



Procedure for Reporting Safety-Related Conditions and Low-Pressure System Problems

Summary	<p>This utility procedure establishes a uniform system for reporting gas safety-related conditions and low-pressure system problems.</p> <p>Level of Use: Information Use</p> <hr/>
Target Audience	<p>All personnel involved with gas transmission and distribution (T&D) operations, engineering, and gas maintenance and construction (M&C).</p> <hr/>
Safety	<p>Perform all work in compliance with the Code of Safe Practices and Utility Standard Practice (USP) 22, "Safety and Health Program."</p> <hr/>
Before You Start	<p>NA</p> <hr/>



Procedure for Reporting Safety-Related Conditions and Low-Pressure System Problems

Table of Contents

Subsection	Title	Page
1	Procedure for Reporting Safety-Related Conditions	2
2	Reporting Low-Pressure System Problems	3
3	Record Retention Requirements	4

Procedure Steps

1 Procedure for Reporting Safety-Related Conditions

Designated gas engineering employees are responsible for determining if a condition is safety-related (refer to the criteria in [Utility Standard TD-4413S, "Gas Event Reporting Requirements"](#)). Company regulatory support/analysis representatives (RS&As) determine if the condition is reportable.

1.1 On determining that a potential safety-related condition exists, the designated **gas engineering employee** forwards the information to the applicable RS&A representative. The RS&A representative **must** receive the information **within 2 hours** after the condition is determined to be safety-related, regardless whether or not the event meets the criteria in the *Code of Federal Regulations* (CFR) 49 CFR, Part 191.23 section (8) (b) (4).

1.2 The **RS&A representative** must evaluate whether or not the condition is reportable.

1. If the condition meets the reporting criteria, the RS&A representative must:

- a. Prepare a "safety-related condition report" (see [Attachment 1, "Safety-Related Condition Report."](#) for a list of what to include in the report).
- b. Compose a letter to be reviewed and signed by the senior director responsible for gas engineering.
- c. Once the senior director has signed the letter, inform the employee who submitted the initial information that the letter and report will be sent to the Department of Transportation (DOT) and the California Public Utilities Commission (CPUC).



Procedure for Reporting Safety-Related Conditions and Low-Pressure System Problems

- d. Send the signed letter and report, via fax, to the Information Resources Manager, [Office of Pipeline Safety](#), Research and Special Program Administration, U.S. DOT, and email copies to the [CPUC Safety and Reliability Branch](#). The letter and report must be received by the DOT within 5 working days from the date the condition was determined to be a safety-related condition, but no greater than 10 working days after the discovery of the safety-related condition.
2. The gas engineering employee who originally determined the condition was safety related must notify the RS&A representative within 5 working days after the condition is resolved. In turn, the RS&A representative must inform the DOT and the [CPUC Safety and Reliability Branch](#) of the resolution in writing.
3. If it is determined that the condition did not meet the reporting criteria, the RS&A representative must notify the gas engineering employee of the reasons.
- 1.3 All safety-related conditions (reportable or not) must be entered in the [Event Reporting Engine](#) by the responsible department supervisor, manager, or delegate in accordance with [Utility Procedure WP1465-02, "Gas Event and Near Hit Reporting."](#)
- 1.4 The RS&A representative must notify the system reliability and support organization of all safety-related condition reports.

2 Reporting Low-Pressure System Problems

Supervisors and RS&A representatives are responsible for evaluating and reporting low-pressure system problems, as follows:

- 2.1 The supervisor responsible for the area in which the low-pressure system problem has occurred must determine if the problem meets one or more of the reporting criteria outlined in [Utility Standard TD-4413S](#). If so, the supervisor must contact the applicable RS&A representative no later than the end of the business day in which the supervisor becomes aware of the event. If complete information is unavailable by the time the report is required, the supervisor must make a preliminary report and then a subsequent report when the information is complete.
- 2.2 The RS&A representative must evaluate the report to ensure it meets the reporting criteria and, if so, email a courtesy notification to the CPUC (using the format shown in [Attachment 2, "Low-Pressure System Problem Courtesy Notification"](#)) within the following business day after the problem was identified.
- 2.3 All low-pressure system problems must be entered in the [Event Reporting Engine](#) by the responsible department supervisor, manager, or delegate in accordance with [Utility Procedure WP1465-02](#).



Procedure for Reporting Safety-Related Conditions and Low-Pressure System Problems

3 Record Retention Requirements

Retain all correspondence and other written materials relating to gas incidents in accordance with [Utility Standard Practice \(USP\) 4, "Record Retention and Disposal."](#)

END of Instructions



Procedure for Reporting Safety-Related Conditions and Low-Pressure System Problems

Definitions

Applicable Company facilities: All gas distribution and transmission facilities owned by the Company, except gathering lines that are not within the limits of a city, town, or village (incorporated or unincorporated) or within a residential or commercial area such as a subdivision, business or shopping center, or community development.

CPUC Safety and Reliability Branch: That part of the CPUC specifically responsible for utility safety and reliability.

Line organization: A division or district of an operating area.

Regulatory support and analysis (RS&A) representative: Any gas engineering employee been assigned to serve as a point of contact for gas incidents.

Safety-related condition: A condition, as specified by the DOT, that affects the serviceability or structural integrity of the pipeline or other gas facilities and that could lead to an imminent hazard.

Supervisory Control and Data Acquisition (SCADA): The system used by the Company to transmit system status information from remote sensing locations to central monitoring locations.

Implementation Responsibilities

The senior director responsible for gas engineering is accountable for implementing this procedure.

Governing Document

[Utility Standard TD-4413S, "Gas Event Reporting Requirements"](#)

Compliance Requirement/Regulatory Commitment

[Code of Federal Regulations](#), 49 CFR Parts 191 and 192

[General Order \(GO\) 112-E, "State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems"](#)



Procedure for Reporting Safety-Related Conditions and Low-Pressure System Problems

Reference Documents

Developmental References:

[Code of Federal Regulations](#) 49 CFR Parts 191 and 192

[Code of Safe Practices](#)

[CPUC General Order 112-E, "State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems."](#)

[Utility Procedure WP1465-02, "Gas Event and Near Hit Reporting"](#)

[Utility Procedure TD-4413P-01, "Procedure for Documenting and Reporting Gas Events"](#)

[Utility Procedure WP6436-12, "Handling Emergency Conditions Reported by Outside Agencies and Other Entities"](#)

[Utility Standard S0353/S4112, "Physical Inspection of Pipelines, Mains and Services"](#)

[Utility Standard S4110, "Leak Survey and Repair of Gas Transmission and Distribution Facilities"](#)

[Utility Standard Practice \(USP\) 22, "Safety and Health Program"](#)

Supplemental References:

[USP 4, "Record Retention and Disposal."](#)

Appendices

NA

Attachments

[Attachment 1, "Safety-Related Condition Report"](#)

[Attachment 2, "Low-Pressure System Problem Courtesy Notification"](#)



Procedure for Reporting Safety-Related Conditions and Low-Pressure System Problems

Document
Revision

NA

Note: [Utility Standard TD-4413S, "Gas Event Reporting Requirements,"](#) along with this procedure and other new procedures governed by the standard, replace Utility Standard D-S0355/S4413, "CPUC and DOT Reportable Incidents, Curtailments and Conditions and Low Pressure System Problem Report."

Approved By

Todd Hogenson, Director

Document Owners



Senior Program Manager

Document
Contact



Revision Notes

Where?	What Changed?
NA	This is a new document.

