

April 14, 2023

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Subject: General Order 112-F Inspection of Central Valley Gas Storage's Damage
Prevention Program

Dear Mr. Eng,

Central Valley Gas Storage, LLC (CVGS) continues to place the safety of the public and its workforce as its top priority and endeavors to operate and maintain its gas pipeline facilities at standards that meet or exceed the requirements of California Public Utilities Commission General Order (GO) 112. Our management team at CVGS values the SED inspection process as an opportunity to improve our practices and records with the benefit of your findings and recommendations, and we appreciated being able to interact with your SED auditors during the March inspection of CVGS' Damage Prevention Procedures.

We have carefully reviewed the Summary of Inspection Findings and provided a response to each of the concerns on the attached documents. In summary, CVGS continues to apply what it learns from its performance to improve its processes and documentation. CVGS appreciates the thorough review of its facilities and documentation by the SED audit team and looks forward to continuing our constructive relationship with SED in accomplishing the top priority of maintaining safe and reliable operations. We believe that the actions we have taken to address these audit findings demonstrate that CVGS continues to be responsive to safety concerns. I trust that the actions documented in this response are suitable to resolve the concerns and observations that were noted.

Please contact me at 404-391-3141 if you have any questions about this response or require additional information.

Sincerely,



Stephen Wassell
Vice President Storage and
Peaking Operations

cc: Robert Cornell



PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 27, 2023

GI-2023-03-CVS-39-14

Stephen Wassell, VP Storage Peaking & Ops Eng/Ops (swassell@southernco.com)
10 Peachtree Place NE, Suite 1000
Atlanta, GA 20209

SUBJECT: General Order 112-F Inspection of Central Valley Gas Storage's Damage Prevention Program

Dear Mr. Wassell:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Wai Yin (Franky) Chan and Andrea Garcia Ruvalcaba conducted a General Order 112-F inspection of Central Valley Gas Storage Company's (CVS) Damage Prevention Program from March 6 to 9, 2023.

SED staff noted one (1) area of concern which are described in the attached "Post-Inspection Written Preliminary Findings" report. The summary reflects only those records and pipeline facilities that SED inspected.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the concerns noted in the Summary.

If you have any questions, please contact Wai Yin (Franky) Chan at (415) 703-2482 or by email at Wai-Yin.Chan@cpuc.ca.gov.

Sincerely,

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Findings

cc:

Robert Cornell, CVS (rcornell@southernco.com)
Dennis Chappell, CVS (dchappel@southernco.com)
Claudia Almengor, SED
Dennis Lee, SED

Post-Inspection Written Findings

Dates of Inspection: 3/6/2023 – 3/9/2023

Operator: CENTRAL VALLEY GAS STORAGE, LLC

Operator ID: 32603 (primary)

Inspection Systems: Damage Prevention Program

Assets (Unit IDs) with results in this report: Central Valley Gas Storage (86918)

System Type: GT

Inspection Name: 2023 Damage Prevention 32603 Central Valley Gas Storage

Lead Inspector: Wai-Yin Chan

Operator Representative: Robert Cornell

Unsatisfactory Results

No Preliminary Findings.

Concerns

Public Awareness and Damage Prevention : Damage Prevention (PD.DP)

Question Title, ID Damage Prevention Program, PD.DP.PDPROGRAM,P

Question 1. Is a damage prevention program approved and in place?

References 192.614(a)

Assets Covered Central Valley Gas Storage (86918 (39))

Issue Summary SED reviewed the Damage Prevention Program Procedure 3.01 in Central Valley Gas Storage's (CVS) Operation and Maintenance Manual and found that the procedure is still referencing some parts of the California Government Code 4216 that has changed. For example, the 4216.2(f) and 4216.2(e) requirements on page 233 of 656 of the Operation and Maintenance Manual are no longer the current requirements stated in 4216.2(f) and

4216.2(e). CVS should review the current California Marking Guidelines in its Operation and Maintenance Manual and make any necessary updates to reflect the current requirements.

In addition, there were some important changes in the past 6 years with California Government Code 4216 that might be applicable to CVS's operations. For example, 4216.3(c)(1)(a) states that, "On and after January 1, 2021, every operator shall supply an electronic positive response through the regional notification center before the legal excavation start date and time." 4216.3 (a) (5) states that, "Commencing January 1, 2023, all new subsurface installations shall be mapped using a geographic information system and maintained as permanent records of the operator." SED recommends that CVS review the current California Government Code 4216 requirements and make the necessary updates to CVS's procedures.

CVGS has updated several sections of its procedures in response. The revisions are attached.

The affected sections are as follows:

CVGS O&M Section 3.01 was updated to reflect the latest changes to CGC 4216 and the California Marking Guidelines.

CVGS O&M Section 3.01- 5.4.2 was updated to comply with 4216.2 (e).

CVGS O&M Section 3.01- 5.4.2 was also updated to comply with 4216.3 (c) (1) (A).

CVGS O&M Section 3.01 -5.6.22 was updated to comply with 4216.3 (C) (5).

CVGS O&M Section 3.01- 8. 7.1 was updated to comply with 4216.2 (f)