

## 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](mailto: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](mailto:Wai-Yin.Chan@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng".

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](mailto:rcornell@southernco.com))  
Dennis Chappell, CVS ([dchappel@southernco.com](mailto: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.