

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 10, 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: SED's Closure Letter for General Order 112-F Inspection of Central Valley Gas Storage's Damage Prevention Program

Dear Mr. Wassell:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Central Valley Gas Storage Company's (CVS) response letter dated April 14, 2023, for the findings identified during the General Order 112-F inspection of CVS's Damage Prevention Program from March 6 to 9, 2023.

A summary of the inspection findings documented by SED, CVS's response to our findings, and SED's evaluation of CVS's response taken for each identified Violation and Area of Concern is attached.

This letter serves as the official closure of the 2023 GO 112-F inspection of CVS's Damage Prevention Program and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. 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,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
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)
James Hotinger, CVS (jhoting@southernco.com)
Claudia Almengor, SED
Terence Eng, 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.

CVS's Response:

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

The affected sections are as follows:

CVGS O&M Section 3.0 I 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 3.0 I -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)

SED's Conclusion:

SED has reviewed the response from CVS and determined that the corrective actions articulated by CVS sufficiently address SED's concern.