

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's
Own Motion to Adopt New Safety and Reliability
Regulations for Natural Gas Transmission and
Distribution Pipelines and Related Ratemaking
Mechanisms

R.11-02-019

**OPENING COMMENTS OF THE
COALITION OF CALIFORNIA UTILITY EMPLOYEES ON
SED'S PROPOSED REVISIONS TO GENERAL ORDER 112-E**

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Pursuant to the Administrative Law Judge's Ruling Setting Schedule for Filing Comment on Proposed Rule Changes to General Order 112 ("Ruling") issued on July 8, 2014, the Coalition of California Utility Employees submits these Opening Comments on the Safety and Enforcement Division's ("SED") proposed revisions to General Order 112-E.

The Coalition of California Utility Employees (CUE) is a coalition of unions whose members work at electric and natural gas utilities in California. These unions include the International Brotherhood of Electrical Workers, Local 1245, which has 12,000 members who work on both natural gas and electricity systems at PG&E. CUE offers these comments from the perspective of employees who have worked on PG&E's gas systems for many decades. CUE appreciates the opportunity to comment on SED's proposals.

I. INTRODUCTION

CUE offered comments on SED's Proposed Rule Changes to General Order 112-E on September 27, 2013, pursuant to the Amended Scoping Memo issued on May 2, 2013. This Ruling introduces two new proposed rules to the previously presented revisions to GO 112-E, however, CUE does not comment on the new proposed rules. CUE will repeat its previous comments on Proposed Rule Changes to GO 112-E because even though SED did not respond to them after the first round of comments, they are valid and important inclusions for GO 112-E.

II. GAS SAFETY PLANS SHOULD REQUIRE ANNUAL DRILLS

California will surely have major earthquakes and other natural disasters at some times in the future. Large gas lines will rupture. Distribution lines will have thousands of leaks. These disasters will likely cut off many critical field personnel from communication any centralized command center, yet they will have to respond to protect public safety.

SB 705, as codified in Public Utilities Code Section 961(d)(8) anticipates this inevitability, and requires the Gas Safety Plan to “[p]repare for, or minimize damage from, and respond to, earthquakes and other major events.”¹ Similarly, PHMSA, at 49 CFR 192.615, mandates that Operators “[t]rain the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is

¹ Pub. Util. Code § 961(d)(8).

effective.”² Despite the inevitability of major disasters and the requirements to prepare, amazingly, there is no current requirement that gas utilities conduct actual drills so that field personnel can practice their response. The Commission should fill this obvious gap by requiring gas utilities to conduct an annual drill.

This is not a novel concept. For electric system safety, General Order No. 166 requires each electric utility to prepare an emergency response plan, and conduct annual emergency and training exercises using the utilities’ emergency response plan.³ Safety of the natural gas system requires no less. While some gas Operators already perform annual exercises, the Commission should require these drills as it does for the electric utilities.

CUE recommends the following addition to 123(k):

(k) Gas Safety Plan

1. Each Operator must submit a Gas Safety Plan, as codified by Pub. Util. Code §§ 961 and 963, and as ordered by the Commission in D.12-04-010.
2. Each Operator must make any modifications to its Gas Safety Plan identified by the Commission’s Safety and Enforcement Division, or its successor.
3. Each Operator must conduct annual emergency training and exercises using the procedures set forth in the utility’s Gas Safety Plan.
 - a) The utility shall conduct an exercise annually using the procedures set forth in the utility’s Gas Safety Plan.

² PHMSA, 49 CFR 192.615(b)(2).

³ General Order No. 166, Standards 1 and 3.

- b) The utility shall annually train designated personnel in preparation for emergencies and major outages. The training shall be designed to overcome problems identified in the evaluations of responses to a major outage or exercises and shall reflect relevant changes to the plan.

III. FACILITY RECORDS MUST BE AVAILABLE TO FIELD TECHNICIANS

Section 145 of the SED proposal addresses Operator recordkeeping.

Those records designated in Section 145 must be available to each field technician. CUE understands that amassing 75 years of data is onerous and time-intensive. However, those records provide invaluable safety information to the Operators' employees. For example, a technician may respond to a call and the data found in the database may indicate there are repeated leak problems in the area. This knowledge is essential for protecting the safety of the employee and the residents of the area. In 2014, there is no good reason why complete information is not available electronically, and in one place, for the employees in the field. PHMSA, at 49 CFR 192.605, already requires "[m]aking construction records, maps, and operating history available to appropriate operating personnel."⁴ The Commission should require this information be available electronically to employees in the field.

CUE recommends the following addition to Section 145:

145.2 Each Operator shall make the records from Section 145.1 available to operating personnel and field technicians. These records should be made available in each service vehicle.

⁴ PHMSA, 49 CFR 192.605(b)(3).

VI. CONCLUSION

We thank ALJ Bushey and the SED for giving us the opportunity to comment on the Proposed Rule Changes to General Order 112-E, and ask the Commission to adopt CUE's proposed changes.

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Respectfully submitted,

/s/

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