

BEFORE THE

PUBLIC UTILITIES COMMISSION OF CALIFORNIA

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

Comments of Utility Workers Union (UWU) On the

Ruling of the AUCB of July 8, 2014

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Comments of Utility Workers Union (UWUA)
On the

Proposed Decision of ALJ Bushey issued July

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Introduction

It is nearly 70 years since a defective gas pipeline neighborhood in San Jose. Since then the Legislature and undertaken a effort to transform the safety and culture of transport and delivery, shift from a reactive "culture of proactive" culture of care. As stated in its initial order in this proceeding:

"We must ensure that our gas utilities recognize it is not enough. Safe pipeline operations must begin management and the culture it creates in the work crews of the utility operators demonstrate a and workplace culture that places safety as their (emphasis added)

The current effort to the General's basic gas operations sets the Commission's opportunity to their forward-looking for Bruno's of the and safety culture changes sought by the California's policy

Report of the Independent Report on the Page 9. "to a regulatory model based on performance and effectiveness mindset of the entire agency and will require courage and Report of the volume 2, page 2. "The expenditures for projects authorized in rates are the driving forces affecting investment and maintenance program of the gas pipeline operations. may nor may not be running a safe system. Rather, only regulation leads to an overall approach of the (emphasis added)

2. In 1991 at page 8; 5-15-93 (see also in 9, 2010) the Section in our commitment to improve the safety of natural gas in this context, it is absolutely essential that our regulated utility candor and honesty in our Constitutional and statutory duties, forthright and timely explanations of the issues, as well as advantages and disadvantages of (emphasis added)

The proposed changes to the GQ in August 2013. Cost stakeholders including the UUA in September 2013. Proposed Decision (hereafter, the Ruling), which has direct effect. Appendix A rates a consider response to all of the Comments and is the result made of safety performance. It supports the Ruling and many of the Ruling which has adopted in concept several of UUA's robust operation and maintenance procedures. The Ruling's 2014 comments will focus on the RC Operation and Maintenance for Transmission and Distribution. The Ruling's 112, Section 123). The Ruling's miscellaneous issues that will be adopted General Order and assist the Commission in its safety program. The Ruling's suggestions for UUA's revisions to the Ruling.

I. Operation and Maintenance Performance and Reporting

A. Leak Classification, Repair, and Section 143

Leaks and the operator's approach to preventing and among the defining characteristics of a gas pipeline transport and the issue for the UUA approach to assuring system performance. Every category of the system performance listed in document Managing System Integrity of the American Society of Mechanical Engineers (ASME) ASME B31.85, measured part by leak severity and any other

³ UUA's Comments dated 2013 Sept (the UUA's 25 September Comments) addressed the August 2013 Staff proposal in a comprehensive responsive to a number of UUA's concerns. UUA will here in summary fashion an effort to address operational issues, and refers the Commission to the September Comments for additional commentary.

⁴ This document is incorporated by reference as defining in its regulations. See generally 49 CFR 192.945

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

Currently, 112 notices specifically addressed, including limited leak surveys (143.1) and a requirement not expressly stated in that the (operator) in the aggregate repaired and leaks pending repair during calendar year as a component of its annual report and 49 CFR sections 191.101 and PHMSA's annual The Leaking addresses these deficiencies in a strong beginning with a change to takes the leak that it applies transmission and distribution. It represents a starting point step forward that UWUA generally supports, with several for constructive improvement that will make an effective regime.

1. Leak Detection System (Section 143.1 as amended)
 The foundation for a leak reduction strategy is prompt permanent repair. Weak spots that are out-of-way patrol and a more detailed leak survey using Patrol involves primarily visual inspection and report for odor, ground or soil discoloration or disturbances, dead

incorporating the four general messages Chapter ASM and the of threat in Table 9 and Appendix A.
 5. ASM Table 9 page 30.

other conditions indicating that the facilities have been unreported incursions in the the waiver bill (potential). The bill proposes to extend the basic including section of leak detection devices, both transmission and distribution, to adopt an aggressive, shortened interval for leak detection surveys (Section 143.1(b) establishing a twice yearly interval that not exceed 12 months). UWUA supports this proposal as respects to the needs of the current infrastructure in the UWUA on the Southern California gas system there are pipelines for distribution, and operated and maintained by the distributor carry gas at very high pressures (in excess of 200 UWUA suggests that the transmission leak detection regime to the existing distribution facilities is appropriate

2. Leak Classification and Action Criteria (Section Reducing leaks and emissions from leaks is at the and delivery industry's safety challenge. UWUA has for comprehensive leak reduction strategy developed though a process in which all knowledgeable parties participate, including That process is transparent, participatory, and it has not happened. However, the CPUC staff UWUA August 2013 have made proposals that are comprehensive to focus on make progress in avoiding, reducing and repairing the August 2013 staff (August proposal), finding in part on a regression of current utility practices.

The bill is on of a significant improvement, which can support with clarification and would make it avoiding, reducing, repairing and As a practical matter should result in repair of most leaks, and a significant

upgrading of the procedure for the status of not completely repaired at the time of discovery.

The virtues of the proposed rule include:

- Improved patrol and leak survey procedures and show
- Continuous evaluation of leaks, with the definition of permanent 21 months (twelve months for underground transmission
- Repair as a priority response for Grade 1 leaks;
- Limitation on regrades of distribution and transmission

The weaknesses of the rule should be corrected:

- More thorough consideration of valves;
- Clarification of the relationship between the “prompt action” including addressing leaks at risers;
- Language and concept clarifications that will help the more smooth

Section 143.

Proposed section 143.2. The proposed classification and accident standards for leaks. It establishes a more decreasing severe risk and decreasing urgency of response, to grade 1

Grade 1 Leaks

Grade leaks shall be repaired by an existing or probable persons or property action, immediate repair or action until the conditions are removed.

143.2(a) By specifically repaired as a treatment for a Grade makes a significant improvement August 1, 2013

The PD proposes a new treatment alternative or supplement in immediate for Grade 1 leaks. 143.2(a)(1) “prompt action” as described in both large (rerouting traffic evacuation of premises) and small area (vandalism) at

were included in Staff Prompts that Prompt actions that immediate repair reduce hazard in preparation for appropriate UWUA does not understand the PD to strike for immediate repair

In this regard, paragraph (a)(2) describes an inclusive list of examples of Grade 1 leak scenarios “requiring prompt clarification by adding “repair” to the actions required, so that repair is a component of the beginning of 143.2(a)(2) should Example Grade 1 immediate repair and/or prompt action include, but not

One of the Rule’s lack of classification and action regime it provides flexibility in the field. 2(a)(2) provides operators examples of Grade 1 leaks identified by a series of two (numbers (i) and (vii)) and give judgment to qualified personnel. Five rule objective conditions.

- “(i) Any leak, which in the judgment of the scene, is regarded as an immediate hazard;
- (ii) Escaping gas that has ignited unintentionally;
- (iii) Any indication of gas that has been integrated into or attached;
- (iv) Any reading at the outside wall of a building could potentially migrate to the inside wall of;
- (v) Any reading of eighty percent of the gas’ (LEL) or greater in the enclosed space
- (vi) Any reading of eighty percent of LEL or substructures not associated with gas facilities where potentially migrate to the outside wall of a building
- (vii) Any leak that can be seen, heard, or felt location that may endanger the general public or

The subjective judgments called for items (i) and qualified personnel within the meaning of the rule and MSA

6 The rule provides in part:

Qualified means that an individual has been evaluated an

143.2(a)(2)(i) and (vii) shall include the following: (i) the qualified operator personnel that is regarded as an immediate hazard;... and (vii) any leak that can be detected by the qualified operator personnel which in the public or specifying the requirements of the qualification controversy and conflict of interest decisions and this suggestion applies to Grade 2 leaks. Examples of Grade 2 leaks requiring action include... (vi) Any leak that in the qualified operator personnel at the scene is of sufficient magnitude to justify scheduled

The objective criteria through a clearly straightforward description of scenarios where experience has shown a possibility of UWUA suggests adding to the list other situations that because of the presence of a source of ignition: present along with electrical equipment; any leaks in the conditions conducive to static electric buildup and discarding the following language: Examples of qualified operator personnel "ix."

- vii. Any leak in an enclosed space where
- viii. Any leak in pipe where static electricity may

Items (v) and (vi) gas concentration by volume is lower explosive limit that is not compatible with used in the field by UWUA increases gas concentration directly percentage of gas sample taken. It shall require application conversion formula to WUA suggests providing an alternative

- (a) Part assigned covered tasks; and
- (b) Recognize and react to abnormal operating conditions

concentration metric of 2.7% in the Madison plant to the personnel. This suggestion applies to the examples involving equipment of Grade 2 leaks (as a subsection) 143.

ii. Grade 2 Leaks

Grade 2 leaks are recognized as being the most of detection but justifies scheduled repair based a future "cleaned" Grade 2 leaks must be repaired 15 Ruling proposed section 43.2(b) SUDIN(b) introduces the concept of "clearing" a leak. It is not apparent from repair in that paragraph there been a reference repair." Ruling that is Ruling that is in the Grade 2 leaks through the process of which cleaning could permit continuous churn of leaks for years through a shifting. The Ruling can be clarified stating this purpose by or clear." is UWUA's preferred approach. If the inspection of 112, some simple language may be needed to avoid conf

1. Apply the same concept to that it applies to Grade 2 leaks and Grade 2 leaks can be repaired and then must be repaired in a year. Section 143.2(e) regraded grade 2 leaks should be repaired within six months, adding subsection Section 143.2(b)(5)

2. apply the evaluation process (Section 143.2(b)(2)) 2 leaks repaired

3. Place a limit of 24 months for perm leak after discovery

3. Leaks at Risers

the A risers piping in the service line of the transitions from below ground (to underground and district level pressure (up to 60 psi in the case of an pressures in the risers) to the regulator, which then pressure before it enters a dwelling unit or other before it goes through the meter.

Risers are frequent sources of leaks. For the have considered leaks at risers to (day) repaired for reasons:

- the pressures involved;
- the location on the service line (upstream of the impossible to the stop controlled release of gas;
- proximity to the human habitation;
- the direct exposure of people to the leaking gas;
- the possibility that leaking gas can be used for and

UWUA proposes to (a) of the immediate its General Rate Southern California Gas (SCG) requested and received funding replacing leaky risers.

A leak at the riser should always be considered; classification scheme proposed by the network. However, for above the “prompt action” alternative to immediate The regulation should require repair of UWUA proposes:

Add new Section 4.3 Beaks at Risers

143.3. Leaks at meters and risers

- (a) A leak at the riser shall be completely repaired or repaired within the same day the leak is reported; repair performed by qualified employees of the operator.
- (b) The operator shall include these standards as a part of the required by the operator.

4. Valves and new Section 143.2 Main Maintenance

Valves are a critical component of the gas transmission system. Valves can serve a number of functions including reducing or increasing downstream pressure; redirecting gas flow, etc. The Commission has expressed a particular concern for functions. See SB 216 (2011, Yee) and AB 56 (2011, Hironaka) section 57122 GO currently addresses valves in a manner that a valve is appropriate in a manner. Currently, section 143.2 provides:

143.2 Valve Main Enhance Valve, the use of which for the safe operation of a distribution system, r lubricated (where required) and partially operated at 15 months, but at least once each calendar year.

The limitations in this provision include: (1) not (2) no definition of "necessary for the safe operation" therefore no guidance as to what is covered by the dimensions of the universe of valves covered by the about the outcome of the maintenance procedures; (4) excessively long intervals between maintenance procedures. renumbering the sections poses no change.

UWUA recommended a significantly revised approach bas preventive scheduled maintenance:

143.4 Valve Maintenance

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

Note that the California regulation omits a crucial 192.745(b): (b) Each operator must take the appropriate to correct if found inoperable, unless the operator design safe alternatives not document the operable condition of a valve that has the repair.

(b) Each valve, the use of which may be transmission or distribution system, must be properly lubricated (where required) and maintained at the conclusion of the "operable" means that a crew can easily open and

(c) The report of the inspection must include: found at the beginning of the inspection; maintenance procedures or other activities at the site; and the conclusion of the inspection.

(d) The operator will ensure that each inspection equipment to lubricate and operate in the field of

□

□ UWUA's recommendation poses several improvements, beginning comprehensive valve inventory. □ This enables an objective and prioritizing valves "the use of which may be a system. □ The problem that this addresses is that prioritization may leave many valves needed to address uninspected for years, and potentially inoperable when such as occurred at San Bruno. □ The inventory includes the SED staff and experienced utility employees identifying the valves "necessary for safe operation" and assure that valve maintenance contributes to improving the safety decreasing the risk that an inoperable valve extends: □ Second, UWUA includes transmission and distribution valve inventory. □ PHMSA regulations cover this (49 CFR 192.7 distribution (49 CFR 192.747) valves but apply a different (partially operate for transmission versus "check" for distribution standard would result in an outcome that transmission for distribution valves.

□ Third, UWUA recommends a standard for assessing the inspection and maintenance procedures, the valve meaning that it can be "easily opened and closed" with this maintenance standard, □ UWUA proposes that operation beginning and conclusion of maintenance procedures be documented

□

importance of documenting the condition as found at this location. It may suggest an underlying condition addressed, if deterioration from the condition in which conclusion of the previous maintenance procedure is observed. Fourth, UWUA recommends shortening the interval “valves necessary for the safe operation” from 15-month lengthy inspection interval permits impaired function to a systemic safety risk that should be addressed and maintenance is one engineering function that is dependent on workforce. The workforce adequacy definition proposed by approved authorities have an effective valve maintenance (See below, pages 3-5.)

UWUA notes that in its September Comments it adds a general requirement of training comparable in its new proposed 143.4 a good suggestion UWUA fully supports an improvement over UWUA’s valves. This section should be included in the updated

5. Encroachments and

Encroachments and Marked Modified Signs Section 143.5

The adding adds an important new section on encroachment clear utility of rights and reduce unsuspected dangers to the section can be improved by adding requirements that give any whose activities might encroach actual notice of the proximity. This will make it much easier for adding of adding in the proximity to utility activities trigger adding requires markers “wherever necessary to identify the location of the tra

⁸ adding the Commission accepts UWUA’s proposed new sections 143.4 (Valves) that section should be 3.4 numbered Section

reduce the possibility of rendering inoperative 2107(b) of
proposal of freight marks at the subjectivity in the PHM
providing a mark on the line of signature of the adjacent
mark

B. Improvements to all addressing Section 123.2

1.

1. ASME Reporting Matters

Improved transparency and accountability on operational issues that has been promoted by Commission from the very beginning to San Bernardino. In no area is this system important we know this; we long-term maintenance efforts to reduce leaks. Understanding and reporting the scope of the problem in the first place. The Bulletin in 1966 responded by proposing a new 112 that contains a much more comprehensive and detailed annually the CPUC (CPUC long annual with Report on the Air Pollution UWUA strongly supports the

There are several reasons why and that the Commission include in its decision

- (1) the detailed report of response times for reports proposed in Section 123.2(c)
- (2) the granularity of the report requiring disclosure of terms of the ASME Ruling proposed in Section 3(g)
- (3) reporting the time between report and repair for Ruling proposed in 123.2(b) aggregate report that reveals number of leaks repaired and pending repair does effectiveness of leak repair. This proposal will improve Commission's ability to improve timeliness of leak repair both to the public and the environment;
- (4) reporting certain "near misses" over proposed Section 123.2(d), including items that are not incident reporting procedures in Section 123.2(a) use no damage occurred

⁹ Report of the Independent Regulatory Review (2011); Reform 4.4 and 5.4.4.5, page 75; San Joaquin Water Users' Association v. CPUC, 2011 WL 132019 (April 11, 2011), through 13 responding to Assigned Commissioner Bulletin issued

(5) The requirement of a granular analysis for gas (LAUF) proposed section 12

(6) The requirement proposed section 3.2(e) for procedures to system and the veridical basis for accuracy of documentation and potentially the time it takes to update information for planning and in the field;

(7) Tracking and reporting employees assigned to activities proposed section 123.2(f);

(8) The requirement that utilities include in the annual incident reporting proposed section 123.2(h);

(9) The requirement to track activities classified as contained in ASME B31.4, B31.5, and proposed section 123.2(g);

(10) The requirement to include in the Annual plan as updated.

UWUA suggests that the "Near-miss events" are defined in a new provision of the definition is a significant advance toward the goal of hazards before they cause injury or damage. C.f., 961(d)(1).

"Near-miss events" mean unplanned, undesired events that an operator's facilities or operations but do not result in damage, release of gas, loss of essential gas pipeline facilities, or otherwise a reportable incident, or potential to do so.

Such events can include, but are not limited to:

- (a) A subsurface pipeline facility not marked for purposes;
- (b) Excavation activity near a pipeline without a ticket; Underground Service Area ticket;
- (c) The operation of an incorrect valve or pressure;
- (d) An incorrectly mapped pipeline facility;
- (e) Work activity in which a standard, procedure, or operator was applied but the activity, nevertheless,

creating a situation or condition where a change or occurred.”

□

Tracking and reporting near misses and events and giving Operator discretion to include them in a safety report, the definition of a near miss. It provides an important tool for achieving hazard reduction. EWING suggests that 123.2 include a report of near miss events:

123.2 At the same time copies of the reports submitted, each operator shall submit, in a format the Commission’s Safety and Enforcement Division has following information to demonstrate to the Commission Operator’s efforts towards minimizing the risk from system failures:

□
...□

(1) A compilation of incidents by the Commission by the operator significant or predictive of potential

□

2. Requirements for Misses in Incident Reporting

UWUA notes and descriptions of the near miss events including pressure and pressure events and loss of certain over and pressure events in the incident reporting process Section 122.2(a)(applicable to incident 122.2(a)(6) quarterly Ruling, PRC at page 13.

Near misses are events that can to system credits before they cause injury and/or damage reason, UWUA su, additional near miss incidents in the utility’s discipline the incident report regime as follows:

122.2 Requirements for Reporting to the CPUC

(a) Each operator shall report incidents to the following criteria

□

(i) □

iii. An incident is a near miss if it is a significant in

□

judgment, even though it did not
Sections 121.21(i) or (j), above.

¶

II. Miscellaneous Issues

¶

A. Acknowledging State Legislative Activity

In the session following the Senate Bill 2011, the Legislature added to the Public Utilities Act a comprehensive new Safety Act including the Gas Pipeline Safety Act sections 955 through 970, inclusive. The new chapter is including AB 56, Stats. 2011 Ch. 519 (Hill); SB 44, 216, Stats. 2011 Ch. 52 (Leno), and 2011 Ch. 53 (Pardue). This legislation declares that safety employees is the top priority in operating California's section 96(b) and requires gas utilities and the Commission implement safety standards specified in the subject Code section 96.1. In addition, it formally designates the responsible entity for implementing and enforcing federal (Pub. Util. Code b) and 55 by SB 44).

An update of GO 112 by the Commission should Legislature's activity and objectives as a public utility in the updated GO 112 should contain the following language: Subpart A. ¶ (Please note that this language is two Comments.) ¶

Section 102.1. The purpose of the state is to provide new language defining the Natural Gas Pipeline Safety

¶

102.1. The purpose of the state is to provide inclusive, and the physical safety of California law

¶

¶

Section B. Relationship between State and Federal Law

Up to now the Commission has leaned on federal adopted by the Pipeline and Hazardous Materials Safety 49 CFR Part 191 provide substantive standards for gas pipeline maintenance, including documentation, testing, repairs and maintenance general this may be appropriate, since PHMSA has had industry expertise that Commission which put safety on. However, the PHMSA standards represent a national lowest for O&M that may not now be appropriate for California emphasis on safety in the wake of San Bruno. An Supreme Court 112 should retain deference to PHMSA regulations contained in 49 CFR 191 primarily for that, should rigorous standards be appropriate for California. California is not in this area for pipeline infrastructure transportation Subpart A include the following language in amended Section

101.2. The State shall not adopt or to the federal regulations, specifically Title 49 of the Code of Federal 191, 192, 193 and 199, which also govern the Operation, and Maintenance of Gas and Pipeline Systems gas pipeline facilities in the State of California. These the federal pipeline safety regulations but are supplementary regulations. Specific standards or requirements in these or than a federal standard applicable to intrastate pipeline transportation are compatible with the applicable federal standards Pub Utilities Code sections 955 and 970, and are in accordance to safeguard the safety of the local convenience of the utility employees, property and public welfare and to

10. The 49 USC section 10104(a) from State shall have submitted a current certification of the title may adopt or more stringent safety standards for intrastate pipeline facility transportation only if those standards are compatible with the prescribed under this chapter. A State authority may safety standards for interstate pipeline facilities or interstate pipeline

adequate service will be maintained by gas utilities jurisdiction of the Commission.
.

 C. Adequate Workforce Adequacy Definition 105

The Legislature has directed gas utilities to implement gas safety set forth in the gas implementation will the policy established in paragraph (3) of Article 105 ... an adequately sized, qualified, gas and for operation and to carry out the Public Util. Code section 961(d)(10) An undersized, untrained, unqualified cause safety procedures to unfulfilled, or inadequately executed. The Commission employ workforces sized and skilled to meet their star safety-related policies and procedures that provide the qua public and policy expecti

The Commission has committed to addressing this is R.11-02-019. On 05-10-20, the Southern California Gas General decision, the Commission found that:

- 236. Pub. Util. Code § 961 requires a gas ut and reliable operation of its gas operations, and updates are to include information sized to ut qualified properly trained gas corporation workforce to carry
- 237. Since 2-19-13 is addressing the workforce issues Pub. Util. Code § 961, we refrain from deciding adequate size of its gas workforce should be.

D.13-05-010, Findings of Fact 236 and 237, page 1061
 UWUA proposes to define the term “adequate workf the utility to meet the Commission’s standards and to according to the terms and a timely basis.

Section 105

(h) Adequate Workforce purposes of implementing Pub. U

section 961(d)(10) and for purposes of these rules, the term "trained and certified workers" means necessary to carry out the rules and the frequency of the utility's adopted maintenance procedures according to their terms, and in order to promote the safety, health, comfort, and convenience of employees and the public.

This is, first, a quantitative standard that will prevent their own efforts to meet the Commission's and the adequate safe, reliable service delivered on a timely basis employing enough regular employees to actually do the work. A separate issue is the related questions of training regulations, which currently are the GO 112 standard, "qualification program," that otherwise unqualified employees to perform covered tasks if "directed and observed by an individual 805(c)¹¹ The UWUA proposal would require that in performed by a qualified employee exercised by someone else.

D. Publishing Current GO 112 Text on Commission Website
UWUA recommends that the Commission add 104.3 to timely update the Commission's website, so that the public informed of the current requirements and

104.3 Timely Update Commission Website

The Commission shall update the text of GO 112 after the issuance of a decision, including a General Order, or 15 days after any order comes into effect.

¹¹ PHMSA defines a person as "qualified" if the person "perform assigned covered tasks." 49 CFR 192.403(c) and (d) does not require any experience or demonstration of competence lead to a scenario in which an inexperienced supervisor "observe" an unqualified utility employee, and to give the safety directions, and comply with the PHMSA standard.

III. **Summary of UWUA Recommendations**

UWUA

UWUA has made a number of recommendations for revisions of existing GOCS. They are:

UWUA

(1) **Relation to Federal Law**

UWUA

101.2. These rules are adopted in addition to regulations, specifically Title 49 of the Code of 191, 192, 193 and the Government Code, Design, Construction, Operation, and Maintenance of Gas Piping Systems for gas pipeline facilities in the State of California. These rules are the federal pipeline safety regulations, except that specific standards or requirements more stringent than a federal standard applicable to facilities or transportation are declared to be compatible and will control, pursuant to Pub. Utilities Code 970, and 49 USC 60104(c).

UWUA

(2) **Purpose of Rules to Implement State**

UWUA

102.1. The purpose of the existing law is to protect Gas Pipeline Safety. 2011, Pub. Util. Code 950 and specifically to implement and enforce the principle of public interest, top priority in the operation and delivery system in California.

UWUA

(3) **Timely Update on Commission Website**

UWUA

104.3. Timely Update on Commission Website
The Commission shall update the text of GO 112 after the issuance of a decision adding, deleting, or General Order 115 days after any order on rehearing comes in.

UWUA

(4) **Adequate Workforce Definition**

UWUA

(h) Adequate Workforce purposes of implementing Pub. U section 961(d)(10) and for supervising the trained and necessary workers to carry out these rules and the utility's adopted operation maintenance procedures according to their needs and

UWUA

order, promote safety, health, comfort and convenience of employees and the public.

☐

(5) Section 122.2 Near Miss Events in Incident Reporting

122.2 Requirements for Reporting to the CPUC

(a) Each operator shall report incidents to the CPUC following criteria:

☐

(i) ☐

iii. An incident including a near miss is a significant incident in the operator's judgment, even though it did not meet Sections 122.2(a)(1)(i) or (ii), above

☐

(6) Section 123.2 Missed Near Miss Events in the CPUC Annual Report

123.2 ☐

☐ ... ☐

☐

(i) ☐ A compilation of near miss events as defined by the Operator to be significant or predictive

☐

(7) Section 143.2 Leak Classification and Actions

☐

143.2 Leak classification and Grading in the Priority Leak Report

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(a) A "Grade 1 leak" is a leaking gas or other hazardous persons or property and requiring prompt action, until the conditions are no longer hazardous.

(1) Prompt action in response to a leak may include the following:

(i) Implementation of the gas safety emergency plan CFR §192.15

(ii) Evacuating the area

(iii) Blocking off an area;

(iv) Rerouting traffic;

(v) Eliminating sources of ignition;

(vi) Venting the area;

(vii) Stopping the flow of gas by closing valves or

☐

(viii) Notifying police and fire departments.

(2) Examples of Grade 1 leaks include, but are not limited to:

(i) Any leak, which is in an underground person's area, is regarded as an immediate hazard;

(ii) Escaping gas that has ignited unintentionally;

(iii) Any indication of gas that has migrated into or through;

(iv) Any reading at the outside wall of a building;

(v) Any 2.5% of gas concentration of the gas' explosive limit or greater in an enclosed space;

(vi) Any 2.5% of gas concentration of LEL or greater in small structures not associated with gas facilities where migrate to the outside wall of a building;

vii. Any leak in an enclosed space where elect
viii. Any leak in a pipe, structure, or building;

(ix) Any leak that can be seen or smelled by a qualified operator in person is an indication that may endanger the property.

(b) A "Grade 2 leak" is a leak that is recognized time of the detection in the judgment of a qualified operator as a scheduled repair based on the potential hazard.

(1) Except as required by local codes, a Grade 2 leak shall be repaired within 60 days from the date the leak occurs in a segment of a pipeline. If an additional six months may be added to the maximum time provided above in the repair priority, each operator following criteria:

- (i) Amount and migration of gas;
- (ii) Proximity of gas to buildings and subsurface structure
- (iii) Extent of pavement;
- (iv) Soil type and conditions, such as frost cap, or natural venting.

(2) Each operator must evaluate Grade 2 leaks at least once every six months and be repaired. The frequency of reevaluation should be determined by the location and magnitude of the leak.

(3) Grade 2 leaks vary in potential hazard. When evaluated by the criteria, it will be repaired within five working days. Other Grade 2 leaks may be repaired by the operator must bring these conditions to the responsible

for scheduling leakage of gas in the working day. Man because of the magnitude, can be scheduled for routine basis with periodic reevaluation as necessary.

(4) When evaluating gas, the operator must consider leaks ahead of ground freezing or other conditions that could potentially migrate to the building, or other adverse soil conditions.

(5) Examples of Grade 2 leaks requiring no repairs include, but not limited to:

- (i) Any reading of 1.5% of gas concentration or LEL or greater sidewalk to all paved area that does not qualify where gas could potentially migrate to the outside wall
 - (ii) Any reading of one hundred percent to a wall paved area that does not qualify as a grade potentially migrate to the building
 - (iii) Any reading of 1% of gas concentration or LEL in small substructures associated with gas facilities and where migrate creating a probable future hazard;
 - (iv) Any reading between twenty percent LEL and eighty percent LEL in an enclosed space;
 - (v) Any reading on a pipeline or specified of the yield strength or greater has been qualified to leak;
 - (vi) Any leak that in qualified personnel determine the scene is of sufficient magnitude to justify scheduled reevaluation
- (c) A "Grade 3 leak" is a flat leak in the time base detected reasonably be expected to be hazardous.

(1) Each Operator must evaluate all leaks scheduled or they next or within fifteen months of the date of the leak must be reevaluated every five months in the results in the reading.

(2) Examples of Grade 3 leaks requiring reevaluation include, but are not limited to:

- (i) Any reading eight percent present than associated small gas leaks such as small pipe leaks
- (ii) Any reading under the street level where it is unlikely the gas could migrate to the outside wall
- (d) Grade 1 and 2 leaks can only be downgraded a pay repair. After a leak has been downgraded to reevaluated within 15 months and repaired within 21 days
- (e) All underground leaks on transmission lines classified subcategories of grades are established between Grade 2 or be repaired by the Operator either upon discovery or discovery.

