η proposed 웹□η is 웹□η the 웹□η The 웹□η CPUC 웹□η has 웹□η responded 웹□η by 웹□η proposing 웹□η a 웹□η new 웹□η that 웹□η contains 웹□η a 웹□η much 웹□η more 웹□η comprehensive 웹□η and 웹□η detailed annually 웹□η CPUC 웹□η (CPUC 웹□η) 웹□η annual 웹□η report 웹□η annual 웹□η report UWUA 웹□η only 웹□η supports 웹□η our 웹□η

웹□η There 웹□η are 웹□η several 웹□η points of view on this matter, 웹□η that 웹□η the 웹□η Commission include 웹□η in 웹□η their 웹□η decision.

- (1) 웹□η the 웹□η detailed 웹□η report 웹□η of 웹□η responsible for 웹□η leaks 웹□η to 웹□η the 웹□η report PD 웹□η proposed 웹□η 향후 웹□η 123.2 웹□η
- (2) 웹□η the 웹□η granularity 웹□η of 웹□η the 웹□η report 웹□η requiring 웹□η disclosure 웹□η terms 웹□η of 웹□η the 웹□η ASME 웹□η proposed 웹□η report 웹□η 2018 웹□η
- (3) 웹□η setting 웹□η the 웹□η time 웹□η between 웹□η report 웹□η and 웹□η repair 웹□η proposed 웹□η section 웹□η 123.2(d) 웹□η integrates 웹□η report 웹□η that 웹□η reveals 웹□η on leaks 웹□η repaired 웹□η and 웹□η pending 웹□η repair 웹□η does 웹□η not 웹□η fully 웹□η effectiveness 웹□η of 웹□η the 웹□η repair 웹□η This 웹□η proposal 웹□η will 웹□η the Commission's 웹□η ability 웹□η to 웹□η improve 웹□η timeliness 웹□η of 웹□η leak 웹□η or both 웹□η the 웹□η public 웹□η and 웹□η the 웹□η environment;
- (4) 웹□η the 웹□η reporting 웹□η certain 웹□η "near 향후 웹□η mis 웹□η ever 웹□η reporting over Section 웹□η 123.2(d), 웹□η including 웹□η items 웹□η 웹□η 웹□η 웹□η 웹□η 웹□η independent reporting 웹□η procedures 웹□η of 웹□η Sections 웹□η 123.2(d) 웹□η cause 웹□η the 웹□η page occurred; 웹□η

웹□η 웹□η 웹□η the 웹□η independent reporting over Section 웹□η 123.2(d) 웹□η the 웹□η independent reporting over Section 웹□η 123.2(d) (Jane 웹□η 2011), 웹□η Recommendations 웹□η 5.4.4.5, 웹□η page 웹□η 15 웹□η 웹□η 웹□η 웹□η 웹□η 웹□η 웹□η 웹□η April 웹□η 11, 웹□η 201 through 웹□η 13 웹□η responding 웹□η to 웹□η Assigned 웹□η Commissioner 웹□η Ruling 웹□η issue

웹□η

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- (5) requirement of a granular analysis for proposed post (LAUF) proposed requirement of procedures to systematize assessment of documentation and planning information in the field;
- (6) requirement of procedures to take up to date information in the field; reporting employees assigned to operational activities in the proposed section 123.2(f);
- (8) requirement that utilities include in the annual plan incidents in the proposed section 123.2(h);
- (9) the proposed section 123.2(g);
- (10) the requirement to include in the Annual plan as proposed.

WUA suggests that the proposed section 123.2(d) compilation of events, as defined in the proposed definition is significant toward the goal hazards before they occur or damage. c.f., Pub. 961(d)(1).

“Near-miss” mean unplanned, undesired, events that are an operator’s facilities or operations but do not result in damage, loss of gas or pipeline, or potential hazards before they occur or damage.

Such events can include, (a) A subsurface pipeline facility not marketed for purposes;

(b) Excavation activity near a pipeline facility or Under ground Service ticket;

(c) The operation of an incorrect valve or pipe;

(d) An incorrectly mapped pipeline facility;

(e) Work activity in a reduced mode, improved

operator was correctly applied but the activity, in

creating 웹□ηa 웹□ηsituation 웹□ηor 웹□ηcondition 웹□ηwhere 웹□ηaccident 웹□η
occurred.” 웹□η

웹□η

Tracking 웹□ηand 웹□ηreporting 웹□ηthe 웹□ηoperator’s 웹□ηnear miss report and 웹□ηgiving 웹□η
Operator 웹□ηdiscretion 웹□ηto 웹□ηinclude 웹□ηthe 웹□ηoperator’s 웹□ηnear miss report in
the 웹□ηdefinition 웹□ηof near miss. It 웹□ηprovides 웹□ηan 웹□ηimportant 웹□ηtool 웹□η
achieving 웹□ηhazard 웹□ηreduction. 웹□ηthe 웹□ηUWUA 웹□ηsuggests 웹□ηthat 웹□ηan operator
a 웹□ηreport 웹□ηof 웹□ηnear miss 웹□ηmiss 웹□ηevents:

123.2 웹□ηAt 웹□ηthe 웹□ηsame 웹□ηtime 웹□ηcopies 웹□ηof 웹□ηthe 웹□ηnear miss report
submitted, 웹□ηeach 웹□ηoperator 웹□ηshall 웹□ηsubmit, 웹□ηin 웹□ηa 웹□ηform
the 웹□ηCommission’s 웹□ηSafety 웹□ηand 웹□ηEnforcement 웹□ηlessons, 웹□ηnear miss report
following 웹□ηinformation 웹□ηto 웹□ηdemonstrate 웹□ηto 웹□ηthe 웹□ηCommission 웹□η
Operator’s 웹□ηactions 웹□ηtowards 웹□ηminimizing 웹□ηthe 웹□ηrisk 웹□ηfrom 웹□ηsy
failures: 웹□η

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... 웹□η

(1) 웹□ηthe 웹□ηnear miss report is significant or has potential to be significant or predictive of future
near misses.

웹□η

2. Near Misses in Incident Reporting

UWUA 웹□ηnotes 웹□ηand 웹□ηnear miss reporting is required under Part 122.2(a) of the
Regulations, 웹□ηincluding pressure and pressure events. The 웹□ηnear miss report
certain events and pressure events in the 웹□ηincident reporting 웹□η
Section 122.2(a)(applicable to incidents occurring after 1 January 2012).

PD, 웹□ηat 웹□ηpage 13.

Near misses are events that have the potential to cause physical damage before they cause physical damage. The reason, UWUA 웹□η^{additional} near miss incidents are included in the near miss report regime. The near miss report follows:

122.2 Requirements for Near Miss Reporting to the Commission

(a) Each operator shall report near miss incidents to the Commission following criteria:

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... 웹□η

iii. An incident involving near miss that is significant

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掴□η judgment掴□η 라고 한다掴□η even掴□η though掴□η it掴□η did掴□η not掴□η
掴□η Sections掴□η(1)(i)掴□η or掴□η 뒤에掴□η above.

掴□η掴□η

II. Misleadingous掴□η

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A. 掴□ηnew法令掴□η掴□ηState掴□ηLegislative法令掴□ηActivity掴□η

掴□η In掴□η the掴□η session掴□η following掴□η the掴□η 2011掴□η立法 Session掴□η legislative
added掴□η to掴□η the掴□η Public Utilities掴□η Act掴□η a掴□η 諸法公公用事業法掴□η
Safety掴□η including掴□η Natural Gas Pipeline掴□η Safety掴□η Act掴□η ed by the掴□η 2011;
955掴□η through掴□η 970,掴□η inclusive.掴□η掴□η掴□η The掴□η new掴□η chapter掴□η
including掴□η AB掴□η 56,掴□η Stats.掴□η 2011掴□η Ch.519掴□η (Hill);掴□η SB法令掴□η 214,
216,掴□η Stats.掴□η 2011掴□η Ch.52法令掴□η (Meadow),掴□η SB法令掴□η 215,掴□η (Leno),掴□η and掴□η
2011掴□η Ch.掴□η 52法令掴□η (Meadow)掴□η This法令掴□η declares掴□η that掴□η its
employees掴□η is掴□η the法令掴□η top法令掴□η priority法令掴□η in法令掴□η operating法令掴□η Code法令掴□η s
section法令掴□η 9法令掴□η and法令掴□η requires法令掴□η gas法令掴□η utilities法令掴□η and法令掴□η the法令掴□η Comm.
implement法令掴□η safety法令掴□η plans法令掴□η that法令掴□η attached法令掴□η to法令掴□η proposed法令掴□η
by法令掴□η Util.法令掴□η Code法令掴□η section法令掴□η 10法令掴□η In法令掴□η addition,法令掴□η it法令掴□η formally法令掴□η designates法令掴□η the
responsible法令掴□η entity法令掴□η for法令掴□η implementing法令掴□η and法令掴□η enforcing法令掴□η federal法令掴□η
(Pub.法令掴□η Util.法令掴□η Code法令掴□η section法令掴□η 9法令掴□η)法令掴□η added法令掴□η by法令掴□η SB法令掴□η 44).
掴□η An法令掴□η update法令掴□η of法令掴□η GO法令掴□η 112法令掴□η by法令掴□η the法令掴□η Commission法令掴□η sh
Legislature's法令掴□η activity法令掴□η and法令掴□η objectives法令掴□η has法令掴□η been法令掴□η updated法令掴□η
updated法令掴□η GO法令掴□η 112法令掴□η should法令掴□η contain法令掴□η the法令掴□η following法令掴□η language
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Comments.)法令掴□η

Section法令掴□η 10法令掴□η move法令掴□η current法令掴□η content法令掴□η to法令掴□η new法令掴□η
language法令掴□η changing法令掴□η the法令掴□η Natural Gas法令掴□η Pipeline法令掴□η Sa
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102.1.掴□η掴□η The法令掴□η purpose法令掴□η of法令掴□η states法令掴□η law法令掴□η
Natural Gas法令掴□η Pipeline法令掴□η Safety法令掴□η Act法令掴□η of法令掴□η 2011,法令掴□η Pub.法令掴□η
inclusive,法令掴□η and法令掴□η specifies法令掴□η of法令掴□η safety法令掴□η as法令掴□η the法令掴□η top法令掴□η
California法令掴□η law法令掴□η

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ุง□ηB. ุง□η ุง□ηRelationships ุง□η State and ุง□η Federal ุง□ηL

49 웹□ηUp 웹□ηto 웹□ηnow 웹□ηthe 웹□ηCommission 웹□ηhas 웹□ηleaned 웹□ηon 웹□ηfe
adopted 웹□ηby 웹□ηthe 웹□ηPipeline 웹□ηand 웹□ηHazardous 웹□ηMateA 웹□η~~the~~ 웹□η~~the~~
maintenance, 웹□ηincluding 웹□ηdocumentation, 웹□ηtesting, 웹□ηrepairs 웹□ηand 웹□ηn
general 웹□ηthis 웹□ηmay 웹□ηbe 웹□ηappropriate, 웹□ηas since 웹□ηPHMSA 웹□ηhas 웹□η
industry 웹□ηprise 웹□ηthan 웹□ηhas 웹□ηthe 웹□ηCommission, 웹□ηwhich 웹□ηput 웹□η
However 웹□η~~the~~ PHMSA 웹□ηstandards 웹□ηrepresent 웹□ηa 웹□ηnational 웹□ηlowest 풀
for 웹□ηO&M 웹□ηthat 웹□ηmay 웹□ηnot 웹□ηnow 웹□ηbe 웹□ηappropriate 웹□ηfor 웹□η
emphasis 웹□ηon 웹□ηsafety 웹□η~~the~~ 웹□ηwake 웹□ηof 웹□ηs
웹□η An 웹□ηup 웹□η~~the~~ 웹□η2 웹□ηshould 웹□ηretain 웹□ηsince 웹□η~~the~~ 웹□η~~the~~ 웹□η~~the~~
regulations 웹□η~~the~~ 웹□ηin 웹□η49 웹□ηCFR 웹□η191 웹□η~~the~~ 웹□η~~the~~ 웹□η~~the~~ 웹□η~~the~~
rigorous 웹□ηstandards 웹□η~~the~~ 웹□ηappropriate 웹□η~~the~~ 웹□ηCalifornia 웹□η~~the~~ 웹□η~~the~~ 웹□η~~the~~
in 웹□η~~the~~ 웹□η~~the~~ 웹□ηany 웹□ηintrastate 웹□ηpipeline 웹□η~~the~~ 웹□η~~the~~ 웹□η~~the~~ 웹□η~~the~~
include 웹□ηthe 웹□ηfollowing 웹□ηlanguage 웹□ηin 웹□η~~the~~ 웹□ηamended 웹□ηSection 풀

5

adequate 웹□η service 웹□η will 웹□η be 웹□η maintained 웹□η by 웹□η gas 웹□η utility jurisdiction 웹□η of 웹□η the 웹□η commission. 웹□η

.웹□η

웹□η

C. 웹□η 웹□η Workforce 웹□η Adequacy 웹□η Definition 웹□η in 웹□η Section 웹□η

웹□η The 웹□η Legislature 웹□η has 웹□η directed 웹□η gas 웹□η utility's 웹□η implementation 웹□η of 웹□η safety 웹□η and 웹□η health 웹□η standards 웹□η gas 웹□η regulation 웹□η will 웹□η the 웹□η policy 웹□η established 웹□η in 웹□η paragraph 웹□η (3) 웹□η of 웹□η California 웹□η Division 웹□η ... 웹□η an 웹□η adequately 웹□η sized, 웹□η qualified 웹□η and 웹□η appropriate 웹□η trained 웹□η carry 웹□η out 웹□η required 웹□η public 웹□η Util. 웹□η Code 웹□η section 웹□η 961(d)(10) 웹□η 웹□η undersized, 웹□η untrained, 웹□η unqualified 웹□η or 웹□η carries 웹□η safety 웹□η procedures 웹□η to 웹□η unfulfilled, 웹□η or 웹□η inadequately 웹□η executed. 웹□η 웹□η 웹□η The 웹□η Commission 웹□η employ 웹□η workforces 웹□η sized 웹□η and 웹□η skilled 웹□η to 웹□η meet 웹□η their 웹□η safety-related 웹□η policies 웹□η and 웹□η procedures 웹□η that 웹□η provide 웹□η the 웹□η public 웹□η and 웹□η make 웹□η safety 웹□η explicit 웹□η

웹□η The 웹□η Commission 웹□η has 웹□η committed 웹□η to 웹□η making 웹□η passing 웹□η rule 웹□η R.11-02-019. 웹□η 웹□η 01 웹□η 13e 웹□η Southern 웹□η California 웹□η Gas 웹□η General decision, 웹□η the 웹□η Commission 웹□η found 웹□η that:

236. 웹□η Pub. 웹□η Util. 웹□η Code 웹□η § 웹□η 961 웹□η requires 웹□η a 웹□η gas 웹□η and 웹□η reliable 웹□η operation 웹□η of 웹□η corporation 웹□η to 웹□η carry 웹□η plan 웹□η updates 웹□η are 웹□η to 웹□η include 웹□η information 웹□η about 웹□η "an 웹□η adequately 웹□η trained 웹□η gas 웹□η corporation 웹□η workforce 웹□η to 웹□η carry 웹□η

237. 웹□η Since 웹□η is 웹□η addressing 웹□η the 웹□η workforce 웹□η issues 웹□η Pub. 웹□η Util. 웹□η Code 웹□η § 웹□η 961, 웹□η we 웹□η refrain 웹□η from 웹□η deciding 웹□η adequate 웹□η size 웹□η of 웹□η SDG&E's 웹□η gas 웹□η workforce 웹□η should 웹□η be 웹□η

D.13-05-010, 웹□η Findings 웹□η of 웹□η Fact 웹□η 2 웹□η and 웹□η 237, 웪□η page 웪□η
웹□η UWUA 웪□η proposes 웪□η to 웪□η define 웪□η the 웪□η term 웪□η "adequate" 웪□η with
the 웪□η purpose 웪□η to 웪□η meet 웪□η the 웪□η Commission's 웪□η standards 웪□η and 웪□η to 웪□η
according 웪□η to 웪□η their 웪□η own 웪□η term 웪□η and 웪□η on 웪□η a 웪□η timely 웪□η
웹□η

Section 웹□η 1 웹□η

웹□η

(h) Adequate Workforce 웹□η 웪□η purposes 웪□η of 웪□η implementing 웪□η Pub. 웪□η

section 웹□η961(d)(10) 웹□ηand 웹□ηfor 웹□ηemployees who are trained to perform their job in a safe and reliable manner. 웹□ηtrained 웹□ηqualified workers 웹□ηnecessary 웹□ηto 웹□ηcarry 웹□ηout 웹□ηthe
these 웹□ηrules 웹□ηand 웹□ηset forth in the utility's 웹□ηadopted 웹□ηsafe
maintenance 웹□ηprocedures 웹□ηaccording to 웹□ηtheir 웹□ηown
order. 웹□ηprotection of the 웹□ηsafety, 웹□ηhealth, 웹□ηcomfort, 웹□ηand 웹□ηconvenience
employees 웹□ηand 웹□ηthe general public.

웹□η

This 웹□ηis, 웹□ηfirst, 웹□ηa 웹□ηquantitative 웹□ηstandard 웹□ηthat 웹□ηwill 웹□ηprevail
their 웹□ηown 웹□ηefforts 웹□ηto 웹□ηmeet 웹□ηthe 웹□ηCommission's 웹□ηand 웹□ηthe
adequate 웹□ηsafe, 웹□ηreliable 웹□ηservice 웹□ηdelivered 웹□ηon 웹□ηa 웹□ηtimely 웹□η
employing 웹□ηenough 웹□ηregular 웹□ηemployees 웹□ηthat 웹□ηactually 웹□ηdo 웹□ηthe
웹□ηA 웹□ηseparate 웹□ηissue 웹□ηis 웹□ηthe 웹□ηrelated 웹□ηquestions 웹□ηof 웹□η
regulations, 웹□ηwhich 웹□ηare 웹□ηin GO 웹□η112 웹□ηstandard, 웹□ηrequire 웹□η
“qualification” 웹□ηprogram,” 웹□ηthat 웹□ηpermits 웹□ηotherwise 웹□ηunqualified 웹□η
covered 웹□ηtasks 웹□ηif 웹□η“directed” 웹□ηand 웹□ηobserved 웹□ηby 웹□ηan 웹□ηind.
805(c)¹¹ 웹□ηThe 웹□ηUWUA 웹□ηproposes to make one change to the rule to reflect the work
performed 웹□ηby 웹□ηa 웹□ηqualified 웹□ηemployee, 웹□ηnot 웹□ηan 웹□ηunqualified
someone 웹□η.

D. Publishing Current GO 112 Next GO on the Commission's Website
The Commission recommends that the Commission's website be updated in a timely manner after the issuance of a decision adding, deleting, or amending an order. The Commission will update the website within 15 days of any order that comes into effect.

104.3 웹□η 웹□η Timely Update of the Commission's Website

The Commission shall update the text of the General Order within 15 days after the issuance of a decision adding, deleting, or amending an order. The Commission will update the website within 15 days of any order that comes into effect.

¹¹ 웹□η PHMSA 웹□ηdefines 웹□ηa 웹□ηperson 웹□ηas 웹□η“qualified” 웹□ηif 웹□ηthe 웹□η
“perform” 웹□ηassigned 웹□ηcovered 웹□ηtasks. 웹□ηGeneral Order 1049 웹□ηcan be found at 웹□η
does 웹□ηnot 웹□ηrequire 웹□ηany 웹□ηexperience 웹□ηor 웹□ηdemonstrates 웹□ηqualifications or
lead 웹□ηto 웹□ηa 웹□ηscenario. 웹□ηin 웹□ηwhich 웹□ηan 웹□ηinexperienced 웹□ηsupervisor
“observe” 웹□ηan 웹□ηunqualified 웹□ηemployee. 웹□ηEmployee 웹□ηand 웹□ηgive
directions, 웹□ηand 웹□ηcomply with 웹□ηthe PHMSA 웹□ηstandard. 웹□η 웹□η
웹□η

웹□η

III. 웹□η 웹□η Summary 웹□η of 웹□η UWUA 웹□η Recommendations

웹□η

웹□η UWUA 웹□η made 웹□η a 웹□η number of revisions 웹□η new sections 웹□η revisions 웹□η of existing 웹□η sections 웹□η GO 웹□η 112. 웹□η 웹□η They 웹□η

웹□η

(1) 웹□η Relation to Federal Law

웹□η

101.2. 웹□η 웹□η 웹□η These rules are adopted in addition to regulations, specifically Title 49 CFR Regulation 191, 192, 193 and 199, which also govern its Operation, and Maintenance of gas pipelines facilities gas pipeline in California. These are the federal pipeline safety regulations but are subject to regulations, except that specific standards or requirements more stringent than a federal standard applicable to facilities or transportation declared to be compatible standard and will control, pursuant to Pub. Util. 970, and section 49 USC section 60104(c).

웹□η

(2) 웹□η Purpose of Rules to Implement State

웹□η

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

웹□η

(3) 웹□η Timely Update on Commission Website

웹□η

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

웹□η

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

웹□η

(4) 웹□η Adequate Workforce definition

웹□η

(h) **Adequate Workforce** includes purposes of implementation section Pub. section 961(d)(10) and for whom to carry out their terms according to the utility's adopted maintenance procedures according to their terms.

order 웹□η promote 웹□η the 웹□η safety, 웹□η health, 웹□η comfort, 웹□η and 웹□η employees 웹□η and 웹□η the 웹□η public.

웹□η

웹□η

(5) 웹□η Near Miss Events 웹□η 122.2 웹□η Near Miss 웹□η Events 웹□η in 웹□η Incident 웹□η

122.2 웹□η Requirements 웹□η for 웹□η Reporting 웹□η to 웹□η the 웹□η CFI

(a) 웹□η the 웹□η operator 웹□η shall 웹□η report 웹□η incidents 웹□η following 웹□η criteria 웹□η

웹□η

웹□η Near Miss Events 웹□η

웹□η iii. 웹□η An 웹□η incident which is near, 웹□η that 웹□η event is significant 웹□η i 웹□η judgment 웹□η even though 웹□η it 웹□η did 웹□η not 웹□η 웹□η Sections 웹□η 122.2(a) 웹□η or 웹□η the 웹□η above

웹□η

(6) 웹□η Near Miss Events 웹□η 123.2 웹□η Near Miss 웹□η Events 웹□η in 웹□η the 웹□η

웹□η 123.2. 웹□η

웹□η ... 웹□η

웹□η

(i) 웹□η 웹□η A 웹□η compilation 웹□η of 웹□η near miss 웹□η events 웹□η as 웹□η by 웹□η the 웹□η Operator 웹□η to 웹□η be 웹□η significant 웹□η or 웹□η predictive 웹□η 웹□η

(7) 웹□η Leak Classification 웹□η and 웹□η Actions

웹□η

143.2 웹□η Leak 웹□η classification 웹□η and 웹□η action definition criteria 웹□η

leak 웹□η response

웹□η

(a) 웹□η A 웹□η "Grade 1 leak" 웹□η which is likely to involve immediate danger to persons 웹□η or 웹□η property 웹□η and 웹□η which may lead to fire, 웹□η or 웹□η action 웹□η until 웹□η the 웹□η conditions 웹□η are no longer 웹□η hazardous.

(1) 웹□η Prompt 웹□η action 웹□η in 웹□η response to leak 웹□η may include the following: 웹□η

(i) 웹□η Implementation 웹□η of the company's emergency plan (ER) 웹□η § 웹□η 19(2)(b);

(ii) 웹□η Evacuating 웹□η the premises;

(iii) 웹□η Blocking 웹□η an area;

(iv) 웹□η Rerouting traffic;

(v) 웹□η Eliminating 웹□η sources of ignition;

(vi) 웹□η Venting 웹□η area;

(vii) 웹□η Stopping 웹□η the flow of gas 웹□η by closing 웹□η valves 웹□η

웹□η

23

(viii) 웹□η Notifying 웹□η preparing for dependent upon
웹□η

(2) 웹□η Examples 웹□η of 웹□η Grade Report □η In the report, the equations include, 웹□η are 웹□η defined 웹□η for

(i) 웬□ηAny 웬□ηleak, 웬□ηwhich 웬□η~~main~~^{the} judgment 웬□ηperson 웬□ηthat 웬□ηis 웬□ηregarded 웬□ηas 웬□ηan 웬□ηimmediate 웬□ηhazard;

(ii) 웹□η Escaping^{going} 웹□η that 웹□η has 웹□η ignited^{blown} 웹□η unintentionally;

(iii) 웹□ηAny 웹□ηindication 웹□ηof 웹□ηgas 웹□ηthat 웹□ηhas 웹□ηmigrated 웹□ηinto 푸 or 웹□ηtun 푸

(iv) 웬□ηAny 웬□ηreading 웬□ηat 웬□ηthe 웬□ηoutside 웬□ηthe 웬□ηwall 웬□ηof 웬□ηa 웬□ηbuilding;

(vi) 웬□ηAny 웬□η~~any~~ *small structures* 웬□ηnot 웬□ηassociated with files. 웬□η~~any~~ *small structures* 웬□ηcould

migrate 웹□ηto 웹□ηthe 웹□ηoutside 웹□ηwall 웹□ηof 웹□ηa 웹□ηbuilding;
"vii. 웹□η 웹□ηAny 웹□ηleak 웹□ηin 웹□ηan 웹□ηenclosed 웹□ηspace 웹□ηwhere 웹□η

viii. 펌□η 펌□ηAny 펌□ηleak 펌□ηin 펌□ηsimilarity 펌□ηlike 펌□ηripit 펌□ηloop 펌□ηbuild 펌□ηu

(ix) 웹□ηAny 웹□ηle~~Qualified Person~~ by the~~anyone~~ judgment 웹□ηjudgment 웹□ηqualified 웹□ηOperator 웹□ηpersons 웹□ηthat 웹□ηmay 웹□ηendanger 웹□ηthe 웹□η

or 웹 □η propriety
웹 □η

(b) 웹□ηA 웹□η "Grade 웹□η2 웹□ηleak" 웹□ηis 웹□ηa 웹□ηleak 웹□ηth 웹□ηis 웹□ηre time 웹□ηof 웹□η ~~the~~ ~~in the~~ 웹□ηjudgment 웹□ηof 웹□ηqualified 웹□ηoperator 웹□ηnot 웹□ηscheduled 웹□ηrepair 웹□ηbased 웹□ηfor the reason that 웹□ηoperator 웹□ηa hazard.

(1) 웬□ηExcept 웬□ηas 웬□ηrequired 웬□ηby Each 웬□ηoperator 웬□ηrepair 웬□ηGrade 웬□η2 웬□ηleaks 웬□ηwithin 웬□ηone 웬□ηmonth 웬□ηand 웬□ηPeak 웬□ηGrade 웬□ηleak 웬□ηoccurs 웬□ηin 웬□ηa 웬□ηsegment 웬□ηof 웬□ηtime 웬□ηthree 웬□ηdays 웬□ηadditional 웬□ηsix 웬□ηmonths 웬□ηplay 웬□ηthe 웬□ηadvised 웬□ηmaximum 웬□ηtime 웬□ηprovided 웬□ηabove 웬□ηuniting 웬□ηthe 웬□ηrepair 웬□ηand 웬□ηfit 웬□ηOperator 웬□ηmust 웬□ηfollowing 웬□ηalia: 웬□η

(i) 웬□ηAmount 웬□ηand 웬□ηMigration 웬□ηof 웬□ηgas;

(ii) 웹□ηProximity웹□ηof웹□ηgas웹□ηto웹□ηbuilding웹□ηand웹□ηsubsurface웹□ηs
(iii) 웹□ηExtent웹□ηof웹□ηpavement;웹□ηand

(iv) 土壤类型和条件, Soil type and conditions,

(2) `Each` `operator` must `reevaluate` `Grad` `2` `leaks`

six 웹□ηmonths~~the~~ 웹□ηpermanently 웹□ηrepaired. The 웹□ηfrequency 웹□ηof 웹□ηreeval
should 웹□ηbe determined 웹□ηby 웹□ηthe 웹□ηlocation 웹□ηand 웹□ηmagnit 웹□ηof 웹□ηr

(3) When Grade 2 hazard is evaluated by the criteria, when new project

five 웨□ηworking 웨□ηdays. 웨□ηOther 웨□ηGrade 웨□ηoperator 웨□ηmust 웨□ηbring 웨□ηthese 웨□ηindividual 웨□ηre

for 웹□η scheduling 웹□η leakages 웹□η repairing 웹□η the 웹□η working 웹□η day. 웹□η because 웹□η of 웹□η the 웹□η magnitude, 웹□η can 웹□η be 웹□η scheduled 웹□η for 웹□η routine 웹□η basis 웹□η with periodic 웹□η reevaluation 웹□η has 웹□η nece

(4) 웹□η When 웹□η evaluating 웹□η ground 웹□η leaks 웹□η requiring 웹□η leaks 웹□η action 웹□η ahead 웹□η of 웹□η ground 웹□η freezing 웹□η potential 웹□η hazard 웹□η any 웹□η leak 웹□η that 웹□η could 웹□η potentially 웹□η migrate 웹□η building, 웹□η frozen 웹□η or 웹□η other 웹□η adverse 웹□η soil 웹□η conditions.

(5) 웹□η Examples 웹□η of 웹□η Grade 웹□η 2 웹□η marks 웹□η indicating 웹□η potential 웹□η hazard 웹□η not 웹□η limit 웹□η to:

(i) 웹□η Any 웹□η 15% LEL gas in the area near the wall 웹□η LEL 웹□η or 웹□η great sidewalk 웹□η paved wall 웹□η paved wall 웹□η not 웹□η qualify 웹□η as 웹□η a 웹□η where 웹□η gas 웹□η could 웹□η potentially 웹□η migrate 웹□η to 웹□η the 웹□η outside 웹□η

(ii) 웹□η Any 웹□η reading 웹□η of 웹□η one 웹□η hundred 웹□η meters 웹□η from 웹□η the 웹□η wall 웹□η paved 웹□η area 웹□η that 웹□η does 웹□η not 웹□η qualify 웹□η gas 웹□η place 웹□η potentially 웹□η migrate 웹□η to 웹□η the 웹□η outside 웹□η wall 웹□η of

(iii) 웹□η Any 웹□η reading 10% gas in the area near the wall 웹□η in 웹□η its substructures 웹□η associated 웹□η with 웹□η gas 웹□η facilities 웹□η and 웹□η where 웹□η migrate 웹□η creating 웹□η pure 웹□η hazard;

(iv) 웹□η Any 웹□η reading 웹□η between 웹□η twenty 웹□η percent 웹□η LEL 웹□η and 웹□η LEL 웹□η in 웹□η an 웹□η end posed 웹□η space;

(v) 웹□η Any 웹□η reading 웹□η more than one meter from the wall 웹□η specified 웹□η height 웹□η yield 웹□η strength 웹□η or 웹□η greater 웹□η than 웹□η one meter from the wall 웹□η as 웹□η leak; 웹□η

(vi) 웹□η Any 웹□η leak 웹□η that 웹□η modified the area, regarding the operator in the area near the wall 웹□η the scene 웹□η is 웹□η of 웹□η sufficient 웹□η magnitude 웹□η justifies 웹□η scheduled 웹□η

(c) 웹□η A 웹□η "Grade 3" 웹□η leak" 웹□η is 웹□η a 웹□η leak 웹□η that 웹□η is 웹□η de

reasonably 웹□η be 웹□η expected 웹□η to 웹□η repair 웹□η not 웹□η hazardous.

(1) 웹□η Each 웹□η Operator 웹□η must 웹□η have 웹□η leaks 웹□η due to 웹□η the 웹□η or 웹□η within 웹□η fifteen 웹□η months 웹□η of 웹□η the 웹□η lifting 웹□η date, 웹□η the 웹□η leak 웹□η must 웹□η be 웹□η repaired 웹□η every 웹□η year 웹□η is 웹□η regraded results 웹□η in 웹□η reading.

(2) 웹□η Examples 웹□η of 웹□η Grade 3 웹□η leaks 웹□η requiring 웹□η reevaluation 웹□η include, 웹□η but 웹□η are 웹□η limited 웹□η to:

(i) 웹□η Any 웹□η reading 웹□η high pressure gas leak 웹□η such 웹□η as 웹□η small 웹□η meter 웹□η valve or 웹□η gas 웹□η valve

(ii) 웹□η Any 웹□η reading 웹□η underground gas leak 웹□η it 웹□η is 웹□η unlikely 웹□η the 웹□η gas 웹□η could 웹□η migrate 웹□η together with the 웹□η outside 웹□η wall

(d) 웹□η Grade 1 웹□η and 웹□η Grade 2 웹□η leaks 웹□η physical repair. 웹□η After 웹□η a 웹□η leak 웹□η has 웹□η been 웹□η downgrad reevaluated 웹□η within 웹□η 15 웹□η months 웹□η and 웹□η repaired 웹□η within 웹□η 21 웹□η

(e) 웹□η All 웹□η underground 웹□η leaks 웹□η on 웹□η transmission 웹□η lines 웹□η classifi subcategories 웹□η of 웹□η grades 웹□η an 웹□η operator 웹□η may 웹□η nest 웹□η 웹□η betw be 웹□η repaired 웹□η by 웹□η the 웹□η Operator 웹□η either 웹□η upon 웹□η discovery 웹□η discovery. 웹□η

memberId

(8) 웹포털LeakshatLeakshandLeakers

翫□n

143.3. 펌□n 펌□n Leaks 펌□nat 펌□meters 펌□n and 펌□n risers

чив

(a) ~~the~~ leak ~~was~~ not repaired ~~on~~ the ~~operator~~ ~~shall~~ be ~~cor~~
~~repaired~~ ~~on~~ ~~the~~ ~~day~~ ~~the~~ ~~operator~~ ~~performed~~ repair ~~per~~
~~performed~~ by ~~a~~ qualified ~~employee~~ ~~of~~ the ~~operator~~.

(b) 편집자나 operator는 shall을 include하는 reports를 작성할 때는 required로 by를 사용해야 한다. 예시는 123.2.

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(9) 𠮶𠵼口n 𠮶𠵼𠮶𠵼n valves

143.4 펌▶n 펌▶n Valve 펌▶n Maintenance

懈 n

(a) 웹□η 웹□η Each 웹□η operator 웹□η will 웹□η make 웹□η an 웹□η inventory 웹□η a 웹□η description 웹□η location, 웹□η type, 웹□η size, 웹□η number 웹□η turn and 웹□η criticality.

(b) 편□η 편□η each, 편□η the 편□η use 편□η of 편□η which 편□η may 편□η be 편□η ne transmission 편□η or 편□η control system, 편□η must 편□η annually 편□η inspected 편□η lubricated 편□η (where 편□η required) 편□η and 편□η left 편□η fully 편□η operational 편□η inspection. 편□η 편□η “Fully 편□η operational 편□η operator 편□η can 편□η easily and 편□η close 편□η the 편□η valve 편□η

(c) 웬디는 The report에 respect the valve를 include: 웬디가 웬디는 the valve를 has found at the beginning of the maintenance procedures. 웬디는 that the site; 웬디는 and 웬디는 condition at the conclusion of the inspection.

(d) 웹□η 웬□η The 웹□η operator 웬□η will 웬□η ensure 웬□η that 웬□η each 웬□η insp equipment 웬□η to 웬□η lubricate 웬□η and 웬□η operate 웬□η the 웬□η 웬□η valve 웬□η at

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(10) **점수와 평가기준** (Score and Evaluation Criteria)

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143.5. 짐마크□ηof 짐□ηs 템마크□ηMarks

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Each utility shall provide sign permanent along its transmission and distribute few right that marks are both directions from main road the right

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CONCLUSION웹□η

웹□η

For 웹□η the 웹□η foregoing 웹□η reasons 웹□η UWUA 웹□η requests 웹□η that 웹□η the 웹□η

(1) 웹□η modify 웹□η the 웹□η Proposed 웹□η Decision 웹□η of 웹□η ALJ 웹□η Bushey 웹□η as 웹□η

(2) 웹□η improve 웹□η the 웹□η Proposed 웹□η decision 웹□η as 웹□η modified.

웹□η

웹□η

Respectfully 웹□η submit 웹□η

웹□η

/s/ 웹□η 웹□η 웹□η 웹□η 웹□η 웹□η 웹□η 웹□η /s/ 웹□η

Carl 웹□η Almond 웹□η 웹□η 웹□η 웹□η 웹□η William 웹□η 웹□η

Regulatory 웹□η Affairs 웹□η 웹□η 웹□η 웹□η 43556 웹□η Almond 웹□η Lane 웹□η

Utility 웹□η Workers 웹□η Union 웹□η 웹□η 웹□η Davis 웹□η CA 웹□η 웹□η 95618

2021 웹□η S. 웹□η Neumann 웹□η 웹□η 웹□η 웹□η Phone: 웹□η 웹□η (631) 웹□η 219

Oceanside 웹□η 905 웹□η 웹□η 웹□η 웹□η 웹□η E-mail: 웹□η 웹□η billjulian@sbglobal.net

Phone: 웹□η (951) 웹□η 2567

E-mail: 웹□η julian@uwua.net 웹□η

웹□η

웹□η

September 웹□η 26, 웹□η 2013

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